

REBUTTAL TESTIMONY
OF
JULIA FORGUE, P.E.
ON BEHALF OF THE CITY OF NEWPORT, UTILITIES DEPARTMENT,
WATER DIVISION

In re: City of Newport Utilities Department, Water Division

Docket No. 4128

March 1, 2010

1 **Q. Please provide your full name, title and business address for the record.**

2 A. Julia Forgue, P.E. I am employed by the City of Newport where I serve as Director of
3 Utilities. My business address is 70 Halsey Street, Newport, RI.

4
5 **Q. Are you the same Julia Forgue who submitted pre-filed direct testimony in this
6 docket?**

7 A: Yes I am.

8
9 **Q. What is the purpose of this testimony?**

10 A. I would like to respond to certain points or conclusions that were made in the pre-filed
11 testimony of William McGlenn.

12
13 **Q. Do you agree with Mr. McGlenn's general description of the Newport Water
14 System?**

15 A. I agree with Mr. McGlenn's general description of the interconnections between
16 Newport Water and its wholesale customers, Portsmouth Water & Fire District and Naval
17 Station Newport. Mr. McGlenn correctly indicates that Newport water has three (3)
18 pressure zones.

19
20 **Q. Mr. McGlenn indicates that Newport Water did not correctly respond to PWFD
21 2-4, do you agree?**

22 A. As set forth in the answer to PWFD 2-4, the current management staff at Newport
23 Water did not have information from 1989 available. Therefore, we don't dispute
24 PWFD's records regarding the use of Mitchell Lane connection during this time. In
25 addition, Newport Water did overlook the December 2005 use of the Mitchell Lane
26 connection when approximately 613,000 gallons was used by Newport Water from this
27 connection to top off the Goulart Lane Tank while a water main break was repaired on
28 West Main Road at Forest Avenue which required the Forest Avenue pump station to be
29 out of service.

30

31

1 **Q. Do you agree with Mr. McGlenn's assessment of PWFD as a customer of**
2 **Newport Water?**

3 A. No I do not. I refer my pre filed testimony regarding Newport Water operating as one
4 system rather than as two separate systems. I do agree emergency connections are just
5 that, only used in an emergency, at which time they are invaluable.

6

7 **Q. Does this conclude your testimony?**

8 A. Yes it does.

9

CERTIFICATION

I hereby certify that on March 1, 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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