



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

150 South Main Street • Providence, RI 02903

(401) 274-4400

TDD (401) 453-0410

Patrick C. Lynch, Attorney General

August 12, 2008

Joseph A. Keough, Jr., Esquire
Keough & Sweeney
100 Armistice Boulevard
Pawtucket, RI 02860-3233

Re: Pawtucket Water Supply Board – General Rate Filing
Docket No. 3945

Dear Mr. Keough:

Enclosed please find Rhode Island Division of Public Utilities & Carrier responses to the Pawtucket Water Supply Board's Data Requests, 1-1 and 2-1 (a) & (b), in the above-referenced matter. If you have any questions, please do not hesitate to contact me.

Very Truly Yours,

Leo J. Wold
Special Assistant Attorney General
(401) 274-4400 x 2218

LJW/kz
Enclosure

cc: Thomas F. Ahern, Administrator
Service List

PATUCKET WATER SUPPLY BOARD
Docket No. 3945
Pawtucket Water Supply Board's Data Requests to
the Division of Public Utilities and Carriers

1. For each case in Rhode Island since (and including) 1993 listed in Ms. Crane's appendix A involving a water utility, please list the rate year consumption that Ms. Crane initially recommended in her direct testimony (as may be distinct from the amount approved by the Commission or subsequent amounts that were settled upon by the parties) and the actual water sales for the rate year as set forth in each utility's annual reports submitted to the Commission. If the rate year overlaps a reporting year - please provide the reported water sales for the two years that encompass the rate year.

Response: See attached worksheet.

Respondent: John Bell

Pawtucket Water Supply Board											
Docket 3945											
Division's Response to Pawtucket's Data Request 1-1											
Docket	Utility	Comments	Rate Year Ending	Recommended Rate Year Consumption	Reported Consumption	Report Period Ending	Reported Consumption	Report Period Ending	Reported Consumption	Report Period Ending	
2098	KCWA	Info Not Available	12/31/94	-	-	-	-	-	-	-	
2158	PWSB	Cust Growth Adj Only	6/30/95	-	-	-	-	-	-	-	
2555	KCWA		11/30/98	4,444,900	4,380,094	6/30/98	4,508,558	6/30/99	4,508,558	6/30/99	
2674	PWSB	Cust Growth Adj Only	6/30/99		6,314,189	6/30/99					
2860	KCWA	Abbr Filing - No Adj.,	6/30/00	-	-	-	-	-	-	-	
3164	PWSB	Wholesale Adj. Only	7/31/01	552,820	741,077	6/30/01	655,779	6/30/02	655,779	6/30/02	
3311	KCWA		12/31/02	4,384,860	4,663,331	6/30/02	4,566,617	6/30/03	4,566,617	6/30/03	
3378	PWSB	No Adjustment	12/31/02	-	-	-	-	-	-	-	
3497	PWSB	Residential Adj.	6/30/05	3,481,040	3,181,994	6/30/05					
		Wholesale Adj		712,834	686,462	6/30/05					
3626	Woonsocket		12/31/05	1,809,073	1,839,550	6/30/05	1,588,029	6/30/06	1,588,029	6/30/06	
3660	KCWA	Retail Only	6/30/06	4,222,038	4,240,390	6/30/06	N/A	N/A	N/A	N/A	
3674	PWSB	Small Class Only	12/31/06	3,247,974	3,103,794	6/30/06	2,884,356	6/30/07	2,884,356	6/30/07	
3800	Woonsocket		6/30/08	1,713,789	N/A	N/A	N/A	N/A	N/A	N/A	

PAWTUCKET WATER SUPPLY BOARD
Docket No. 3945
Pawtucket Water Supply Board's Second Set of Data Requests to
the Division of Public Utilities and Carriers

2-1: In ACC 3, Ms. Crane has suggested a "Customer Growth Adjustment" of \$80,890. This adjustment is based on customer growth of 175 customers and an average usage per customer of 139.95. In the PWSB's first set of Data Requests to the Division, Request 4(b), the question was asked:

"Did Ms. Crane do any analysis of "usage per customer" for prior years? If so, please provide that data."

Ms. Crane replied:

"Ms. Crane relied upon the Company's methodology, which used a four-year average of consumption, Ms. Crane did update that average to reflect actual results for fiscal year 2008 that were provided in response to discovery."

The PWSB understands that Ms. Crane relied on the PWSB's four year average of consumption, updated for FY08, to determine residential sales (see A. Crane Direct Testimony, pp 8-11). However, Ms. Crane has also suggested a "Customer Growth Adjustment," based on usage per customer. Therefore, based on the foregoing, the request is the following:

- a) Did Ms. Crane do, or has she ever done, an analysis of "usage per customer" for any of the PWSB's customers for any year or time period that would predate the time period used in her "Customer Growth Adjustment," which is June 30, 2007 to June 30, 2009?
- b) If she did, please provide the calculations and workpapers that show the derivation of each calculation of "usage per customer."

Response:

Please note that the referenced adjustment is not intended to change the usage per customer used by the PWSB. The referenced adjustment is intended to adjust for the number of customers, not for usage per customer.

- a) On page 9 of her testimony in Docket No. 3497, Ms. Crane showed the residential usage per customer as derived from the Board's Annual Reports to the Commission for the years 1994-2002, as well as certain multi-year averages.

b) Ms. Crane does not have any calculations or workpapers for her testimony in Docket No. 3497. The only material from that case was her testimony.

Respondent: Andrea C. Crane