

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**  
**DOCKET NO. 4128**  
**City Of Newport - Utilities Division - Water Department**  
**Response to**  
**The Portsmouth Water and Fire District's Data Requests**  
**Set 4**

**PWFD 4-1:** Mr. Woodcock's pre-filed testimony raised several issues regarding the demand study that do not appear to be addressed by Newport Water's rebuttal testimony.

- a. With respect to Account 078-20551 (Marriott Long Wharf):
  - (i) This single meter recorded large use every 7-30 days, but nothing in between those periods of use, and accounted for nearly 2/3 of the maximum day demand. Can Newport Water explain what the Marriott used this water for?
  - (ii) Based on the demand study data this account used exactly 100,000 units but on only 7 days between May 1, 2009 and September 22, 2009. Is it Newport's contention that this account did not use any water on 137 of the 144 days between May 1, 2009 and September 22, 2009? Was the use exactly 100,000 units on each of one or more specific days and zero on other days or does the 100,000 units represent the accumulated use over several days?
- b. With respect to the replacement residential account (124 Harrison Ave) identified in the response to PWFD 1-13(c):
  - (i) Please confirm if the reported amount for this account in 2009 of 425,700 was used to derive the overall residential base or average demand in the demand study.
  - (ii) This account showed substantially higher use in 2009 (425,700) than in 2008 (35,590). As noted in Mr. Woodcock's testimony, the 2009 total use appears far too high compared to the prior year or the use in the summer of 2009 for that account. Is it Newport Water's contention that this account used 425,700 in 2009 or is this in error? If it is in error, please provide the correct annual amount. Please provide an update to the residential maximum day demands from the demand study if this is corrected.

**Response:**

- a. With respect to meter 078-20551:
  - i. Newport does not know the specific uses of water by the Marriott hotel, but we assume water was used for laundry washing, bathing, and other typical uses of water.
  - ii. It should be noted that the two Marriott Long Wharf meters included in the daily read sample (078-20550 and 078-20551) are

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**  
**DOCKET NO. 4128**  
**City Of Newport - Utilities Division - Water Department**  
**Response to**  
**The Portsmouth Water and Fire District's Data Requests**  
**Set 4**

configured to function like a compound meter. Meter 078-20550 is the a 2-inch Actaris meter that measures at flow rates between 2 and 160 gallons per minute. Meter 078-20551 is a 6-inch Neptune meter that measures consumption when the flow rate to the Marriott exceeds the range of 2-inch meter. To determine the actually daily consumption at the Marriott, the consumption registered on both these meters should be totaled.

Newport does not contend that this account did not use any water on 137 of the 144 days between May 1, 2009 and September 22, 2009, but that the flow rate to the Marriott on 137 days was low enough such that all consumption was measured by the 2-inch meter.

- b. With respect to the residential account at 124 Harrison Ave.:
  - i. The four quarterly billed consumption volumes whose sum equals the reported FY 2009 consumption amount of 425,700 gallons for this account were used in the determination of the residential class average demand.
  - ii. Since each of the four bills for this account in FY 2009 was based on an actual meter read, it is Newport's contention that this account used 425,700 gallons, was billed for 425,700 gallons and paid for 425,700 gallons. It should be noted that it was determined that a significant portion of this consumption was attributed to a leak in the customer's plumbing system, but since even water lost through leaks places demands on the system, this consumption is included in the demand analysis.

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 Portsmouth Water and Fire District's Data Requests**  
**Set 4**

**CERTIFICATION**

I hereby certify that on April 15, 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>
Julia Forgue, Director of Public Works Newport Water Department 70 Halsey St. Newport, RI 02840	<a href="mailto:jforgue@cityofnewport.com">jforgue@cityofnewport.com</a>	401-845-5601 401-846-0947
	<a href="mailto:resten@cityofnewport.com">resten@cityofnewport.com</a>	
	<a href="mailto:lsitrin@CityofNewport.com">lsitrin@CityofNewport.com</a>	
Jon Hagopian, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Jhagopian@riag.ri.gov">Jhagopian@riag.ri.gov</a>	401-222-2424 401-222-3016
	<a href="mailto:sscialabba@ripuc.state.ri.us">sscialabba@ripuc.state.ri.us</a>	
	<a href="mailto:pdodd@ripuc.state.ri.us">pdodd@ripuc.state.ri.us</a>	
	<a href="mailto:Amancini@ripuc.state.ri.us">Amancini@ripuc.state.ri.us</a>	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a>	
	<a href="mailto:Mtobin@riag.ri.gov">Mtobin@riag.ri.gov</a>	
Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte, NC 28203	<a href="mailto:Hsmith@raftelis.com">Hsmith@raftelis.com</a>	704-373-1199 704-373-1113
	<a href="mailto:Hhooover@raftelis.com">Hhooover@raftelis.com</a>	
Gerald Petros, Esq. Hinckley, Allen & Snyder 1500 Fleet Center Providence, RI 02903	<a href="mailto:gpetros@haslaw.com">gpetros@haslaw.com</a>	401-274-2000
	<a href="mailto:dmarquez@haslaw.com">dmarquez@haslaw.com</a>	
	<a href="mailto:jmansolf@haslaw.com">jmansolf@haslaw.com</a>	
William McGlinn Portsmouth Water & Fire District 1944 East Main Rd. PO Box 99 Portsmouth, RI 02871	<a href="mailto:wmcglinn@portsmouthwater.org">wmcglinn@portsmouthwater.org</a>	401-683-2090 ext. 224
Audrey VanDyke, Esq. Naval Facilities Engineering Command Litigation Command 1314 Harwood St., SE Washington Navy Yard, DC 20374-5018	<a href="mailto:Audrey.VanDyke@navy.mil">Audrey.VanDyke@navy.mil</a>	202-685-1931 202-433-2591
Dr. Kay Davoodi, P.E. Utility Rates and Studies Office NAVFACHQ- Building 33 1322 Patterson Ave SE Washington Navy Yard, D.C. 20374-5065	<a href="mailto:Khojasteh.davoodi@navy.mil">Khojasteh.davoodi@navy.mil</a>	202-685-3319 202-433-7159
	<a href="mailto:Larry.r.allen@navy.mil">Larry.r.allen@navy.mil</a>	
Maurice Brubaker Brubaker and Associates, Inc.	<a href="mailto:mbrubaker@consultbai.com">mbrubaker@consultbai.com</a>	401-724-3600 401-724-9909
Jerry Mierzwa Exeter Associates, Inc.	<a href="mailto:Jmierzwa@exeterassociates.com">Jmierzwa@exeterassociates.com</a>	410-992-7500 410-992-3445

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**  
**DOCKET NO. 4128**  
**City Of Newport - Utilities Division - Water Department**  
**Response to**  
**The Portsmouth Water and Fire District's Data Requests**  
**Set 4**

Thomas S. Catlin Exeter Associates, Inc.	<a href="mailto:tcatlin@exeterassociates.com">tcatlin@exeterassociates.com</a>	410-992-7500 410-992-3445
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	<a href="mailto:Woodcock@w-a.com">Woodcock@w-a.com</a>	508-393-3337 508-393-9078
<b>File an original and nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:lmassaro@puc.state.ri.us">lmassaro@puc.state.ri.us</a>	401-780-2107
	<a href="mailto:cwilson@puc.state.ri.us">cwilson@puc.state.ri.us</a>	401-941-1691
	<a href="mailto:anault@puc.state.ri.us">anault@puc.state.ri.us</a>	

/s/ Joseph A. Keough, Jr.  
\_\_\_\_\_  
Joseph A. Keough, Jr., Esquire # 4925  
KEOUGH & SWEENEY, LTD.  
100 Armistice Boulevard  
Pawtucket, RI 02860  
(401) 724-3600