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RHODE ISLAND & MASSACHUSETTS

April 28, 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 Portsmouth Water and Fire District's Sixth 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

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DOCKET NO. 4128
City Of Newport - Utilities Division - Water Department
Response to
The Portsmouth Water and Fire District's Data Requests
Set 6

PWFD 6-1: With respect to accounts billed quarterly, please confirm that Newport Water typically obtains three non-estimated (i.e. actual) readings and one estimated reading per account per year. If true:

- a. Is the same period (quarter) estimated for an account each year or does the estimated quarter change? Please explain.
- b. Are there occasions when more than one reading per account per year is estimated rather than actual? If so, over the past 18 months, how many of the "non-estimated" readings were actual readings and how many were estimates?
- c. For estimated readings, explain how Newport Water determines the estimate.

Response: Newport water attempts to obtain three actual reads per year for each account.

- a. For scheduled estimates, the same billing period is estimated each year.
- b. NWD does have situations where accounts may be estimated more than once a year. During the past 18 months, NWD issued 81,653 quarterly bills as follows:

Actual Readings	54,700
Scheduled Estimates	14,773
Non-Scheduled Estimates	12,110

- c. Estimated readings are calculated within the Opal billing software. The estimate formula is used along with the historical information individual to calculate each account. Below is a sample calculation showing the formula:

Date for Estimate	1/29/2010
Prior reading date	10/9/2009
1 Year Previous Date	10/6/2008

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	<i>Bill Date</i>	<i>Prior read date</i>	<i>Current read date</i>	<i>Water usage (gallons)</i>
	2009-11	8/14/2009	10/9/2009	4,530
	2009-08	4/3/2009	8/3/2009	6,334
	2009-05	1/9/2009	4/3/2009	4,000
	2009-02	10/6/2008	1/9/2009	5,000
a	Annual usage calculation			19,864
b	Number of days for base	(10-06-08 - 10-09-09)		368
c=a/b	Average daily usage			53.98
d	Number of days for estimated period	(10-09-09 – 01-29-10)		112
e=c*d	Estimated usage in gallons			6,046

Prepared by: R. Esten

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PWFD 6- 2: Regarding the daily demand study:

- a. Does Newport Water intend to continue the daily demand study readings that were conducted last year? If so, for calendar year 2010, when will Newport Water begin and end daily demand study readings?
- b. Does Newport intend to use the same accounts that were used last year?
- c. The parties agreed to a sample that picked customers with different levels of use and meter sizes. The substitute customers used last year did not conform to the originally agreed upon sample protocol. Will Newport agree to replace last year's substitute customers with ones that matched the initially agreed upon sample in terms of annual water use and meter size? If not, why not?

Response:

- a. Due to the issues raised in this Docket, specifically those raised by PWFD, Newport had not intended to continue the daily demand study readings. However, since the "data profilers" are still installed on the accounts used in the daily read sample from the summer of 2009, Newport can continue to collect daily data on these accounts if it is determined that the collection of such data is a worthwhile endeavor. Additionally, since the profilers can store several thousand data points, it will most likely be possible to download daily data for whatever sample period is deemed appropriate.
- b. Please see Newport's response to PWFD 6-2 a. Further, as stated in the response to PWFD 6-2 a., since the profilers are still installed on the accounts that were used last year and these profilers are gathering data for these accounts, if it is determined that additional data should be collected, Newport would propose to continue gathering data from all of the accounts used in 2009. To the extent that the addition of new accounts to the sample is determined to be worthwhile, and would improve the accuracy of the demand analysis, accounts can be added.
- c. Please see Newport's response to PWFD 6-2 a. As discussed in testimony submitted by Newport's witnesses and in responses to other data requests, accounts selected for the daily read sample using a random sampling protocol were replaced with accounts that were not selected using the same random sampling protocol. While some of these replacement accounts may be less valuable in the daily read sample, there are others that were viable replacement accounts. As stated in the

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response to PWFD 6-2 b., if it is determined that additional data should be collected, Newport would prefer to continue to gather data from all accounts for which data was gathered during the summer of 2009. Furthermore, if it is determined that additional data should be collected, Newport is willing to add profilers to a reasonable number of additional accounts to be agreed upon between the parties in this Docket.

Prepared by: Harold J. Smith

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CERTIFICATION

I hereby certify that on April 28, 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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/s/ Joseph A. Keough, Jr.

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