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June 22, 2011

The Honorable Elia Germani, Chairman
State of Rhode Island
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

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PUBLIC UTILITIES COMMISSION

Re: United Water Rhode Island, Inc.
General Rate Filing, June 2011
Docket No. 4255

Enclosed please find a Motion to Intervene by the Town of South Kingstown in connection with the above-referenced matter.

Yours sincerely,

URSILLO, TEITZ & RITCH, LTD.


Michael A. Ursillo

MAU/gb
Enclosure

cc: The Honorable Stephen A. Alfred, Town Manager

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: United Water Rhode Island Inc., Application
to Change Rates

Docket No. 4255

Motion to Intervene by The Town of South Kingstown, Rhode Island
Rule 1.13

Now comes the Town of South Kingstown (“South Kingstown”), a Rhode Island Municipal Corporation, pursuant to Rule 1.13 of the Public Utilities Commission Rules of Practice and Procedure and hereby files its request to intervene in the above-captioned matter. In support, South Kingstown states as follows:

1. Applicant United Water Rhode Island Inc. (applicant) is a public utility corporation providing utility service to the residents and taxpayers of South Kingstown as well as ratepayers located elsewhere in the State of Rhode Island.
2. South Kingstown purchases all water used in both the Middlebridge and South Shore Water systems wholesale from applicant.
3. Applicant’s proposed rate increases would have a detrimental effect on South Kingstown as well as the town’s taxpayers. As the purchaser of water from applicant in the area where the proposed rate increases will occur, South Kingstown has “an interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding.” (Rule 1.13(b)(2)) South Kingstown is also concerned with the necessary increase in rates that would need to be charged to its citizens and the potential deficit in the town budget that would be caused by the proposed rate increases. Accordingly, South Kingstown has “[an]other interest of such a nature that [its]

participation” in the proceedings before the Commission are “in the public interest.” (Rule 1.13(b)(3))

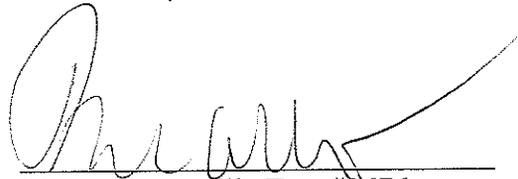
4. Therefore, South Kingstown would be directly harmed by the proposed rate increases and the citizens of South Kingstown would be burdened by the increased price of water and the potential deficit that would be created in South Kingstown’s budget.

5. In conclusion, South Kingstown believes that its intervention is both as of right and in the public interest, as protective of the interests of the Town, its taxpayers, and its residents.

Respectfully submitted,

The Town of South Kingstown,

By its Attorney,



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Dated: June 21, 2011

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the within was mailed to the following on this 22 day of June, 2011.

Cindy Wilson-Frias, Esq.
Senior Legal Counsel
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

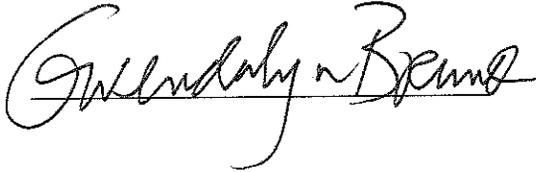
Thomas F. Ahern
Administrator of the Division of Public
Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

The Honorable Elia Germani
Chairman
Rhode Island Public Utilities Commission
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