

June 27, 2012

Via Electronic Filing and Regular Mail

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

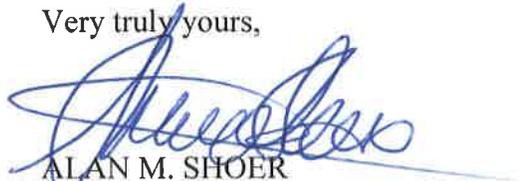
RE: City of Woonsocket, Water Division – Docket No. 4320

Dear Luly:

On behalf of the City of Woonsocket, Water Division (“WWD”), enclosed please find an original and seven (7) copies of WWD’s Responses to the Commission Legal Counsel’s Questions issued June 14, 2012 for this docket.

Please let me know if you have any questions.

Very truly yours,



ALAN M. SHOER
ashoer@apslaw.com

cc: Via E-mail:
Service List

614423.1

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

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

DOCKET NO. 4320

**COMMISSION LEGAL COUNSEL'S QUESTIONS TO
WOONSOCKET WATER DIVISION
(Issued June 14, 2012)**

CLC-3 If the answer to number one is in the affirmative, will this requirement have any effect on WWD's ability to deliver safe and potable water to its customers?

RESPONSE If the answer to number one above is in the affirmative it most likely will not impact "WWD's ability to deliver safe and potable water it customers. As I stated above I expect that the Budget Commission will understand the fact the WWD is an enterprise fund and I believe the Commission will most likely avoid making changes to the operating funds of the WWD that result operating problems for the utility. I think that it is unlikely that the Budget Commission will hurt the WWD standalone water utility operations to help some other part of the City budget.

In addition, the review and/or approval of water utility expenditures by the Budget Commission should not have any effect on WWD's ability to deliver safe and potable water to its customers. The Budget Commission meets regularly, to consider and/or approve expenditures. WWD expects that the Budget Commission will act responsibly to approve all necessary expenditures required to allow the City to deliver safe and potable water to its customers. As long as water utility expenses are authorized by the Budget Commission in a timely manner the fact that the decision on approving funding is from a Budget Commission as compared to the City's finance department should have no impact on WWD's quality and safety of water provided to customers

RESPONDENT Walter E. Edge, Jr. MBA CPA
Alan M. Shoer (as to legal questions)

DATE June 27, 2012

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

IN RE: CITY OF WOONSOCKET :
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WOONSOCKET WATER DIVISION
(Issued June 14, 2012)**

CLC-5 Please provide WWD's most recent accounts payable ageing.

RESPONSE In response to a recent data request from the Commission (COMM 1-26), WWD provided an aging of accounts receivable and accounts payable. WWD refers you to the attachment that was provided in response to this question, and to assist provides another copy with this response. See attached.

RESPONDENT David G. Bebyn CPA
Sheila McGauvran, Public Works Director

DATE June 27, 2012

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: CITY OF WOONSOCKET :
WATER DIVISION APPLICATION : DOCKET NO. 4320
TO CHANGE RATES :

WOONSOCKET WATER DIVISION'S RESPONSES TO
COMMISSION'S FIRST SET OF DATA REQUESTS
(Issued May 17, 2012)

COMM. 1-26 Please provide an ageing of accounts receivable and accounts payable.
RESPONSE See attached.
RESPONDENT Sheila McGauvran
DATE June 8, 2012

Aging Report by Fund by Vendor
City of Woonsocket

6/7/2012 9:57:49 AM
Fiscal Year 2011 - 2012

Account Key	Trans #	Invoice Number	Invoice	Amou	Descripti	Batch	Ag		
						Cur 30+	60+	90+	120
BLUE CHIP									
1-015-W65-54-54471	275	May 2012	5/15/2012	\$5,773.90	Premium - Water	BC015-	23	X	
1-015-W65-54-54471	278	June 2012	5/24/2012	\$5,773.90	Premium - Water	AP015-JUN	14	X	
				Total for BLUE CHIP	\$11,547.80				
						Cur 30+	60+	90+	120
BLUE CROSS									
1-015-W65-54-54471	275	May 2012	5/15/2012	\$1,260.64	BC Plan 65 - Water	BC015-	23	X	
1-015-W65-54-54471	275	May 2012	5/15/2012	\$2,802.24	BC & Phys Service - Plan 100	BC015-	23	X	
1-015-W65-54-54471	278	June 2012	5/24/2012	\$1,260.64	BC Plan 65 - Water	AP015-JUN	14	X	
1-015-W65-54-54471	278	June 2012	5/24/2012	\$2,802.24	BC & Phys Service - Plan 100	AP015-JUN	14	X	
				Total for BLUE CROSS	\$8,125.76				
						Cur 30+	60+	90+	120
CITY TREASURER									
1-015-W65-54-54434	278	W/E 05/05/12	5/10/2012	\$1,035.44	FICA 310 - Water Dept	AP015-JUN	28	X	
1-015-W65-54-54434	278	W/E 05/05/12	5/10/2012	\$357.45	FICA MED - Water Dept	AP015-JUN	28	X	
1-015-W65-54-54434	278	W/E 05/12/12	5/21/2012	\$355.58	FICA MED - Water Dept	AP015-JUN	17	X	
1-015-W65-54-54434	278	W/E 05/12/12	5/21/2012	\$1,030.03	FICA 310 - Water Dept	AP015-JUN	17	X	
1-015-W65-53-53321	279	February 2012	5/22/2012	\$679.68	Diesel gas	AP015-JUN	16	X	
1-015-W65-53-53321	279	February 2012	5/22/2012	\$2,069.87	Unleaded gas	AP015-JUN	16	X	
1-015-W65-53-53321	279	March 2012	5/22/2012	\$1,189.92	Diesel gas	AP015-JUN	16	X	
1-015-W65-53-53321	279	March 2012	5/22/2012	\$1,540.89	Unleaded gas	AP015-JUN	16	X	
1-015-W65-53-53321	279	April 2012	5/23/2012	\$1,630.95	Diesel gas	AP015-JUN	15	X	
1-015-W65-53-53321	279	April 2012	5/23/2012	\$2,222.85	Unleaded gas	AP015-JUN	15	X	
1-015-W65-54-54434	278	W/E 05/19/12	5/25/2012	\$1,054.71	FICA 310 - Water Dept	AP015-JUN	13	X	
1-015-W65-54-54434	278	W/E 05/19/12	5/25/2012	\$364.16	FICA MED - Water Dept	AP015-JUN	13	X	
1-015-W65-54-54434	278	W/E 05/26/12	6/1/2012	\$365.55	FICA MED - Water Dept	AP015-JUN	6	X	
1-015-W65-54-54434	278	W/E 05/26/12	6/1/2012	\$1,058.79	FICA 310 - Water Dept	AP015-JUN	6	X	
				Total for CITY TREASURER	\$14,955.87				
						Cur 30+	60+	90+	120
DELTA DENTAL OF RI									
1-015-W65-54-54472	278	June 2012	5/21/2012	\$3,046.86	Munl/Retirees & Cobra	AP015-JUN	17	X	
				Total for DELTA DENTAL OF RI	\$3,046.86				

RI GENERAL TREASURER

Cur 30+ 60+ 90+ 120

1-015-W65-52-52260	279	Lic# 1559518	5/21/2012	\$14,227.50	PWS Community Lic Renewal	AP015-JUN	17	X
				Total for RI GENERAL TREASURER	\$14,227.50			

UNITED HEALTH CARE

Cur 30+ 60+ 90+ 120

1-015-W65-54-54471	275	May 2012	5/15/2012	\$665.37	Premium - Water	BC015-	23	X
				Total for UNITED HEALTH CARE	\$665.37			

Total for Fund015 \$52,569.16