KEOUGH & SWEENEY, LTD. ATTORNEYS AND COUNSELORS AT LAW 41 MENDON AVENUE PAWTUCKET, RHODE ISLAND 02861 TELEPHONE (401) 724-3600

**FACSIMILE** (401) 724-3000 www.keoughsweeney.com

#### JOSEPH A. KEOUGH JR.\* JEROME V. SWEENEY III\*

#### SEAN P. KEOUGH\* STACI L. KOLB

JEROME V. SWEENEY II OF COUNSEL 171 MILK STREET SUITE 30 BOSTON, MA 02109 TEL. (617) 574-0054 FAX (617) 451-1914

BOSTON OFFICE:

\*ADMITTED TO PRACTICE IN RHODE ISLAND & MASSACHUSETTS

April 12, 2013

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

### Re: City of Newport, Utilities Department, Water Division Docket 4355

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the following documents:

1. Newport Water's Response to the Public Utilities Commission's Hearing Record Request.

Please be advised that an electronic copy of these documents has been sent to the service list.

Thank you for your attention to this matter.

Sincerely,

oseph A. Keough Jr.

JAK/kf Enclosure

RAYNHAM OFFICE: 90 NEW STATE HIGHWAY RAYNHAM, MA 02109 TEL. (508) 822-2813 FAX (508) 822-2832

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION DOCKET NO. 4355 Response Of The City Of Newport, Utilities Division, Water Department To The Commission's Hearing Record Request

**Comm. RR-1**: Please provide information regarding the breakdown of the number of customers affected by Newport's proposed rate changes for different categories of meter sizes and consumption levels.

**Response**: Attached as RR-1 is supplemental information related to the impact of the proposed rates on the bills of various customers at various consumption levels. The schedule is an adaptation of HJS Schedule A-3 from the COS Model.

The information shown is based on FY12 billing data. The column labeled "# of Bills" shows the number of bills that were issued in FY12 where billed consumption fell within the corresponding consumption block. Note that the leftmost column now lists consumption blocks instead of discrete amounts of consumption as was the case on Schedule A-3. The values for "Bill at Current Rates", "Bill at Proposed Rates", "Dollar Change", and "Percent Change" correspond to consumption at the upper limit of the consumption block. For example, in the row for 4,001-5,000 consumption block under Residential (Monthly) the \$49.14 is the bill at proposed rates for 5,000 gallons of consumption.

Also note that the total number of bills shown on this schedule is less than the total number of bills prepared in FY12 because this table does not include all meter sizes. This schedule does not show meters over 3 inches as the majority of customers have meters under 3 inches. As shown on Joint Settlement Schedules A-2, the revenue from billing charges for customers with meters over 3 inches is relatively minor because there are so few customers with meters larger than 3 inches.

Prepared by: Harold J. Smith

# Rhode Isalnd Public Utilities Commission Docket 4355 Supplemental Impact Analysis

			Proposed				Proposed				Proposed			
Customer Class		All Meter Sizes		5/8 Inch Meter 3/4 Inch Met			Meter 1 Incl				ter			
	Monthly	Bill at	Bill at				Bill at				Bill at			
	Consumption	Current	Proposed	Dollar	Percent		Proposed	Dollar	Percent		Proposed	Dollar	Percent	
	Block(gallons)	Rates	Rates	Change	Change	# of Bills	Rates	Change	Change	# of Bills	Rates	Change	Change	# of Bills
Residential (Monthly)														
	<1,001	\$25.18	\$16.18	-\$9.00	-35.7%	21	\$16.28	-\$8.90	-35.3%	7	\$17.20	-\$7.98	-31.7%	16
	1,001-2,000	\$31.61	\$24.42	-\$7.19	-22.7%	8	\$24.52	-\$7.09	-22.4%	7	\$25.44	-\$6.17	-19.5%	7
	2,001-4,000	\$44.47	\$40.90	-\$3.57	-8.0%	7	\$41.00	-\$3.47	-7.8%	14	\$41.92	-\$2.55	-5.7%	18
	4,001-5,000	\$50.90	\$49.14	-\$1.76	-3.5%	2	\$49.24	-\$1.66	-3.3%	9	\$50.16	-\$0.74	-1.5%	10
	5,001-7,500	\$66.98	\$69.74	\$2.77	4.1%	0	\$69.84	\$2.87	4.3%	8	\$70.76	\$3.79	5.7%	56
	7,501-10,000	\$83.05	\$90.34	\$7.29	8.8%	6	\$90.44	\$7.39	8.9%	3	\$91.36	\$8.31	10.0%	60
	10,001-15,000	\$115.20	\$131.54	\$16.34	14.2%	3	\$131.64	\$16.44	14.3%	1	\$132.56	\$17.36	15.1%	28
	15,001-20,000	\$147.35	\$172.74	\$25.39	17.2%	0	\$172.84	\$25.49	17.3%	2	\$173.76	\$26.41	17.9%	15
	20,001-25,000	\$179.50	\$213.94	\$34.44	19.2%	0	\$214.04	\$34.54	19.2%	1	\$214.96	\$35.46	19.8%	8
	25,001-30,000	\$211.65	\$255.14	\$43.49	20.5%	0	\$255.24	\$43.59	20.6%	1	\$256.16	\$44.51	21.0%	5
Residential (Quarterly)		-												
	<1,001	\$25.18	\$19.71	-\$5.47	-21.7%	3,972	\$20.03	-\$5.15	-20.5%	850	\$22.78	-\$2.40	-9.5%	115
	1,001-2,000	\$31.61	\$27.95	-\$3.66	-11.6%	2,251	\$28.27	-\$3.34	-10.6%	412	\$31.02	-\$0.59	-1.9%	52
	2,001-3,000	\$38.04	\$36.19	-\$1.85	-4.9%	2,645	\$36.51	-\$1.53	-4.0%	471	\$39.26	\$1.22	3.2%	36
	3,001-4,000	\$44.47	\$44.43	-\$0.04	-0.1%	2,806	\$44.75	\$0.28	0.6%	533	\$47.50	\$3.03	6.8%	42
	4,001-8,500	\$73.41	\$81.51	\$8.11	11.0%	11,051	\$81.83	\$8.43	11.5%	1,941	\$84.58	\$11.18	15.2%	155
	8,501-15,000	\$115.20	\$135.07	\$19.87	17.2%	11,838	\$135.39	\$20.19	17.5%	2,458	\$138.14	\$22.94	19.9%	281
	15,001-60,000	\$404.55	\$505.87	\$101.32	25.0%	6,164	\$506.19	\$101.64	25.1%	2,217	\$508.94	\$104.39	25.8%	595
	60,001-80,000	\$533.15	\$670.67	\$137.52	25.8%	73	\$670.99	\$137.84	25.9%	47	\$673.74	\$140.59	26.4%	33
	80,001-100,000	\$661.75	\$835.47	\$173.72	26.3%	32	\$835.79	\$174.04	26.3%	21	\$838.54	\$176.79	26.7%	22
	100,001-120,000	\$790.35	\$1,000.27	\$209.92	26.6%	24	\$1,000.59	\$210.24	26.6%	11	\$1,003.34	\$212.99	26.9%	10
							- <b>-</b>							

		Proposed					Propos	sed		Proposed				
	All Meter	5/8 Inch Meter			3/4 Inch Meter				1 Inch Meter					
Monthly	Bill at	Bill at				Bill at				Bill at				
Consumption	Current	Proposed	Dollar	Percent		Proposed	Dollar	Percent		Proposed	Dollar	Percent		
Block(gallons)	Rates	Rates	Change	Change	# of Bills	Rates	Change	Change	# of Bills	Rates	Change	Change	# of Bills	
<2,001	\$31.61	\$26.32	-\$5.29	-16.7%	504	\$26.42	-\$5.19	-16.4%	201	\$27.34	-\$4.27	-13.5%	446	
2,001-5,000	\$50.90	\$53.89	\$2.99	5.9%	227	\$53.99	\$3.09	6.1%	69	\$54.91	\$4.01	7.9%	259	
5,001-10,000	\$83.05	\$99.84	\$16.79	20.2%	217	\$99.94	\$16.89	20.3%	69	\$100.86	\$17.81	21.4%	265	
10,001-25,000	\$179.50	\$237.69	\$58.19	32.4%	130	\$237.79	\$58.29	32.5%	134	\$238.71	\$59.21	33.0%	335	
25,001-30,000	\$211.65	\$283.64	\$71.99	34.0%	12	\$283.74	\$72.09	34.1%	28	\$284.66	\$73.01	34.5%	62	
30,001-40,000	\$275.95	\$375.54	\$99.59	36.1%	21	\$375.64	\$99.69	36.1%	38	\$376.56	\$100.61	36.5%	105	
40,001-50,000	\$340.25	\$467.44	\$127.19	37.4%	5	\$467.54	\$127.29	37.4%	22	\$468.46	\$128.21	37.7%	58	
50,001-75,000	\$501.00	\$697.19	\$196.19	39.2%	12	\$697.29	\$196.29	39.2%	17	\$698.21	\$197.21	39.4%	68	
75,001-100,000	\$661.75	\$926.94	\$265.19	40.1%	11	\$927.04	\$265.29	40.1%	8	\$927.96	\$266.21	40.2%	28	

Non-Residential (Monthly)

**Customer Class** 

## Rhode Isalnd Public Utilities Commission Docket 4355 Supplemental Impact Analysis

				Propos	ed			Propos	ed			Propos	ed		
Customer Class		All Meter Sizes		1.5 Inch N	leter			2 Inch M	eter		3 Inch Meter				
	Monthly	Bill at	Bill at				Bill at				Bill at				
	Consumption	Current	Proposed	Dollar	Percent		Proposed	Dollar	Percent		Proposed	Dollar	Percent		
	Block(gallons)	Rates	Rates	Change	Change	# of Bills	Rates	Change	Change	# of Bills	Rates	Change	Change	#	
Residential (Monthly)															
	<1,001	\$25.18	\$19.54	-\$5.64	-22.4%	0	\$21.77	-\$3.41	-13.5%	16	\$33.88	\$8.70	34.6%	,	
	1,001-2,000	\$31.61	\$27.78	-\$3.83			\$30.01	-\$1.60	-5.1%		\$42.12	\$10.51	33.2%		
	2,001-4,000	\$44.47	\$44.26	-\$0.21	-0.5%		\$46.49	\$2.02	4.5%		\$58.60	\$14.13	31.8%		
	4,001-5,000	\$50.90	\$52.50	\$1.60			\$54.73	\$3.83	7.5%		\$66.84	\$15.94	31.3%		
	5,001-7,500	\$66.98	\$73.10	\$6.13			\$75.33	\$8.36			\$87.44	\$20.47	30.6%		
	7,501-10,000	\$83.05	\$93.70	\$10.65	12.8%		\$95.93	\$12.88	15.5%		\$108.04	\$20.47	30.1%		
	10,001-15,000	\$115.20	\$134.90	\$10.05			\$95.95 \$137.13	\$12.88	19.0%		\$149.24	\$34.04	29.5%		
		-						-				-			
	15,001-20,000	\$147.35	\$176.10	\$28.75	19.5%			\$30.98	21.0%		\$190.44	\$43.09	29.2%		
	20,001-25,000	\$179.50	\$217.30	\$37.80			\$219.53	\$40.03	22.3%		\$231.64	\$52.14	29.0%		
	25,001-30,000	\$211.65	\$258.50	\$46.85	22.1%	22	\$260.73	\$49.08	23.2%	41	\$272.84	\$61.19	28.9%		
Residential (Quarterly)	.1.001	¢25.40	600 <b>7</b> 0	¢ 4. C 4	40.20/	5.4	60C 40	644.24	44.00/		672.04	647.00	100.00/	Т	
	<1,001	\$25.18	\$29.79	\$4.61	18.3%			\$11.31	44.9%		\$72.81	\$47.63	189.2%		
	1,001-2,000	\$31.61	\$38.03	\$6.42			\$44.73	\$13.12	41.5%		\$81.05	\$49.44	156.4%		
	2,001-3,000	\$38.04	\$46.27	\$8.23	21.6%		\$52.97	\$14.93	39.2%		\$89.29	\$51.25	134.7%		
	3,001-4,000	\$44.47	\$54.51	\$10.04			\$61.21	\$16.74	37.6%		\$97.53	\$53.06	119.3%		
	4,001-8,500	\$73.41	\$91.59	\$18.19			\$98.29	\$24.89	33.9%		\$134.61	\$61.21	83.4%		
	8,501-15,000	\$115.20	\$145.15	\$29.95	26.0%	72	\$151.85	\$36.65	31.8%	16	\$188.17	\$72.97	63.3%		
	15,001-60,000	\$404.55	\$515.95	\$111.40	27.5%	259	\$522.65	\$118.10	29.2%	61	\$558.97	\$154.42	38.2%		
	60,001-80,000	\$533.15	\$680.75	\$147.60	27.7%	45	\$687.45	\$154.30	28.9%	14	\$723.77	\$190.62	35.8%		
	80,001-100,000	\$661.75	\$845.55	\$183.80	27.8%	31	\$852.25	\$190.50	28.8%	5	\$888.57	\$226.82	34.3%	,	
	100,001-120,000	\$790.35	\$1,010.35	\$220.00	27.8%	21	\$1,017.05	\$226.70	28.7%	6	\$1,053.37	\$263.02	33.3%	,	
				Propos	ed			Propos	ed			Propos	ed		
Customer Class		All Meter		1.5 Inch N	leter			2 Inch M	eter			3 Inch M	eter		
	Monthly	Bill at	Bill at				Bill at				Bill at				
	Consumption	Current	Proposed	Dollar	Percent		Proposed	Dollar	Percent		Proposed	Dollar	Percent		
	Block(gallons)	Rates	Rates	Change	Change	# of Bills	Rates	Change	Change	# of Bills	Rates	Change	Change	#	
Non-Residential (Monthly)															
	<2,001	\$31.61	\$29.68	-\$1.93	-6.1%	237	\$31.91	\$0.30	0.9%	224	\$44.02	\$12.41	39.3%		
	2,001-5,000	\$50.90	\$57.25	\$6.35	12.5%	171	\$59.48	\$8.58	16.9%	119	\$71.59	\$20.69	40.6%	,	
	5,001-10,000	\$83.05	\$103.20	\$20.15	24.3%	177	\$105.43	\$22.38	26.9%	161	\$117.54	\$34.49	41.5%		
	10,001-25,000	\$179.50	\$241.05	\$61.55	34.3%	389	\$243.28	\$63.78	35.5%	309	\$255.39	\$75.89	42.3%	J	
	25,001-30,000	\$211.65	\$287.00	\$75.35	35.6%	93	\$289.23	\$77.58	36.7%	99	\$301.34	\$89.69	42.4%	,	
	30,001-40,000	\$275.95	\$378.90	\$102.95	37.3%	140	\$381.13	\$105.18	38.1%	190	\$393.24	\$117.29	42.5%	,	
	40,001-50,000	\$340.25	\$470.80	\$130.55			\$473.03	\$132.78	39.0%		\$485.14	\$144.89	42.6%		
	50,001-75,000	\$501.00	\$700.55	\$199.55			\$702.78				\$714.89	\$213.89	42.7%		
	75 001 100 000	¢661 75	¢020.20	<b>ά</b> ρεο ΓΓ	40.6%	01	¢022 Γ2	¢ 770 70	40.0%	170	6044 C4	6202.00	40 70/		

75,001-100,000

\$661.75

\$930.30

\$268.55

40.6%

\$270.78

40.9%

\$944.64

179

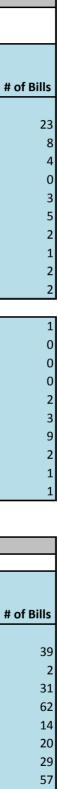
\$282.89

42.7%

36

\$932.53

81



STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION DOCKET NO. 4355 Response Of The City Of Newport, Utilities Division, Water Department To The Commission's Hearing Record Request

## **CERTIFICATION**

I hereby certify that on April 12, 2013, 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.

Parties/Address	E-mail Distribution	Phone
Julia Forgue, Director of Public	jforgue@cityofnewport.com	401-845-5601
Works	crussell@cityofnewport.com	
Newport Water Department	Isitrin@CityofNewport.com	
70 Halsey St.		
Newport, RI 02840		
Karen Lyons, Esq.		401-222-2424
Dept. of Attorney General	klyons@riag.ri.gov	
150 South Main St.	sscialabba@ripuc.state.ri.us	
Providence, RI 02903	psmith@ripuc.state.ri.us	
	dmacrae@riag.ri.gov	
	jmunoz@riag.ri.gov	
Harold Smith	Hsmith@raftelis.com	704-373-1199
Raftelis Financial Consulting, PA		
511 East Blvd.		
Charlotte, NC 28203		
Gerald Petros, Esq.	gpetros@haslaw.com	401-274-2000
Hinckley, Allen & Snyder		-
1500 Fleet Center	aramos@haslaw.com	
Providence, RI 02903	jmansolf@haslaw.com	
William McGlinn	wmcglinn@portsmouthwater.org	401-683-2090
Portsmouth Water & Fire District		ext. 224
1944 East Main Rd.		
PO Box 99		
Portsmouth, RI 02871		
Ellen M. Evans	ellen.evans@navy.mil	202-685-2235
Senior Trial Attorney		
Naval Facilities Engineering		
Command Litigation Office		
720 Kennon St., Bldg. 36, Room		
233		
Washington Navy Yard, DC 20374-		
5051		

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION DOCKET NO. 4355 Response Of The City Of Newport, Utilities Division, Water Department To The Commission's Hearing Record Request

	1	1
Dr. Kay Davoodi, P.E.	Khojasteh.davoodi@navy.mil	202-685-3319
Utility Rates and Studies Office		
NAVFACHQ- Building 33		
1322 Patterson Ave SE	Larry.r.allen@navy.mil	
Washington Navy Yard, D.C. 20374-		
5065		
Maurice Brubaker	mbrubaker@consultbai.com	401-724-3600
Brubaker and Associates, Inc.		401-724-9909
PO Box 412000	bcollins@consultbai.com	
St.Louis, MO 63141-2000		
Thomas S. Catlin	tcatlin@exeterassociates.com	410-992-7500
Exeter Associates, Inc.		-
10480 Little Patuxent Parkway,	jmierzwa@exeterassociates.com	
Suite 300		
Columbia, MD 21044		
Christopher Woodcock	Woodcock@w-a.com	508-393-3337
Woodcock & Associates, Inc.		
18 Increase Ward Drive		
Northborough, MA 01532		
An original and nine (9) copies w/:	Imassaro@puc.state.ri.us	401-780-2107
Luly E. Massaro, Commission Clerk		
Public Utilities Commission	cwilson@puc.state.ri.us	]
89 Jefferson Blvd.		
Warwick, RI 02888	sccamara@puc.state.ri.us	1

al

Joseph A. Kedugh, Jr., Esquire # 4925 KEOUGH & SWEENEY, LTD. 41 Mendon Avenue Pawtucket, RI 02861 (401) 724-3600 (phone) (401) 724-9909 (fax) jkeoughjr@keoughsweeney.com