

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

Petition of the KENT COUNTY WATER  
AUTHORITY-Rate Application

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Docket No.: 3942

**MOTION TO EXTEND TIME**

Now comes the Intervenor City of Warwick (the “City”), by and through its City Solicitor, and hereby moves to extend the time within which to submit pre-filed testimony in the above-captioned matter. As grounds, the City avers that its rate consultant, Christopher Woodcock is the same Christopher Woodcock who has been retained by the Kent County Water Authority (the “KCWA”) and who has submitted pre-filed testimony on behalf of the KCWA rate hike request. In addition, Christopher Woodcock has resigned his position as rate consultant to the City as a result of his conflict in this matter and the City has diligently proceeded to secure the services of another rate consultant. At this time the City has not been able to retain a replacement rate consultant. The City has issued a Request for Proposals for a water rate consultant and responses have been received for this service. The Warwick City Council is expected to authorize the selection of a rate consultant at their August meeting. The City expects the rate consult to begin work immediately thereafter. As such, a forty-five (45) day extension of time is sought by the City within which to submit pre-filed testimony for the already scheduled September 25, 2008 evidentiary hearing in this matter. Prior to the filing of this motion, the movant certifies that they did confer with the KCWA seeking concurrence with the request for an extension of time and that the KCWA denied the request of the City.

For these reasons and pursuant to PUC Rule 1.15, the City hereby requests the PUC to grant its Motion to Extend Time.

Respectfully submitted,  
CITY OF WARWICK,  
By and Through Its Attorney,

/s/ Peter D. Ruggiero  
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City Council Solicitor  
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Dated: July 28, 2008

**CERTIFICATION**

I, the undersigned, do hereby certify that I did forward a copy of the within Motion via e-mail and regular U.S. Mail, postage pre-paid, to all on the following service list on the 28<sup>th</sup> day of July, 2008.

**Docket No. 3942 – Kent County Water Authority - General Rate Filing  
Service List 6/18/08**

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/s/ Peter D. Ruggiero \_\_\_\_\_