

April 27, 2012

Ms. Luly Massaro, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Blvd  
Warwick, R.I. 02888

RE: City of Woonsocket, Water Division – Docket No. 4320

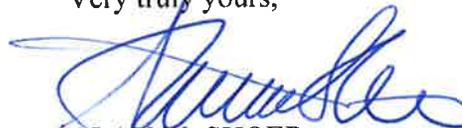
Dear Luly:

On behalf of the City of Woonsocket, Water Division (“WWD”) enclosed please find an original and three (3) copies of WWD’s Responses to the Division of Public Utilities and Carriers’ First Set of Data Requests Issued April 4, 2012 for the aforementioned docket.

There are attachments requested in excel format. These will be e-mailed to the people on the service list.

Please let me know if you have any questions.

Very truly yours,



ALAN M. SHOER

Enclosures

cc: Via E-mail:  
Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: CITY OF WOONSOCKET  
WATER DIVISION APPLICATION  
TO CHANGE RATES

DOCKET NO. 4320

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TO THE DIVISION OF PUBLIC UTILITIES AND CARRIERS'  
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(Issued April 4, 2012)

DIV 1-1.	Please explain the nature of the metering arrangements for private fire services.
RESPONSE	Woonsocket Water requires a separate meter for all fire services.
RESPONDENT	Sheila McGauvran
DATE	April 27, 2012

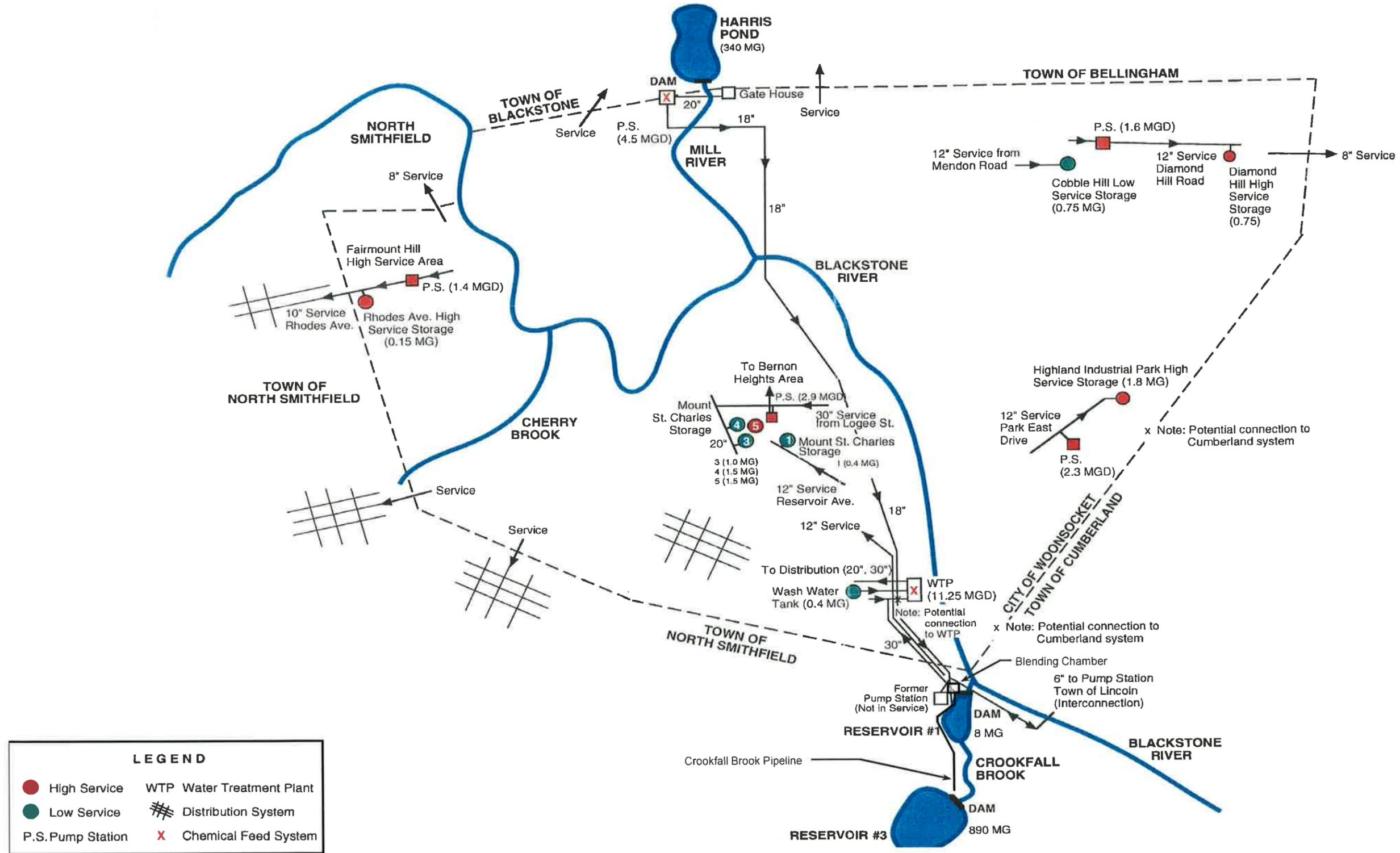
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DIV 1-2.	Please provide a large scale map of the City's water utility facilities, showing sources of supply, treatment plants, major transmission lines, wholesale customers, etc.
RESPONSE	See attached.
RESPONDENT	Sheila McGauvran
DATE	April 27, 2012



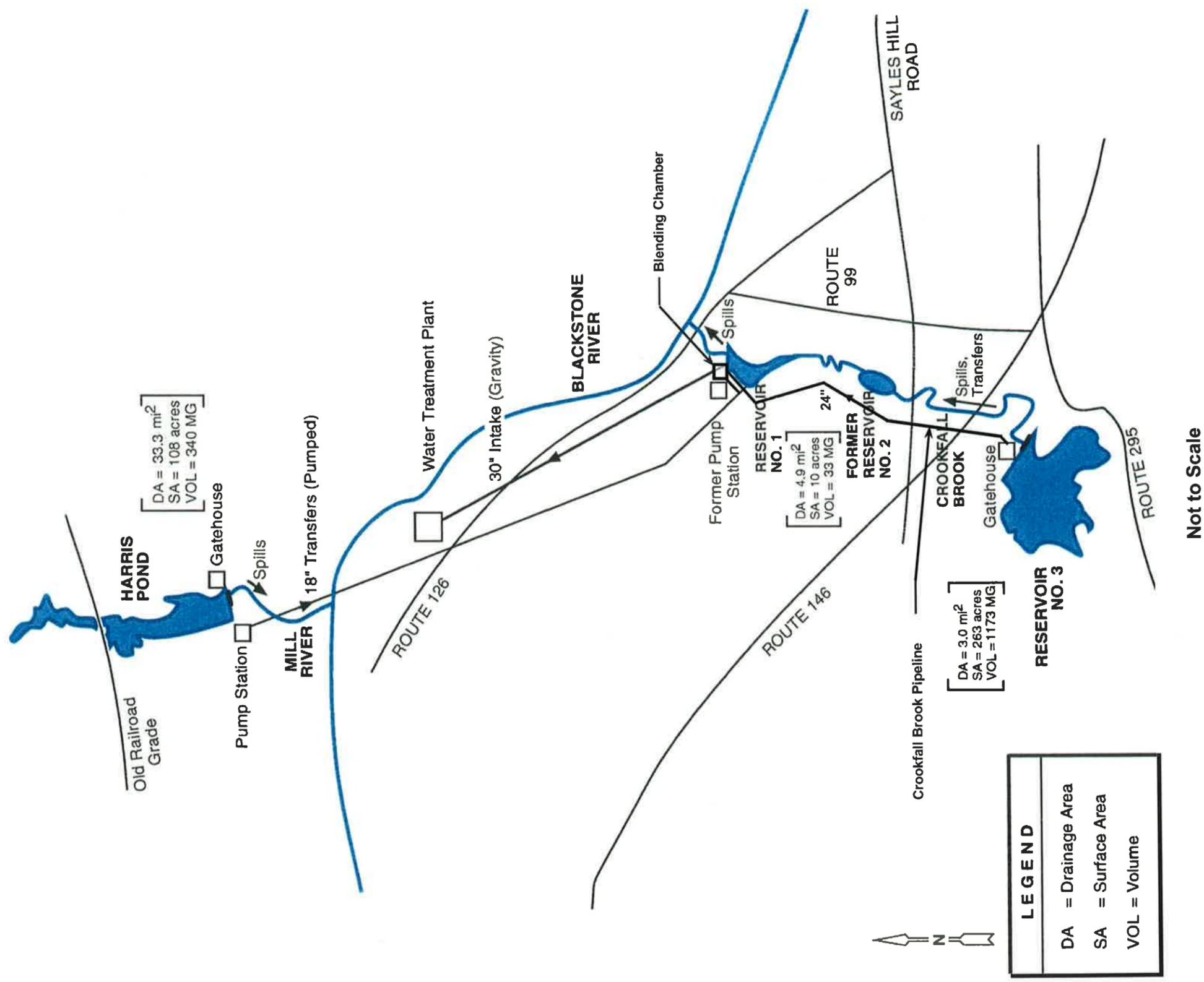
LEGEND	
● High Service	WTP Water Treatment Plant
● Low Service	## Distribution System
P.S. Pump Station	X Chemical Feed System

Not to Scale

Figure 2-1  
Woonsocket Water Supply  
System Schematic

Revised January 2002





**Figure 2-2**  
**Woonsocket Water Supply**  
**Sources Schematic**

Revised January 2002



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DIV 1-3.	Does the City provide free water service to any customers? If yes, please identify the customers and the annual volumes.
RESPONSE	No, the City does not provide free water service to any customers.
RESPONDENT	Sheila McGauvran
DATE	April 27, 2012

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DIV 1-4. Please explain how the retail maximum day and fire demands were determined (Schedules DGB-4B and DGB-4C).

RESPONSE The retail maximum day and fire demands used were not custom calculated by Mr. Bebyn as part of this filing. They are the same retail maximum day and fire demands used in Woonsocket's last cost of service study which was approved in Docket 3800. Furthermore, in preparing the schedules for Docket 3800, Mr. Bebyn had adopted retail maximum day and fire demands previously developed in Woonsocket's prior cases Docket #3626 which were prepared by another rate consultant. Docket #3626 was in turn based on additional prior dockets. No further information could be obtained since previous filings, Dockets #3512 & 2904, were not available on the PUC's website.

RESPONDENT David Bebyn

DATE April 27, 2012

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DIV 1-5.	Please identify CIAC by service (i.e., resale, wholesale, private/public fire) and facility type (mains, services, hydrants).
RESPONSE	Woonsocket Water does not have any CIAC with regard to its fixed assets.
RESPONDENT	David Bebyn
DATE	April 27, 2012

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DIV 1-6.

With respect to wholesale customers;

- a. Please explain whether the customers take service regularly on a daily basis throughout the year or only during peak periods; and
- b. identify the maximum daily demand of wholesale customers for each of the last three years

RESPONSE

- a. Regularly
- b. WWD records of wholesale customer usage is recorded by quarter (see attached). During the last three (3) years, the maximum demand during a three (3) month period in that year was as follows:

<u>2009</u>	<u>1,657,580 cf</u>
<u>2010</u>	<u>2,258,200 cf</u>
<u>2011</u>	<u>1,853,940 cf</u>

RESPONDENT      Sheila McGauvran

DATE                April 27, 2012

## NORTH SMITHFIELD BULK USAGE HISTORY FOR LAST 3 YEARS

Acct # meter size	14200 1.5"	14201 8"	Total cf
2009-06	171980	683000	854980
2009-09	291580	1366000	1657580
2009-12	366310	1291000	1657310
2010-03	220900	1272000	1492900
2010-06	247600	1128000	1375600
2010-09	296200	1962000	2258200 *
2010-12	253490	1211000	1464490
2011-03	262830	1208000	1470830
2011-06	294560	1410000	1704560
2011-09	232940	1621000	1853940
2011-12	188110	1583000	1771110
2012-03	257200	1269000	1526200

\* highest usage quarter within last three year period /by 90 days = 25091cf per day  
usage period = approx. 5/13/2010 - 8/23/2010

**Account Information**

Account Status: Active  
 Account Number: W00-0142-01 *8" meter*  
 Utility Billing Address:  
 TOWN OF NORTH SMITHFIELD  
 PO BOX 248  
 SLATERSVILLE RI 02876-0248

Parcel ID:  
 Location: 0 RHODES AVENUE TANK  
 Property Type: RESIDENTIAL  
 District: NORTH SMITHFIELD  
 Business Type:  
 Section:  
 Billing Freq:

**Water Billing History**

Billing Roll	Read Type	Reading	Reading Date	Consumption	Total
2006-06 Water		645,000	08/03/2006	645,000	\$15,667.70
2006-09 Water		2,406,000	08/21/2006	1,761,000	\$42,451.70
2006-12 Water		4,323,000	11/13/2006	1,917,000	\$62,298.50
2007-03 Water		5,832,000	02/19/2007	1,509,000	\$36,399.70
2007-06 Water		7,091,000	05/14/2007	1,259,000	\$30,216.00
2007-09 Water		9,592,000	08/20/2007	2,501,000	\$73,029.20
2007-12 Water		11,430,000	11/13/2007	1,838,000	\$54,037.20
2008-03 Water		12,411,000	05/19/2008	981,000	\$27,468.00
2008-06 Water		13,453,000	05/19/2008	1,042,000	\$29,176.00
2008-09 Water		155,750	09/23/2008	21,220	\$59,416.00
2008-12 Water		166,530	02/01/2009	10,780	\$30,390.73
2009-03 Water	ACTUAL	18,018,000	03/26/2009	1,365,000	\$38,426.73
2009-06 Water	ACTUAL	18,701,000	05/17/2009	883,000	\$19,330.73
2009-09 Water	ACTUAL	20,067,000	08/18/2009	1,366,000	\$38,454.73
2009-12 Water	ACTUAL	21,358,000	11/16/2009	1,291,000	\$36,354.73
2010-03 Water	ACTUAL	22,630,000	02/23/2010	1,272,000	\$35,822.73
2010-06 Water	ACTUAL	23,758,000	05/13/2010	1,128,000	\$31,790.73
2010-09 Water	ACTUAL	25,720,000	08/23/2010	1,962,000 ✓	\$55,142.73
2010-12 Water	ACTUAL	26,931,000	11/17/2010	1,211,000	\$34,114.73
2011-03 Water	ACTUAL	28,139,000	02/11/2011	1,208,000	\$34,030.73
2011-06 Water	ACTUAL	29,549,000	05/31/2011	1,410,000	\$39,686.73
2011-09 Water	ACTUAL	31,170,000	08/17/2011	1,621,000	\$45,594.73
2011-12 Water	ACTUAL	32,753,000	11/15/2011	1,583,000	\$44,530.73
2012-03 Water	ACTUAL	34,022,000	02/08/2012	1,269,000	\$35,738.73

*highest usage period 5/13/10 - 8/23/10*

**Account Information**

Account Status: Active  
 Account Number: W00-0142-00  
 Utility Billing Address:  
 TOWN OF NORTH SMITHFIELD  
 PO BOX 248  
 SLATERSVILLE RI 02876-0248

1 1/2" meter

Parcel ID:  
 Location: 0 RHODES AVENUE TANK  
 Property Type: RESIDENTIAL  
 District: NORTH SMITHFIELD  
 Business Type:  
 Section:  
 Billing Freq:

**Water Billing History**

Billing Roll	Read Type	Reading	Reading Date	Consumption	Total
2006-06 Water		15,430	06/03/2006	15,430	\$558.02
2006-09 Water		145,160	08/21/2006	129,730	\$3,301.22
2006-12 Water		468,320	11/13/2006	323,160	\$7,755.84
2007-03 Water		796,620	02/19/2007	328,300	\$8,066.90
2007-06 Water		1,065,120	05/14/2007	268,500	\$6,631.70
2007-09 Water		1,310,370	08/20/2007	245,250	\$7,368.03
2007-12 Water		1,566,510	11/13/2007	256,140	\$7,737.25
2008-03 Water		1,884,750	02/18/2008	318,240	\$9,362.80
2008-06 Water		2,164,039	05/19/2008	279,289	\$7,858.71
2008-09 Water		2,347,270	09/02/2008	183,231	\$5,337.20
2008-12 Water		2,606,423	11/19/2008	259,153	\$7,256.28
2009-03 Water	ACTUAL	2,492,950	03/26/2009	259,906	\$7,277.37
2009-06 Water	ACTUAL	2,664,930	05/17/2009	171,980	\$4,815.44
2009-09 Water	ACTUAL	2,956,510	08/18/2009	291,580	\$8,164.24
2009-12 Water	ACTUAL	3,322,820	12/16/2009	366,310	\$10,256.68
2010-03 Water	ACTUAL	3,543,720	02/23/2010	220,900	\$6,185.20
2010-06 Water	ACTUAL	3,791,320	05/13/2010	247,600	\$6,932.80
2010-09 Water	ACTUAL	4,087,520	08/23/2010	296,200	\$8,293.60
2010-12 Water	ACTUAL	4,341,010	11/17/2010	253,490	\$7,097.72
2011-03 Water	ACTUAL	4,603,840	02/11/2011	262,830	\$7,359.24
2011-06 Water	ACTUAL	4,898,400	05/31/2011	294,560	\$8,247.68
2011-09 Water	ACTUAL	5,131,340	08/17/2011	232,940	\$6,522.32
2011-12 Water	ACTUAL	5,319,450	11/15/2011	188,110	\$5,267.08
2012-03 Water	ESTIMATE	5,576,650	02/06/2012	257,200	\$7,201.60

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DIV 1-7.	Please provide a copy of the City's cost of service study in Excel format with all formulas intact.
RESPONSE	See attachment to electronic submission of this request.
RESPONDENT	David Bebyn
DATE	April 27, 2012

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- DIV 1-8. Please provide the basis and supporting documents/workpapers for the following allocation factors found on Schedule DGB-3A:
- a. E
  - b. F
  - c. I
  - d. K
  - e. N
  - f. HE
  - g. Q
  - h. T
  - i. W

RESPONSE

The analysis or explanations used to develop some of these allocators are not available. All of these allocation factors used were not custom calculated by Mr. Bebyn as part of this filing. They are the same allocators used in Woonsocket's last cost of service study which was approved in Docket 3800. Furthermore, in preparing the schedules for Docket 3800, Mr. Bebyn had adopted these allocators previously developed in Woonsocket's prior cases Docket #3626 which were prepared by another rate consultant. Docket #3626 was in turn based on additional prior dockets. No further information could be obtained since previous filings, Dockets #3512 & 2904, were not available on the PUC's website.

Allocators E, N, HE, Q, T, & W tend to be standard allocators and will not vary greatly from year to year. It is intended to adjust allocator F for power costs in a subsequent filing when a new treatment facility will have a greater impact on this allocation. It is also anticipated to adjust allocator I and allocator K.

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DIV 1-9.	Reference Schedule DGB-3, City Service Charges. Please explain the nature of the services provided to the Water Department by the City.
RESPONSE	Attached is a spreadsheet analysis concerning Water Fund charges paid to the City General Fund for services provided by the City to the Water Department.
RESPONDENTS	Thomas Bruce, City of Woonsocket, Finance Director David Bebyn, B & E Consulting
DATE	April 27, 2012

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	COSTS ATTRIBUTABLE TO WATER DIVISION:														
2															
3				\$	201,671										
4				\$	1,544										
5				\$	1,490										
6				\$	6,173										
7				\$	20,000										
8				\$	6,810										
9				\$	15,000										
10				\$	73,435										
11				\$	326,122										
12															
13															
14															
15															
16	DEPARTMENT	DIVISION	EMPLOYEE	POSITION	SALARY (Annual)	FICA 7.65%	PENSION 3.44%	MEDICAL	DENTAL	LIFE INS	WORKERS COMP 0.32%	SALARY & BENEFITS	% of duties attributable to Water Emps*	% of time attributable to Water	Amount charged to Water
17															
18															
19	FINANCE	PERSONNEL	Christina Duarte	Personnel Director	\$56,466.31	\$4,319.67	\$1,942.44	\$16,413.60	\$1,190.88	\$444.00	\$180.69	\$80,957.59	9%		\$7,286.18
20	FINANCE	PERSONNEL	Helen DeThomas	Executive Assistant	\$38,831.58	\$2,970.62	\$1,335.81	\$16,413.60	\$1,190.88	\$333.00	\$124.26	\$61,199.74	9%		\$5,507.98
21	FINANCE	CONTROLS	Kendra Roy	Payroll Clerk	\$46,177.16	\$3,532.55	\$1,588.49	\$16,413.60	\$1,190.88	\$177.60	\$147.77	\$69,228.06	9%		\$6,230.53
22	FINANCE	CONTROLS	Marie Carpentier	Accounting System Clerk	\$30,814.18	\$2,357.28	\$1,060.01	\$6,584.88	\$381.00	\$177.60	\$98.61	\$41,473.56		15%	\$6,221.03
23	FINANCE	CONTROLS	Christine Chamberland	Controller	\$61,934.26	\$4,737.97	\$2,130.54	\$16,413.60	\$1,190.88	\$177.60	\$198.19	\$86,783.03		15%	\$13,017.46
24	FINANCE	OFFICE OF DTR	Thomas Bruce	Finance Director	\$90,000.00	\$6,885.00	\$3,096.00	\$16,413.60	\$1,190.88	\$444.00	\$288.00	\$118,317.48		15%	\$17,747.62
25	FINANCE	OFFICE OF DTR	Diane Cuillo	Executive Secretary	\$37,414.87	\$2,862.24	\$1,287.07	\$6,584.88	\$381.00	\$177.60	\$119.73	\$48,827.39		15%	\$7,324.11
26	FINANCE	OFFICE OF DTR	Cindy Russell	Fiscal Officer	\$58,332.46	\$4,462.43	\$2,006.64	\$16,413.60	\$1,190.88	\$333.00	\$186.66	\$82,925.67		15%	\$12,438.85
27	FINANCE	OFFICE OF DTR	Jessica Desrochers	Purchase Order Clerk	\$36,776.47	\$2,813.40	\$1,265.11	\$6,584.88	\$381.00	\$177.60	\$117.68	\$48,116.14		15%	\$7,217.42
28	FINANCE	TREASURY	Mary LeClerc	Bookkeeper	\$32,983.61	\$2,523.25	\$1,134.64	\$16,413.60	\$1,190.88	\$177.60	\$105.55	\$54,529.12		20%	\$10,905.82
29	FINANCE	TREASURY	Sue-Ellen Beals	Treasury Aide	\$31,132.08	\$2,381.60	\$1,070.94	\$16,413.60	\$1,190.88	\$177.60	\$99.62	\$52,466.33		20%	\$10,074.78
30	FINANCE	TREASURY	Diane Koback	Accounts Receivable Clerk	\$29,253.92	\$2,237.93	\$1,006.33	\$16,413.60	\$1,190.88	\$177.60	\$93.61	\$50,373.88		20%	\$9,727.58
31	FINANCE	TREASURY	Kavila Keophakdy	Accounts Clerk	\$27,695.75	\$2,118.73	\$952.73	\$16,413.60	\$1,190.88	\$177.60	\$88.63	\$48,637.92		33%	\$47,136.81
32	PUBLIC WORKS	OFFICE OF DTR	Sheila McGauvran	Public Works Director	\$112,010.00	\$8,568.77	\$3,853.14	\$16,413.60	\$1,190.88	\$444.00	\$358.43	\$142,838.82		33%	\$19,623.78
33	PUBLIC WORKS	OFFICE OF DTR	Jennifer Masse	Executive Secretary	\$37,414.87	\$2,862.24	\$1,287.07	\$16,413.60	\$1,190.88	\$177.60	\$119.73	\$59,465.99		10%	\$10,717.65
34	EXECUTIVE	OFFICE OF MAYOR	Leo Fontaine	Mayor	\$80,000.00	\$6,120.00	\$2,752.00	\$16,413.60	\$1,190.88	\$444.00	\$256.00	\$107,176.48			
35															
36	*Total Employees 366/Total Water Employees 33 = 9%														
37	**Total Employees in City Hall 48/Total Water Emps in City Hall 6 = 12.5%														
														TOTAL	\$201,670.86

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DIV 1-10. Reference Schedule DGB-8. Please provide the basis and supporting documents/workpapers for the 90 percent meter and 10 percent services allocation.

RESPONSE The analysis or explanations used to develop the meter and service allocation are not available. All of these allocation factors used were not custom calculated by Mr. Bebyn as part of this filing. They are the same allocators used in Woonsocket's last cost of service study which was approved in Docket 3800. Furthermore, in preparing the schedules for Docket 3800, Mr. Bebyn had adopted these allocators previously developed in Woonsocket's prior cases Docket #3626 which were prepared by another rate consultant. Docket #3626 was in turn based on additional prior dockets. No further information could be obtained since previous filings, Dockets #3512 & 2904, were not available on the PUC's website.

RESPONDENT David Bebyn

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DIV 1-11.	Please provide an electronic copy of Mr. Bebyn's Schedules 3 through 12 in Excel format with all formulas and links intact.
RESPONSE	Schedule 3 has already been provided to the response to DIV 1-7. See attachment to electronic submission of this request for Schedules 4 through 12.
RESPONDENT	David Bebyn
DATE	April 27, 2012