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\*ADMITTED TO PRACTICE IN  
RHODE ISLAND & MASSACHUSETTS

August 30, 2011

Ms. Luly Massaro, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: *United Water Rhode Island, Inc.***  
***Docket No. 4255***

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of United Water Rhode Island, Inc.'s ("United Water") response to the Division of Public Utilities and Carriers' ("Division") Fourth Set of Data Requests.

Please be advised that United Water is seeking protective treatment of a confidential attachment identified as attachment Div. 4-4, as permitted by Commission Rule 1.2(g) and by RIGL §38-2-2(4)(i)(B). Also enclosed, you will find an original and nine (9) copies of United Water's Motion For Protective Treatment Of Confidential Information along with one (1) sealed copy of a confidential attachment to Div. 4-4. A confidential copy of this attachment has been provided to the Division pursuant to a protective agreement between United Water and the Division pending a determination of United Water's motion.

Please note that an electronic version of United Water's response to the Division's Fourth Set of Data Requests has been sent to the service list. However, the electronic version of United Water's response to Div. 4-4 has not been provided pending a decision on the Motion For Protective Treatment Of Confidential Information.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,



Joseph A. Keough, Jr.

Enclosures

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

<b>IN RE: UNITED WATER</b>	:	<b>DOCKET NO. 4255</b>
<b>RHODE ISLAND, INC.</b>	:	
	:	
	:	
	:	

**UNITED WATER RHODE ISLAND, INC.'S MOTION FOR PROTECTIVE  
TREATMENT OF CONFIDENTIAL INFORMATION**

**I. INTRODUCTION**

Now comes United Water Rhode Island, Inc. (“United Water”) and hereby requests that the Rhode Island Public Utilities Commission (“Commission”) provide confidential treatment to, and grant protection from public disclosure of, certain confidential and sensitive information. United Water makes this request pursuant to Commission Rule 1.2(g) and RIGL §38-2-2 (4)(i)(B). United Water also requests that the Commission preliminarily grant its request for confidential and protective treatment pursuant to Rule 1.2(g)(2).

**II. FACTS**

On July 14, 2011, United Water filed a response to the Division of Public Utilities and Carriers’ (“Division”) First Set of Data Requests, Request 1-10 (“Request”). This Request sought “a large scale map of United’s water utility facilities, showing treatment plants, major transmission lines, large customers, sales for resale customers, etc.”

Also on July 14, 2011, United Water filed a Motion For Protective Treatment Of Confidential Information seeking protective treatment of a confidential attachment identified as attachment Div. 1-10. One (1) sealed copy of the confidential attachment to

Div. 1-10 was provided to the Commission as permitted by Commission Rule 1.2(g) and by RIGL §38-2-2(4)(i)(B). In addition, United Water provided a confidential copy of the attachment to Div. 1-10 to the Division pursuant to a Protective Agreement between United Water and the Division dated July 14, 2011 pending a determination of United Water's motion.

On August 10, 2011, the Division issued its Fourth Set of Data Requests to United Water. Request 4-4 sought production of the following:

“Reference the response to DIV. 1-10. Please identify the locations of the interconnects with the Company's wholesale customers.”

United Water seeks confidential treatment of documentation responsive to this request on the same basis it sought confidential treatment of the information provided in response to Div. 1-10.

### **III. LEGAL STANDARD**

Commission Rule 1.2(g) provides that access to a public record shall be granted in accordance with the Access to Public Records Act (“APRA”), RIGL §38-2-1, et seq. Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be a “public record”, unless the information set forth in the documents and materials falls within one of the enumerated exceptions identified in RIGL §38-2-2(4). As such, the Commission has the authority under the APRA to protect such information from public disclosure and deem it to be confidential if it falls within one of the specific exceptions to the APRA. A review of RIGL §38-2-2(4)(i)(B) indicates that the following records are not deemed to be public:

“Trade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature.”

In making a confidentiality determination, the Rhode Island Supreme Court set forth a two-prong test. The first prong assesses whether the information was provided voluntarily to a governmental agency. *Providence Journal Company v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001).*Id.* at 47. If the answer to this first question is in the affirmative, then the next question becomes whether the information “is of a kind that would customarily not be released to the public by the person from whom it was obtained.” *Id.*

Furthermore, the Supreme Court has held that agencies making determinations as to the disclosure of information under the APRA may apply the balancing test established in *Providence Journal v. Cane*, 577 A.2d 661, (RI 1990). Under this test, the Commission may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure.

#### **IV. BASIS FOR CONFIDENTIALITY**

In the interest of security, United Water seeks confidential treatment of the document sought. United Water does not wish to have a large scale map of its water utility facilities, showing treatment plants, major transmission lines and wholesale interconnects in the public domain. This is not the type of information United Water would ordinarily release to the public. In fact, United Water participates in regulatory proceedings in several other jurisdictions, and it routinely requests confidential treatment of the type of information sought by the Division’s Request.

In the post 9/11 era, water professionals have taken steps to further protect water supplies, treatment facilities and distribution systems from natural and man-made

disasters.<sup>1</sup> Threats are now targeted at the country's vital institutions and infrastructure, including drinking water and wastewater systems.<sup>2</sup> To combat such threats, it is essential that government agencies, water utilities, state and local water agencies and public health organizations, be ready to protect our water infrastructure.<sup>3</sup> A map of United Water's facilities could potentially provide valuable information, and could lead to vulnerability in the system.

## V. CONCLUSION

For the reasons set forth herein, United Water hereby requests that the Rhode Island Public Utilities Commission grant the relief sought herein and grant protective and confidential treatment to the information produced in response to the Division of Public Utilities and Carriers' Data Request 4-4.

UNITED WATER RHODE ISLAND, INC.  
By its attorney,



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Joseph A. Keough, Jr., Esquire # 4925  
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(401) 724-3600

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<sup>1</sup>See American Water Works Association web site  
(<http://www.awwa.org/drinktap/BlogPost.cfm?ItemNumber=48146&showLogin=N>)

<sup>2</sup> See EPA's Role in Water Security Research  
([http://www.epa.gov/safewater/watersecurity/pubs/water\\_exec\\_summ.pdf](http://www.epa.gov/safewater/watersecurity/pubs/water_exec_summ.pdf))

<sup>3</sup> Id.

**CERTIFICATION**

I hereby certify that on August 30, 2011, 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.

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone/Fax</b>
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Timothy J. Michaelson United Water Mgmt. & Services, Inc. 200 Old Hook Road Harrington Park, NJ 07640	<a href="mailto:Tim.Michaelson@UnitedWater.com">Tim.Michaelson@UnitedWater.com</a>	201-750-3406 201-750-5728
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Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:klyons@riag.ri.gov">klyons@riag.ri.gov</a>	
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Mark A. McSally, Esq. Kelly, Kelleher, Reilly & Simpson 146 Westminster Street, Suite 500 Providence, RI 02903	<a href="mailto:mmcsally@kkrs.com">mmcsally@kkrs.com</a>	401-789-7800
<b>File an 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>	401-780-2107 401-941-1691
	<a href="mailto:plucarelli@puc.state.ri.us">plucarelli@puc.state.ri.us</a>	
	<a href="mailto:sccamara@puc.state.ri.us">sccamara@puc.state.ri.us</a>	

*Carole Mazzola*

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STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4255  
Response of United Water Rhode Island, Inc.  
To The Division of Public Utilities And Carriers'  
Data Requests  
Set 4

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Div. 4-1: Reference the response to DIV. 1-5. Please provide the number of meters associated with the investment for each sized meter.

RESPONSE: Please see table below for the number of meters by meter size as of December 31, 2010 and July 31, 2011.

<b>Size</b>	<b>12/31/10</b>	<b>7/31/11</b>
5/8"	7,488	7,548
3/4"	5	5
1"	284	284
1 1/2"	84	84
2"	168	168
3"	13	13
4"	7	7
6"	6	6
8"	1	1
<b>Total</b>	<b>8,056</b>	<b>8,116</b>

Prepared by: Michaelson

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.  
To The Division of Public Utilities And Carriers'  
Data Requests  
Set 4

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Div. 4-2: Reference the response to DIV. 1-8.

- (a) Please identify any contractual peak day or peak hour demand limitations imposed on the Town of South Kingstown and the Town of Narragansett.
- (b) In the Company's opinion, what would be a reasonable approach to calculating the peak day demand for the Town of Narragansett from peak weekly demands?
- (c) For each of the four days listed for the Town of South Kingstown, please provide the weekly demand using the same weekly meter reading schedule as Narragansett.

RESPONSE:

- a) By agreement, the Town of Narragansett can take no more than 1600 gallons per minute. Narragansett's historic peak use is about half this limit.
- b) In responding to this question, the Company considered the following:
  - Narragansett takes more than twice the volume of South Kingston.
  - Narragansett has three water storage tanks and South Kingston has two.
  - Narragansett gets 100% of their water from the Company at Point Judith. For the North End portion of the Narragansett system, they get approximately 75% of the water from the Company and the remainder from North Kingstown.

Based on these differences, it is not clear that the two communities would have similar demands; that is, any information on a peak day for South Kingston may not necessarily be applicable to Narragansett. The AWWA M1 Manual has an appendix on estimating maximum day and peak hour demand factors. This method is intended for retail use however, not wholesale use. Further, the method requires estimates of maximum day and peak hour to be determined in part, based on information regarding specific commercial and industrial uses. The Company is unaware of the existence of any such data for either South Kingston or Narragansett. The Company acknowledges that use for each day within the peak week is likely not exactly the same; however, the Company is unable to estimate what the day to day variations may be.

Considering the above, a maximum day that is 20% higher than the average day within the peak week would not appear to be unreasonable.

c) Please find below the weekly demands for South Kingstown that include the peak days provided on the Company's response to 1-8:

- 7/1/07 falls in the range 6/26/07 – 7/3/07 = 5,345,000 gallons
- 7/20/08 falls in the range 7/15/08 – 7/22/08 = 7,153,000 gallons
- 8/16/09 falls in the range 8/11/09 – 8/18/09 = 5,985,000 gallons
- 7/5/10 falls in the range 6/29/10 – 7/6/10 = 6,272,000 gallons

Additionally, below are the peak weeks for South Kingstown:

- 7/3/07 – 7/10/07 = 6,313,000 gallons
- 7/15/08 – 7/22/08 = 7,153,000 gallons
- 8/18/09 – 8/25/09 = 6,285,000 gallons
- 8/10/10 – 8/17/10 = 6,595,000 gallons

Prepared by: C. Woodcock, S. Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.  
To The Division of Public Utilities And Carriers'

Data Requests

Set 4

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Div. 4-3: Please identify any specific net investment by type for facilities used to service wholesale customers including, but not limited to, meters, mains, hydrants (per DIV. 1-13).

RESPONSE:

The South Kingstown wholesale customer has the following specific investments associated with its connections:

Middlebridge connection – 8" Meter, Net Asset amount of \$3,353

Middlebridge connection – Valves, Net Asset amount of \$1,388

Route 1 connection – 12" Main & 12" Valves, Net Asset amount of \$495,453

The Net Asset amount for the Middlebridge Valves is an estimate based on an in-service date of 1968 and estimated cost of \$3,000. The Route 1 connection is net of a \$500,000 Contribution.

All other assets associated with the four interconnections with South Kingstown and Narragansett were contributed by the customers.

Prepared by: Michaelson

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4255  
Response Of United Water Rhode Island Inc.  
To The Division Of Public Utilities And Carriers'  
Data Requests  
Set 4

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Div. 4-4: Reference the response to DIV. 1-10. Please identify the locations of the interconnects with the Company's wholesale customers.

RESPONSE: A document responsive to this request has been provided to the Division pursuant to a Protective Agreement between United Water and the Division, and a confidential copy has been provide to the Commission subject to a Motion For Protective Treatment of Confidential Information as provided for by Rule 1.2(g)(2) of the Commission's Rules of Practice and Procedure and R.I.G.L. § 38-2-2.

Prepared by: Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.  
To The Division of Public Utilities And Carriers'

Data Requests

Set 4

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Div. 4-5: Reference the response to DIV. 1-13. Please explain the public fire protection arrangements with South Kingstown and Narragansett. Why would these wholesale customers be using the Company's hydrants? Explain how this is accounted for in the cost of service study.

RESPONSE: The Company's service area includes parts of South Kingston and Narragansett. The remainders of those towns are serviced by the town water systems or wells. In those areas of the towns where the Company provides retail service it also provides fire protection. Only those hydrants included in the Company's service area are subject to the public fire charges. The wholesale portions of the towns do not use the Company's hydrants.

Prepared by: C. Woodcock, S. Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4255  
Response of United Water Rhode Island, Inc.  
To The Division of Public Utilities And Carriers'  
Data Requests  
Set 4

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Div. 4-6: Please update the responses to the following Division requests through August 2011:

- (a) 1-18;
- (b) 1-19;
- (c) 1-20;
- (d) 1-21.

RESPONSE: August 2011 data will not be available at the time the Company's response to this data request is due. The Company will file August data as soon as possible after the due date in a supplemental response.

(a) Please see Div 4-6 Attachment A. Please note that the number of Resale customers on the report for the years 2004 – 2011 has been changed from 3 to 2. The Company has had and currently has two Resale customers – South Kingstown and Narragansett. Both of these towns have two connections as detailed below:

1. South Kingstown
  - a. Middlebridge and Torrey Road account
  - b. South Kingstown Route 1 account
2. Narragansett
  - a. Point Judith account (South End)
  - b. Narragansett North End (West Bay & Scarborough) account

Before 2005, UWRI only had three connections, each of which was considered a customer for internal reporting purposes due to the fact that there were individual bills generated for each connection. In early 2005, UWRI installed an additional connection with the South Kingstown system (South Kingstown Route 1), but never updated its internal report to include this 4<sup>th</sup> customer. After reviewing this situation, the Company has determined that it will consider each town a single customer, even though each has two connections.

(b) Please see table below for number of Turn On / Turn Off by month

<b>Month</b>	<b>Occurrences</b>
Jan	14
Feb	5
Mar	40
Apr	41
May	26
Jun	24
Jul	12

(c) Please see Div 4-6 Attachment C

(d) Please see Div 4-6 Attachment D. Please note that June, 2010 and June, 2011 amounts have been revised to reflect correct volumes/sales.

Prepared by:

(a) Ugboaja

(b) Knox

(c) Knox

(d) Ugboaja





**United Water Rhode Island, Inc.**  
**Billed Consumption by Customer Class (in '000 Gallons)**

		2011												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	Residential	28,553	30,192	26,471	22,569	28,345	28,720	32,148	-	-	-	-	-	196,998
2	Commercial	7,608	13,774	15,861	6,723	13,479	19,662	11,231	-	-	-	-	-	88,338
3	Industrial	86	91	25	117	115	142	339	-	-	-	-	-	915
4	Public Authority	1,169	1,036	3,772	846	1,111	2,945	1,463	-	-	-	-	-	12,342
5	Resale	52,899	7,161	6,794	40,664	8,647	35,115	37,741	-	-	-	-	-	189,021
		2010												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
6	Residential	28,929	29,787	24,862	22,736	29,279	31,787	34,872	43,371	61,779	43,448	37,061	36,065	423,976
7	Commercial	7,531	13,957	15,756	6,482	13,899	20,880	11,006	19,568	27,301	13,331	17,142	21,414	188,267
8	Industrial	80	136	38	135	79	150	340	496	175	134	155	34	1,952
9	Public Authority	1,099	1,124	2,437	940	1,168	2,835	1,919	2,192	4,288	2,829	2,860	2,865	26,556
10	Resale	3,017	8,152	8,554	53,370	9,931	13,273	121,252	27,188	26,217	17,249	118,972	8,619	415,797
		2009												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
11	Residential	22,053	37,798	25,333	18,915	31,560	24,102	27,008	41,796	50,977	40,999	35,835	32,746	389,122
12	Commercial	6,996	14,330	16,236	6,297	13,113	18,490	8,321	15,355	33,252	12,676	13,454	18,429	176,949
13	Industrial	84	303	23	94	264	127	240	504	184	136	375	49	2,383
14	Public Authority	1,243	1,334	2,758	764	1,196	2,835	1,926	1,167	4,776	2,400	2,836	3,577	23,977
15	Resale	55,499	8,419	6,533	52,594	8,299	11,838	83,223	18,233	17,260	95,117	9,927	16,716	383,658
		2008												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
16	Residential	35,036	30,991	23,945	23,950	28,583	28,066	36,310	45,471	62,381	41,731	41,495	33,508	431,467
17	Commercial	18,359	13,745	11,290	10,548	13,869	19,421	11,138	18,400	27,375	14,012	18,431	19,454	196,042
18	Industrial	271	327	120	456	545	336	262	858	138	501	290	26	4,130
19	Public Authority	2,183	1,241	2,682	1,304	1,185	2,578	2,229	2,460	4,604	3,259	2,465	3,024	29,214
20	Resale	64,865	4,726	7,432	51,099	9,281	14,035	98,408	26,771	22,067	88,547	11,459	7,783	406,473
		2007												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
21	Residential	28,975	32,613	22,908	23,351	33,214	26,453	34,118	58,776	61,680	43,286	30,222	53,673	449,269
22	Commercial	8,403	13,808	12,390	11,423	12,644	11,080	17,955	19,082	24,751	13,364	14,682	13,131	172,713
23	Industrial	531	468	379	556	609	361	386	736	309	391	781	229	5,736
24	Public Authority	1,265	1,439	1,633	1,287	1,652	2,634	2,347	4,023	3,781	2,899	1,488	4,856	29,304
25	Resale	52,841	9,354	7,409	50,079	9,255	16,468	102,137	8,149	18,374	110,100	8,155	8,246	400,567
		2006												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
26	Residential	24,667	28,938	32,585	15,757	45,074	23,817	42,002	27,325	75,028	38,095	34,469	28,063	415,820
27	Commercial	15,764	12,724	9,929	16,550	16,138	7,230	21,130	14,821	25,886	14,041	14,178	16,649	185,040
28	Industrial	449	970	536	898	918	714	964	1,368	593	646	893	434	9,383
29	Public Authority	1,426	1,372	2,781	1,110	2,060	3,302	1,873	1,113	6,861	2,076	1,556	3,134	28,664
30	Resale	61,009	6,367	5,756	62,263	10,144	14,173	80,340	12,168	15,952	109,372	8,090	5,983	391,617

**United Water Rhode Island, Inc.**  
**Billed Consumption by Customer Class (in '000 Gallons)**

		2005												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
31	Residential	25,280	41,742	26,031	26,901	29,977	27,766	30,994	55,905	70,212	44,574	34,386	44,819	458,587
32	Commercial	17,168	15,559	9,348	17,960	12,950	9,890	21,679	20,380	22,324	20,202	15,234	16,315	199,009
33	Industrial	751	1,170	1,025	1,014	1,334	967	817	1,605	767	773	1,039	797	12,059
34	Public Authority	1,333	1,802	2,965	1,363	1,143	2,784	1,797	2,764	6,531	3,550	2,089	4,677	32,798
35	Resale	77,164	1,299	1,270	73,143	1,050	1,503	95,214	2,220	1,863	147,332	8,512	9,831	420,401
		2004												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
36	Residential	30,268	31,323	28,492	25,384	29,852	32,877	37,390	44,510	53,575	43,481	35,631	31,107	423,890
37	Commercial	10,624	14,483	13,556	8,810	13,773	15,935	13,970	16,636	21,522	16,571	15,083	9,599	170,562
38	Industrial	1,082	1,084	650	926	1,179	1,516	1,136	1,593	1,255	1,435	1,130	683	13,669
39	Public Authority	2,482	1,486	2,188	1,891	1,515	1,608	3,665	2,465	5,204	2,630	2,114	2,955	30,203
40	Resale	78,766	1,325	1,018	81,326	1,327	2,336	118,067	1,514	67,664	128,433	842	1,185	483,803
		2003												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
41	Residential	30,581	30,296	29,554	25,783	29,788	29,437	33,679	39,042	49,997	45,164	35,849	33,329	412,499
42	Commercial	10,795	14,122	15,006	9,411	13,669	15,480	12,663	17,230	20,371	16,662	15,907	15,270	176,586
43	Industrial	833	934	744	952	1,043	785	1,098	1,599	1,672	1,593	1,043	727	13,023
44	Public Authority	1,757	1,473	3,101	1,600	1,563	3,081	1,462	3,568	5,106	3,331	4,906	3,911	34,859
45	Resale	53,974	9,234	1,075	78,548	1,221	1,442	96,461	42,062	1,640	134,497	1,036	1,069	422,259
		2002												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
46	Residential	31,139	29,171	26,195	24,699	29,477	30,775	37,578	46,935	59,423	49,185	38,666	32,002	435,245
47	Commercial	10,373	24,456	12,641	8,684	13,042	14,698	21,624	17,234	20,298	15,817	16,275	14,726	189,868
48	Industrial	842	1,262	806	1,035	1,274	1,199	1,229	1,315	1,041	1,247	941	823	13,014
49	Public Authority	1,788	1,501	3,894	1,265	1,876	3,966	1,757	2,069	6,080	4,288	2,632	4,087	35,203
50	Resale	52,596	1,011	926	48,811	1,166	1,391	75,643	2,746	1,640	88,674	1,037	1,070	276,711
		2001												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
51	Residential	27,880	27,880	31,373	23,854	31,633	31,348	38,508	43,874	60,149	46,584	37,247	33,950	434,280
52	Commercial	15,920	12,546	12,386	12,513	13,875	16,585	14,407	18,393	23,940	16,852	18,918	15,350	191,685
53	Industrial	1,677	1,896	1,291	1,173	1,127	903	1,353	1,102	1,682	1,419	1,395	947	15,965
54	Public Authority	1,334	1,569	4,149	1,330	1,268	3,624	1,896	2,006	6,409	3,425	1,916	4,299	33,225
55	Resale	80,650	10,561	1,169	47,468	14,945	18,198	73,849	20,495	16,575	91,779	26,337	13,852	415,878

**United Water Rhode Island, Inc.  
Water Use Per Customer by Class**

		<b>2011</b>											
<u>Line #</u>	<u>Customer Class</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
1	Residential	3.89	4.11	3.60	3.07	3.85	3.90	4.37	-	-	-	-	-
2	Commercial	10.64	19.26	22.18	9.40	18.85	27.50	15.71	-	-	-	-	-
3	Industrial	8.60	9.10	2.50	11.70	11.50	14.20	33.90	-	-	-	-	-
4	Public Authority	12.05	10.68	38.89	8.72	11.45	30.36	15.08	-	-	-	-	-
5	Resale	26,449.50	3,580.50	3,397.00	20,332.00	4,323.50	17,557.50	18,870.50	-	-	-	-	-
		<b>2010</b>											
<u>Line #</u>	<u>Customer Class</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
6	Residential	3.97	4.09	3.41	3.12	4.01	4.35	4.77	5.93	8.44	5.93	5.06	4.91
7	Commercial	10.58	19.60	22.13	9.10	19.52	29.33	15.46	27.48	38.18	18.64	23.97	29.95
8	Industrial	8.00	13.60	3.80	13.50	7.90	15.00	34.00	49.60	17.50	13.40	15.50	3.40
9	Public Authority	11.33	11.59	25.12	9.69	12.04	29.23	19.78	22.60	44.21	29.16	29.48	29.54
10	Resale	1,508.70	4,076.14	4,277.14	26,685.20	4,965.64	6,636.64	60,626.23	13,593.86	13,108.67	8,624.75	59,486.05	4,309.49
		<b>2009</b>											
<u>Line #</u>	<u>Customer Class</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
11	Residential	3.05	5.23	3.50	2.61	4.36	3.32	3.72	5.76	7.02	5.64	4.93	4.50
12	Commercial	9.83	20.13	22.80	8.84	18.42	25.97	11.69	21.57	46.70	17.80	18.90	25.88
13	Industrial	8.40	30.30	2.30	9.40	26.40	12.70	24.00	50.40	18.40	13.60	37.50	4.90
14	Public Authority	12.81	13.75	28.43	7.88	12.33	-	19.86	12.03	49.24	24.74	29.24	36.88
15	Resale	27,749.50	4,209.50	3,266.50	26,297.00	4,149.50	5,919.00	41,611.50	9,116.50	8,630.00	47,558.50	4,963.50	8,358.00
		<b>2008</b>											
<u>Line #</u>	<u>Customer Class</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
16	Residential	4.90	4.33	3.33	3.33	3.97	3.90	5.04	6.31	8.65	5.79	5.75	4.64
17	Commercial	26.00	19.47	15.99	14.94	19.64	27.39	15.71	25.95	38.50	19.68	25.89	27.32
18	Industrial	27.10	32.70	12.00	45.60	54.50	33.60	26.20	85.80	13.80	50.10	29.00	2.60
19	Public Authority	22.51	12.79	27.65	13.44	12.22	26.58	22.98	25.36	47.46	33.60	25.41	31.18
20	Resale	32,432.50	2,363.00	3,716.00	25,549.50	4,640.50	7,017.50	49,204.00	13,385.50	11,033.50	44,273.50	5,729.50	3,891.50
		<b>2007</b>											
<u>Line #</u>	<u>Customer Class</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
21	Residential	4.06	4.57	3.21	3.27	4.65	3.70	4.77	8.21	8.61	6.04	4.21	7.48
22	Commercial	11.94	19.61	17.60	16.23	17.93	15.69	25.40	26.99	35.01	18.88	20.74	18.60
23	Industrial	53.10	46.80	37.90	55.60	60.90	36.10	38.60	73.60	30.90	39.10	78.10	22.90
24	Public Authority	13.04	14.84	16.84	13.27	17.03	27.15	24.20	41.47	38.98	29.89	15.34	50.06
25	Resale	26,420.50	4,677.00	3,704.50	25,039.50	4,627.50	8,234.00	51,068.50	4,074.50	9,187.00	55,050.00	4,077.50	4,123.00
		<b>2006</b>											
<u>Line #</u>	<u>Customer Class</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
26	Residential	3.53	4.13	4.65	2.24	6.41	3.38	5.96	3.86	10.58	5.37	4.85	3.94
27	Commercial	22.39	18.07	14.10	23.51	22.92	10.27	30.01	21.05	36.77	19.94	20.14	23.65
28	Industrial	44.90	97.00	53.60	89.80	91.80	71.40	96.40	136.80	59.30	64.60	89.30	43.40
29	Public Authority	14.70	14.14	28.67	11.44	21.24	34.04	19.31	11.47	70.73	21.40	16.04	32.31
30	Resale	30,504.50	3,183.50	2,878.00	31,131.50	5,072.00	7,086.50	40,170.00	6,084.00	7,976.00	54,686.00	4,045.00	2,991.50

**United Water Rhode Island, Inc.  
Water Use Per Customer by Class**

		<b>2005</b>											
		<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
31	Residential	3.62	5.98	3.73	3.85	4.28	3.96	4.41	7.96	9.98	6.33	4.88	6.34
32	Commercial	24.39	22.10	13.28	25.51	18.39	14.05	30.79	28.95	31.71	28.70	21.64	23.17
33	Industrial	75.10	117.00	102.50	101.40	133.40	96.70	81.70	160.50	76.70	77.30	103.90	79.70
34	Public Authority	13.74	18.58	30.57	14.05	11.78	28.70	18.53	28.49	67.33	36.60	21.54	48.22
35	Resale	38,582.00	649.50	635.00	36,571.50	525.00	751.50	47,607.00	1,110.00	931.50	73,666.00	4,256.00	4,915.50
		<b>2004</b>											
		<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
36	Residential	4.40	4.55	4.14	3.68	4.32	4.75	5.40	6.41	7.72	6.25	5.11	4.46
37	Commercial	15.20	20.72	19.34	12.51	19.56	22.63	19.84	23.63	30.57	23.54	21.42	13.63
38	Industrial	108.20	108.40	65.00	92.60	117.90	151.60	113.60	159.30	125.50	143.50	113.00	68.30
39	Public Authority	25.59	15.32	22.56	19.49	15.62	16.58	37.78	25.41	53.65	27.11	21.79	30.46
40	Resale	39,383.00	662.50	509.00	40,663.00	663.50	1,168.00	59,033.50	757.00	33,832.00	64,216.50	421.00	592.50
		<b>2003</b>											
		<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
41	Residential	4.50	4.45	4.34	3.79	4.37	4.31	4.93	5.71	7.30	6.59	5.23	4.86
42	Commercial	15.49	20.26	21.53	13.46	19.56	22.15	18.12	24.65	29.14	23.84	22.76	21.85
43	Industrial	83.30	93.40	74.40	95.20	104.30	78.50	109.80	159.90	167.20	159.30	104.30	72.70
44	Public Authority	18.30	15.34	32.30	16.67	16.11	31.76	15.07	36.78	52.64	34.34	50.58	40.32
45	Resale	26,987.00	4,617.00	537.50	39,274.00	610.50	721.00	48,230.50	21,031.00	820.00	67,248.50	518.00	534.50
		<b>2002</b>											
		<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
46	Residential	4.65	4.36	3.90	3.67	4.37	4.56	5.56	6.94	8.77	7.25	5.70	4.71
47	Commercial	15.06	35.49	18.37	12.57	18.82	21.18	31.02	24.73	29.12	22.69	23.35	21.13
48	Industrial	84.20	126.20	80.60	103.50	127.40	119.90	122.90	131.50	104.10	124.70	94.10	82.30
49	Public Authority	18.63	15.64	40.99	13.32	19.54	41.31	18.30	21.55	63.33	44.67	27.42	42.57
50	Resale	8,766.00	168.50	154.33	8,135.17	194.33	231.83	12,607.17	457.67	546.67	29,558.00	345.67	178.33
		<b>2001</b>											
		<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
51	Residential	4.24	4.23	4.76	3.62	4.78	4.74	5.81	6.60	9.05	6.99	5.58	5.08
52	Commercial	23.34	18.40	18.13	18.32	20.31	24.21	21.03	26.85	34.95	24.93	27.54	22.34
53	Industrial	167.70	189.60	129.10	117.30	112.70	90.30	135.30	110.20	168.20	141.90	139.50	94.70
54	Public Authority	14.19	16.69	43.22	13.85	13.21	37.75	19.75	20.90	66.76	35.68	19.96	44.78
55	Resale	13,441.67	1,760.17	194.83	7,911.33	2,490.83	3,033.00	12,308.17	3,415.83	2,762.50	15,296.50	4,389.50	2,308.67

**Response to Part A: Actual cooling degree days:**

	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
2006	0.0	0.0	0.0	0.0	28.5	138.4	334.8	223.4	98.1	0.0	0.0	0.0
2007	0.0	0.0	0.0	0.0	45.7	132.0	257.4	229.9	67.7	26.6	0.0	0.0
2008	0.0	0.0	0.0	0.0	1.3	197.4	332.9	159.1	767.0	0.4	0.0	0.0
2009	0.0	0.0	0.0	7.5	10.4	75.6	197.2	301.8	38.8	0.0	0.0	0.0
2010	0.0	0.0	0.0	1.4	53.8	196.8	375.9	248.2	96.2	2.3	0.0	0.0
2011	0.0	0.0	0.0	0.0	38.3	107.8	319.0					

**Response to Part B: NOAA Cooling degree days 30 year average:**

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
0	0	0	3	25	122	265	223	71	5	0	0

**Response to Part C: Actual Rainfall:**

	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
2006	6.35	2.00	0.40	3.11	6.78	8.90	4.79	4.22	3.89	5.64	3.88	2.43	52.39
2007	4.68	2.60	4.10	7.60	1.95	1.91	3.06	2.21	2.25	2.27	3.36	4.27	40.26
2008	2.20	5.11	5.39	3.45	2.57	2.59	3.97	2.61	1.33	2.14	3.55	5.95	40.86
2009	3.79	1.75	2.34	5.67	3.26	4.63	11.70	1.99	1.82	5.83	2.58	5.01	50.37
2010	2.89	4.67	16.13	2.01	2.18	1.59	0.64	2.25	0.20	3.71	4.09	3.44	43.80
2011	2.97	5.36	2.48	5.98	3.17	5.21	2.75						

**Response to Part D: NOAA 30 year average rainfall:**

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
4.37	3.45	4.43	4.16	3.16	3.38	3.17	3.90	3.70	3.69	4.40	4.14	45.95

Pool Sales by Month  
January 2010 - July 2011

<b>Month</b>	<b>Gallons</b>	<b>\$ Amount</b>
Jan-10	12,400	32.12
May-10	278,500	853.01
Jun-10	1,043,000	3,198.82
Jul-10	259,400	776.45
Aug-10	2,663,200	8,110.19
Sep-10	15,000	48.14
Oct-10	7,350	22.52
Nov-10	926,000	2,837.00
Jun-11	252,000	771.95
Jul-11	1,350,000	3,496.00
	<b>6,806,850</b>	<b>20,146.20</b>

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.  
To The Division of Public Utilities And Carriers'  
Data Requests

Set 4

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Div. 4-7: Reference the response to DIV. 1-18, DIV. 1-8, and the electronic version of the cost of service study, "Units" tab. Please explain why the response to DIV. 1-18 shows three wholesale customers, DIV. 1-8 identifies two wholesale customers, and the cost of service study includes one wholesale customer.

RESPONSE: As explained in the Company's response to Div 4-6, part A., the number of Resale customers shown on the internal report used in Div 1-18 has been changed from 3 to 2. The Company had been counting its number of Resale connections as customers, but after review will consider each town (South Kingstown and Narragansett) a single customer, making the total 2.

The Cost of Service study "Units" tab identifies the number of Company-owned Resale meters properly at one. Only the meter for the Middlebridge and Torrey Road Account in South Kingstown is owned by the Company. The other three Resale meters are owned and maintained by the towns.

Prepared by: Ugboaja

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4255  
Response of United Water Rhode Island, Inc.  
To The Division of Public Utilities And Carriers'  
Data Requests  
Set 4

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Div. 4-8      Reference the response to DIV. 1-7. Please provide any evidence that wholesale customers maintain adequate levels of storage and place no peak hour demands on the Company, given that the data relied upon was from a 1991 Report on Water Rates. Demonstrate that flows to wholesale customers are uniform on an hourly basis throughout the day.

RESPONSE: Both communities have water storage tanks: South Kingstown has two and Narragansett has three. While the uses from these two customers are not uniform, they do not exhibit any real spikes in demand. Both communities take water from the Company based on the level of their tanks. Typically the tanks are drawn down during the day and refilled at night.

The Company does not have data that would confirm or deny uniform usage on an hourly basis throughout the day.

Prepared by: Woodcock, Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.  
To The Division of Public Utilities And Carriers'

Data Requests

Set 4

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Div. 4-9      Reference the electronic version of the cost of service study, "Units" tab. Please explain and provide workpapers and calculations showing the derivation of the Residential first and second Block sales quantities.

RESPONSE: Please see Schedule DIV 4-9 Attachment.

In reviewing its response to this request, the Company discovered an error in which the projected change in consumption was not converted from gallons to CCFs before inclusion in the Pro Forma Rate Year consumption. As a result, the projected consumption used in the filing was understated by 7,985 CCFs. The Attachment shows the impact before and after the error.

The corrected consumption results in a revenue requirement amount that is \$17,623 lower than the filed amount.

Prepared by: Ugboaja

**United Water Rhode Island, Inc.**  
**Growth Projections - Using 5 Years of Data**

A	Customer Growth: Trend Method	2001 - 2010									Projected	Projected	
		2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	No. of Customers 2011	No. of Customers 2012
	Residential	6,628	6,749	6,828	6,922	7,015	7,053	7,153	7,195	7,251	7,306	7,373	7,421
	Commercial	684	694	699	703	704	704	706	709	712	713	716	716
	Industrial	10	10	10	10	10	10	10	10	10	10	10	10
	Public Authority	96	96	97	97	97	97	97	97	97	97	97	97
	Resale	6	5	3	3	3	3	3	3	3	3	3	3
	<b>Total</b>	<b>7,423</b>	<b>7,554</b>	<b>7,636</b>	<b>7,735</b>	<b>7,829</b>	<b>7,867</b>	<b>7,969</b>	<b>8,014</b>	<b>8,073</b>	<b>8,129</b>	<b>8,199</b>	<b>8,247</b>

  

B	Historical Consumption (in '000 Gallons)	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
	Residential	434,280	435,245	412,499	423,890	458,587	415,820	449,269	431,467	389,122	423,976
	Commercial	191,685	189,868	176,586	170,562	199,009	185,040	172,713	196,042	176,949	188,267
	Industrial	15,965	13,014	13,023	13,669	12,059	9,383	5,736	4,130	2,383	1,952
	Public Authority	33,225	35,203	34,859	30,203	32,798	28,664	29,304	29,214	26,816	26,556
	Resale	415,878	276,711	422,259	483,803	420,401	391,617	400,567	406,473	383,658	415,797
	<b>Total</b>	<b>1,091,033</b>	<b>950,041</b>	<b>1,059,226</b>	<b>1,122,127</b>	<b>1,122,854</b>	<b>1,030,524</b>	<b>1,057,589</b>	<b>1,067,326</b>	<b>978,928</b>	<b>1,056,548</b>

  

C	Average Per Capita Usage (B / A)	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
	Except Residential	280.41	273.65	252.81	242.65	282.68	262.84	244.69	276.63	248.52	264.05
	Commercial	1,596.50	1,301.40	1,302.30	1,366.90	1,205.90	938.30	573.60	413.00	238.30	195.20
	Industrial	347.30	367.34	360.61	311.37	338.12	295.51	302.10	301.18	276.45	273.78
	Public Authority	69,313.00	52,706.86	140,753.00	161,267.67	140,133.67	130,539.00	133,522.33	135,491.00	127,886.00	138,599.00
	Resale										

  

D	Projected Consumption (D x A...projected)	5- Yr Average	2011 Consumption	2012 Consumption
	Residential		413,893	416,589
	Commercial	259.35	185,679	185,679
	Industrial	471.68	1,952	1,952
	Public Authority	289.80	28,111	28,111
	Resale	133,207.47	399,622	399,622
			<u>1,029,257</u>	<u>1,031,953</u>

**United Water Rhode Island, Inc.**  
**Change in consumption - Test Year to Rate Year - (12/31/2010 - 12/31/2012)**

RESIDENTIAL Change in Customers	Customer Class	Billing Frequency	Unit of Measure	Meter Size	Test Year Normalized Bills		Incremental Bills	Rate Year Normalized New Bills	
					Prop. Cust Growth				
115	RES	Q	CCF	5/8"	27,810	113	450		28,260
	RES	Q	CCF	3/4"	20	0	0		20
	RES	Q	CCF	1"	555	2	9		564
	RES	Q	CCF	1 1/2"	44	0	1		45
	RES	Q	CCF	2"	17	0	0		17
	RES	Q	CCF	3"	-	-	-		-
	RES	Q	CCF	4"	-	-	-		-
	RES	Q	CCF	6"	-	-	-		-
	RES	Q	CCF	8"	-	-	-		-
					<b>Total</b>	<u>28,446</u>	<u>115</u>		

  

Change in Consumption	Block Split	2010 Test Year		Change in Consumption 0-24 CCF	Change in Consumption Over 24 CCF	2012 Rate Year		
		Actual Consumption 0-24 CCF	Actual Consumption Over 24 CCF			Rate Year Consumption 0-24 CCF	Rate Year Consumption Over 24 CCF	
-7387	(5,548) Blk 1	5/8"	414,686	114,834	(5,405)	(1,497)	409,281	113,337
	(1,840) Blk 2	3/4"	320	226	(4)	(3)	316	223
		1"	9,416	17,009	(123)	(222)	9,293	16,787
		1 1/2"	895	6,521	(12)	(85)	884	6,436
		2"	344	2,554	(4)	(33)	340	2,520
		3"	-	-	-	-	-	-
		4"	-	-	-	-	-	-
		6"	-	-	-	-	-	-
		8"	-	-	-	-	-	-
				<u>425,662</u>	<u>141,143</u>	<u>(5,548)</u>	<u>(1,840)</u>	<u>420,114</u>

Total Residential Rate Year Consumption: 559,418 CCF

**United Water Rhode Island, Inc.**  
**Change in consumption - Test Year to Rate Year - (12/31/2010 - 12/31/2012)**

<b>COMMERCIAL</b>									
Change in Customers	Customer Class	Billing Frequency	Unit of Measure	Meter Size	Normalized Bills	Prop. Cust Growth	Incremental Bills	Rate Year New Bills	
3	COM	Q	CCF	5/8"	1,433	2	6	1,439	
	COM	Q	CCF	3/4"	-	-	-	-	
	COM	Q	CCF	1"	451	-	-	451	
	COM	Q	CCF	1 1/2"	223	-	-	223	
	COM	Q	CCF	2"	455	1	4	459	
	COM	Q	CCF	3"	20	-	-	20	
	COM	Q	CCF	4"	-	-	-	-	
	COM	Q	CCF	6"	16	-	-	16	
	COM	Q	CCF	8"	4	-	-	4	
				<b>Total</b>	<b>2,602</b>	<b>3</b>		<b>2,612</b>	

  

Change in Consumption	Block Split	2010 Test Year		Change in Consumption All CCF	Change in Consumption All CCF	2012 Rate Year	
		Actual Consumption All CCF	Actual Consumption All CCF			Rate Year Consumption All CCF	Rate Year Consumption All CCF
-2588							
	- Blk 1	5/8"	34,834	(433)	-	34,401	-
	- Blk 2	3/4"	-	-	-	-	-
		1"	33,906	(422)	-	33,484	-
		1 1/2"	26,378	(328)	-	26,050	-
		2"	97,862	(1,217)	-	96,645	-
		3"	9,442	(117)	-	9,325	-
		4"	-	-	-	-	-
		6"	5,074	(63)	-	5,011	-
		8"	616	(8)	-	608	-
		<b>Total</b>	<b>208,112</b>	<b>(2,588)</b>	<b>-</b>	<b>205,524</b>	<b>-</b>

Total Commercial Rate Year Consumption: 205,524 CCF

<b>INDUSTRIAL</b>									
Change in Customers	Customer Class	Billing Frequency	Unit of Measure	Meter Size	Normalized Bills	Prop. Cust Growth	Incremental Bills	Rate Year New Bills	
0	IND	M	CCF	5/8"	12	-	-	12	
	IND	M	CCF	3/4"	-	-	-	-	
	IND	M	CCF	1"	12	-	-	12	
	IND	M	CCF	1 1/2"	-	-	-	-	
	IND	M	CCF	2"	24	-	-	24	
	IND	M	CCF	3"	-	-	-	-	
	IND	M	CCF	4"	12	-	-	12	
	IND	M	CCF	6"	-	-	-	-	
	IND	M	CCF	8"	-	-	-	-	
				<b>Total</b>	<b>60</b>	<b>-</b>		<b>60</b>	

  

Change in Consumption	Block Split	2010 Test Year		Change in Consumption All CCF	Change in Consumption All CCF	2012 Rate Year	
		Actual Consumption All CCF	Actual Consumption All CCF			Rate Year Consumption All CCF	Rate Year Consumption All CCF
-351							
	- Blk 1	5/8"	101	(20)	-	81	-
	- Blk 2	3/4"	-	-	-	-	-
		1"	12	(2)	-	10	-
		1 1/2"	-	-	-	-	-
		2"	1,592	(319)	-	1,273	-
		3"	-	-	-	-	-
		4"	49	(10)	-	39	-
		6"	-	-	-	-	-
		8"	-	-	-	-	-
		<b>Total</b>	<b>1,754</b>	<b>(351)</b>	<b>-</b>	<b>1,403</b>	<b>-</b>

Total Industrial Rate Year Consumption: 1,403 CCF

**United Water Rhode Island, Inc.**  
**Change in consumption - Test Year to Rate Year - (12/31/2010 - 12/31/2012)**

PUBLIC AUTHORITY		2010 Test Year		Change in Consumption All CCF	Change in Consumption All CCF	2012 Rate Year	
		Actual Consumption All CCF	Actual Consumption All CCF			Rate Year Consumption All CCF	Rate Year Consumption All CCF
Change in Consumption	Block Split						
1555		5/8"	999	44	-	1,043	-
	- Blk 1	3/4"	-	-	-	-	-
	- Blk 2	1"	679	30	-	709	-
		1 1/2"	2,100	92	-	2,192	-
		2"	18,453	808	-	19,261	-
		3"	7,847	344	-	8,191	-
		4"	729	32	-	761	-
		6"	4,696	206	-	4,902	-
		8"	-	-	-	-	-
			<u>35,503</u>	<u>1,555</u>	<u>-</u>	<u>37,058</u>	<u>-</u>
Total Public Authority Rate Year Consumption:						<u>37,058</u>	CCF
RESALE			Consumption Gallons	Change in Consumption Gallons	Change in Consumption Gallons	Rate Year Consumption Gallons	Rate Year Consumption Gallons
Change in Consumption	Block Split						
-16175		Middlebridge	15,994	(623)	-	15,371	-
		South Kingstown Rt	126,162	(4,914)	-	121,248	-
		Point Judith System	217,207	(8,461)	-	208,746	-
		Narragansett North E	55,881	(2,177)	-	53,704	-
			<u>415,244</u>	<u>(16,175)</u>	<u>-</u>	<u>399,069</u>	<u>-</u>
Total Resale Rate Year Consumption:						<u>399,069</u>	Gallons
<b>Summary - Total Consumption - CCF</b>							
Residential			559,418				
Commercial			205,524				
Industrial			1,403				
PA			37,058				
Resale			<u>534,255</u>				
			<u>1,337,657</u>				

**United Water Rhode Island, Inc.**  
**Growth Projections - Using 5 Years of Data**

A	Customer Growth: Trend Method										Projected	Projected
	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	No. of Customers 2011	No. of Customers 2012
Residential	6,628	6,749	6,828	6,922	7,015	7,053	7,153	7,195	7,251	7,306	7,373	7,421
Commercial	684	694	699	703	704	704	706	709	712	713	716	716
Industrial	10	10	10	10	10	10	10	10	10	10	10	10
Public Authority	96	96	97	97	97	97	97	97	97	97	97	97
Resale	6	5	3	3	3	3	3	3	3	3	3	3
<b>Total</b>	<b>7,423</b>	<b>7,554</b>	<b>7,636</b>	<b>7,735</b>	<b>7,829</b>	<b>7,867</b>	<b>7,969</b>	<b>8,014</b>	<b>8,073</b>	<b>8,129</b>	<b>8,199</b>	<b>8,247</b>

B	Historical Consumption (in '000 Gallons)									
	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
Residential	434,280	435,245	412,499	423,890	458,587	415,820	449,269	431,467	389,122	423,976
Commercial	191,685	189,868	176,586	170,562	199,009	185,040	172,713	196,042	176,949	188,267
Industrial	15,965	13,014	13,023	13,669	12,059	9,383	5,736	4,130	2,383	1,952
Public Authority	33,225	35,203	34,859	30,203	32,798	28,664	29,304	29,214	26,816	26,556
Resale	415,878	276,711	422,259	483,803	420,401	391,617	400,567	406,473	383,658	415,797
<b>Total</b>	<b>1,091,033</b>	<b>950,041</b>	<b>1,059,226</b>	<b>1,122,127</b>	<b>1,122,854</b>	<b>1,030,524</b>	<b>1,057,589</b>	<b>1,067,326</b>	<b>978,928</b>	<b>1,056,548</b>

C	Average Per Capita Usage (B / A)									
	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
Commercial	280.41	273.65	252.81	242.65	282.68	262.84	244.69	276.63	248.52	264.05
Industrial	1,596.50	1,301.40	1,302.30	1,366.90	1,205.90	938.30	573.60	413.00	238.30	195.20
Public Authority	347.30	367.34	360.61	311.37	338.12	295.51	302.10	301.18	276.45	273.78
Resale	69,313.00	52,706.86	140,753.00	161,267.67	140,133.67	130,539.00	133,522.33	135,491.00	127,886.00	138,599.00

D	Projected Consumption (in '000 Gallons)			Source: Item 2.8 h page 11 of 21
(D x A...projected)	5- Yr Average	2011 Consumption	2012 Consumption	
Residential		413,893	416,589	
Commercial	259.35	185,679	185,679	
Industrial	471.68	1,952	1,952	
Public Authority	289.80	28,111	28,111	
Resale	133,207.47	399,622	399,622	
		<b>1,029,257</b>	<b>1,031,953</b>	

**United Water Rhode Island, Inc.**  
**Change in consumption - Test Year to Rate Year - (12/31/2010 - 12/31/2012)**

RESIDENTIAL	Change in Customers	Customer Class	Billing Frequency	Unit of Measure	Meter Size	Test Year Normalized Bills	Prop. Cust Growth	Incremental Bills	Rate Year Normalized New Bills
	115	RES	Q	CCF	5/8"	27,810	113	450	28,260
		RES	Q	CCF	3/4"	20	0	0	20
		RES	Q	CCF	1"	555	2	9	564
		RES	Q	CCF	1 1/2"	44	0	1	45
		RES	Q	CCF	2"	17	0	0	17
		RES	Q	CCF	3"	-	-	-	-
		RES	Q	CCF	4"	-	-	-	-
		RES	Q	CCF	6"	-	-	-	-
		RES	Q	CCF	8"	-	-	-	-
					<b>Total</b>	<b>28,446</b>	<b>115</b>		<b>28,906</b>

Change in Consumption	Block Split	Meter Size	2010 Test Year		Change in Consumption 0-24 CCF	Change in Consumption Over 24 CCF	2012 Rate Year	
			Actual Consumption 0-24 CCF	Actual Consumption Over 24 CCF			Rate Year Consumption 0-24 CCF	Rate Year Consumption Over 24 CCF
-10		5/8"	414,686	114,834	(7)	(2)	414,679	114,832
	(7) Blk 1	3/4"	320	226	(0)	(0)	320	226
	(2) Blk 2	1"	9,416	17,009	(0)	(0)	9,416	17,009
		1 1/2"	895	6,521	(0)	(0)	895	6,521
		2"	344	2,554	(0)	(0)	344	2,554
		3"	-	-	-	-	-	-
		4"	-	-	-	-	-	-
		6"	-	-	-	-	-	-
		8"	-	-	-	-	-	-
			<b>425,662</b>	<b>141,143</b>	<b>(7)</b>	<b>(2)</b>	<b>425,654</b>	<b>141,141</b>

Total Residential Rate Year Consumption: 566,795 CCF

**United Water Rhode Island, Inc.**  
**Change in consumption - Test Year to Rate Year - (12/31/2010 - 12/31/2012)**

**COMMERCIAL**

Change in Customers	Customer Class	Billing Frequency	Unit of Measure	Meter Size	Normalized Bills	Prop. Cust Growth	Incremental Bills	Rate Year New Bills
3	COM	Q	CCF	5/8"	1,433	2	6	1,439
	COM	Q	CCF	3/4"	-	-	-	-
	COM	Q	CCF	1"	451	-	-	451
	COM	Q	CCF	1 1/2"	223	-	-	223
	COM	Q	CCF	2"	455	1	4	459
	COM	Q	CCF	3"	20	-	-	20
	COM	Q	CCF	4"	-	-	-	-
	COM	Q	CCF	6"	16	-	-	16
	COM	Q	CCF	8"	4	-	-	4
				<b>Total</b>	<b>2,602</b>	<b>3</b>		<b>2,612</b>

Change in Consumption	Block Split	2010 Test Year		Change in Consumption All CCF	Change in Consumption All CCF	2012 Rate Year	
		Actual Consumption All CCF	Actual Consumption All CCF			Rate Year Consumption All CCF	Rate Year Consumption All CCF
-3							
	- Blk 1	5/8"	34,834	(1)	-	34,833	-
	- Blk 2	3/4"	-	-	-	-	-
		1"	33,906	(1)	-	33,905	-
		1 1/2"	26,378	(0)	-	26,378	-
		2"	97,862	(2)	-	97,860	-
		3"	9,442	(0)	-	9,442	-
		4"	-	-	-	-	-
		6"	5,074	(0)	-	5,074	-
		8"	616	(0)	-	616	-
		<b>Total</b>	<b>208,112</b>	<b>(3)</b>	<b>-</b>	<b>208,109</b>	<b>-</b>
Total Commercial Rate Year Consumption:						<u>208,109</u>	CCF

**INDUSTRIAL**

Change in Customers	Customer Class	Billing Frequency	Unit of Measure	Meter Size	Normalized Bills	Prop. Cust Growth	Incremental Bills	Rate Year New Bills
0	IND	M	CCF	5/8"	12	-	-	12
	IND	M	CCF	3/4"	-	-	-	-
	IND	M	CCF	1"	12	-	-	12
	IND	M	CCF	1 1/2"	-	-	-	-
	IND	M	CCF	2"	24	-	-	24
	IND	M	CCF	3"	-	-	-	-
	IND	M	CCF	4"	12	-	-	12
	IND	M	CCF	6"	-	-	-	-
	IND	M	CCF	8"	-	-	-	-
				<b>Total</b>	<b>60</b>			<b>60</b>

Change in Consumption	Block Split	2010 Test Year		Change in Consumption All CCF	Change in Consumption All CCF	2012 Rate Year	
		Actual Consumption All CCF	Actual Consumption All CCF			Rate Year Consumption All CCF	Rate Year Consumption All CCF
0							
	- Blk 1	5/8"	101	(0)	-	101	-
	- Blk 2	3/4"	-	-	-	-	-
		1"	12	(0)	-	12	-
		1 1/2"	-	-	-	-	-
		2"	1,592	(0)	-	1,592	-
		3"	-	-	-	-	-
		4"	49	(0)	-	49	-
		6"	-	-	-	-	-
		8"	-	-	-	-	-
		<b>Total</b>	<b>1,754</b>	<b>(0)</b>	<b>-</b>	<b>1,754</b>	<b>-</b>
Total Industrial Rate Year Consumption:						<u>1,754</u>	CCF

**United Water Rhode Island, Inc.**  
**Change in consumption - Test Year to Rate Year - (12/31/2010 - 12/31/2012)**

PUBLIC AUTHORITY		2010 Test Year		Change in Consumption All CCF	Change in Consumption All CCF	2012 Rate Year	
		Actual Consumption All CCF	Actual Consumption All CCF			Rate Year Consumption All CCF	Rate Year Consumption All CCF
Change in Consumption	Block Split						
2		5/8"	999	0	0	999	-
	- Blk 1	3/4"	-	-	-	-	-
	- Blk 2	1"	679	0	0	679	-
		1 1/2"	2,100	0	0	2,100	-
		2"	18,453	1	1	18,454	-
		3"	7,847	0	0	7,847	-
		4"	729	0	0	729	-
		6"	4,696	0	0	4,696	-
		8"	-	-	-	-	-
			<u>35,503</u>		<u>2</u>	<u>35,505</u>	

Total Public Authority Rate Year Consumption: 35,505 CCF

RESALE		Consumption Gallons	Consumption Gallons	Change in Consumption Gallons	Change in Consumption Gallons	Rate Year Consumption Gallons	Rate Year Consumption Gallons
Change in Consumption	Block Split						
-16175		Middlebridge	15,994	-	(623)	15,371	-
		South Kingstown Rt	126,162	-	(4,914)	121,248	-
		Point Judith System	217,207	-	(8,461)	208,746	-
		Narragansett North E	55,881	-	(2,177)	53,704	-
			<u>415,244</u>		<u>(16,175)</u>	<u>399,069</u>	

Total Resale Rate Year Consumption: 399,069 Gallons

Total Resale Rate Year Consumption: 533,480 CCF

**Summary - Total Consumption - CCF**

Residential	566,795
Commercial	208,109
Industrial	1,754
PA	35,505
Resale	<u>533,480</u>
	<u>1,345,642</u>

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.  
To The Division of Public Utilities And Carriers'  
Data Requests  
Set 4

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Div. 4-11 Please explain why it would be unreasonable to credit a share of pool-fill sales revenue to public or private fire service.

RESPONSE: Tanker trucks that take water to fill swimming pools take the water from a designated area, not through any fire hydrants. Accordingly, it would not be appropriate to give any credit for these sales to any direct (hydrant) related fire charges.

The miscellaneous revenues, including pool fill sales, are credited to general water service (90%) and customer service (10%) (see Woodcock Ex 5, Sch. 3). The miscellaneous revenues allocated to general water service are allocated to (credited to) the base function (see Woodcock Ex 5, Sch. 5). As shown on Woodcock Ex 5, Sch. 7, a small portion of the "base" miscellaneous revenues are credited to the fire protection costs.

Prepared by: Woodcock, Knox

**CERTIFICATION**

I hereby certify that on August 30, 2011, 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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