

**KEOUGH & SWEENEY, LTD.**

ATTORNEYS AND COUNSELORS AT LAW

100 ARMISTICE BOULEVARD

PAWTUCKET, RHODE ISLAND 02860

JOSEPH A. KEOUGH JR.\*  
JEROME V. SWEENEY III\*

SEAN P. KEOUGH\*  
MARGARET HOGAN SWEENEY\*

JEROME V. SWEENEY II  
OF COUNSEL

\*ADMITTED TO PRACTICE IN  
RHODE ISLAND & MASSACHUSETTS

TELEPHONE  
(401) 724-3600

FACSIMILE  
(401) 724-9909

www.keoughsweeney.com

BOSTON OFFICE:  
171 MILK STREET  
SUITE 30  
BOSTON, MA 02109  
TEL. (617) 574-0054  
FAX (617) 451-1914

August 7, 2008

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

**Re: Pawtucket Water Supply Board – Docket No. 3945**

Dear Ms. Massaro:

Enclosed please find an original and nine copies of the Pawtucket Water Supply Board's Second Set of Data Requests to the Division of Public Utilities and Carriers.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK:prc  
Enclosures

RECEIVED  
2008 AUG 12 PM 3:31  
DIVISION OF PUBLIC UTILITIES AND CARRIERS

**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 135.95. 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."

RECEIVED  
2008 AUG 12 PM 3:31  
DIVISION OF PUBLIC UTILITIES AND CARRIERS

**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**  
**CERTIFICATION**

I hereby certify that I sent by electronic mail a copy of the within to all parties set forth on the attached Service List on August 7, 2008, and that I mailed one original, and nine copies via first class mail to Luly Massaro, Clerk, Rhode Island Public Utilities Commission.

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone/Fax</b>
James DeCelles, Acting General Mgr. Pawtucket Water Supply Board 85 Branch St. Pawtucket, RI 02861	<a href="mailto:decelles@pwsb.org">decelles@pwsb.org</a>	401-729-5001
	<a href="mailto:rbenson@pwsb.org">rbenson@pwsb.org</a>	
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:LWold@riag.ri.gov">LWold@riag.ri.gov</a>	401-222-2424 ext. 2218
	<a href="mailto:sscialabba@ripuc.state.ri.us">sscialabba@ripuc.state.ri.us</a>	
	<a href="mailto:jbell@ripuc.state.ri.us">jbell@ripuc.state.ri.us</a>	
	<a href="mailto:RDIMeglio@riag.ri.gov">RDIMeglio@riag.ri.gov</a>	
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	<a href="mailto:Woodcock@w-a.com">Woodcock@w-a.com</a>	508-393-3337 508-393-9078
David Bebyn B&E Consulting 21 Dryden Lane Providence, RI 02904	<a href="mailto:dbebyn@beconsulting.biz">dbebyn@beconsulting.biz</a>	401-785-0800 401-421-5696
Andrea Crane The Columbia Group PO Box 810 Georgetown, CT 06829	<a href="mailto:Ctcolumbia@aol.com">Ctcolumbia@aol.com</a>	203-544-9900
Jerry Mierzwa Exeter Associates, Inc. 5565 Sterrett Place, Suite 310 Columbia, MD 21044	<a href="mailto:Jmierzwa@exeterassociates.com">Jmierzwa@exeterassociates.com</a>	410-992-7500 410-992-3445
<b>File original and nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888	<a href="mailto:lmassaro@puc.state.ri.us">lmassaro@puc.state.ri.us</a>	401-780-2104 401-941-1691
	<a href="mailto:cwilson@puc.state.ri.us">cwilson@puc.state.ri.us</a>	
	<a href="mailto:anault@puc.state.ri.us">anault@puc.state.ri.us</a>	

/s/ Joseph A. Keough, Jr.  
Joseph A. Keough, Jr., Esquire # 4925  
KEOUGH & SWEENEY, LTD.  
100 Armistice Boulevard  
Pawtucket, RI 02860  
(401) 724-3600