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*ADMITTED TO PRACTICE IN
RHODE ISLAND & MASSACHUSETTS

April 23, 2010

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

***Re: City of Newport, Utilities Department, Water Division
Docket 4128***

Dear Ms. Massaro:

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

Please note that electronic copies of these documents have been provided to the service list.

Thank you for your attention to this matter.

Sincerely,

Joseph A. Keough Jr.

JAK/kf
Enclosures

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET NO. 4128
City Of Newport - Utilities Division - Water Department
Response to
The Division Of Public Utilities and Carriers' Data Requests
Set 2

Div. 2-1: Reference page 9, lines 1-4 of Mr. Smith's rebuttal testimony:

- a. Please provide the evidence relied upon by Mr. Smith to conclude that Lawton Valley is operated in a way to meet both average day and maximum day demands.
- b. Please provide daily volumes delivered from the Lawton Valley treatment plant to storage for the period May 1, 2009 through August 31, 2009.

Response:

- a. The significant daily production variability at Lawton Valley is the most obvious evidence that Lawton Valley is operated in a way to meet both average day and maximum day demands. As shown in the attached spreadsheet (*Response to DIV 2-1a. FY 2009 Lawton Valley Production Data*), during each month of FY 2009, maximum day production at Lawton Valley was approximately 30% greater than average day production for the same month. Similarly, minimum day production for each month was approximately 30% less than average day production for the same month. If the plant was only operated to meet average day demand, daily production levels for each day, including the maximum and minimum days would tend to be much closer to the average daily production.
- b. See attached spreadsheet, (*Response to DIV 2-1b.*). Note that the volumes shown on this schedule represent water available for distribution from storage and are net of volumes that are delivered to storage and then returned to the plant for filter washes, service water, etc.

Prepared by: Harold J. Smith

RIPUC Docket No. 4128

Response to DIV 2-1 a.

FY 2009 Lawton Valley Production Data

	July-08	August-08	September-08	October-08	November-08	December-08	January-09	February-09	March-09	April-09	May-09	June-09
Max Day	7,845,700	6,343,600	5,542,400	4,824,900	4,304,200	4,440,500	4,116,700	3,330,400	2,801,400	4,409,000	4,495,700	4,758,700
Min Day	3,714,300	2,957,800	3,307,900	2,576,100	2,355,000	2,020,300	2,391,600	1,989,400	573,800	1,630,700	2,165,600	2,570,800
Average Day	5,714,942	4,965,419	4,337,627	3,473,755	3,072,327	3,257,548	2,980,597	2,753,929	2,193,255	2,630,030	3,406,029	3,356,503
Min to Avg.	65%	60%	76%	74%	77%	62%	80%	72%	26%	62%	64%	77%
Max to Avg.	137%	128%	128%	139%	140%	136%	138%	121%	128%	168%	132%	142%

RIPUC Docket No. 4128**Response to DIV 2-1 b.****Lawton Valley Production Data**

	May-09	June-09	July-09	August-09
1	4,367,100	3,088,300	3,105,100	4,340,700
2	3,802,900	4,584,300	3,093,200	3,005,600
3	4,258,900	4,758,700	3,557,300	3,172,000
4	3,415,300	4,291,400	2,948,200	4,379,700
5	3,387,200	3,182,000	3,566,800	4,434,400
6	3,382,800	2,784,300	3,179,000	4,214,900
7	3,197,000	4,080,300	4,057,700	4,329,000
8	3,036,000	3,035,500	2,842,200	3,179,100
9	2,924,300	2,704,200	3,034,400	4,445,500
10	3,005,900	2,570,800	2,958,500	3,211,400
11	3,810,000	4,071,500	4,263,300	5,754,600
12	3,046,200	2,880,300	3,935,600	4,800,900
13	2,165,600	4,213,200	2,867,500	4,329,600
14	2,866,300	3,515,700	3,661,700	2,964,400
15	2,764,900	2,924,700	3,668,400	5,845,200
16	3,136,600	3,309,100	4,391,000	5,139,500
17	2,666,900	3,439,000	4,000,600	4,471,100
18	2,706,900	3,566,900	4,161,800	5,393,300
19	2,995,700	3,058,500	4,409,800	4,556,300
20	3,214,500	3,028,000	3,297,100	5,581,300
21	2,997,000	2,772,800	3,447,200	5,458,700
22	4,351,100	3,013,700	3,641,300	4,373,200
23	4,495,700	3,257,600	3,200,800	6,112,400
24	4,002,800	2,890,600	2,698,400	4,252,900
25	2,825,000	3,025,900	3,685,400	4,683,600
26	3,829,400	2,991,800	3,207,500	4,840,900
27	3,332,900	3,854,200	2,458,700	6,168,500
28	3,573,100	3,631,600	4,474,200	3,958,900
29	4,203,000	2,959,000	4,284,400	4,695,900
30	3,976,800	3,211,200	3,250,400	3,999,900
31	3,849,100		3,025,800	3,637,800
Total	105,586,900	100,695,100	108,373,300	139,731,200

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CERTIFICATION

I hereby certify that on April 23, 2010, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

Parties/Address	E-mail Distribution	Phone/Fax
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File an original and nine (9) copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	lmassaro@puc.state.ri.us	401-780-2107 401-941-1691
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/s/ Joseph A. Keough, Jr.

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