



797 BALD HILL ROAD
WARWICK, RI 02886

401-821-1330
FAX 401-823-0970
E-MAIL: jjm@petrarcamcgair.com
www.petrarcamcgair.com

November 5, 2007

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

Re: Docket No. 3876
Proposed Amendments to Rules and Regulations
Governing the Termination of Residential Electric,
Gas and Water Utility Service

Dear Ms. Massaro:

In response to your Notice of Rule Making and Public Hearings provided on September 29, 2007 and October 11, 2007, Kent County Water Authority would like to offer further comments in this Docket relating to Implementation of Rules and Regulations governing the termination of residential electric, gas and water utility service. The subject matter of this comment is proposed Article V, Section 4 which proposes elimination of "Nothing in these Rules and Regulations shall prevent a gas, water or electric public utility from setting up a standard residential payment plan or a payment plan for a individual residential customer with less stringent requirements." As you recall, the 2002 amendment to the Rules and Regulations governing termination of residential electric, gas and water utility services included a general exemption to water utilities from compliance with the payment plans described by the Commission new termination rules. Further, and more specifically, the 2002 Rules and Regulations included a granting by the Commission of Kent County Water Authority Request for Waiver from Compliance with the Payment Plans Prescribed by the Commission Termination Rules. The Commission ruling regarding the general exemption and waiver for Kent County Water Authority noted above, can be found in Docket Number 3423, Order Number 16966, issued on April 16, 2002.

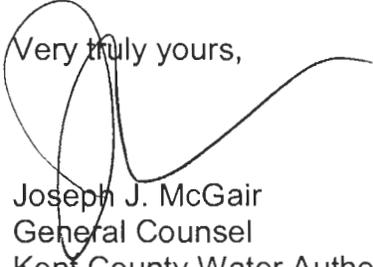
Kent County Water Authority, as part of the Rules and Regulations Governing the Termination of Residential Electric, Gas and Water Utility Service now under consideration by the Commission, hereby submits that the same exemption and waiver noted above from compliance with the payment plans prescribed by the Commission termination rules that was given to water utilities in general and more specifically, to

Page 2
Ms. Massaro
November 5, 2007

Kent County Water Authority, is automatically exempted in the order approving the rules and regulations now under consideration by the Commission and shall not be superseded or repealed by the issuance of the Rules and Regulations now under consideration by the Commission.

Thank you for your attention to this matter.

Very truly yours,



Joseph J. McGair
General Counsel
Kent County Water Authority

JJM:maj
Cc: Kent County Water Authority