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June 4, 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 Commission's First 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 Rhode Island Public Utilities Commission's Data Requests**  
**Set 1**

**PUC 1-1:** Please itemize and explain any T&D administration costs Newport Water incurs on a regular basis as a result of having PWFD as a customer.

**Response:** Newport Water does not incur any T&D administration costs specifically as a result of serving PWFD.

Prepared by: Harold J. Smith

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**  
**DOCKET NO. 4128**  
**City Of Newport - Utilities Division - Water Department**  
**Response to**  
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**Set 1**

**PUC 1-2:** Please provide by month the typical or average number of hours of treatment plant operation for each plant (LVWTP & Station 1). Please also provide the estimated typical or average number of hours of treatment plant operation for each plant assuming PWFD was no longer a customer of Newport Water.

**Response:** Station 1 operates 24 hours per day, 365 days per year. Newport has prepared the attached spreadsheet (*LV Hrs of Operation 5-09 thru 4-10*) indicating the number of hours the Lawton Valley Treatment Plant ("LVWTP") operated on a monthly basis for the last twelve months.

Newport has developed another spreadsheet (*Lawton Valley Water Produced Available For Sale vs. PWFD Sales*), which estimates the number of hours that the Lawton Valley Treatment Plant would have to operate assuming PWFD was no longer a customer. (See attached) These hours of operation are based on the amount of water produced available for sale (WPAFS) from the LVWTP for the past twelve months, while subtracting the amount of water sold to PWFD in that timeframe. The sale of water to PWFD does not coincide exactly to the month due to the date that the PWFD meter is read. This meter is read on or about the 25<sup>th</sup> of every month.

It should be noted that the analyses shown in the *Lawton Valley Water Produced Available For Sale vs. PWFD Sales* attachment assumes that Newport Water would continue serving its remaining customers in the same way that it does today even if PWFD was not a customer. In reality, if PWFD ceased being a customer, Newport Water would need to carefully examine its alternatives with respect to meeting its customer's demands. Due to the versatility of Newport's system, it is possible that Newport Water could serve all of its customers from Station 1 and shut Lawton Valley down during certain low demand periods if PWFD was not a customer.

Prepared by: K. Mason

Lawton Valley Hours of Operation - May 2009 through April 2010

Date	Running	Shut down	Date	Running	Shut down	Date	Running	Shut down
1-May	24.00	0.00	1-Jun	16.00	8.00	1-Jul	16.00	8.00
2-May	20.50	3.50	2-Jun	24.00	0.00	2-Jul	15.50	8.50
3-May	24.00	0.00	3-Jun	24.00	0.00	3-Jul	15.50	8.50
4-May	18.25	5.75	4-Jun	23.50	0.50	4-Jul	15.00	9.00
5-May	19.50	4.50	5-Jun	15.50	8.50	5-Jul	15.50	8.50
6-May	18.00	6.00	6-Jun	15.00	9.00	6-Jul	16.00	8.00
7-May	18.00	6.00	7-Jun	15.50	8.50	7-Jul	22.50	1.50
8-May	15.00	9.00	8-Jun	16.00	8.00	8-Jul	14.50	9.50
9-May	15.50	8.50	9-Jun	16.50	7.50	9-Jul	16.50	7.50
10-May	16.00	8.00	10-Jun	13.00	11.00	10-Jul	16.00	8.00
11-May	20.50	3.50	11-Jun	23.50	0.50	11-Jul	15.50	8.50
12-May	17.00	7.00	12-Jun	15.50	8.50	12-Jul	15.25	8.75
13-May	12.00	12.00	13-Jun	15.50	8.50	13-Jul	15.00	9.00
14-May	15.50	8.50	14-Jun	15.50	8.50	14-Jul	19.50	4.50
15-May	15.00	9.00	15-Jun	16.00	8.00	15-Jul	19.00	5.00
16-May	15.50	8.50	16-Jun	17.50	6.50	16-Jul	23.50	0.50
17-May	14.00	10.00	17-Jun	18.50	5.50	17-Jul	15.50	8.50
18-May	14.75	9.25	18-Jun	17.75	6.25	18-Jul	16.00	8.00
19-May	16.00	8.00	19-Jun	15.50	8.50	19-Jul	17.50	6.50
20-May	17.50	6.50	20-Jun	16.00	8.00	20-Jul	16.50	7.50
21-May	15.50	8.50	21-Jun	15.50	8.50	21-Jul	19.00	5.00
22-May	15.50	8.50	22-Jun	16.00	8.00	22-Jul	15.00	9.00
23-May	16.00	8.00	23-Jun	17.50	6.50	23-Jul	16.00	8.00
24-May	16.25	7.75	24-Jun	16.00	8.00	24-Jul	14.50	9.50
25-May	15.00	9.00	25-Jun	16.50	7.50	25-Jul	16.00	8.00
26-May	21.00	3.00	26-Jun	15.50	8.50	26-Jul	16.50	7.50
27-May	17.00	7.00	27-Jun	15.50	8.50	27-Jul	12.00	12.00
28-May	20.00	4.00	28-Jun	15.00	9.00	28-Jul	24.00	0.00
29-May	15.50	8.50	29-Jun	16.00	8.00	29-Jul	24.00	0.00
30-May	15.50	8.50	30-Jun	17.50	6.50	30-Jul	17.50	6.50
31-May	15.50	8.50				31-Jul	16.00	8.00
<b>Total</b>	<b>529.25</b>	<b>214.75</b>	<b>Total</b>	<b>511</b>	<b>209</b>	<b>Total</b>	<b>527</b>	<b>217</b>

Lawton Valley Hours of Operation - May 2009 through April 2010

Date	Running	Shut down	Date	Running	Shut down	Date	Running	Shut down
1-Aug	23.50	0.50	1-Sep	19.00	4.50	1-Oct	23.00	0.50
2-Aug	16.50	7.50	2-Sep	20.50	3.50	2-Oct	16.00	8.00
3-Aug	16.50	7.50	3-Sep	20.50	3.50	3-Oct	15.50	8.50
4-Aug	24.00	0.00	4-Sep	16.00	8.00	4-Oct	18.00	6.00
5-Aug	24.00	0.00	5-Sep	24.00	0.00	5-Oct	24.00	0.00
6-Aug	24.00	0.00	6-Sep	20.00	4.00	6-Oct	21.00	3.00
7-Aug	24.00	0.00	7-Sep	17.00	7.00	7-Oct	23.50	0.50
8-Aug	16.00	8.00	8-Sep	24.00	0.00	8-Oct	16.00	8.00
9-Aug	23.50	0.50	9-Sep	24.00	0.00	9-Oct	23.50	0.50
10-Aug	17.00	7.00	10-Sep	23.50	0.50	10-Oct	15.50	8.50
11-Aug	24.00	0.00	11-Sep	15.00	9.00	11-Oct	16.75	7.25
12-Aug	24.00	0.00	12-Sep	24.00	0.00	12-Oct	16.00	8.00
13-Aug	23.50	0.50	13-Sep	17.00	7.00	13-Oct	24.00	0.00
14-Aug	15.00	9.00	14-Sep	17.00	7.00	14-Oct	19.00	5.00
15-Aug	24.00	0.00	15-Sep	24.00	0.00	15-Oct	18.00	6.00
16-Aug	20.00	4.00	16-Sep	24.00	0.00	16-Oct	18.00	6.00
17-Aug	17.00	7.00	17-Sep	24.00	0.00	17-Oct	15.50	8.50
18-Aug	24.00	0.00	18-Sep	16.00	8.00	18-Oct	16.00	8.00
19-Aug	24.00	0.00	19-Sep	24.00	0.00	19-Oct	15.75	8.25
20-Aug	24.00	0.00	20-Sep	17.00	7.00	20-Oct	23.50	0.50
21-Aug	23.50	0.50	21-Sep	24.00	0.00	21-Oct	16.00	8.00
22-Aug	17.00	7.00	22-Sep	24.00	0.00	22-Oct	15.00	9.00
23-Aug	23.50	0.50	23-Sep	24.00	0.00	23-Oct	11.75	12.25
24-Aug	17.00	7.00	24-Sep	23.50	0.50	24-Oct	15.50	8.50
25-Aug	24.00	0.00	25-Sep	16.00	8.00	25-Oct	14.50	9.50
26-Aug	24.00	0.00	26-Sep	24.00	0.00	26-Oct	13.00	11.00
27-Aug	23.50	0.50	27-Sep	17.00	7.00	27-Oct	16.50	7.50
28-Aug	14.50	9.50	28-Sep	24.00	0.00	28-Oct	13.50	10.50
29-Aug	24.00	0.00	29-Sep	24.00	0.00	29-Oct	11.00	13.00
30-Aug	15.50	8.50	30-Sep	24.00	0.00	30-Oct	13.50	10.50
31-Aug	16.50	7.50				31-Oct	13.00	11.00
<b>Total</b>	<b>651.5</b>	<b>92.5</b>	<b>Total</b>	<b>635</b>	<b>85</b>	<b>Total</b>	<b>532</b>	<b>212</b>

Lawton Valley Hours of Operation - May 2009 through April 2010

Date	Running	Shut down	Date	Running	Shut down	Date	Running	Shut down
1-Nov	14.50	9.50	1-Dec	9.00	15.00	1-Jan	12.00	11.50
2-Nov	15.75	8.25	2-Dec	10.50	13.50	2-Jan	12.75	11.25
3-Nov	11.00	13.00	3-Dec	10.50	13.50	3-Jan	13.75	10.25
4-Nov	5.50	18.50	4-Dec	6.50	17.50	4-Jan	15.00	9.00
5-Nov	12.00	12.00	5-Dec	12.50	11.50	5-Jan	17.50	6.50
6-Nov	14.50	9.50	6-Dec	12.00	12.00	6-Jan	13.00	11.00
7-Nov	14.50	9.50	7-Dec	10.50	13.50	7-Jan	13.50	10.50
8-Nov	14.00	10.00	8-Dec	12.00	12.00	8-Jan	13.00	11.00
9-Nov	10.50	13.50	9-Dec	9.00	15.00	9-Jan	14.75	9.25
10-Nov	11.00	13.00	10-Dec	9.50	14.50	10-Jan	14.75	9.25
11-Nov	12.50	11.50	11-Dec	9.50	14.50	11-Jan	15.00	9.00
12-Nov	9.50	14.50	12-Dec	12.50	11.50	12-Jan	13.50	10.50
13-Nov	12.75	11.25	13-Dec	12.50	11.50	13-Jan	10.50	13.50
14-Nov	11.50	12.50	14-Dec	9.50	14.50	14-Jan	10.50	13.50
15-Nov	12.50	11.50	15-Dec	10.50	13.50	15-Jan	12.00	12.00
16-Nov	8.50	15.50	16-Dec	10.50	13.50	16-Jan	12.50	11.50
17-Nov	13.00	11.00	17-Dec	10.50	13.50	17-Jan	12.50	11.50
18-Nov	8.00	16.00	18-Dec	11.00	13.00	18-Jan	12.50	11.50
19-Nov	13.50	10.50	19-Dec	11.00	13.00	19-Jan	10.50	13.50
20-Nov	11.50	12.50	20-Dec	10.50	13.50	20-Jan	10.00	14.00
21-Nov	9.00	15.00	21-Dec	7.50	16.50	21-Jan	10.00	14.00
22-Nov	12.75	11.25	22-Dec	9.50	14.50	22-Jan	9.00	15.00
23-Nov	10.50	13.50	23-Dec	11.75	12.25	23-Jan	11.50	12.50
24-Nov	11.00	13.00	24-Dec	10.50	13.50	24-Jan	11.50	12.50
25-Nov	10.50	13.50	25-Dec	5.50	18.50	25-Jan	8.50	15.50
26-Nov	9.50	14.50	26-Dec	12.50	11.50	26-Jan	13.00	11.00
27-Nov	9.50	14.50	27-Dec	12.50	11.50	27-Jan	11.00	13.00
28-Nov	12.50	11.50	28-Dec	10.00	14.00	28-Jan	10.00	14.00
29-Nov	12.00	12.00	29-Dec	11.50	12.50	29-Jan	9.50	14.50
30-Nov	9.00	15.00	30-Dec	12.00	12.00	30-Jan	11.50	12.50
			31-Dec	10.50	13.50	31-Jan	12.50	11.50
<b>Total</b>	<b>342.75</b>	<b>377.25</b>	<b>Total</b>	<b>324</b>	<b>420</b>	<b>Total</b>	<b>378</b>	<b>366</b>

Lawton Valley Hours of Operation - May 2009 through April 2010

Date	Running	Shut down	Date	Running	Shut down	Date	Running	Shut down
1-Feb	14.00	10.00	1-Mar	9.50	14.50	1-Apr	14.00	9.50
2-Feb	14.50	9.50	2-Mar	10.00	14.00	2-Apr	14.75	9.25
3-Feb	8.50	15.50	3-Mar	10.00	14.00	3-Apr	16.00	8.00
4-Feb	7.00	17.00	4-Mar	9.00	15.00	4-Apr	17.00	7.00
5-Feb	13.00	11.00	5-Mar	10.50	13.50	5-Apr	14.50	9.50
6-Feb	12.50	11.50	6-Mar	11.50	12.50	6-Apr	15.00	9.00
7-Feb	11.50	12.50	7-Mar	11.00	13.00	7-Apr	18.00	6.00
8-Feb	9.00	15.00	8-Mar	7.50	16.50	8-Apr	16.50	7.50
9-Feb	13.00	11.00	9-Mar	12.00	12.00	9-Apr	11.50	12.50
10-Feb	7.50	16.50	10-Mar	13.00	11.00	10-Apr	12.50	11.50
11-Feb	9.50	14.50	11-Mar	10.50	13.50	11-Apr	11.75	12.25
12-Feb	8.00	16.00	12-Mar	12.50	11.50	12-Apr	12.00	12.00
13-Feb	12.75	11.25	13-Mar	14.75	9.25	13-Apr	11.50	12.50
14-Feb	12.50	11.50	14-Mar	14.00	10.00	14-Apr	15.00	9.00
15-Feb	11.00	13.00	15-Mar	12.75	11.25	15-Apr	13.00	11.00
16-Feb	9.50	14.50	16-Mar	13.00	11.00	16-Apr	14.50	9.50
17-Feb	11.00	13.00	17-Mar	10.75	13.25	17-Apr	12.50	11.50
18-Feb	9.00	15.00	18-Mar	13.75	10.25	18-Apr	14.25	9.75
19-Feb	11.00	13.00	19-Mar	12.00	12.00	19-Apr	13.00	11.00
20-Feb	12.00	12.00	20-Mar	12.50	11.50	20-Apr	17.00	7.00
21-Feb	12.25	11.75	21-Mar	14.00	10.00	21-Apr	15.00	9.00
22-Feb	10.25	13.75	22-Mar	15.00	9.00	22-Apr	18.00	6.00
23-Feb	14.00	10.00	23-Mar	11.25	12.75	23-Apr	14.00	10.00
24-Feb	9.00	15.00	24-Mar	13.00	11.00	24-Apr	14.75	9.25
25-Feb	7.00	17.00	25-Mar	13.75	10.25	25-Apr	14.50	9.50
26-Feb	8.00	16.00	26-Mar	10.75	13.25	26-Apr	15.00	9.00
27-Feb	12.50	11.50	27-Mar	14.25	9.75	27-Apr	16.00	8.00
28-Feb	12.00	12.00	28-Mar	13.50	10.50	28-Apr	16.25	7.75
			29-Mar	11.50	12.50	29-Apr	14.50	9.50
			30-Mar	11.50	12.50	30-Apr	14.50	9.50
			31-Mar	10.25	13.75			
<b>Total</b>	<b>301.75</b>	<b>370.25</b>	<b>Total</b>	<b>369.25</b>	<b>374.75</b>	<b>Total</b>	<b>437</b>	<b>283</b>

Lawton Valley Water Produced Available For Sale vs. PWFD Sales - May 2009 through April 2010

	A	B	C	((A-B)/A X C
<b>Date</b>	<b>WPAFS (gallons)</b>	<b>PWFD sales (gallons)</b>	<b>LV hours of Oper.</b>	<b>LV estimated hours of oper. excluding PWFD sales</b>
May-09	105,586,900	34,280,000	529.25	357.4
Jun-09	100,695,000	46,840,000	511.00	273.3
Jul-09	108,373,300	35,810,000	527.00	352.9
Aug-09	139,731,200	44,600,000	651.50	443.6
Sep-09	130,567,300	40,019,888	635.00	440.4
Dec-09	105,873,800	33,320,000	532.00	364.6
Nov-09	66,760,900	35,840,000	342.75	158.7
Dec-09	60,515,400	28,140,000	324.00	173.3
Jan-10	69,775,900	32,280,000	378.00	203.1
Feb-10	55,105,600	31,400,000	301.75	129.8
Mar-10	66,838,200	25,750,000	369.25	227.0
Apr-10	80,837,400	28,160,000	437.00	284.8

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**Set 1**

**PUC 1-3:** On page 4 of her Direct Testimony, Ms. Forgue indicates that NWD has committed to replace the Lawton Valley WTP by December 31, 2014.

- a. Please provide a timeline of the steps that are required to meet the 12/31/14 deadline?
- b. Please identify any issues, events, conditions that NWD is aware of that would put the 12/31/14 deadline in jeopardy
- c. Please identify any consequences that will occur in the event the 12/31/14 deadline is not met.
- d. Please provide an estimate of the cost for the new treatment plant.
- e. Please provide an estimate of the effect on rates the new plant will have.
- f. When does NWD expect to seek a rate increase to fund the new plant?

**Response:**

a. The timeline of steps is as follows:

- October 2010 - Issue Request for Proposals (RFP) to the 3 shortlisted Design/Build Firms
- March 2011- Proposals Due
- September/October 2011- Design/Build Contract Award
- December 2014 - Contract completion

b. The 12/31/14 deadline may have to be extended if additional time is required by the regulatory agencies to complete their review process.

c. If there is a delay due to unforeseen circumstances, the City would request a time extension from RIDOH. The Consent Agreement allows the RIDOH to defer any compliance dates for good cause.

d. The estimated cost for the Design Build Project, which includes the new Lawton Valley Water Treatment Plant and the upgrades to the Station 1 Plant, is currently estimated at \$83 million to \$86 million.

e. Depending on a number of variables, including the timing of the actual expenditures, the combination of IFR and debt used to fund the project, the terms of the debt used to fund the project, and assuming all other costs remain the same, rates required to support the completion of the project, could be 30% to 60% higher than the rates currently in effect.

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f. The rate increases necessary to fund this project are likely to occur in phases. It is likely that Newport Water will file an application to increase rates to fund some of the preliminary costs of the new treatment plant as early as the fall of 2010. Additionally, it is likely that Newport Water will seek additional rate increases associated with the funding of the new treatment plant in 2011 through 2013.

Prepared by: J. Forgue

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**Set 1**

**PUC 1-4:** Please explain the reason(s) behind the large number of non-scheduled estimated quarterly bills (12,110) referenced in the response to PWFD 6-1.

**Response:** Of the 12,110 non-scheduled estimated quarterly bills, 3,243 (27%) were in two billing periods (February 2009 and July 2009). The readings for these billing periods were done in two months when there was a shortage of meter readers due to illness or retirement.

The readings for the February 2009 billings were done in January 2009 and included 1,677 non-scheduled estimates. In January 2009, one of the three meter reading positions was open for the entire month due to a retirement, which was not filled until February.

The readings for the July 2009 billings were done in June 2009 and included 1,566 non-scheduled estimates. One of the three meter readers was out due to illness for the entire month of June.

The other principal reason for non-scheduled estimates is lack of access to meters.

Prepared by: R. Esten

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**Response to**  
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**Set 1**

**CERTIFICATION**

I hereby certify that on June 4, 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.

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone/Fax</b>
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**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**  
**DOCKET NO. 4128**  
**City Of Newport - Utilities Division - Water Department**  
**Response to**  
**The Rhode Island Public Utilities Commission's Data Requests**  
**Set 1**

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