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March 9, 2007

Via Hand Delivery and Electronic Mail

Luly Massaro, Division Clerk
Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket No. 3800: Woonsocket Water Division's Responses To Second Set of Data Requests From Division of Public Utilities and Carriers Dated: February 14, 2007

Dear Luly:

On behalf of the City of Woonsocket's Water Division, I am enclosing an original and nine copies of their responses to the Division's Second Set of Data Requests..

Please do not hesitate to contact me if you have any questions or comments.

Respectfully submitted,

Alan M. Shoer #3248
Attorney for Woonsocket Water Division

AMS/bck

Enclosure

cc: Service List (via regular and electronic mail) (with enclosures)

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DATA REQUESTS TO WOONSOCKET WATER DIVISION
FROM THE DIVISION OF PUBLIC UTILITIES AND CARRIERS
DATED: February 14, 2007

DOCKET NO. 3800

SET 2

DIV. 2-1. Please identify all incremental capital costs incurred by, or projected to be incurred by, Woonsocket in order to serve the Town of North Smithfield pursuant to the Intermunicipal Agreement.

Response: Any capital cost incurred by Woonsocket per the Intermunicipal Agreement will be reimbursed by North Smithfield. This is detailed in section 4.2 of the Intermunicipal Agreement.

Respondent: Walter Edge

Dated: March 9, 2007

DATA REQUESTS TO WOONSOCKET WATER DIVISION
FROM THE DIVISION OF PUBLIC UTILITIES AND CARRIERS
DATED: February 14, 2007

DOCKET NO. 3800

SET 2

DIV. 2-2. Please identify all incremental operating costs incurred by or projected to be incurred by Woonsocket in order to serve the Town of North Smithfield pursuant to the Intermunicipal Agreement.

Response: Much of the operating costs is a function of usage and is already included in the wholesale rates. Operating costs for maintenance are also covered by section 4.2 of the Intermunicipal Agreement and are intended to be reimbursed by North Smithfield. One possible incremental cost could be the electricity for the pump on the Rhodes Ave Tank. The rate study allocates the Rhodes Tank 100% to wholesale/base which is then allocated based on retail/wholesale consumption. This allocation is shown on schedule DGB-4C.

Respondent: David Bebyn

Dated: March 9, 2007

DATA REQUESTS TO WOONSOCKET WATER DIVISION
FROM THE DIVISION OF PUBLIC UTILITIES AND CARRIERS
DATED: February 14, 2007

DOCKET NO. 3800

SET 2

DIV. 2-3. Please provide the status of the Regionalization Study and state when the study is expected to be complete.

Response: The status of the Regionalization Study has been detailed in the response to the first set of Commission Data requests. Please refer to the responses to Comm. 1-6, 1-7 & 1-8.

Respondent: Walter Edge

Dated: March 9, 2007

DATA REQUESTS TO WOONSOCKET WATER DIVISION
FROM THE DIVISION OF PUBLIC UTILITIES AND CARRIERS
DATED: February 14, 2007

DOCKET NO. 3800

SET 2

DIV. 2-4. The Response to DIV-6 indicated that "Professional Services" are included in the $200,000 cost of the Regionalization Study but page 10, lines 4-6 of Ms. Lariviere's testimony states that in addition to its share of the study, Woonsocket will pay "its fair share of fees for professional services retained in connection with the preparation and analysis of this study." Please clarify the data request response in view of this testimony. Also, if professional services are in addition to the $200,000 cost of the study, then please provide an estimate for all such professional services costs.

Response: The costs for the study will include costs for professional services, as more fully outlined in the task order attached to our response to Comm-6. My response in Div-6 that "professional services will be included in the cost of the study" is consistent with this statement.

The point I was trying to make in my testimony is that per the Intermunicipal Agreement, Section 14.2 (page 10) there will be a split on fees between North Smithfield and Woonsocket.

My testimony should not be read to mean that costs for professional services are in addition to and not already included in the cost of the study.

Respondent: Carol Lariviere

Dated: March 9, 2007

DATA REQUESTS TO WOONSOCKET WATER DIVISION
FROM THE DIVISION OF PUBLIC UTILITIES AND CARRIERS
DATED: February 14, 2007

DOCKET NO. 3800

SET 2

DIV. 2-5. The response to DIV 1-27 has an asterisk but no associated footnote. Please explain the purpose for the asterisk.

Response: The asterisk should have been removed from the schedule. The attachment for DIV 1-20 was used as a template to prepare the attachment to DIV 1-27. The asterisk from DIV 1-20 was inadvertently not removed. The Attachment to DIV 1-27 has no footnote.

Respondent: David Bebyn

Dated: March 9, 2007

DATA REQUESTS TO WOONSOCKET WATER DIVISION
FROM THE DIVISION OF PUBLIC UTILITIES AND CARRIERS
DATED: February 14, 2007

DOCKET NO. 3800

SET 2

DIV. 2-15. Regarding the response to DIV 1-33, for each of the past five years, please provide a) the total amount paid by the Woonsocket Water Division pursuant to the working rate and b) the amount of any subsequent true-up.

Response: WWD is still working on this response and will supplement its response as soon as this information is available.

Respondent: Walter Edge

Dated: March 9, 2007

DATA REQUESTS TO WOONSOCKET WATER DIVISION
FROM THE DIVISION OF PUBLIC UTILITIES AND CARRIERS
DATED: February 14, 2007

DOCKET NO. 3800

SET 2

DIV. 2-16. Please provide all supporting assumptions, calculations, and documentation for the interim year chemical costs of $120,000 per Schedule WEE-9.

Response: The interim year chemical costs were calculated by annualizing the half year chemical costs listed in Exhibit 1 Table C attached to Ms. Lariviere's pre-filed testimony.

Respondent: Walter Edge

Dated: March 9, 2007

DATA REQUESTS TO WOONSOCKET WATER DIVISION
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DOCKET NO. 3800

SET 2

DIV. 2-17. Regarding Schedule DGB-2, what is the reason for the significant decline in Service & Extensions revenue since fiscal year 2004?

Response: The WWD during fiscal years 2003 and 2004 used staff to perform service and extensions services. Much of this work for the past two years was preformed by independent contactors since WWD staff was reassigned to capital projects. It is anticipated that some of this work will return as the projects are completed.

Respondent: David Bebyn

Dated: March 9, 2007

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