

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

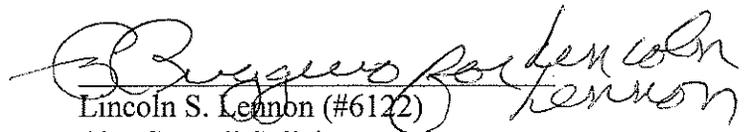
Petition of the KENT COUNTY WATER  
AUTHORITY-Rate Application

Docket No.: 3942

2008 MAY 23 PM 1:12

**ENTRY OF APPEARANCE**

I hereby enter my appearance on behalf of the City of Warwick in the above-captioned matter.

  
Lincoln S. Lennon (#6122)  
City Council Solicitor  
915 Smith Street  
Providence, Rhode Island 02908  
Tel: 401-621-7600  
Fax: 401-521-7330

Dated: May 23, 2008

**CERTIFICATION**

I, the undersigned, do hereby certify that I did forward a copy of the within Entry via e-mail and regular U.S. Mail, postage pre-paid, to all on the following service list on the 23<sup>rd</sup> day of May, 2008.

Joseph J. McGair, Esq.  
Petrarca & McGair, Inc.  
797 Bald Hill Rd.  
Warwick RI 02886

Leo Wold, Esq.  
Dept. of Attorney General  
150 South Main St.  
Providence RI 02895

Thomas S. Catlin  
Exeter Associates, Inc.  
5565 Sterrett Place, Suite 310  
Columbia, MD 21044

Timothy Brown, P.E.  
General Manager Chief Engineer  
Kent County Water Authority  
PO Box 192  
West Warwick RI 02893-0192

Christopher Woodcock  
Woodcock & Associates, Inc.  
18 Increase Ward Drive  
Northborough MA 01532

Luly E. Massaro, Commission Clerk  
Public Utilities Commission  
89 Jefferson Blvd.  
Warwick RI 02889

*Susan J. Goggin*

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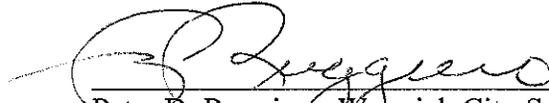
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AUTHORITY-Rate Application

Docket No.: 3942

RECEIVED  
2008 MAY 23 AM 9:29

**ENTRY OF APPEARANCE**

I hereby enter my appearance on behalf of the City of Warwick in my capacity as City Solicitor in the above-captioned matter.



Peter D. Ruggiero, Warwick City Solicitor (#5733)  
RUGGIERO, ORTON & BROCHU  
20 Centerville Road  
Warwick, Rhode Island 02886  
Tel: 401-737-8700  
Fax: 401-737-0735

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**MOTION TO INTERVENE**

Now comes the City of Warwick (the "City"), by and through its City Solicitor, and the City Council of the City of Warwick, by and through its legal counsel, and hereby moves to intervene in the above-captioned matter. As grounds, the City avers that it has an interest which will be directly affected and which is not represented by any existing party in this proceeding. The issue concerns the Kent County Water Authority's (the "Authority") request to increase rates to cover an expected more than Five Million Dollar (\$5,000,000.00) revenue shortfall anticipated during their upcoming budget year. The City purchases water from the Authority and provides that purchased water to its customers. This purchased water is set at the Providence wholesale purchase rate and will not be affected by this rate hike request. However, several thousand customers of the Authority are located within the municipal boundaries of the City. These residents and businesses served by the Authority are located in the Cowesett, Apponaug and Tollgate areas of the City. These customers will have to bear any increase in the rate for water purchased from the Authority.

Based on this situation the City requests intervention status to examine the need and justification for the sought after rate hike approval by the Authority. Without granting the City's Motion to Intervene, the City's residents and businesses served by the Authority will not be represented by an existing party to this proceeding. (R.I. Gen. Laws 45-6-1 (1999 & Supp. 2006)(Rule 1.13 Rules of Practice and Procedure). The City has a direct interest in the affect an

approval of this rate hike Petition would have on the Authority's customers located within the City.

For these reasons and pursuant to PUC Rule 1.13, the City hereby requests the PUC to grant its Motion to Intervene.

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



Peter D. Ruggiero, Warwick City Solicitor (#5733)  
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