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June 12, 2007

Ms. Luly Massaro, Clerk  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

RECEIVED  
2007 JUN 14 AM 9:53  
PUBLIC UTILITIES COMMISSION

**Re: City of Newport, Utilities Department, Water Department – Docket 3818**

Dear Ms. Massaro:

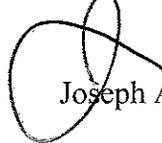
Enclosed please find the following documents:

- 1) Newport Water's Response to Portsmouth Water and Fire District's Data Requests (Set 6);
- 2) Newport Water's Data Request to Portsmouth Water and Fire District (Set 3).

Electronic copies of these documents were served on the Service List on June 11, 2007.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK:prc  
Enclosures

**CITY OF NEWPORT – UTILITIES DIVISION - WATER DEPARTMENT**  
**Docket No. 3818**  
**Response to**  
**Portsmouth Water and Fire District's Data Requests**  
**Set 6**

**PWFD 6-1:** Regarding Mr. Smith's rebuttal testimony, page 28, lines 11-13, please provide copies of the leases that will be in effect for the rate year and a summary showing that the amounts of each lease add up to the total claimed by Newport Water in its rebuttal filing (\$75,100 RFC Rebuttal Schedule D)

**Response:** See table below

VENDOR	2007 JULY	2007 AUG	2007 SEPT	2007 OCT	2007 NOV	2007 DEC	2008 JAN	2008 FEB	2008 MAR	2008 APR	2008 MAY	2008 JUNE	Totals
T Mobile	1,800.00	1,800.00	1,800.00	1,800.00	1,800.00	1,800.00	1,800.00	1,800.00	1,800.00	1,800.00	1,800.00	1,800.00	21,600.00
T Mobile	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	6,000.00
Verizon	958.33	958.33	958.33	958.33	958.33	958.33	958.33	958.33	958.33	958.33	958.33	958.33	11,499.96
ATT	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	18,000.00
ATT	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	1500.00	18,000.00
<b>Fiscal totals</b>													<b>75,099.96</b>

Prepared by: K Garcia

**CITY OF NEWPORT - WATER DEPARTMENT**

**Docket No. 3818**

**Data Requests to**

**Portsmouth Water & Fire District**

**Set 3**

1. In Newport's first set of data requests to PWFD, Newport made the following request (No. 8)

"In Mr. Woodcock's testimony (Page 9, Lines 2-6 and Page 11, Line 8), he indicates that Newport has a history of using funds from the Capital Spending restricted account to help make repayments to the City. Please have Mr. Woodcock state each and every fact upon which he bases this allegation. Please identify each and every instance by date and amount that Newport Water used funds from the capital restricted account to help make payment to the City of Newport."

Mr. Woodcock responded as follows:

"Please refer to the settlement agreement and the Commission's report and order in Docket No. 3578."

Thus, Newport asks that Mr. Woodcock cite the exact page, the exact line number and the exact language in both the settlement agreement and the Commission's report and order in Docket No. 3578 that support his allegations on Page 9, lines 2-6 that Newport Water has a history of using funds from the Capital Spending restricted account to help make repayments to the City of Newport, and his statement on Page 11 line 8 that Newport Water has used "capital/debt funds...to pay back the City of Newport."

2. In Newport's first set of data requests to PWFD, Newport made the following request (No. 13)

"In Mr. Woodcock's testimony (Page 16, Lines 6-9), he indicates that he called the Newport City Clerk's Office seeking various documents. Please have Mr. Woodcock set forth all facts supporting this assertion, including the following:

- a) The date and time Mr. Woodcock called the City Clerk's Office;
- b) The exact documents he indicated he was seeking;
- c) The name of the person Mr. Woodcock spoke with;
- d) Any and all documents which evidence, support or document this telephone call."

Mr. Woodcock responded as follows:

"Mr. Woodcock spoke to the City Clerk's office during the last docket when the issue of the allocation of this office to the Water Department came up. Please see the record of that docket for such information."

As Mr. Woodcock knows the "record" of Docket 3675 contains a number of documents. Further, Newport's review of that Docket does not reveal the specific information sought in subsections (a) through (d) requested in NWD 1-13. Therefore, Newport requests that either Mr. Woodcock produce the specific documents from Docket 3675 that contain the

**CITY OF NEWPORT - WATER DEPARTMENT**

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information sought in subsections (a) through (d) in NWD 1-13 or that Mr. Woodcock provide the answers to subsection (a) though (d) requested in NWD 1-13 as Mr. McGlenn did in his answer to NWD 1-14.

3. With respect to Mr. Driscoll's answers to NWD 1-16, 1-17, 1-18 and 1-19, please identify, with specificity, the following:

(a) Each and every monthly accrual report Newport has allegedly refused to provide.

(b) Each and every Commission Order (identified by page and line number) that Newport has violated by allegedly refusing to provide the accrual reports identified in subsection (a).

(c) The date of each and every request Portsmouth made to Newport for the monthly accrual reports that Newport allegedly refused to provide.

(d) Each and every piece of documentation Portsmouth sent to Newport requesting the monthly accrual reports that Newport allegedly refused to provide.