KEOUGH & SWEENEY, LTD.

ATTORNEYS AND COUNSELORS AT LAW 100 ARMISTICE BOULEVARD PAWTUCKET, RHODE ISLAND 02860

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

SEAN P. KEOUGH*
MARGARET HOGAN SWEENEY*

JEROME V. SWEENEY II OF COUNSEL

*Admitted to Practice in Rhode Island & Massachusetts TELEPHONE (401) 724-3600 FACSIMILE (401) 724-9909

www.keoughsweeney.com

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

January 26, 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 and original and nine copies of Newport Water's response to Portsmouth Water and Fire District's Third 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

City Of Newport - Utilities Division - Water Department Response to Portsmouth Water and Fire District's Data Requests Set 3

PWFD 3-1: Regarding the response to PWFD 1-16: PWFD 1-16 requests that Newport describe the specific units of time (e.g., days, weeks, hours, months, etc.) used in the "Demand x Peaking Factor" columns for maximum day and maximum hour calculations. PWFD believes that the units of time are different for the various classes (fire protection vs. the others). For example, the residential maximum hour demand (5,336) is based on the multiplication of a day's use ("adjusted average daily demand") multiplied by a peaking factor of 2.29. The same (1000 gallons in a day) appears to be true for all other classes with the exception of the fire demand. The Fire demand (240) appears to be 1000 gallons in a one hour period only and not expressed in gallons per day like the other classes. Please clarify Newport's response and (i) provide the unit of time over which gallons are measured for each class, and (ii) confirm whether the units of time are the same for all classes.

Response: The values for all classes shown in RFC Schedule B-9 represent the capacity requirements that each class places on the system expressed in thousands of gallons per day (kgal./day). For example, the estimated maximum day demand characteristics of all customer classes combined, including fire protection demands, require that the system be able to produce and deliver water at a rate of 12,069 kgal./day. Similarly, the peak hour demand requirements of all classes require that the system have the capacity to produce and deliver water at a rate of 13,590 kgal./day. However, these two values differ to the extent that the maximum day demands require that the system actually be able to produce and deliver 12,069 kgal. during the estimated peak day, but the peak hour demands do not require that the system be able to actually deliver 13,590 kgal. during the course of a day; only that it be able to deliver water during the peak hour at a rate of 13,590 kgal./day.

Prepared by: Harold J. Smith

City Of Newport - Utilities Division - Water Department Response to Portsmouth Water and Fire District's Data Requests Set 3

PWFD 3-2: Regarding the response to PWFD 1-9: PWFD is attempting to ascertain the costs associated with the Forest Avenue Pumping Station and the 6 mg/day booster pumps at Lawton Valley (Mason testimony page 5, line 7). Newport is referred to the testimony and data responses from Docket 4025 regarding pumping station costs. From the response to PWFD 1-9 it is understood that Newport does not know the value of or have a breakout of the value for the 6 mg/day booster pumps at Lawton Valley (Mason testimony page 5, line 7). Therefore:

- a. Please provide Newport's best estimate of the value of the pumps and building associated the with 6 mg/day booster pumps at Lawton Valley (Mason testimony page 5, line 7) that are in the building to the South of the LVWTP. If Newport cannot provide an estimate, will it agree to 10% of the LVWTP costs on RFC B-5? If not, provide another estimate and the basis for that estimate.
- b. Please identify the operating costs associated with the 6 mg/day booster pumps at Lawton Valley (Mason testimony page 5, line 7) that are included on RFC Schedule D-5. What portion of the Total Annual Pumping Cost of \$31,689 is associated with these pumps and building?
- c. Please identify the operating costs associated with the Forest Ave.
 Pumping Station and provide them in a format similar to RFC Schedule D5. Where are these costs included in the original filing? If they are part of the costs in RFC D-5, under which facility are they included? If not included in D-5 where are they included?

Response:

- a. Newport Water estimates that a pump similar to the 6 mg/day pump at Lawton Valley would cost approximately \$600,000 if installed today. The 6mg/day pump at Lawton Valley was put in service in 1973.
- b. All of the pumping costs for Lawton Valley shown on RFC Schedule D-5 are associated with the 6mg/day pump.
- c. The schedule showing the operating costs for the Forest Avenue pump station is attached. These costs are captured under the Transmission & Distribution account in the original filing.

Prepared by: Harold J. Smith and Kenneth Mason

Newport Water Division Cost Of Service Analysis Response to PWFD 3-2C

Development of Pumping Costs for Forest Avenue Pump Station

Pumping Labor and Benefits

Forest Avenue	
Labor hours per day pumping Days per year	1.0000 365
Total Hours	365.0
Average per hour pay	\$22.10
Average per hour benefits	\$4.82
Pumping Salaries	\$8,066.50
Pumping Benefits	\$1,759.30

Pumping Repairs and Supplies

0275	Danair & Maintananaa Equin	
	Repair & Maintenance - Equips	ment
	Chesterton Packing	\$311.00
Repair	& Maintenance Pumping	\$311.00
50311	Operating Supplies Vendor Ralco Electric	amount \$541.00
Opera	ating Supplies - Pumping	\$541.00
	0311	Repair & Maintenance Pumping 0311 Operating Supplies Vendor

Pumping Electricity

Station One		
	Annual Pumping Power	\$11,820

Total Pumping Costs

Station One	
Pumping Salaries	\$8,067
Pumping Benefits	\$1,759
Total Repair & Maintenance Pumping	\$311
Total - Operating Supplies - Pumping	\$541
Annual Pumping Power	\$11,820
Total Annual Pumping Costs	\$22,498

City Of Newport - Utilities Division - Water Department Response to

Portsmouth Water and Fire District's Data Requests Set 3

CERTIFICATION

I hereby certify that on January 26, 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
Julia Forgue, Director of Public Works	jforgue@cityofnewport.com	401-845-5601
Newport Water Department	resten@cityofnewport.com	401-846-0947
70 Halsey St. Newport, RI 02840	lsitrin@CityofNewport.com	
Jon Hagopian, Esq.		401-222-2424
Dept. of Attorney General	Jhagopian@riag.ri.gov	401-222-3016
150 South Main St.		
Providence, RI 02903	sscialabba@ripuc.state.ri.us	
, 10,100,100,111	pdodd@ripuc.state.ri.us	
	Amancini@ripuc.state.ri.us	
	dmacrae@riag.ri.gov	
	Mtobin@riag.ri.gov	704 272 1100
Harold Smith	Hsmith@raftelis.com	704-373-1199 704-373-1113
Raftelis Financial Consulting, PA	YII	/04-3/3-1113
511 East Blvd.	Hhoover@raftelis.com	
Charlotte, NC 28203	gpetros@haslaw.com	401-274-2000
Gerald Petros, Esq. Hinckley, Allen & Snyder	gpetros@nasiaw.com	401-274-2000
1500 Fleet Center	dmarquez@haslaw.com	<u>* </u>
Providence, RI 02903	jmansolf@haslaw.com	
William McGlinn	wmcglinn@portsmouthwater.org	401-683-2090
Portsmouth Water & Fire District	winegiiiii(a/portsinoutiiwater.org	ext. 224
1944 East Main Rd.		Ont. 22 .
PO Box 99	·	
Portsmouth, RI 02871	·	
Audrey VanDyke, Esq.	Audrey.VanDyke@navy.mil	202-685-1931
Naval Facilities Engineering Command		202-433-2591
Litigation Command	•	
1314 Harwood St., SE		
Washington Navy Yard, DC 20374-5018		
Dr. Kay Davoodi, P.E.	Khojasteh.davoodi@navy.mil	202-685-3319
Utility Rates and Studies Office		202-433-7159
NAVFACHQ- Building 33		
1322 Patterson Ave SE	Larry.r.allen@navy.mil	
Washington Navy Yard, D.C. 20374-5065		
Maurice Brubaker	mbrubaker@consultbai.com	401-724-3600
		401-724-9909

City Of Newport - Utilities Division - Water Department Response to

Portsmouth Water and Fire District's Data Requests Set 3

56.5	
Jmierzwa@exeterassociates.com	410-992-7500
	410-992-3445
tcatlin@exeterassociates.com	410-992-7500
	410-992-3445
Woodcock@w-a.com	508-393-3337
	508-393-9078
lmassaro@puc.state.ri.us	401-780-2107
	401-941-1691
ewilson@puc.state.ri.us	
anault@puc.state.ri.us	
	Jmierzwa@exeterassociates.com teatlin@exeterassociates.com Woodcock@w-a.com lmassaro@puc.state.ri.us ewilson@puc.state.ri.us

Joseph A. Keough, Jr., Esquire # 4925

KEOUGH & SWEENEY, LTD.

100 Armistice Boulevard Pawtucket, RI 02860

(401) 724-3600