

# Schacht & McElroy

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August 6, 2007

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

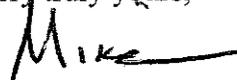
Re: Providence Water Supply Board – Full Rate Filing  
Docket No. 3832

Dear Luly:

Enclosed for filing are an original and nine copies of Providence Water Supply Board's Objection to Commission data requests nos. 7, 15, and 16.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg  
PWSB16:2007-Massaro4  
cc: Service List

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE WATER SUPPLY BOARD : DOCKET NO. 3832  
FULL RATE FILING :

**PROVIDENCE WATER SUPPLY BOARD'S MOTION**  
**OBJECTING TO THE COMMISSION'S**  
**THIRD SET OF DATA REQUESTS, NOS. 7, 15, and 16**

Pursuant to Rule 1.18, Providence Water Supply Board hereby objects to the following data requests on the grounds that they are unreasonable, not material, not relevant, and unduly burdensome for the following reasons:

REQUEST No. 7: If the answer to Request No. 6 is yes, calculate the actual aggregate amount of retiree health care claims by year for PWSB retirees from 1997 through 2005.

OBJECTION to 7: Providence Water retirees are not in a separate group, therefore it would be very difficult to calculate this amount, according to John Cimino, Deputy Controller. The City is attempting to break out smaller groups in the future, but does not have this for the past. The only way to do this would be to request an amount paid for each retiree individually and then add them all up, but this would be extremely time consuming and burdensome. We may be able to get the total retirees (City and Water) claims and the total number of covered individuals. If so, we will provide that information.

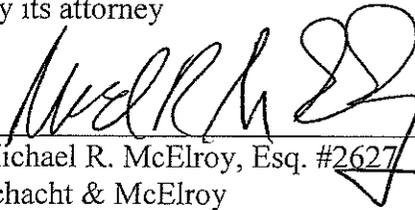
REQUEST No. 15: Since and including 1997, indicate by year the percentage of the actuarially required pension contribution and the amount paid by PWSB to the Providence pension system. Indicate the percentage of the actuarially required pension contribution paid by the City of Providence to the Providence pension system during that same time period.

REQUEST No. 16: If the percentage paid by PWSB to the Providence pension system differs from the percentage paid the City of Providence in Request No. 15, calculate how much

additional money PWSB contributed to the Providence pension system assuming PWSB had only contributed the same percentage to the pension system as the City of Providence did since and including 1997.

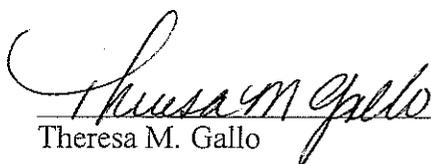
OBJECTION to 15 and 16: Boyce Spinelli testified in detail to all of this information in Docket No. 3446. He filed extensive testimony and responded to many data requests on this subject. Mr. Spinelli also gave a verbal update at the hearing in Docket 3684 on November 21, 2005. However, we will update the information by providing FY 2003 through FY 2007.

Respectfully submitted,  
PROVIDENCE WATER SUPPLY BOARD  
By its attorney

  
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CERTIFICATE OF SERVICE

I hereby certify that on the 6<sup>th</sup> day of August, 2007, I mailed a true copy of the foregoing by first class mail to the service list:

  
\_\_\_\_\_  
Theresa M. Gallo

**SERVICE LIST - RIPUC DOCKET NO. 3832**  
**Providence Water Supply Board – Rate Filing**

Updated: 5/4/07

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<b>File original and nine (9) copies w/:</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
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