

**KEOUGH & SWEENEY, LTD.**

ATTORNEYS AND COUNSELORS AT LAW  
100 ARMISTICE BOULEVARD  
PAWTUCKET, RHODE ISLAND 02860

JOSEPH A. KEOUGH JR.\*  
JEROME V. SWEENEY III\*

SEAN P. KEOUGH†  
MARGARET HOGAN SWEENEY†

JEROME V. SWEENEY II  
OF COUNSEL

TELEPHONE  
(401) 724-3600  
FACSIMILE  
(401) 724-9909  
www.keoughsweeney.com

BOSTON OFFICE:  
171 MILK STREET  
SUITE 30  
BOSTON, MA 02109  
TEL. (617) 574-0054  
FAX (617) 451-1914

\*ADMITTED TO PRACTICE IN  
RHODE ISLAND & MASSACHUSETTS

July 9, 2007

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

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

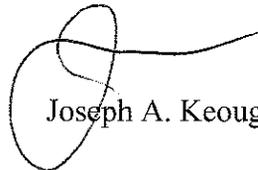
Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of Newport Water's Further Supplemental Response to PWFD 2-10.

Please note that this pleading was electronically served on the parties to this Docket on July 6, 2007.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK:prc  
Enclosures

RECEIVED  
2007 JUL 11 PM 1:38  
PUBLIC UTILITIES COMMISSION

**CITY OF NEWPORT - WATER DEPARTMENT**  
**Docket No. 3818**  
**Supplemental Response to**  
**PWFD Data Requests**  
**Set 2 (2-10(c))**

PWFD 2-10: Please provide a spreadsheet for all water billings in test year FY-06 showing by month:

- a. Total number of water accounts billed
- b. Total gallons billed for "a" above
- c. Total number of water accounts with an estimated meter reading and/or an estimated bill
- d. The total gallons billed for "c" above.

**Response:**

<b>Month</b>	<b>(a)</b>	<b>(d)</b>	<b>(b)</b>	
	<b>Number of Bills</b>	<b>Estimated</b>	<b>Consumption Actual</b>	<b>Total</b>
July 2005	4,968	18,129,694	154,358,515	172,488,209
August 2005	3,485	22,262,908	162,587,465	184,850,373
Sept 2005	4,421	18,017,724	215,085,867	233,103,591
Oct 2005	4,500	52,264,854	177,033,343	229,298,197
Nov 2005	4,681	32,716,775	140,262,704	172,979,479
Dec 2005	3,450	41,901,244	126,396,412	168,297,656
Jan 2006	4,352	27,856,295	137,739,205	165,595,500
Feb 2006	4,492	61,548,050	104,170,843	165,718,893
March 2006	4,649	48,080,427	95,846,421	143,926,848
April 2006	3,452	37,016,382	98,544,147	135,560,529
May 2006	4,480	20,065,248	121,800,433	141,865,681
June 2006	4,577	16,386,411	149,436,439	165,822,850
<b>Totals</b>	<b>51,507</b>	<b>396,246,012</b>	<b>1,683,261,794</b>	<b>2,079,507,806</b>

**CITY OF NEWPORT - WATER DEPARTMENT**

**Docket No. 3818**

**Supplemental Response to**

**PWFD Data Requests**

**Set 2 (2-10(c))**

Please note the spreadsheet above indicates the number of bills issued each month for FY 2006 as requested in part (a). The total gallons consumed for those bills are indicated in the total column as requested in part (b). For part (c), the billing software is currently unable to show separately the number of water accounts with an estimated meter reading or bill. However, in answer to part (d), we have included the consumption amounts which were estimated each month.

**Supplemental Responses:**

As indicated in the rebuttal testimony of Julia A. Forgue, NWD reviewed the request from PWFD 2-10 with the software programmer. With some procedural changes and the exporting of files NWD has been able to go back and extract information to allow the compilation of the number of accounts which received estimated reads. NWD has been able to track the estimated bills back to December 2006. This information is provided in the attached schedule PWFD 2-10 SUP provides the breakdown of said information as for the period December 2006 through May 2007. NWD can provide the same information for the period July 1, 2006 though November 2006 if Portsmouth needs this information, but said information will have to be provided in a further supplement to this response.

Prepared by: Karen Garcia

**Further Supplemental Response:**

Enclosed herein below is the requested information for FY06:

<b>Year</b>	<b>Month</b>	<b>(a) Number of Bills</b>	<b>(b) Consumption Total</b>	<b>© Number of Bills- estimated</b>	<b>(d) Consumption Estimated</b>
2005	July	4968	172,488,209	752	18,129,694
2005	August	3,485	184,850,373	881	22,262,908
2005	Sept	4,421	233,103,591	696	18,017,724
2005	Oct	4,500	229,298,197	1,527	52,264,854
2005	Nov	4,681	172,979,479	725	32,716,775
2005	Dec	3,450	168,297,656	651	41,901,244
2006	Jan	4,352	165,595,500	656	27,856,295
2006	Feb	4,492	165,718,893	1,220	61,548,050
2006	March	4,649	143,926,848	1,036	48,080,427
2006	April	3,452	135,560,529	791	37,016,382

**CITY OF NEWPORT - WATER DEPARTMENT**  
**Docket No. 3818**  
**Supplemental Response to**  
**PWFD Data Requests**  
**Set 2 (2-10(c))**

2006	May	4,480	141,865,681	544	20,065,248
2006	June	4,577	165,822,850	529	16,386,411
Totals		51,507	2,079,507,806	10,008	396,246,012

Prepared by: K. Garcia

**CITY OF NEWPORT - WATER DEPARTMENT**

**Docket No. 3818**

**Supplemental Response to**

**PWFD Data Requests**

**Set 2 (2-10(c))**

**CERTIFICATION**

I hereby certify that I sent by electronic mail a copy of the within to all parties set forth on the attached Service List on July 6, 2007.

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone/Fax</b>
Joseph A. Keough, Jr., Esq. Keough & Sweeney 100 Armistice Blvd. Pawtucket RI 02860	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a>	401-724-3600 401-724-9909
Julia Forgue, Director of Public Works Newport Water Department 70 Halsey St. Newport RI 02840	<a href="mailto:jforgue@cityofnewport.com">jforgue@cityofnewport.com</a>	401-845-5601 401-846-0947
	<a href="mailto:kgarcia@cityofnewport.com">kgarcia@cityofnewport.com</a>	
	<a href="mailto:lsitrin@CityofNewport.com">lsitrin@CityofNewport.com</a>	
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence RI 02903	<a href="mailto:lwold@riag.ri.gov">lwold@riag.ri.gov</a>	401-222-2424 401-222-3016
	<a href="mailto:sscialabba@ripuc.state.ri.us">sscialabba@ripuc.state.ri.us</a>	
	<a href="mailto:pdodd@ripuc.state.ri.us">pdodd@ripuc.state.ri.us</a>	
	<a href="mailto:RDIMeglio@riag.ri.gov">RDIMeglio@riag.ri.gov</a>	
Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte NC 28203	<a href="mailto:Hsmith@raftelis.com">Hsmith@raftelis.com</a>	704-373-1199 704-373-1113
	<a href="mailto:Hhoover@raftelis.com">Hhoover@raftelis.com</a>	
Gerald Petros, Esq. Hinckley, Allen & Snyder 1500 Fleet Center Providence RI 02903	<a href="mailto:gpetros@haslaw.com">gpetros@haslaw.com</a>	401-274-2000
	<a href="mailto:bcanning@haslaw.com">bcanning@haslaw.com</a>	
William McGlinn Portsmouth Water & Fire District 1944 East Main Rd. PO Box 99 Portsmouth RI 02871	<a href="mailto:wmcglinn@portsmouthwater.org">wmcglinn@portsmouthwater.org</a>	401-683-2090 ext. 224
Audrey VanDyke, Esq. Naval Facilities Engineering Command Litigation Command 1314 Harwood St., SE Washington Navy Yard, DC 20374-5018	<a href="mailto:Audrey.VanDyke@navy.mil">Audrey.VanDyke@navy.mil</a>	202-685-1931 202-433-2591
Dr. Kay Davoodi, P.E. Utility Rates and Studies Office NAVFACHQ- Building 33 1322 Patterson Ave SE Washington Navy Yard, D.C. 20374-5065	<a href="mailto:Khojasteh.davoodi@navy.mil">Khojasteh.davoodi@navy.mil</a>	202-685-3319 202-433-7159

**CITY OF NEWPORT - WATER DEPARTMENT**

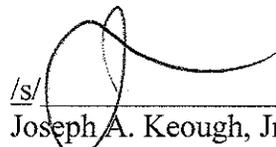
**Docket No. 3818**

**Supplemental Response to**

**PWFD Data Requests**

**Set 2 (2-10(c))**

Thomas S. Catlin Exeter Associates, Inc. 5565 Sterrett Place, Suite 310 Columbia, MD 21044	<a href="mailto:tcatlin@exeterassociates.com">tcatlin@exeterassociates.com</a>	410-992-7500 410-992-3445
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough MA 01532	<a href="mailto:Woodcock@w-a.com">Woodcock@w-a.com</a>	508-393-3337 508-393-9078
<b>Email copy and one original to:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	<a href="mailto:lmassaro@puc.state.ri.us">lmassaro@puc.state.ri.us</a>	401-941-4500 401-941-8827
	<a href="mailto:PatriciaL@gw.doa.state.ri.us">PatriciaL@gw.doa.state.ri.us</a>	
	<a href="mailto:anault@puc.state.ri.us">anault@puc.state.ri.us</a>	

  
/s/ \_\_\_\_\_  
Joseph A. Keough, Jr., Esquire # 4925  
KEOUGH & SWEENEY, LTD.  
100 Armistice Boulevard  
Pawtucket, RI 02860  
(401) 724-3600