



*City of East Providence*

OFFICE OF CITY SOLICITOR  
CITY HALL  
145 TAUNTON AVENUE  
EAST PROVIDENCE, RHODE ISLAND 02914-4505

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May 9, 2013

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

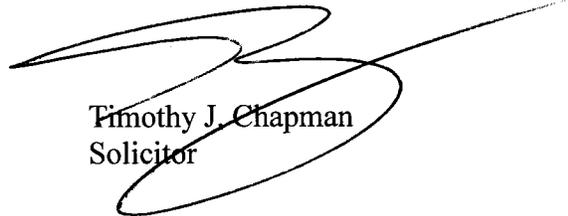
Re: Providence Water Supply Board  
Docket No. 4406

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the City of East Providence's Motion to Intervene and the Entry of Appearance of the City's Solicitor, Timothy J. Chapman, in the above captioned matter. Please be advised that electronic copies of these documents have been sent to the service list.

Thank you for your attention to this matter.

Sincerely,



Timothy J. Chapman  
Solicitor

TJC:bs

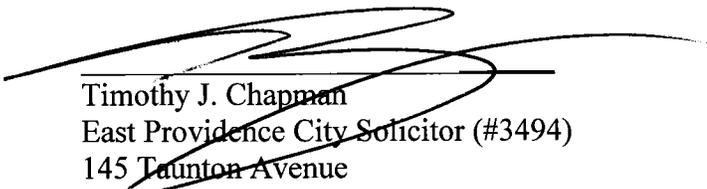
Enc.

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

**IN RE: PROVIDENCE WATER SUPPLY BOARD     Docket No. 4406  
Rate Filing Application**

**ENTRY OF APPEARANCE**

I hereby enter my appearance on behalf of the City of East Providence in my capacity as City Solicitor in the above-captioned matter.

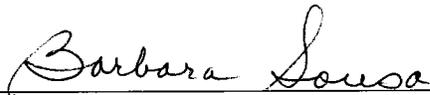


Timothy J. Chapman  
East Providence City Solicitor (#3494)  
145 Taunton Avenue  
East Providence, RI 02914  
Tel. 401.435.7523  
Fax: 401.438.1719  
Email: [tchapman@cityofeastprov.com](mailto:tchapman@cityofeastprov.com)

Dated: May 9, 2013

**CERTIFICATION**

In accordance with Rule 1.7D of Rules of Practice and Procedure of the Public Utilities Commission, I hereby certify that on the 9<sup>th</sup> day of May, 2013, a copy of the above Entry of Appearance was mailed electronically to the attached service list.

  
\_\_\_\_\_  
Barbara Sousa

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

**IN RE: PROVIDENCE WATER SUPPLY BOARD**

**DOCKET NO. 4406**

**THE CITY OF EAST PROVIDENCE  
MOTION TO INTERVENE**

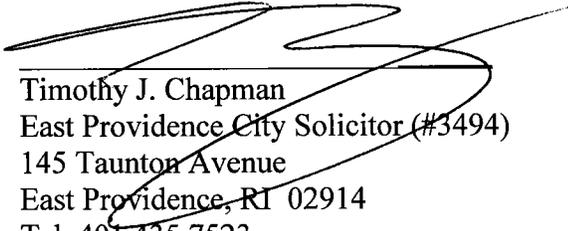
Now comes the City of East Providence (“City”), and pursuant to Rule 1.13 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission (“Commission”), moves that the Commission grant the City the right to intervene as a party in the above-captioned Docket for the reasons set forth herein:

1. The City owns and operates its own water distribution system which serves all residents, businesses, and other entities within the City.
2. The City purchases 100% of its water supply from the Providence Water Supply Board (“PWSB”).
3. Between fiscal year fiscal years 2010 through 2012, the City purchased the following amounts of water from the PWSB:  
  
FY 2010 – 1,609,000 gallons  
  
FY 2011 – 1,576,000 gallons  
  
FY 2012 – 1,492,000 gallons
4. The rate increase sought by the PWSB represents a substantial increase in the wholesale price of water that the City purchases from the PWSB.
5. Any increase in the PWSB’s wholesale water rate will result in increased water rates for the City’s customers.

6. The City has a significant interest that will be directly affected by the Commission's review and decision in this matter.
7. This interest is not adequately represented or protected by the existing parties in the Docket.
8. In addition, the City's participation in this Docket is in the public interest.

Wherefore, the City of East Providence requests that the Commission grant its Motion to Intervene and that it be granted status as a party in this proceeding, and that the Commission grant all other relief if deems meet and just.

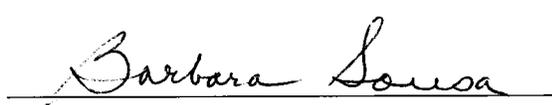
CITY OF EAST PROVIDENCE  
By: Timothy J. Chapman City Solicitor



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East Providence City Solicitor (#3494)  
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**CERTIFICATION**

I hereby certify that on the 9<sup>th</sup> day of May, 2013, I sent a copy of the within Motion 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.



Barbara Sousa

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
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Boyce Spinelli, General Manager Providence Water Supply Board 552 Academy Avenue Providence, RI 02908	<a href="mailto:Bspinelli@provwater.com">Bspinelli@provwater.com</a>	401-521-6300
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Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte, NC 28203	<a href="mailto:Hsmith@raftelis.com">Hsmith@raftelis.com</a>	704.373-1199
<b>File 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> <a href="mailto:cwilson@puc.state.ri.us">cwilson@puc.state.ri.us</a> <a href="mailto:sccamara@puc.state.ri.us">sccamara@puc.state.ri.us</a>	401-780-2107
<b>Interested Parties:</b>		
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Peter D. Ruggiero, City Solicitor Ruggiero Brochu 20 Centerville Road Warwick, RI 02886	<a href="mailto:peter@rubroc.com">peter@rubroc.com</a> <a href="mailto:maryann@rubroc.com">maryann@rubroc.com</a>	401-737-8700