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April 6, 2010

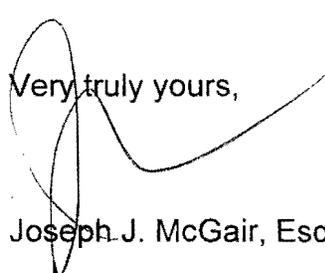
Luly E. Massaro
Commission Clerk
Rhode Island Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

Re: Kent County Water Authority
Rate Filing, Docket No. 4142

Dear Ms. Massaro,

Enclosed herewith you will find an original and nine copies of Kent County Water Authority Revised Response to the City of Warwick Data Request No. 1-4 in the above matter. The same was e-mailed to the attached service list today.

Very truly yours,


Joseph J. McGair, Esq.

JJM:dd
Enc.
HAND-DELIVERED

Docket No. 4142 – Kent County Water Authority - Rate Application
 Service List 2/5/10

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Timothy Brown, P.E. General Manager Chief Engineer Kent County Water Authority PO Box 192 West Warwick RI 02893-0192	tbrown@kentcountwater.org	401-821-9300 401-823-4810
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Peter D. Ruggiero, Warwick City Solicitor Ruggiero, Orton & Brochu 20 Centerville Road Warwick, RI 02886	ruggieropd@ruggiero-orton-brochu.com	401-737-8700 401-737-0735
Original & nine (9) copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02889	Lmassaro@puc.state.ri.us Cwilson@puc.state.ri.us sccamara@puc.state.ri.us	401-780-2107 401-941-1691

KENT COUNTY WATER AUTHORITY

FIRST DATA REQUEST OF THE CITY OF WARWICK TO THE
KENT COUNTY WATER AUTHORITY

(Revised 4/5/2010)

1-4 How many budget years has the Authority experienced water consumption revenue shortfalls?

- A. Question is vague but we will try to respond. We have been experiencing reduced water sales for years and explained that in our previous rate cases; in particular, Docket #3942. As explained in my testimony Docket # 3942, FY 2003 through FY 2007 have experienced decreased sales, see attached.

Adjusted sales for FY 2008 were 389.4 million cubic feet and FY 2009 363.9 million cubic feet. FY 2010 we believe will also be on the downside as well. We just completed the wettest March in history.

1 Island Section of the American Society of Civil Engineers and the Rhode Island Society of
2 Professional Engineers.

3
4 **Q. What is your role in these proceedings?**

5 A. As General Manager/Chief Engineer of the Kent County Water Authority, I am responsible
6 for the Authority operations including plant, transmission, pumping stations and storage
7 facilities within the Kent County Water Authority.

8
9 **Q. What are the total water sales for the Kent County Water Authority during each of
10 the last five fiscal years (excluding Warwick)?**

11 A. Last five fiscal year water sales in cubic feet (FY 03, 04 and 05 are unadjusted, FY 06 and
12 07 are adjusted) are as follows:

13
14 FY 03 – 447.0 million cubic feet

15 FY 04 – 435.8 million cubic feet

16 FY 05 – 430.9 million cubic feet

17 FY 06 – 424.0 million cubic feet

18 FY 07 – 390.3 million cubic feet

19
20 **Q. Doesn't this show a clear downward trend in sales?**

21 A. Yes, it does. It is somewhat unknown but I believe it relates to our demand management
22 methods, loss of large customers, wetter than normal years and generally less water use
23 by our customers.

24
25 **Q. What is the fiscal year of the Kent County Water Authority?**

26 A. From July 1st to the succeeding June 30th.

27
28 **Q. What is the test year of the Kent County Water Authority in this filing?**

29 A. From July 1, 2006 to the succeeding June 30, 2007.