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RHODE ISLAND & MASSACHUSETTS

December 24, 2009

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 and original and nine copies of Newport Water's response to Portsmouth Water and Fire District'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
Portsmouth Water and Fire District's Data Requests
Set 1

PWFD 1-1: Why does the cost of service study combine so many line items that have been presented as individual line items in previous submissions? Does Mr. Smith believe that a portion of chemical and power costs within the treatment categories are maximum day and maximum hour related?

Response: The cost of service study uses an allocation approach that allocates costs from functional categories that correspond to the major functions performed by Newport Water. Since Newport Water budgets and tracks costs in accounts that correspond with the major functional categories all costs in each account are generally treated in a similar fashion during the allocation process.

Yes, I do believe that a portion of chemical and power costs within the treatment categories are maximum day and maximum hour related as reflected in the allocation of costs for the two treatment cost accounts.

Prepared by: Harold J. Smith

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Response to
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PWFD 1-2: Why are the service line costs within T&D not allocated to the meters portion of the billing charge?

Response: The portion of Newport Water's capital costs associated with meters and services are allocated to the meters portion as shown on RFC Schedule B-5. As for the O&M costs associated with services, Newport Water does not maintain records that would allow for an accurate determination of T&D costs specifically associated with services. While it would have been possible to estimate the costs associated with services there is no guarantee that the resulting rates would be a more accurate reflection of the true cost of service than the proposed rates.

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City Of Newport - Utilities Division - Water Department

Response to

Portsmouth Water and Fire District's Data Requests

Set 1

PWFD 1-3: Referring to the footnote on RFC B-7, did Mr. Smith use the non-coincident or coincident basis to derive demand factors? Please explain the basis for the choice.

Response: Demand factors were derived using non-coincident demand. This approach was used because it should result in fair and equitable rates for all customer classes that recognize the peak demands that each class places on the system.

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PWFD 1-4: Does Newport contend that the periods used in the demand data calculations (2007 – 2009) are typical or normal years in terms of customer demands? If so, what is the basis for this contention? If not, what does Newport propose to do in order to reflect normal or typical demands?

Response: The periods used in the demand data calculations are as normal or typical as any period in terms of customer demands. When data from this period is considered in conjunction with demand data from the previous six years it is obvious that the data from this period reflects the general downward trend in consumption that many Rhode Island utilities have experienced over the past decade. While consumption during this period was likely influenced by weather, this response to weather conditions is normal. To recognize that demand patterns may have been abnormally impacted by unusual weather during the three year period from which data was used for the cost of service study, particularly the second half of FY 2009, customer class demand factors were developed using the average demand during the period. While it may have been possible to “normalize” demand for each of the individual years during this period, the process of normalization would have required the use of unsubstantiated assumptions regarding demand and would not have resulted in a more accurate cost of service study.

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PWFD 1-5: The Settlement in Docket 3578 stated: "The parties agree that Newport's cost allocation study in this Docket does not seek to charge Portsmouth with transmission, distribution or peak costs associated with supply or treatment. However, should Newport seek to charge Portsmouth with such charges in future rate cases, Newport shall be required to submit a demand study with any cost allocation study. The requirements of the demand study shall be established by the experts for the four parties in this Docket. These requirements of the required demand study as agreed to by the parties are incorporated herein and attached hereto as Exhibit 2." Please indicate where in the rate filing Newport has included the demand study described in the settlement (including Exhibit 2 to that settlement) and referred to on page 7 of Mr. Smith's testimony. If Newport contends that the customer billing and production data and derivation of demand factors using this data is the "demand study" please provide a copy of any and all correspondence among "the experts for the four parties" that agreed that this data would be used for the agreed upon demand study in Docket 3578 in lieu of that presented in Exhibit 2 of the Settlement.

Response: The results of the demand study are incorporated in the schedules attached to my testimony, and the study is explained in my testimony. An Excel file containing the raw data and the analysis that was performed on that data has been included in the response to PWFD 1-8. As for correspondence among the parties, there were phone conversations that were not reduced to writing along with letters exchanged between the experts. In particular, there were letters sent by me to Messrs. Woodcock, Catlin and Allen on August 4, 2008 and January 12, 2009. In addition, there were letters exchanged by counsel to Newport Water and Portsmouth between these two dates. Portsmouth is in possession of these letters. As such, they have not been reproduced in response to this request.

Prepared by: Harold J. Smith

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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Response to

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PWFD 1-6: Regarding RFC D-3 (Production Summary), are the maximum day and maximum hourly values for Lawton Valley the volumes delivered from the treatment facility to storage (4mg and/or 2 mg) or are they the volumes delivered into the system? If they are not the volumes delivered into the system after storage, please provide the same information presented on RFC D-3 presenting the volumes delivered into the system (net of additions to storage and withdrawals from storage).

Response: The values on RFC Schedule D-3 represent water delivered from the Lawton Valley plant to the 4MG tank and the 2MG standpipe. The volumes delivered to the system net of additions to and withdrawals from storage are shown on the attached schedule. Tank withdrawal and addition volume estimates are based on daily tank level logs.

Prepared by: Harold J. Smith

Docket No. 4128
Response to PWFD DR 1-6
Net Water Delivered To System from Lawton Valley

MAX DAY PRODUCTION AVAILABLE FOR SALE

		Lawton Valley	
		Max Day Production	
		Date	In Gallons
<u>FY 07 JULY 2006 - JUNE 2007</u>		8/14/2006	
	Water Produced and Available for Sale		5,958,100
	4MG Tank Withdrawal/(Addition)		-560,000
	2MG Standpipe Withdrawal/(Addition)		133,500
	Net Water Delivered To System		5,531,600
<u>FY 08 JULY 2007 - JUNE 2008</u>		6/10/2008	
	Water Produced and Available for Sale		6,805,400
	4MG Tank Withdrawal/(Addition)		-520,000
	2MG Standpipe Withdrawal/(Addition)		-80,100
	Net Water Delivered To System		6,205,300
<u>FY 09 JULY 2008 - JUNE 2009</u>		7/18/2008	
	Water Produced and Available for Sale		7,845,700
	4MG Tank Withdrawal/(Addition)		-580,000
	2MG Standpipe Withdrawal/(Addition)		Data Not Available
	Net Water Delivered To System		7,265,700

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PWFD 1-7: Please explain how the peak hourly flow from Lawton Valley is exactly at a rate of 8.0 mgd (333,333 gallons/ hour) every year yet varies as to the day it occurs. Are there other days of the year when the peak hourly volume is also at a rate of 8.0 mgd? If so, what days were those?

Response: Peak hourly flow at Lawton Valley occurs when the 6MGD and 2MGD fixed rate pumps are operated concurrently for a one hour period thus producing a flow rate of 333,333 gallons/hour. System demands rarely require this type of operation and it appears that it was required only once a year during FY 07, FY08 and FY09.

Prepared by: Harold J. Smith

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PWFD 1-8: Regarding RFC D-8 in the Excel spreadsheet that was provided, please provide all the analyses and workpapers from the demand study that formed the basis for the results reported in that schedule. How did Newport derive the average day and maximum day values for each of the four customer classes?

Response: An electronic copy of the file "Demand Study Daily reads 10-02-09 Analysis" is provided with this response. Note that this file has not been formatted for printing. This Excel file consists of 12 worksheets.

The first worksheet "Raw Data" is the raw data from the daily read program conducted from May through September of 2009.

On the next four sheets ("Residential", "Commercial", "Navy" and "PWFD"), the raw data has been segregated by customer class. Although the meter serving PWFD was not included in the daily read program, daily water purchase data provided by PWFD for the sampling period was used to create the sheet for PWFD. On these four sheets, columns have been inserted at the end of the data for each month such that the monthly data for each account could be summarized and demand statistics for each month could be calculated. At the far right of these sheets, demand by day of the week has been tabulated. This demand by day of the week data was extracted from these sheets to create the tables that are included in the response to PWFD 1-15.

The next sheet, "Summary", is a summary of the data by month for each account for the retail customer classes and the two wholesale customers. The next three sheets ("Res Summary", "Comm Summary", and "Wholesale Summary") show the same data shown on the "Summary".

The next three sheets ("Res FY09", "Comm FY09", and "Wholesale FY09") show the calculation of peaking factors using FY 09 billing data for the sample accounts and peak days derived from the daily sample data. This is the information that is shown on RFC Schedule D-8. It should be noted that these peaking factors were not used in the cost of service analysis for the reasons provided in my direct testimony.

Prepared by: Harold J. Smith

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PWFD 1-9: Regarding RFC B-5, the breakdown of fixed assets, please indicate where the Forest Ave pumping station is included. Please identify the fixed asset values of (a) the Forest Ave pumping station (b) the 6mg/day pump station at Lawton Valley (Mason testimony page 5, line 7) and (c) the 2.3 mg/day booster pumps at Station One (Mason testimony page 5, line 13).

Response: The value of the Forest Ave. pumping station is included in the "Treatment Both" line item on RFC Schedule B-5.

The value of the Forest Ave. pumping station is \$20,618. The values of the 6mg/day pump station at Lawton Valley and the 2.3 mg/day booster pumps at Station One are included in the cost of the original plant or are included with other improvements to the plants and therefore the value of these individual components is not known.

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PWFD 1-10: Regarding the Demand Data Extracts from Detailed Database in the Excel spreadsheet provided (Demand Detail Tab), what is the source of the estimated monthly demand data for each class? Does Mr. Smith contend that the maximum monthly residential demand for Newport's residential customers occurs in October or November every year? Please explain why the Navy has a peak monthly demand in January 2009 whereas the January demands in 2007 and 2008 are among the lowest.

Response: The data for the retail customer classes and the Navy is derived from Newport Water's customer billing data. The data for PWFD is from spreadsheets provided by PWFD.

No, I do not contend that the residential peak demand occurs in October or November each year, only that October was the peak billing month in FY 2008 and FY 2009 and November was the peak billing month in FY 2009. It is likely that the residential maximum month demand actually occurred in July or August, but due to the billing lag resulting from tertiary billing (in FY 2007) and quarterly billing (FY 2008 and FY 2009) it is not possible to pinpoint the actual peak demand month.

As for the Navy demand in January of 2009, Newport Water's billing data indicates that billed consumption for the Navy was 24,639,928 gallons which is the highest billed demand for the Navy in any month in FY 2009. Why the Navy demanded that amount of water in January is unknown.

Prepared by: Harold J. Smith

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Set 1

PWFD 1-11: Regarding RFC D-4:

- a. What is the source of the FY 2006 annual demand data for each class?
- b. Please explain how the coincident maximum month in each year is September or October, yet the combined maximum production months on RFC D-3 are either July (two years) or August (one year).

Response:

- a. The demand values for FY 2006 in RFC Schedule D-4 are incorrect; however, this data is not used in any way for the cost of service analysis. These cells should be linked to the demand values for FY 2006 shown in RFC Schedule B-6. Unfortunately, incorrect values were hard coded into these cells during the modeling process and the error was not noticed since the data was not being used in the model. Correct values for FY 2006 demand by class are shown on RFC Schedule B-6.
- b. The inconsistency with respect to coincident maximum month as indicated from the billing data and the maximum production months is attributable to the fact that Newport Water bills the majority of its customers on a quarterly basis. As a result, there is a lag between the time at which the water is produced to meet maximum month demand and the time at which bills for the water are issued.

Prepared by: Harold J. Smith

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PWFD 1-12: Regarding the Analysis Using Monthly Bill in the Excel spreadsheet provided (Demand Detail Tab), please explain how the July 2006 monthly commercial demand (37,801,259) can exceed the total demand for July 2006 for commercial accounts presented above it (35,406,980 in cell C10). Also please explain why the monthly commercial accounts can represent some 90-95% of the total commercial demand in some months (Nov 2006, March 2007, June 2008) yet be less than 67% in others (December 2006 November 2008).

Response: It should be noted that the data that this question references is not used in the cost of service analysis and was not included as a schedule in the rate filing. During the initial development of the cost of service model the use of data from monthly only accounts for the development of peaking factors was considered, but was rejected in part due to the reason described on Page 13, lines 9-13 of my direct testimony. Additionally, the query used to extract monthly only data from Newport Water's billing database resulted in discrepancies similar to the ones addressed in this question. Since the idea of using monthly only data was rejected early in the process for the reason cited in my testimony, no additional effort was made to extract the monthly only data from the database and this schedule would have been deleted from the model except for the fact that I wanted to retain the model functionality that allowed for the use of monthly only data in the event it was ever decided to do so.

Prepared by: Harold J. Smith

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PWFD 1-13: Regarding page 3 line 24 to page 4 line 8 of Mr. Mason's testimony:

- a) Did Newport advise or notify any of the other parties (including Mr. Smith) of this docket of the issues that were encountered prior to the preparation and submission of Mr. Mason's testimony? If so, please provide copies of all such notifications related to this issue.
- b) Please provide a list of the 23 (30 – 7) commercial accounts that were initially identified but not used in the study. Please provide a listing of the 31 replacement commercial accounts that were used. For each of the initial 23 that were replaced and each of the 31 replacement accounts please provide: (i) account address; (ii) account number; (iii) meter size; and (iv) the annual water use for a two year period (annual amount for each of the years) for each of these accounts on an individual basis.
- c) Please provide a list of the 50 (130 – 80) residential accounts that were initially identified but not used in the study. Please provide a listing of the 27 replacement residential accounts that were used. For each of the initial 50 that were replaced and each of the 27 replacement accounts please provide: (i) account address; (ii) account number; (iii) meter size; and (iv) the annual water use for a two year period (annual amount for each of the years) for each of these accounts on an individual basis.

Response:

- a. Newport did not notify any parties prior to the preparation of the testimony for this Cost of Service Study. Mr. Smith was notified of the issues prior to the preparation and submission of Mr. Mason's testimony. The notification was done orally.
- b. Please see attached Excel spreadsheet for commercial data.
- c. Please see attached Excel spreadsheet for residential data.

Prepared by: K. Mason

City of Newport Water Department Docket No. 4128

PWFD 1-13 (b)

Initial commercial accounts not used in the study

Account #	Size	Service Address	FY08 consumption	FY09 consumption
B001-24000	5/8"	109 Long Wharf	376020	195120
B006-22205	5/8"	198 Thames St	73474	107001
B006-22400	5/8"	202 Thames St U-5	154442	134088
B008-23611	5/8"	Christies Whf U-9	8000	5190
B009-05300	5/8"	2 Perry St	45000	61000
B014-11210	5/8"	111 Broadway	105000	83170
B078-20700	3"	49 Americas Cup Ave.	6408230	5913856
073-24610	1"	348 Thames St	1641000	1523000
B022-36600	1-1/2"	590 Ocean Ave	644500	711073
B023-02101	3/4"	220 Bellevue Ave	9810	14561
078-01719	2"	Commercial Whf	550000	600000
B040-07800	5/8"	390 West Main Rd U-1 South	6074	61131
B046-03900	5/8"	753 East Main Rd	151421	94428
078-02492	1-1/2"	Bannisters Wharf	408714	455798
078-00110	1-1/2"	West Wind Marina	1000	412705
B072-05320	2"	19 Third Beach Rd	136787	135700
B078-00900	2"	10 Brown & Howard Whf	704800	510377
B078-03300	2"	49 Touro St	76000	166300
078-01900	1"	9 Sayer's Wharf	1669770	1791293
079-03510	1-1/2"	159 West Main Rd	958500	624800
B078-20506	2"	119 Long Whf	590000	460000
078-09703	2"	Touro St	2555568	2390532
011-16600	5/8"	23 Lucas Ave	11840	13950

Replacement commercial accounts used in the study

Account #	Size	Service Address	FY08 consumption	FY09 consumption
078-12733	5/8"	199 Connell Hwy West	17160	17085
078-12734	5/8"	199 Connell Hwy	5590	8149
078-12738	5/8"	199 Connell Hwy	36380	44090
078-12747	5/8"	199 Connell Hwy	1100	3532
078-12751	5/8"	199 Connell Hwy	5340	27677
078-03501	5/8"	Marlbrough St	327120	297812
078-03610	5/8"	26 Marlborough St	512080	481688
001-19200	3/4"	62 - 64 Bridge St	175100	126110
078-06708	5/8"	270 Bellevue Ave	7000	5779
078-06709	5/8"	268 Bellevue Ave	70000	10354
078-06720	5/8"	260 Bellevue Ave	133670	41280
078-06730	5/8"	258 Bellevue Ave	212200	297995
078-06751	5/8"	266 Bellevue Ave	3032	158539
023-01200	5/8"	196 Bellevue Ave	2762	3051
023-01201	5/8"	198 Bellevue Ave	9556	6958
023-01300	5/8"	200 Bellevue Ave	7540	9113
023-01400	5/8"	202 Bellevue Ave	3270	4379
023-02400	5/8"	1 Casino Ter	0	2
023-02401	5/8"	1 Casino Ter	26149	24654
023-02402	5/8"	1 Casino Ter	4810	2389
023-02403	5/8"	1 Casino Ter	26512	10072
023-02404	5/8"	1 Casino Ter	136835	52485
023-02405	5/8"	1 Casino Ter	40702	15914
023-02406	5/8"	1 Casino Ter	73281	102555
078-06704	5/8"	East Bowery St	32510	35025
078-09260	5/8"	17 Chapel St	18000	41747
078-10800	5/8"	328 Broadway	14590	12733
032-01702	3/4"	12 St Georges Ave	44690	74740
036-17000	1"	2009 West Main Rd	28441	14371
046-04400	3/4"	1105 East Main Rd	8839	4821
046-12326	5/8"	307 Oliphant Ln	2440	2270

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PWFD 1-13 (c)

Initial residential accounts not used in the study

Account #	Size	Service Address	FY08 consumption	FY09 consumption
B001-07060	5/8"	58-60 Washington St U-6	9000	14980
B001-11600	5/8"	7 Elm St	62000	63000
B001-16600	5/8"	13-1/2 Third St	13300	11330
B002-05500	5/8"	33 Third St U-2	29000	27485
B002-08100	5/8"	29 Willow St U-2	29000	34382
B004-13700	5/8"	5 Warner St U-2	54550	52224
B004-20820	5/8"	82 Broadway	136340	118880
B004-20877	5/8"	7 A Marcus WHTLD BLVD	55530	49640
B005-01610	5/8"	41 Gould St	54028	48172
B005-07201	5/8"	8 Stewart St	52566	44290
B005-14000	5/8"	14 Pearl St	107000	85000
B006-17200	5/8"	95 Spring St	46294	40259
B007-02600	1"	141 Pelham St	228000	159060
B008-10400	3/4"	42 Golden Hill St	91930	66910
B008-13800	5/8"	277 Spring St U-1	53000	81000
B009-03259	3/4"	31 Coddington LNDG HSE	99000	75903
B009-07101	5/8"	22 Perry St HSE	1000	400
B009-21500	3/4"	19 Howard St	71000	78199
B011-06300	5/8"	21 Marchant St	61000	72000
B011-10703	5/8"	659 Thames St	19000	23155
B011-23800	5/8"	34 Roseneath Ave	5000	6000
B014-15500	5/8"	43 Cranston Ave	65000	46000
B016-22300	5/8"	30 Bull St	4000	10500
B019-06720	5/8"	9 Burdick Ave	103041	91897
B019-07300	5/8"	25 Burdick Ave	52000	48000
B022-38514	5/8"	15 Hammersmith Rd U-22	42000	36250
B022-38523	3/4"	17 Hammersmith Rd U-14	12000	16000
B022-38531	5/8"	15 Hammersmith Rd U-6	12926	18361
B022-39423	3/4"	127 Harrison Ave U-10	44704	88979
B023-12500	5/8"	75 Annadale RD	17038	17962
B025-06943	5/8"	23 Atlantic Dr	56000	57503
B027-01005	3/4"	37 Shore Dr	11893	64533
B027-08200	5/8"	6 Sunset Hill Rd	41468	46242
B027-12700	5/8"	6 Stimpson St	31000	24000
B031-01699	5/8"	110 Center Ave	72000	82610
B031-02295	5/8"	46 Allston Ave	51000	46000
B032-01702	3/4"	12 St Georges Ave	44690	74740
B034-07400	5/8"	247 West Main Rd	29155	52814
B036-06800	3/4"	362 Forest Ave	70000	38625
B036-17000	1"	2009 West Main Rd	28441	14371
B037-00160	3/4"	87 Gosset's Turn Dr	130000	118500
B037-09700	3/4"	2 Colony Dr	20000	26000
B037-11807	3/4"	146 Corporate Pl	45000	47000
B039-05800	5/8"	12 Yarnell Ave	67000	63000
B040-00500	5/8"	10 Leal Ter	7618	1120
B042-07700	5/8"	15 Shangri La Ln	61000	54000
B043-00300	5/8"	1 Bliss Mine Rd	106220	38440
B046-04400	3/4"	1105 East Main Rd	8839	4821
B047-00100	3/4"	101 Corey Ln	25000	22847
B202-31500	5/8"	13 Thurston Ave	68000	38000

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PWFD 1-13 (c)

Replacement residential accounts used in the study

Account #	Size	Service Address	FY08 consumption	FY09 consumption
001-07050	5/8"	58 Washington St	59000	42400
001-17300	5/8"	31 Bridge St	41370	66940
001-17301	5/8"	31 Bridge St	32756	13500
003-15500	5/8"	98 Third St	17485	3865
003-25000	5/8"	6 Pine St	73895	24511
003-26000	5/8"	19 Cherry St	38253	23147
005-02000	5/8"	34 Gould St	44000	7440
005-22200	5/8"	78 Callendar Ave	108760	60980
007-19800	5/8"	21 John St	49234	77812
009-01000	5/8"	20 West Extension St	13080	11747
009-25900	5/8"	27 Young St	37596	20033
009-26000	5/8"	27 Young St	61317	17498
014-15600	5/8"	70 Kay St	17000	13000
015-24700	5/8"	66 Praire Ave	29615	28820
015-33430	3/4"	183 Eustis Ave	56170	63830
017-15000	5/8"	11 Gould St	100995	47666
018-15310	5/8"	65 - 67 Garfield St	49675	40112
019-02600	5/8"	21 Russell Ave	59749	50747
021-37900	5/8"	9 Eastnor Rd	51401	40040
022-19300	5/8"	211 Coggeshall Ave	162878	40300
022-40500	1"	20 Brenton Rd	53220	37693
022-41200	3/4"	124 Harrison Ave	35590	425700
025-19310	5/8"	395A Valley Rd	56470	49060
031-01600	5/8"	117 Center Ave	75770	82950
043-08010	3/4"	7 Boulevard East	45760	39872
050-06900	5/8"	92 John Kesson Ln	27000	33000
010-06600	5/8"	24 Byrnes St	47030	70220

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PWFD 1-14: Regarding RFC B-7, does Mr. Smith agree that page 297 of the referenced AWWA Manual suggests that:

- a) the “highest ratio of system maximum-day demand to system average-day demand over the most recent five year period” be used? Did Mr. Smith use a three year average rather than the highest ratio?
- b) “the system maximum-month production or treatment plant output for that year” be used (emphasis added)? Did Mr. Smith use an average rather than “that year”?
- c) “the system maximum-hour demand for that year” be used (emphasis added)? Did Mr. Smith use an average rather than “that year”?
- d) “(t)he customer billing records necessary to complete the analysis are the monthly billed consumption records...” (emphasis added)? Did Mr. Smith use quarterly or tri-annual billed consumption records rather than monthly billed consumption records for his analysis? When did Newport begin quarterly billing (rather than tri-annual)? Does Newport estimate one reading every year, or are all the quarterly readings actual?
- e) if monthly data is not used the results will “likely be less accurate”?

Responses:

- a. I agree that the M-1 Manual suggests that the “highest ratio of system maximum-day demand to system average-day demand over the most recent five year period” be used. The cost of service study uses a three year average as shown on RFC Schedule B-7.
- b. I agree that the M-1 Manual suggests that “the system maximum-month production or treatment plant output for that year” be used. As indicated on RFC Schedule B-7 and in my response to PWFD-14a., an average system maximum-month was used.
- c. I agree that the M-1 Manual suggests that “the system maximum-hour demand for that year” be used. I used an average.
- d. I agree that the M-1 Manual suggests that “(t)he customer billing records necessary to complete the analysis are the monthly billed consumption records...”. Since Newport Water does not bill the majority of its customer on a monthly basis, the analysis uses data that is a combination of monthly and quarterly data. Additionally, since Newport Water did not start billing quarterly until October of 2007, the data for FY 2007 includes data from

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accounts that were billed three times a year. For accounts that are not equipped with radio read devices, one of the quarterly reads each year is estimated. For accounts with radio read devices, all reads are actual.

- e. I agree that the M-1 Manual suggests that if monthly data is not used the results will "likely be less accurate". However, if the cost of service study performed for Newport Water were to rely on monthly data alone, there would be no data for the vast majority of its customers.

Prepared by: Harold J. Smith

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PWFD 1-15: Please provide the calculations that form the basis of the Monthly to Daily Peaking Multipliers in RFC B-8 (column M on spreadsheet).

Response: Data collected during the daily read study was used to develop Monthly to Daily Peaking Multipliers that were in turn used to develop Max Day ratios as shown on RFC Schedule B-8. The usage adjustment factors were developed by compiling day of the week consumption data for each class during the daily sampling period and comparing consumption for the day of the week on which maximum consumption occurred and the average day of the week during the daily sample period. The attached spreadsheet shows these calculations for each class.

Prepared by: Harold J. Smith

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Acct. No.	Residential Consumption by Day During Daily Sample Period						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
001-17300	482	1449	1344	1459	1288	1384	569
001-17301	1787	1543	1521	1417	1159	1647	1573
002-07800	3125	2690	2859	2869	3568	2798	3195
003-15500	1133	1863	2211	1905	2152	1592	1585
003-24810	1788	1741	1462	1453	1367	1572	1576
003-25000	2102	2648	2063	2219	1888	2339	2085
003-26000	2398	1420	1538	1609	1852	2011	2890
022-45400	6500	6000	4700	6100	5500	6200	6000
022-10320	1800	1800	1300	2000	2800	1500	1700
021-37900	3768	2925	3697	2760	3245	3527	3544
022-24200	2099	2109	1912	1979	1751	2009	2072
022-19300	3783	4080	4237	3402	3401	3596	4182
022-40500	5400	5800	6000	6300	6500	7600	8400
022-42530	7321	8178	6991	6011	6481	5710	6917
021-29000	5668	4310	2843	3296	3691	3205	3274
022-41200	4543	4354	3900	3491	3461	4486	4082
022-35116	2743	2733	2872	2591	3018	2990	3338
022-32900	0	5	4	15	4	21	2
022-33400	3255	6653	3541	4321	1672	2951	4773
021-16820	3565	3687	3504	3129	3483	3643	3624
021-16106	1286	1538	814	1320	1519	1551	1436
004-02900	888	1066	552	627	1255	871	931
023-04105	878	1000	1057	881	782	802	930
023-05900	1580	1618	1822	1613	1651	1792	1385
023-24700	1987	1851	1805	1952	1857	1980	1946
024-13100	2752	2826	2604	2566	2688	2850	2786
014-32201	1460	1318	876	1204	1447	2037	1437
022-51990	8820	7515	6922	7090	11286	8105	8736
010-17400	2537	1809	1420	1489	1015	1328	2224
009-07101	20	11	40	20	30	60	30
009-17700	7438	7439	7334	7234	6935	7730	7619
009-19300	5768	5413	5251	5277	5509	5571	5406
009-25900	8197	1228	857	1073	1953	1685	6769
009-26000	1590	1147	437	301	452	2471	1568
006-17903	1528	1176	1096	1865	868	970	1215
005-23200	2672	3112	3254	2563	3076	3211	3384
006-14600	322	385	335	364	452	491	362
006-20600	62	33	75	83	79	67	35
007-19800	4638	4680	4482	4521	4835	4850	4810
008-08010	1968	2319	2297	1767	2554	2343	2833
009-01000	0	0	10	0	0	0	0
010-06600	6302	5899	5854	5675	5803	6131	6035
015-05000	1961	1858	1848	2040	2119	2191	2079
016-18203	4012	4175	3848	3917	3758	4216	4235
014-15600	1109	1108	1073	930	981	1009	1045
015-33430	1765	1261	989	1214	1261	1279	1061

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015-24700	3988	4417	3719	4097	3645	4378	3728
014-21300	2253	2422	2306	2363	2291	2225	2408
019-31000	6762	7061	6052	6860	5661	6190	6709
019-26700	2567	2741	2749	2433	2447	2520	2563
019-22700	281	232	216	353	221	478	369
018-30400	3711	3507	3535	3469	3460	3587	3760
005-17702	1377	1485	1586	1379	1355	1607	1585
005-01801	4962	4936	4561	4552	4543	4966	4942
005-02000	3224	3210	3279	3227	3187	3245	3223
017-15000	5858	5927	5563	5664	5700	6164	6034
018-14300	1368	1344	1345	1288	1335	1360	1369
018-15310	1109	946	770	1096	1024	1078	1120
019-02600	3919	4109	4535	5082	4291	3757	3417
017-12500	6929	6961	6981	6818	6694	7021	7067
012-12200	2215	2110	2167	2233	2300	2295	2250
012-05300	4413	4175	4193	4128	4411	4312	4373
011-20110	10	10	24	6	8	14	14
016-09510	916	899	827	1053	955	915	957
016-11000	3897	3578	3943	3799	3866	4401	4298
005-23000	1860	1726	1745	1787	1766	1967	1983
005-22200	7732	7630	7453	7351	6870	7885	7625
018-13200	2364	2438	2431	2454	2436	2481	2631
018-12900	3423	3400	3437	3453	3365	3587	3380
033-00300	314	244	367	323	209	279	227
040-00843	4607	4625	4653	4743	4686	4821	4962
040-00831	10876	11120	9488	9925	10096	10587	9845
131-23900	1681	741	1009	1058	1144	1097	1829
131-29500	4502	4594	4015	4332	4486	4701	4856
132-62200	1929	1939	1904	1885	1954	1984	2158
203-45310	140	169	117	104	150	100	183
203-47500	3381	3471	3381	3391	3434	3686	3637
203-50600	2005	2005	1906	1938	2073	2098	2068
042-12500	394	328	342	404	326	373	478
042-04000	3956	3930	3810	3796	4024	4210	4234
131-14010	3104	3111	3344	3335	3113	3235	3414
033-05300	105	105	112	130	110	120	100
037-11115	3851	3733	3419	2853	2815	3930	3152
043-00200	616	650	572	605	566	688	653
131-32200	3897	3931	3941	3956	3931	4238	4026
043-08010	4248	4879	3562	3270	4040	4044	3012
041-07600	5009	4520	5205	4679	4960	5440	4867
04-10200	1518	1679	1830	1801	1756	1757	1718
027-01022	1977	1985	2118	1685	1825	1957	2505
031-01600	3594	3308	3471	3602	3311	3909	3515
031-02110	5526	5661	5447	5428	5474	5790	5772
032-00315	5142	4623	3444	2729	3421	5195	6353
031-10810	2196	2260	2133	2161	2162	2249	2150
039-02300	3928	3035	2613	2542	2918	3299	3045
039-07530	2805	2506	2463	2835	2647	2827	2738

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039-09280	3327	3439	3733	3628	3660	3520	4029
039-10601	1845	2014	2009	2042	2057	2079	2037
025-19310	5468	5547	5294	5102	5375	5452	4655
025-02400	2936	3465	2858	3006	2653	3227	4859
029-05411	2322	1439	1841	3159	2011	1979	3800
068-07300	5432	5765	5512	5646	5587	6131	5900
034-07400	12009	11699	11642	11510	11793	12368	11787
037-11807	2272	2053	1586	1801	1438	2282	1962
044-00200	5613	4072	2695	2948	2456	2007	3516
044-02400	5709	4798	4950	4725	4541	4908	5397
044-03017	2363	2384	2253	2140	2003	2203	2277
067-10000	1275	921	2100	1138	892	1434	1864
067-09300	1507	1496	1617	1505	1655	1564	1717
050-06900	230	270	177	270	210	159	143
	343,547	331,551	311,801	312,987	316,239	334,732	346,923

Avg. Day of Week 328,254

Max Day of Week 346,923

Max to Avg. 1.06

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Acct. No.	Commercial Consumption by Day During Daily Sample Period						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
078-12733	1274	1123	1481	1676	1332	1507	1801
078-12734	242	396	404	343	430	441	393
078-12738	197	2648	4025	2166	2958	4416	3787
078-12747	109	131	161	160	137	190	180
078-12751	240	353	374	587	1638	971	1605
078-03501	13266	8241	8192	10141	11216	13820	14395
078-03610	25138	19909	20193	26167	26461	28790	34024
001-19200	11310	10000	14300	18700	11500	27400	12100
078-20551	0	300000	0	0	200000	100000	100000
078-20550	747000	698000	654000	675000	666670	749000	835000
010-01313	0	10	0	10	10	10	0
078-06708	240	341	373	382	392	227	75
078-06709	374	590	533	418	543	498	480
078-06720	881	694	828	857	1357	1450	1091
078-06730	19313	18790	21905	19321	19921	20436	20677
078-06751	15875	19522	10819	13027	11945	11820	19294
078-09502	7259	8860	7004	7412	8569	8725	9092
023-01100	8888	4943	6437	5781	6075	8701	10591
023-01200	315	309	276	282	328	335	373
023-01201	278	349	521	350	354	413	466
023-01300	426	640	662	528	714	644	407
023-01400	133	118	200	139	138	186	126
023-02401	831	1583	1181	1527	1188	1536	1374
023-02402	248	256	236	200	188	263	311
023-02403	650	274	300	303	246	307	1015
023-02404	2	3	1	10	13	13	1
023-02405	1478	1915	1450	1416	1545	1451	1785
023-02406	5651	5666	5620	5771	6425	6949	6963
078-06704	65	2163	4825	2629	3153	3032	61
078-09260	3393	4231	2858	4468	1817	3930	3264
078-10800	1401	1830	1611	1696	1815	1814	1919
079-00130	92000	70000	63000	68000	66000	73000	79000
032-01702	6024	2831	4234	5129	3969	5807	7277
079-07230	12257	12765	14470	13209	12959	15373	14004
079-11200	21000	17010	26000	18010	26010	20000	22000
036-17000	1464	2088	2637	593	762	507	192
046-04400	22	440	483	457	520	431	122
046-12326	30	45	28	13	52	14	34
	999,274	1,219,067	881,622	906,878	1,099,350	1,114,407	1,205,279

Avg. Day of Week 1,060,840
Max Day of Week 1,219,067
Max to Avg. 1.15

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Determination of Monthly to Daily Peaking Multipliers

Acct. No.	Navy Consumption by Day During Daily Sample Period						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
089-01500	3010	3250	2510	2340	2480	2930	3140
089-01300	3400000	3500000	3200000	3500000	3200000	3200000	3400000
089-01200	2231500	1919180	1552220	1685800	1551500	2087100	2395500
089-01700	597810	872440	1116349	890994	796395	797140	587130
089-01900	1900000	2360000	2009000	2093200	2084800	2391000	2176000
089-01901	985300	1504300	1081640	1140790	1154730	959200	818800
089-01902	1960800	2043342	3925738	2846930	2651470	2047540	1648590
089-01400	540000	518000	458000	455000	433000	484800	460200
089-01804	195	164	209	183	165	245	193
Total	11,618,615	12,720,676	13,345,666	12,615,237	11,874,540	11,969,955	11,489,553

Avg. Day of Week 12,233,463

Max Day of Week 13,345,666

Max to Avg. 1.09

PWFD	PWFD Consumption by Day During Daily Sample Period						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
PWFD	26,636,000	28,761,000	26,247,000	24,610,000	28,143,000	28,381,000	29,846,000

Avg. Day of Week 27,517,714

Max Day of Week 29,846,000

Max to Avg. 1.08

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PWFD 1-16: Regarding RFC B-9, please describe the units (gallons/day, gallons/ hour, gallons/ year, etc.) that are used in the “Demand x Peaking Factor” columns for maximum day and maximum hour calculations. Are the units the same for fire protection and all other services? If not, what does Mr. Smith believe the correct value(s) should be so that all classes of use are reported with the same units?

Response: The values shown in the Demand x Peaking Factor column are in 1,000s of gallons. The units are the same for fire protection and all other services.

Prepared by: Harold J. Smith

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PWFD 1-17: Regarding RFC B-1, does Newport contend that employees in the Administrative Division have no oversight or responsibility related to the maximum day or maximum hour functions within the treatment and T&D divisions? Please explain why there are no administrative salary costs assigned to maximum day nor maximum hour.

Response: Newport does not contend that employees in the Administrative Division have no oversight or responsibility related to the maximum day or maximum hour functions within the treatment and T&D divisions. These costs were allocated to the Base cost category and to the Meters and Billing categories because these costs are fixed and do not fluctuate based on the maximum day or maximum hour demands placed on the system.

Prepared by: Harold J. Smith

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PWFD 1-18: Regarding RFC B-2, does Newport contend that there are no administrative costs related to or oversight required for the Transmission and Distribution functions? To whom do the T&D employees report? Are City Services and Data Processing not applicable to any T&D functions, services, or employees? Is the administrative staff removed from any oversight or review of purchasing, constructing, maintaining or operating storage tanks or water mains?

Response: RFC Schedule B-2 shows the allocation of costs from Base/Extra Capacity cost categories to the Base Charge and to customer classes and make no contention with respect to administrative costs related to or oversight required for the Transmission and Distribution functions. It is my understanding that T&D employees report to their direct supervisors who in turn report to both the Deputy Director-Engineering and the Director of Utilities.

It is also my understanding that City Services and Data Processing are applicable to some T&D functions, services, or employees. The costs for City Services and Data Processing are included under the "All other admin costs" line item on RFC Schedule B-1 and are assigned to Base/Extra Capacity cost categories as shown on that schedule.

It is my understanding that the administrative staff does provide oversight and or review with respect to purchasing, constructing, maintaining and operating storage tanks and water mains.

Prepared by: Harold J. Smith

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PWFD 1-19: Please explain the \$81,000 of revenue offset for "Rental of Property". What property is this, to whom is it rented, and what is its purpose?

Response: The property rented is located at 2154 West Main Road, Portsmouth, 219 Reservoir Rd, Middletown and 70 Halsey St, Newport. Lessees for the first two properties are Verizon Wireless, AT&T (Cingular), and T-Mobile for cell towers. An office at 70 Halsey St. was rented to the City of Newport Clean Cities program.

Prepared by: R. Esten

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PWFD 1-20: Are the water quality protection fees (\$25,676 revenue offset) derived or calculated based on any factor other than total water sales? If so, please explain.

Response: Water Quality Protection Fees are based on retail water sales except for sales subject to the 65 years of age and older exemption and the commercial agricultural producer exemption. The Naval Station Newport is also exempt from the Water Quality Protection Fee.

Prepared by: R. Esten

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PWFD 1-21: Please indicate where on RFC B-5 the value of service pipes owned by Newport are reflected and the amount of each.

Response: The value of the service pipes is included under the "Meters" line item on RFC Schedule B-5. Newport's fixed asset records group the value of meters and services together and it is not possible to segregate the two types of assets from one another such that the value of services alone is known.

Prepared by: Harold J. Smith

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PWFD 1-22: Please indicate why the portion of storage assets that are assigned to T&D should be allocated 21% to base and 28% to fire protection like all other T&D assets. Explain the base function that storage provides. Explain why 28% of storage is assigned to fire protection.

Response: Since the majority of Newport's storage capacity is associated with the Lawton Valley treatment plant and tank level logs indicate that tank levels remain relatively constant even on peak demand days it is apparent that Newport uses its storage capacity to meet both base and peak demand. Therefore it was decided that storage assets would be treated as part of the T&D system and allocated accordingly. As parts of the T&D system, the storage assets perform the same base function as the other T&D assets, which is to facilitate the meeting of average day demands. 28% of storage is assigned to fire protection based on the demands that fire protection places on the system.

Prepared by: Harold J. Smith

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Response to

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PWFD 1-23: Regarding the maximum month demand for Portsmouth Water & Fire District indicated on RFC B-8, is the demand based on July 2008 purchases that were unusually high because Portsmouth was refilling its water tank?

Response: PWFD's maximum month demand in FY 2009 did occur in July 2008 and the value shown in RFC Schedule B-8 for PWFD's Max Month Water Demand for FY 2009 is the demand for July 2008.

Prepared by: Harold J. Smith

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**DOCKET NO. 4128****City Of Newport - Utilities Division - Water Department****Response to****Portsmouth Water and Fire District's Data Requests****Set 1****CERTIFICATION**

I hereby certify that on December 24, 2009, 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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	Larry.r.allen@navy.mil	
Maurice Brubaker Brubaker and Associates, Inc.	mbrubaker@consultbai.com	401-724-3600 401-724-9909

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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
	cwilson@puc.state.ri.us	
	anault@puc.state.ri.us	

/s/

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