

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

Petition of the KENT COUNTY WATER |  
AUTHORITY-Rate Application |

Docket No.: 4142

**MOTION TO INTERVENE**

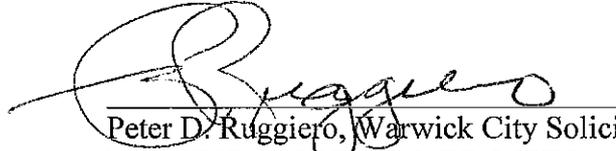
Now comes the City of Warwick (the “City”), by and through its City Solicitor, and hereby moves to intervene in the above-captioned matter. As grounds, the City avers that it has an interest which will be directly affected and which is not represented by any existing party in this proceeding. The issue concerns the Kent County Water Authority’s (the “Authority”) request to seek a rate hike to collect additional revenues of \$1,460,031 during their upcoming budget year, representing an 8.16 percent increase. The City purchases water from the Authority and provides that purchased water to its customers. This purchased water is set at the Providence wholesale purchase rate and will not be affected by this rate hike request. However, several thousand customers of the Authority are located within the municipal boundaries of the City. These residents and businesses served by the Authority are located in the Cowesett, Apponaug and Tollgate areas of the City. These customers will have to bear any increase in the rate for water purchased from the Authority.

Based on this situation the City requests intervention status to examine the need and justification for the sought after rate hike approval by the Authority. Without granting the City’s Motion to Intervene, the City’s residents and businesses served by the Authority will not be represented by an existing party to this proceeding. (R.I. Gen. Laws 45-6-1 (1999 & Supp. 2008)(Rule 1.13 Rules of Practice and Procedure). The City has a direct interest in the affect an

approval of this rate hike Petition would have on the Authority's customers located within the City.

For these reasons and pursuant to PUC Rule 1.13, the City hereby requests the PUC to grant its Motion to Intervene.

Respectfully submitted,  
CITY OF WARWICK,  
By and Through Its Attorney,



Peter D. Ruggiero, Warwick City Solicitor (#5733)  
RUGGIERO, ORTON & BROCHU  
20 Centerville Road  
Warwick, Rhode Island 02886  
Tel: 401-737-8700  
Fax: 401-737-0735

Dated: February 3, 2010

**CERTIFICATION**

I, the undersigned, do hereby certify that I did forward a copy of the within Motion to Intervene via e-mail to all on the following service list on the 3<sup>rd</sup> day of February, 2010.



**Docket No. 4142 – Kent County Water Authority – Rate Application**

**Service List 1/20/2010**

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone/Fax</b>
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence RI 02903	<a href="mailto:Lwold@riag.ri.gov">Lwold@riag.ri.gov</a> <a href="mailto:Mtobin@riag.ri.gov">Mtobin@riag.ri.gov</a> <a href="mailto:Dmacrae@riag.ri.gov">Dmacrae@riag.ri.gov</a> <a href="mailto:sscialabba@ripuc.state.ri.us">sscialabba@ripuc.state.ri.us</a> <a href="mailto:jbelle@ripuc.state.ri.us">jbelle@ripuc.state.ri.us</a> <a href="mailto:amancini@ripuc.state.ri.us">amancini@ripuc.state.ri.us</a>	401-222-2424 401-222-3016
Thomas S. Catlin Exeter Associates, Inc. 5565 Sterrett Place, Suite 310 Columbia, MD 21044	<a href="mailto:tcatlin@exeterassociates.com">tcatlin@exeterassociates.com</a>	410-992-7500 410-992-3445
Joseph J. McGair, Esq. Petarca & McGair, Inc. 797 Bald Hill Rd. Warwick RI 02886	<a href="mailto:jjm@petrarcamcgair.com">jjm@petrarcamcgair.com</a>	401-821-1330 401-823-0970
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
Timothy Brown, P.E. General Manager Chief Engineer Kent County Water Authority PO Box 192 West Warwick RI 02893-0192	<a href="mailto:tbrown@kentcountywater.org">tbrown@kentcountywater.org</a>	401-821-9300 401-823-4810
<b>File 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> <a href="mailto:cwilson@puc.state.ri.us">cwilson@puc.state.ri.us</a> <a href="mailto:sscamara@puc.state.ri.us">sscamara@puc.state.ri.us</a>	401-780-2107