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*ADMITTED TO PRACTICE IN
RHODE ISLAND & MASSACHUSETTS

March 30, 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 Navy's 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 United States Department Of The Navy's Data Requests
Set 2

Navy 2-1: With reference to Page 2, Lines 13 – 15 of Mr. Smith's Rebuttal Testimony, please provide a copy of all data in his possession in support of the statement that "...Raftelis Financial Consulting encountered similar demand patterns in a recent study for a client in Virginia."

Response: All relevant data is provided in the responses to Navy 2-2 through Navy 2-5.

Prepared by: Harold J. Smith

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET NO. 4128
City Of Newport - Utilities Division - Water Department
Response to
The United States Department Of The Navy's Data Requests
Set 2

Navy 2-2: Please provide:

- a. the name of the above-referenced location in Virginia,
- b. the number of water customers in each customer class,
- c. the annual usage of each class,
- d. the peak day and peak hour factors developed by RFC for each customer class;
and;
- e. the underlying data and its use in calculating the class peak day and peak hour ratios.

Response:

- a. Arlington County, Virginia
- b. See attached spreadsheet "Response to Navy DR 2-2 b.-d."
- c. See attached spreadsheet "Response to Navy DR 2-2 b.-d."
- d. See attached spreadsheet "Response to Navy DR 2-2 b.-d."
- e. See attached spreadsheet "Response to Navy DR 2-2 e."

Prepared by: Harold J. Smith

Customer and Consumption Data

	No. of Customers	Annual Consumption (1,000 gals.)
Apartments	1,825	2,662,888
Commercial	1,798	2,477,821
County Accounts	281	152,552
Residential	31,537	2,354,200
Total	35,441	7,647,461

Data from FY 2003

Peaking Factors

	Max. Month	Max. Day	Max. Hour
Apartments	1.20	1.40	2.20
Commercial	1.70	1.80	2.00
County Accounts	1.70	1.75	2.00
Residential	1.50	1.60	2.50

RIPUC Docket No. 4128
Response to Navy DR 2-2 e.
Historical Usage

Fiscal Year 1997

	July				August				September			
	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
Apartments	1	1	\$ 1.64	1.0	10	679	\$ 1,113.56	67.9	1,877	806,393	\$ 1,322,484.52	429.6
Commercial	1,669	203,123	\$ 333,121.72	121.7	1,690	251,415	\$ 412,301.41	148.8	1,633	262,410	\$ 430,352.40	160.7
County Accounts	154	7,638	\$ 12,526.32	49.6	156	23,021	\$ 37,754.44	147.6	141	11,706	\$ 19,197.84	83.0
Residential	13,726	372,832	\$ 597,348.85	27.2	11,701	229,366	\$ 372,363.12	19.6	6,032	136,416	\$ 223,721.46	22.6
	15,550	583,594	\$ 942,998.53	37.5	13,557	504,481	\$ 823,532.53	37.2	9,683	1,216,925	\$ 1,995,756.22	125.7

Fiscal Year 1998

	July				August				September			
	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
Apartments	3	2,114	\$ 3,466.96	704.7	8	2,825	\$ 4,633.00	353.1	1,909	836,715	\$ 1,372,212.60	438.3
Commercial	1,848	227,320	\$ 372,804.80	123.0	1,851	298,252	\$ 489,133.28	161.1	1,847	287,083	\$ 470,816.12	155.4
County Accounts	227	10,160	\$ 16,662.40	44.8	228	11,998	\$ 19,676.72	52.6	229	11,692	\$ 19,174.88	51.1
Residential	13,415	242,205	\$ 397,216.20	18.1	11,522	212,975	\$ 349,278.96	18.5	6,297	135,083	\$ 221,536.12	21.5
	15,493	481,799	\$ 790,150.36	31.1	13,609	526,050	\$ 862,721.96	38.7	10,282	1,270,573	\$ 2,083,739.72	123.6

Fiscal Year 1999

	July				August				September			
	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
Apartments	97	13,661	\$ 22,404.04	140.8	103	11,126	\$ 18,246.64	108.0	1,902	779,082	\$ 1,277,694.48	409.6
Commercial	1,840	243,583	\$ 399,476.12	132.4	1,842	258,922	\$ 424,632.08	140.6	1,839	294,712	\$ 483,327.68	160.3
County Accounts	228	10,588	\$ 17,364.32	46.4	228	11,526	\$ 18,902.64	50.6	229	12,874	\$ 21,113.36	56.2
Residential	13,194	232,172	\$ 380,762.08	17.6	11,454	195,532	\$ 320,672.48	17.1	6,344	125,294	\$ 205,482.16	19.8
	15,359	500,004	\$ 820,006.56	32.6	13,627	477,106	\$ 782,453.84	35.0	10,314	1,211,962	\$ 1,987,617.68	117.5

October				November				December			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
			#DIV/0!				#DIV/0!	1,918	755,057	\$ 1,238,147.13	393.7
1,619	228,473	\$ 374,695.72	141.1	1,622	205,744	\$ 337,420.16	126.8	1,847	197,637	\$ 324,124.68	107.0
146	13,518	\$ 22,169.52	92.6	138	12,492	\$ 20,486.88	90.5	230	9,453	\$ 15,502.92	41.1
12,974	253,517	\$ 415,249.97	19.5	10,986	189,144	\$ 310,187.02	17.2	6,313	102,198	\$ 167,601.40	16.2
14,739	495,508	\$ 812,115.21	33.6	12,746	407,380	\$ 668,094.06	32.0	10,308	1,064,345	\$ 1,745,376.13	103.3

October				November				December			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
3	1,814	\$ 2,974.96	604.7	8	3,855	\$ 6,322.20	481.9	1,909	725,870	\$ 1,190,426.80	380.2
1,837	243,318	\$ 399,041.52	132.5	1,847	208,581	\$ 342,072.84	112.9	1,838	190,917	\$ 313,103.88	103.9
227	13,413	\$ 21,997.32	59.1	227	12,495	\$ 20,491.80	55.0	228	11,443	\$ 18,766.52	50.2
13,268	320,546	\$ 525,695.44	24.2	11,412	237,343	\$ 389,242.37	20.8	6,405	119,468	\$ 195,927.52	18.7
15,335	579,091	\$ 949,709.24	37.8	13,494	462,274	\$ 758,129.21	34.3	10,380	1,047,698	\$ 1,718,224.72	100.9

October				November				December			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
99	9,506	\$ 15,589.84	96.0	99	11,774	\$ 19,309.36	118.9	1,902	785,039	\$ 1,287,463.96	412.7
1,838	335,080	\$ 549,531.20	182.3	1,839	187,137	\$ 306,904.68	101.8	1,835	192,040	\$ 314,945.60	104.7
228	18,223	\$ 29,885.72	79.9	228	10,202	\$ 16,731.28	44.7	229	12,923	\$ 21,193.72	56.4
13,335	330,750	\$ 542,430.00	24.8	11,448	271,474	\$ 445,217.36	23.7	6,625	150,647	\$ 247,061.08	22.7
15,500	693,559	\$ 1,137,436.76	44.7	13,614	480,587	\$ 788,162.68	35.3	10,591	1,140,649	\$ 1,870,664.36	107.7

January				February				March			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
			#DIV/0!				#DIV/0!	1,909	700,392	\$ 1,148,642.88	366.9
1,843	144,022	\$ 236,196.08	78.1	1,841	179,225	\$ 293,929.00	97.4	1,835	168,744	\$ 276,740.16	92.0
228	6,975	\$ 11,439.00	30.6	229	8,626	\$ 14,146.64	37.7	227	8,231	\$ 13,498.84	36.3
13,287	224,346	\$ 367,924.79	16.9	11,360	185,053	\$ 303,486.72	16.3	6,359	105,550	\$ 173,101.79	16.6
15,358	375,343	\$ 615,559.87	24.4	13,430	372,904	\$ 611,562.36	27.8	10,330	982,917	\$ 1,611,983.67	95.2

January				February				March			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
3	1,543	\$ 2,530.52	514.3	3	1,356	\$ 2,223.84	452.0	1,912	705,507	\$ 1,157,031.48	369.0
1,835	182,109	\$ 298,658.76	99.2	1,846	177,311	\$ 290,790.04	96.1	1,837	198,772	\$ 325,986.08	108.2
227	9,702	\$ 15,911.28	42.7	227	11,850	\$ 19,434.00	52.2	228	11,340	\$ 18,597.60	49.7
13,440	234,491	\$ 384,565.24	17.4	11,546	193,506	\$ 317,349.84	16.8	6,461	109,595	\$ 179,735.80	17.0
15,505	427,845	\$ 701,665.80	27.6	13,622	384,023	\$ 629,797.72	28.2	10,438	1,025,214	\$ 1,681,350.96	98.2

January				February				March			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
99	8,760	\$ 14,366.40	88.5	99	9,000	\$ 14,760.00	90.9	1,894	677,910	\$ 1,111,772.40	357.9
1,837	147,942	\$ 242,624.88	80.5	1,842	162,268	\$ 266,119.52	88.1	1,838	152,914	\$ 250,778.96	83.2
229	8,447	\$ 13,853.08	36.9	229	6,554	\$ 10,748.56	28.6	229	8,939	\$ 14,659.96	39.0
13,429	263,850	\$ 432,714.00	19.6	11,465	194,967	\$ 319,745.88	17.0	6,489	107,409	\$ 176,150.76	16.6
15,594	428,999	\$ 703,558.36	27.5	13,635	372,789	\$ 611,373.96	27.3	10,450	947,172	\$ 1,553,362.08	90.6

April				May				June			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
			#DIV/0!				#DIV/0!	1,907	681,876	\$ 1,118,276.64	357.6
1,834	165,394	\$ 271,246.16	90.2	1,847	188,417	\$ 309,003.88	102.0	1,840	255,164	\$ 418,468.96	138.7
226	8,268	\$ 13,559.52	36.6	227	9,352	\$ 15,337.28	41.2	228	11,620	\$ 19,056.80	51.0
13,473	222,233	\$ 364,462.12	16.5	11,491	181,508	\$ 297,657.13	15.8	6,316	98,175	\$ 161,007.00	15.5
15,533	395,895	\$ 649,267.80	25.5	13,565	379,277	\$ 621,998.29	28.0	10,291	1,046,835	\$ 1,716,809.40	101.7

April				May				June			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
3	1,384	\$ 2,269.76	461.3	5	2,479	\$ 4,065.56	495.8	1,903	660,857	\$ 1,083,805.48	347.3
1,838	153,197	\$ 251,243.08	83.3	1,842	214,658	\$ 352,039.12	116.5	1,844	216,490	\$ 355,043.60	117.4
226	7,980	\$ 13,087.20	35.3	226	10,532	\$ 17,272.48	46.6	228	10,624	\$ 17,423.36	46.6
13,450	229,403	\$ 376,220.92	17.1	11,496	180,104	\$ 295,370.56	15.7	6,399	99,966	\$ 163,944.24	15.6
15,517	391,964	\$ 642,820.96	25.3	13,569	407,773	\$ 668,747.72	30.1	10,374	987,937	\$ 1,620,216.68	95.2

April				May				June			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
106	17,195	\$ 28,199.80	162.2	127	34,202	\$ 56,091.28	269.3	1,894	687,365	\$ 1,127,278.60	362.9
1,830	175,022	\$ 287,036.08	95.6	1,842	218,896	\$ 358,989.44	118.8	1,830	249,275	\$ 408,811.00	136.2
224	9,328	\$ 15,297.92	41.6	229	12,037	\$ 19,740.68	52.6	234	12,448	\$ 20,414.72	53.2
13,521	236,128	\$ 387,249.92	17.5	11,427	175,945	\$ 288,549.80	15.4	6,429	109,980	\$ 180,367.20	17.1
15,681	437,673	\$ 717,783.72	27.9	13,625	441,080	\$ 723,371.20	32.4	10,387	1,059,068	\$ 1,736,871.52	102.0

Totals			
Customers	Consumption	Billed Amount	Avg. Consumption
7,622	2,944,398	\$ 4,828,666.37	386.3
21,120	2,449,768	\$ 4,017,600.33	116.0
2,330	130,900	\$ 214,676.00	56.2
124,018	2,300,338	\$ 3,754,111.37	18.5
155,090	7,825,404	\$ 12,815,054.07	50.5

Totals				Change from FY 1997 (1 year)			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
7,669	2,946,319	\$ 4,831,963.16	384.2	0.62%	0.07%	0.07%	-0.55%
22,110	2,598,008	\$ 4,260,733.12	117.5	4.69%	6.05%	6.05%	1.30%
2,728	133,229	\$ 218,495.56	48.8	17.08%	1.78%	1.78%	-13.07%
125,111	2,314,685	\$ 3,796,083.21	18.5	0.88%	0.62%	1.12%	-0.26%
157,618	7,992,241	\$ 13,107,275.05	50.7	1.63%	2.13%	2.28%	0.49%

Totals				Change from FY 1998 (1 year)				Average Annual Change from FY 1997 (2 years)			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
8,421	3,044,620	\$ 4,993,176.80	361.6	9.81%	3.34%	3.34%	-5.89%	5.11%	1.69%	1.69%	-3.26%
22,052	2,617,791	\$ 4,293,177.24	118.7	-0.26%	0.76%	0.76%	1.03%	2.18%	3.37%	3.37%	1.16%
2,744	134,089	\$ 219,905.96	48.9	0.59%	0.65%	0.65%	0.06%	8.52%	1.21%	1.21%	-6.74%
125,160	2,394,148	\$ 3,926,402.72	19.1	0.04%	3.43%	3.43%	3.39%	0.46%	2.02%	2.27%	1.55%
158,377	8,190,648	\$ 13,432,662.72	51.7	0.48%	2.48%	2.48%	1.99%	1.05%	2.31%	2.38%	1.24%

Fiscal Year 2000

	July				August				September			
	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
Apartments	127	13,960	\$ 22,894.40	109.9	129	33,034	\$ 54,175.76	256.1	1,877	835,926	\$ 1,370,918.64	445.4
Commercial	1,835	202,751	\$ 332,511.64	110.5	1,835	378,265	\$ 620,354.60	206.1	1,835	317,869	\$ 521,305.16	173.2
County Accounts	233	11,530	\$ 18,909.20	49.5	234	18,942	\$ 31,064.88	80.9	241	14,657	\$ 24,037.48	60.8
Residential	13,317	272,509	\$ 446,914.76	20.5	11,494	253,697	\$ 416,063.08	22.1	6,389	171,462	\$ 281,197.68	26.8
	15,512	500,750	\$ 821,230.00	32.3	13,692	683,938	\$ 1,121,658.32	50.0	10,342	1,339,914	\$ 2,197,458.96	129.6

Fiscal Year 2001

	July				August				September			
	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
Apartments	163	25,614	\$ 47,642.04	157.1	164	21,113	\$ 39,270.18	128.7	1,812	550,017	\$ 1,023,005.21	303.5
Commercial	1,832	228,868	\$ 425,694.48	124.9	1,834	185,458	\$ 344,951.54	101.1	1,819	244,844	\$ 455,409.84	134.6
County Accounts	243	8,202	\$ 15,255.72	33.8	250	6,947	\$ 12,920.96	27.8	250	9,006	\$ 16,751.16	36.0
Residential	13,518	246,312	\$ 435,963.04	18.2	11,433	204,077	\$ 376,077.49	17.8	6,430	116,416	\$ 216,527.05	18.1
	15,756	508,996	\$ 924,555.28	32.3	13,681	417,595	\$ 773,220.17	30.5	10,311	920,283	\$ 1,711,693.26	89.3

Fiscal Year 2002

	July				August				September			
	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
Apartments	166	27,873	\$ 57,697.11	167.9	167	31,937	\$ 66,109.37	191.2	1,844	694,247	\$ 1,437,054.27	376.5
Commercial	1,813	203,228	\$ 420,681.96	112.1	1,812	260,257	\$ 538,730.39	143.6	1,795	261,961	\$ 542,259.27	145.9
County Accounts	268	10,694	\$ 22,136.58	39.9	269	14,186	\$ 29,364.72	52.7	269	16,189	\$ 33,511.23	60.2
Residential	13,510	214,137	\$ 424,197.23	15.9	11,466	199,809	\$ 408,600.54	17.4	6,430	119,310	\$ 246,971.70	18.6
	15,757	455,932	\$ 924,712.88	28.9	13,714	506,189	\$ 1,042,805.02	36.9	10,338	1,091,707	\$ 2,259,796.47	105.6

Fiscal Year 2003

	July				August				September			
	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
Apartments	171	29,744	\$ 62,461.52	173.9	170	26,823	\$ 56,328.30	157.8	1,863	726,002	\$ 1,524,602.65	389.7
Commercial	1,808	249,947	\$ 524,887.24	138.2	1,805	255,239	\$ 535,487.52	141.4	1,808	354,415	\$ 744,271.50	196.0
County Accounts	277	15,271	\$ 31,984.21	55.1	279	13,115	\$ 27,541.37	47.0	278	19,950	\$ 41,895.00	71.8
Residential	13,477	229,875	\$ 479,002.25	17.1	11,381	209,314	\$ 438,179.84	18.4	6,410	136,176	\$ 285,969.48	21.2
	15,733	524,837	\$ 1,098,335.22	33.4	13,635	504,491	\$ 1,057,537.03	37.0	10,359	1,236,543	\$ 2,596,738.63	119.4

October				November				December			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
129	19,619	\$ 32,175.16	152.1	126	18,965	\$ 31,102.60	150.5	1,851	751,447	\$ 1,232,372.58	406.0
1,841	244,731	\$ 401,358.84	132.9	1,828	186,390	\$ 305,679.60	102.0	1,823	231,080	\$ 378,971.20	126.8
239	21,856	\$ 35,843.84	91.4	241	10,896	\$ 17,869.44	45.2	242	14,574	\$ 23,897.67	60.2
13,520	342,993	\$ 562,508.52	25.4	11,509	236,382	\$ 387,666.48	20.5	6,531	119,928	\$ 196,668.80	18.4
15,729	629,199	\$ 1,031,886.36	40.0	13,704	452,633	\$ 742,318.12	33.0	10,447	1,117,029	\$ 1,831,910.25	106.9

October				November				December			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
162	29,659	\$ 55,165.74	183.1	164	26,072	\$ 48,493.92	159.0	1,808	766,177	\$ 1,425,089.22	423.8
1,822	269,709	\$ 501,649.75	148.0	1,818	211,588	\$ 393,553.68	116.4	1,823	194,351	\$ 361,492.86	106.6
253	15,210	\$ 28,290.60	60.1	254	12,935	\$ 24,059.10	50.9	255	12,322	\$ 22,918.92	48.3
13,489	244,610	\$ 454,973.14	18.1	11,465	200,096	\$ 372,178.56	17.5	6,514	110,903	\$ 206,279.58	17.0
15,726	559,188	\$ 1,040,079.23	35.6	13,701	450,691	\$ 838,285.26	32.9	10,400	1,083,753	\$ 2,015,780.58	104.2

October				November				December			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
165	27,064	\$ 56,022.48	164.0	167	23,965	\$ 49,607.55	143.5	1,861	570,537	\$ 1,180,998.40	306.6
1,802	194,306	\$ 402,213.42	107.8	1,807	167,507	\$ 346,739.49	92.7	1,811	221,788	\$ 459,101.16	122.5
270	20,107	\$ 41,621.49	74.5	274	11,783	\$ 24,390.81	43.0	275	16,241	\$ 33,618.87	59.1
13,522	263,411	\$ 545,260.77	19.5	11,473	191,723	\$ 396,866.56	16.7	6,502	110,055	\$ 227,813.85	16.9
15,759	504,888	\$ 1,045,118.16	32.0	13,721	394,978	\$ 817,604.41	28.8	10,449	918,621	\$ 1,901,532.28	87.9

October				November				December			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
170	32,466	\$ 68,178.60	191.0	170	24,075	\$ 50,557.50	141.6	1,825	652,398	\$ 1,370,035.80	357.5
1,803	277,141	\$ 583,071.84	153.7	1,799	223,066	\$ 468,438.60	124.0	1,795	179,308	\$ 376,546.68	99.9
279	16,536	\$ 34,725.60	59.3	281	12,582	\$ 26,422.20	44.8	283	13,636	\$ 28,635.60	48.2
13,430	340,079	\$ 714,165.33	25.3	11,412	264,073	\$ 554,553.30	23.1	6,556	150,242	\$ 315,508.20	22.9
15,682	666,222	\$ 1,400,141.37	42.5	13,662	523,796	\$ 1,099,971.60	38.3	10,459	995,584	\$ 2,090,726.28	95.2

January				February				March			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
152	17,606	\$ 28,873.84	115.8	154	19,763	\$ 32,411.32	128.3	1,820	655,735	\$ 1,075,405.40	360.3
1,812	121,452	\$ 199,181.28	67.0	1,823	261,611	\$ 429,042.04	143.5	1,822	226,441	\$ 371,363.24	124.3
241	7,300	\$ 11,972.00	30.3	241	17,708	\$ 29,041.12	73.5	242	16,840	\$ 27,617.60	69.6
13,508	242,693	\$ 398,016.52	18.0	11,610	183,501	\$ 300,941.64	15.8	6,518	113,858	\$ 186,727.12	17.5
15,713	389,051	\$ 638,043.64	24.8	13,828	482,583	\$ 791,436.12	34.9	10,402	1,012,874	\$ 1,661,113.36	97.4

January				February				March			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
163	26,481	\$ 49,254.66	162.5	164	25,278	\$ 47,017.08	154.1	1,830	617,263	\$ 1,148,109.18	337.3
1,822	151,955	\$ 282,636.30	83.4	1,829	168,575	\$ 313,549.50	92.2	1,815	166,441	\$ 309,580.26	91.7
250	11,101	\$ 20,647.86	44.4	253	10,302	\$ 19,161.72	40.7	253	9,622	\$ 17,896.92	38.0
13,657	233,204	\$ 433,759.44	17.1	11,258	193,110	\$ 359,184.60	17.2	6,559	109,707	\$ 204,055.02	16.7
15,892	422,741	\$ 786,298.26	26.6	13,504	397,265	\$ 738,912.90	29.4	10,457	903,033	\$ 1,679,641.38	86.4

January				February				March			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
166	24,248	\$ 50,193.36	146.1	167	27,155	\$ 56,210.85	162.6	1,856	621,303	\$ 1,286,097.21	334.8
1,808	150,058	\$ 310,620.06	83.0	1,803	147,136	\$ 304,571.52	81.6	1,808	162,934	\$ 337,273.38	90.1
275	10,719	\$ 22,188.33	39.0	275	10,489	\$ 21,712.23	38.1	275	10,866	\$ 22,492.62	39.5
13,618	243,275	\$ 503,579.25	17.9	11,530	206,364	\$ 427,173.48	17.9	6,532	116,701	\$ 241,571.07	17.9
15,867	428,300	\$ 886,581.00	27.0	13,775	391,144	\$ 809,668.08	28.4	10,471	911,804	\$ 1,887,434.28	87.1

January				February				March			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
170	22,430	\$ 47,103.00	131.9	171	18,507	\$ 38,864.70	108.2	1,831	580,817	\$ 1,219,715.70	317.2
1,784	137,600	\$ 288,960.00	77.1	1,789	110,230	\$ 231,483.00	61.6	1,796	170,450	\$ 357,945.00	94.9
281	9,836	\$ 20,655.60	35.0	282	5,931	\$ 12,455.10	21.0	283	9,753	\$ 20,481.30	34.5
13,540	244,539	\$ 513,531.90	18.1	11,531	178,539	\$ 374,896.81	15.5	6,629	105,601	\$ 221,762.10	15.9
15,775	414,405	\$ 870,250.50	26.3	13,773	313,207	\$ 657,699.61	22.7	10,539	866,621	\$ 1,819,904.10	82.2

April				May				June			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
162	20,867	\$ 34,221.88	128.8	163	26,001	\$ 44,697.05	159.5	1,806	691,742	\$ 1,218,161.88	383.0
1,825	144,575	\$ 237,103.00	79.2	1,820	199,224	\$ 341,709.31	109.5	1,830	272,164	\$ 506,217.87	148.7
238	8,065	\$ 13,226.60	33.9	241	10,544	\$ 18,096.67	43.8	246	12,449	\$ 23,155.83	50.6
13,585	224,946	\$ 368,911.44	16.6	11,520	205,158	\$ 336,975.26	17.8	6,458	106,568	\$ 180,051.74	16.5
15,810	398,453	\$ 653,462.92	25.2	13,744	440,927	\$ 741,478.29	32.1	10,340	1,082,923	\$ 1,927,587.32	104.7

April				May				June			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
165	22,691	\$ 42,205.26	137.5	166	22,178	\$ 41,873.52	133.6	1,833	541,834	\$ 1,043,960.09	295.6
1,822	147,739	\$ 274,794.54	81.1	1,814	169,891	\$ 321,507.28	93.7	1,817	210,608	\$ 435,820.22	115.9
253	9,597	\$ 17,850.42	37.9	261	12,262	\$ 23,321.66	47.0	263	14,369	\$ 29,722.92	54.6
13,674	260,333	\$ 484,219.38	19.0	11,585	172,335	\$ 320,584.67	14.9	6,487	103,916	\$ 197,052.60	16.0
15,914	440,360	\$ 819,069.60	27.7	13,826	376,666	\$ 707,287.13	27.2	10,400	870,727	\$ 1,706,555.83	83.7

April				May				June			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
168	29,155	\$ 60,218.05	173.5	170	25,972	\$ 53,766.25	152.8	1,861	587,247	\$ 1,219,343.16	315.6
1,795	181,113	\$ 374,773.42	100.9	1,803	195,863	\$ 404,229.09	108.6	1,816	196,137	\$ 411,338.17	108.0
275	11,280	\$ 23,349.60	41.0	276	11,758	\$ 24,341.56	42.6	275	12,679	\$ 26,600.59	46.1
13,639	217,441	\$ 450,102.87	15.9	11,539	181,871	\$ 376,474.83	15.8	6,491	106,273	\$ 220,326.42	16.4
15,877	438,989	\$ 908,443.94	27.6	13,788	415,464	\$ 858,811.73	30.1	10,443	902,336	\$ 1,877,608.34	86.4

April				May				June			
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
171	23,033	\$ 48,369.30	134.7	171	21,575	\$ 45,311.73	126.2	1,859	505,018	\$ 1,096,740.50	271.7
1,794	156,233	\$ 328,089.30	87.1	1,803	161,493	\$ 339,288.07	89.6	1,794	202,699	\$ 475,445.26	113.0
282	12,700	\$ 26,670.00	45.0	282	9,935	\$ 20,869.76	35.2	283	13,307	\$ 31,282.89	47.0
13,618	210,677	\$ 442,421.70	15.5	11,560	181,018	\$ 380,137.80	15.7	6,605	104,067	\$ 222,070.25	15.8
15,865	402,643	\$ 845,550.30	25.4	13,816	374,021	\$ 785,607.36	27.1	10,541	825,091	\$ 1,825,538.90	78.3

Totals				Change from FY 1999 (1 year)				Average Annual Change from FY 1998 (2 years)				Average Annual Change from FY 1999 (3 years)		
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount
8,496	3,104,665	\$ 5,177,410.51	365.4	0.89%	1.97%	3.69%	1.07%	5.25%	2.65%	3.51%	-2.47%	3.68%	1.78%	2.35%
21,929	2,786,553	\$ 4,644,797.78	127.1	-0.56%	6.45%	8.19%	7.04%	-0.41%	3.57%	4.41%	3.99%	1.26%	4.39%	4.95%
2,879	165,361	\$ 274,732.33	57.4	4.92%	23.32%	24.93%	17.54%	2.73%	11.41%	12.13%	8.45%	7.31%	8.10%	8.57%
125,959	2,473,695	\$ 4,062,643.04	19.6	0.64%	3.32%	3.47%	2.67%	0.34%	3.38%	3.45%	3.03%	0.52%	2.45%	2.67%
159,263	8,530,274	\$ 14,159,583.66	53.6	0.56%	4.15%	5.41%	3.57%	0.52%	3.31%	3.94%	2.78%	0.89%	2.92%	3.38%

Totals				Change from FY 2000 (1 year)				Average Annual Change from FY 1999 (2 years)				Average Annual Change from FY 1999 (3 years)		
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount
8,594	2,674,377	\$ 5,011,086.10	311.2	1.15%	-13.86%	-3.21%	-14.84%	1.02%	-6.28%	0.18%	-7.23%	3.87%	-3.18%	1.22%
21,867	2,350,027	\$ 4,420,640.25	107.5	-0.28%	-15.67%	-4.83%	-15.43%	-0.42%	-5.25%	1.47%	-4.85%	-0.37%	-3.29%	1.24%
3,038	131,875	\$ 248,797.96	43.4	5.52%	-20.25%	-9.44%	-24.42%	5.22%	-0.83%	6.37%	-5.75%	3.65%	-0.34%	4.42%
126,069	2,195,019	\$ 4,060,854.57	17.4	0.09%	-11.27%	-0.04%	-11.34%	0.36%	-4.25%	1.70%	-4.59%	0.25%	-1.75%	2.27%
159,568	7,351,298	\$ 13,741,378.88	46.1	0.19%	-13.82%	-2.95%	-13.99%	0.38%	-5.26%	1.14%	-5.62%	0.41%	-2.75%	1.59%

Totals				Change from FY 2001 (1 year)				Average Annual Change from FY 2000 (2 years)				Average Annual Change from FY 2000 (3 years)		
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount
8,758	2,690,703	\$ 5,573,318.06	307.2	1.91%	0.61%	11.22%	-1.27%	1.53%	-6.91%	3.75%	-8.31%	1.32%	-4.04%	3.73%
21,673	2,342,288	\$ 4,852,531.33	108.1	-0.89%	-0.33%	9.77%	0.56%	-0.59%	-8.32%	2.21%	-7.78%	-0.58%	-3.64%	4.17%
3,276	156,991	\$ 325,328.63	47.9	7.83%	19.05%	30.76%	10.40%	6.67%	-2.56%	8.82%	-8.66%	6.08%	5.40%	13.94%
126,252	2,170,370	\$ 4,468,938.57	17.2	0.15%	-1.12%	10.05%	-1.27%	0.12%	-6.33%	4.88%	-6.44%	0.29%	-3.22%	4.41%
159,959	7,360,352	\$ 15,220,116.59	46.0	0.25%	0.12%	10.76%	-0.12%	0.22%	-7.11%	3.68%	-7.31%	0.33%	-3.50%	4.25%

Totals				Change from FY 2002 (1 year)				Average Annual Change from FY 2001 (2 years)				Average Annual Change from FY 2001 (3 years)		
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount
8,742	2,662,888	\$ 5,628,269.30	304.6	-0.18%	-1.03%	0.99%	-0.85%	0.86%	-0.22%	5.98%	-1.06%	0.96%	-4.99%	2.82%
21,578	2,477,821	\$ 5,253,914.01	114.8	-0.44%	5.79%	8.27%	6.25%	-0.66%	2.68%	9.02%	3.37%	-0.54%	-3.84%	4.19%
3,370	152,552	\$ 323,618.63	45.3	2.87%	-2.83%	-0.53%	-5.54%	5.32%	7.55%	14.05%	2.12%	5.39%	-2.65%	5.61%
126,149	2,354,200	\$ 4,942,198.96	18.7	-0.08%	8.47%	10.59%	8.56%	0.03%	3.56%	10.32%	3.53%	0.05%	-1.64%	6.75%
159,839	7,647,461	\$ 16,148,000.90	47.8	-0.08%	3.90%	6.10%	3.98%	0.08%	1.99%	8.40%	1.91%	0.12%	-3.58%	4.48%

Projected FY 2004 (using FY 2002 through FY 2003)				Projected FY 2004 (using FY 2001 through FY 2003)				Projected FY 2004 (using FY 2000 through FY 2003)		
Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount
8,726	2,635,360	\$ 5,683,762	302.0	8,817	2,657,162	\$ 5,964,807	301.4	8,826	2,530,069	\$ 5,787,117
21,483	2,621,196	\$ 5,688,498	122.0	21,435	2,544,301	\$ 5,727,721	118.7	21,462	2,382,708	\$ 5,474,213
3,467	148,239	\$ 321,918	42.8	3,549	164,076	\$ 369,085	46.2	3,552	148,507	\$ 341,776
126,046	2,553,601	\$ 5,465,578	20.3	126,189	2,438,068	\$ 5,452,198	19.3	126,212	2,315,665	\$ 5,275,829
159,719	7,945,770	\$ 17,132,453	49.7	159,975	7,799,987	\$ 17,505,035	48.8	160,031	7,373,981	\$ 16,871,027

1997 (3 years)
Avg. Consumption
-1.83%
3.09%
0.74%
1.92%
2.01%

1998 (3 years)	Average Annual Change from FY 1997 (4 years)			
Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
-6.78%	3.05%	-2.38%	0.93%	-5.26%
-2.93%	0.87%	-1.03%	2.42%	-1.89%
-3.85%	6.86%	0.19%	3.76%	-6.24%
-2.00%	0.41%	-1.16%	1.98%	-1.57%
-3.15%	0.71%	-1.55%	1.76%	-2.25%

1999 (3 years)	Average Annual Change from FY 1998 (4 years)				Average Annual Change from FY 1997 (5 years)			
Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
-5.28%	3.38%	-2.24%	3.63%	-5.44%	2.82%	-1.79%	2.91%	-4.48%
-3.08%	-0.50%	-2.56%	3.30%	-2.07%	0.52%	-0.89%	3.85%	-1.40%
-0.65%	4.68%	4.19%	10.46%	-0.47%	7.05%	3.70%	8.67%	-3.13%
-3.50%	0.23%	-1.60%	4.16%	-1.82%	0.36%	-1.16%	3.55%	-1.51%
-3.82%	0.37%	-2.04%	3.81%	-2.40%	0.62%	-1.22%	3.50%	-1.83%

2000 (3 years)	Average Annual Change from FY 1999 (4 years)				Average Annual Change from FY 1998 (5 years)				Average Annual Change from FY 1997 (6 years)			
Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
-5.89%	0.94%	-3.29%	3.04%	-4.19%	2.65%	-2.00%	3.10%	-4.54%	2.31%	-1.66%	2.59%	-3.88%
-3.32%	-0.54%	-1.36%	5.18%	-0.83%	-0.49%	-0.94%	4.28%	-0.46%	0.36%	0.19%	4.57%	-0.17%
-7.63%	5.27%	3.28%	10.14%	-1.89%	4.32%	2.75%	8.17%	-1.51%	6.34%	2.58%	7.08%	-3.54%
-1.69%	0.20%	-0.42%	5.92%	-0.62%	0.17%	0.34%	5.42%	0.17%	0.28%	0.39%	4.69%	0.10%
-3.69%	0.23%	-1.70%	4.71%	-1.93%	0.28%	-0.88%	4.26%	-1.16%	0.50%	-0.38%	3.93%	-0.88%

through FY 2003)	Projected FY 2004 (using FY 1999 through FY 2003)				Projected FY 2004 (using FY 1998 through FY 2003)				Projected FY 2004 (using FY 1997 through FY 2003)			
Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption	Customers	Consumption	Billed Amount	Avg. Consumption
286.7	8,824	2,575,182	\$ 5,799,284	291.8	8,974	2,609,561	\$ 5,802,633	290.8	8,944	2,618,659	\$ 5,773,859	292.8
111.0	21,461	2,444,014	\$ 5,525,976	113.9	21,473	2,454,459	\$ 5,478,765	114.3	21,655	2,482,528	\$ 5,494,173	114.6
41.8	3,548	157,552	\$ 356,437	44.4	3,515	156,741	\$ 350,067	44.6	3,584	156,494	\$ 346,531	43.7
18.3	126,397	2,344,318	\$ 5,234,818	18.5	126,358	2,362,184	\$ 5,209,993	18.7	126,508	2,363,299	\$ 5,173,952	18.7
46.1	160,207	7,517,389	\$ 16,908,611	46.9	160,287	7,580,311	\$ 16,836,043	47.3	160,645	7,618,200	\$ 16,782,313	47.4

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET NO. 4128
City Of Newport - Utilities Division - Water Department
Response to
The United States Department Of The Navy's Data Requests
Set 2

Navy 2-3: Please provide RFC's explanation for the above-referenced location's exhibiting relatively low residential peak day and peak hour factors.

Response: RFC was not asked to provide an explanation for the relatively low residential peak day and peak hour factors; however, the service area is relatively urban with small lots that do not require a great deal of irrigation.

Prepared by: Harold J. Smith

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Response to
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Set 2

Navy 2-4: Does the water utility serving the above-referenced location in Virginia share any similarities other than “similar demand patterns” with Newport?

Response: Yes, I am certain that there are similarities in addition to similar demand patterns. However, as set forth in the response to 2-3, RFC was not asked to provide an explanation for the relatively low residential peak day and peak hour factors in Virginia. Therefore, the extent to which these similarities affect demand patterns is not known. My reference to the demand characteristics of Arlington County's customers in my rebuttal testimony was in no way meant to suggest that similarities between the two utilities cause the same demand patterns, but was merely pointing out the fact that Newport is not the only utility with a relatively low residential peaking factor.

Prepared by: Harold J. Smith

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Navy 2-5: Does RFC have a breakdown of the number of residential customers living in single-family homes versus the number of residential customers living in multi-family units in the above-referenced location? If the response is affirmative, please provide a copy of the residential class breakdown.

Response: See response to 2b.

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Navy 2-6: Please refer to RFC Schedule D-1 Rebuttal. Column 1 lists Connection Sizes of 5 inches and 6 inches, and Column 2 lists corresponding Meter Factors of 21.0 and 29.0 for these two connection sizes, respectively. However, on Page 67 of the AWWA Manual, where a discussion of equivalent meter and service ratios is found, the Table there displays a Meter Factor of only 21.0 for a six-inch meter and a Meter Factor of 29.0 for an eight-inch meter; further, it makes no mention whatsoever of a five-inch meter.

- a. Does Newport have customers who are connected to the system by five-inch meters, or is the inclusion of five-inch meters in Schedule D-1 simply a typographical error? If the values in RFC Schedule D-1 Rebuttal are the result of an error, please provide a corrected cost of service study.
- b. If Newport does have five-inch customer connections, why does it contend that a Meter Factor of 21.0 is appropriate for cost allocation purposes for these customers, and that the Meter Ratio for a six-inch connection be set at 29.0, instead of the 21.0 Meter Factor shown in the AWWA Manual?
- c. Has Newport conducted any study to determine whether the Meter and Service Ratios shown in the Table on Page 67 of the AWWA Manual are appropriate for Newport, in that they have been shown to mirror actual relative costs that Newport has incurred in installing different sized meters and services?

Response:

- a. Yes, Newport does have customers with 5 inch meters.
- b. In adopting the Division's position with respect to base charges that vary by meter size, I also adopted the methodology used by the Division to calculate base charges. The meter equivalency ratios used in my rebuttal model are those that were used by the Division in the model submitted with Mr. Mierzwa's testimony.
- c. No.

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Navy 2-7: At Page 25 of his Rebuttal Testimony, Lines 22 – 23, Mr. Smith states that he has no problem with Newport continuing to gather daily demand data.

- a. Is the metering apparatus still in place to enable continuing the collection of daily demand data from Residential and Commercial customers?
- b. Would the collection of daily demand data entail any additional cost above the annual \$75,000 already included in Newport's rates for this purpose?
- c. If Newport continues to collect daily demand data, will the daily demand data be collected during the May – September period in 2010 corresponding to the data collection period in 2009?
- d. Will Newport make any adjustments to the selection of Residential and Commercial customers to be included in the demand study?
- e. Will Newport share any future daily customer demand readings with the parties to this case?

Response:

- a. Yes.
- b. The collection of daily demand data would certainly entail some cost. It should be noted that despite repeated assertions to the contrary by Portsmouth and the Navy, I have reviewed past Dockets, and I cannot find where the Commission specifically included \$75,000 in rates for the daily demand study. The only reference I can find is in exhibit 2 to the Docket 3578 Settlement Agreement, which state that the "maximum cost for the (demand) study should be limited to \$75,000 unless it can be demonstrated that a study of that magnitude will not yield the necessary information." Newport has never requested funding specifically for the purpose of gathering daily demand data. However, it is likely that if Newport continues to gather daily data it will request to recover the specific costs associated with these efforts through its rates.
- c. Prior to gathering any additional daily demand data Newport will make any adjustments that would help ensure the accuracy and integrity of the data collected.
- d. See response to c.
- e. Yes.

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Navy 2-8: Please refer to Page 26, Lines 14 – 15 of Mr. Smith's Rebuttal Testimony. Please provide the remaining portion of the response stated there.

Response: Apparently a portion of this response was inadvertently deleted in the version of the testimony distributed to the service list.

The response should read as follows:

"Yes I do. The revised cost of service model incorporates changes suggested by the witnesses for the Division and Portsmouth and does not deviate dramatically from the model submitted with my original testimony. Most importantly, the model results in rates that fairly reflect the cost of service to each customer class."

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CERTIFICATION

I hereby certify that on March 30, 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.

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