



City of East Providence

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

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September 11, 2013

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

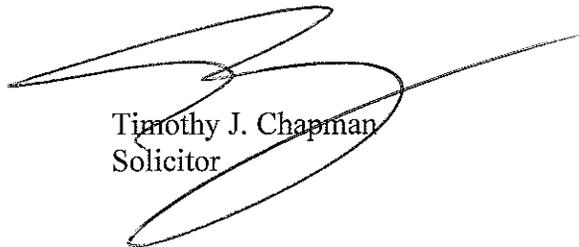
Re: Providence Water Supply Board
Docket No. 4406

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the City of East Providence's Motion in Support of KCWA's and BCWA's Motions to Strike Objection, Compel Further Answers and/or Strike Testimony. Please be advised that electronic copies of these documents have been sent to the service list and hard copies have been sent to those who requested hard copies.

Thank you for your attention to this matter.

Sincerely,



Timothy J. Chapman
Solicitor

TJC:bs

Enc.

c: Service List (*via electronic mail*)
Robert A. Watson, Esq. (*via first-class mail*)
Peter Ruggiero, City Solicitor (*via first class mail*)

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

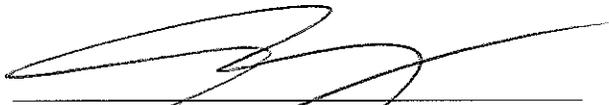
IN RE: PROVIDENCE WATER SUPPLY BOARD : DOCKET NO. 4406

**CITY OF EAST PROVIDENCE'S MOTION IN SUPPORT OF
KCWA'S AND BCWA'S MOTIONS TO STRIKE OBJECTION, COMPEL FURTHER
ANSWERS AND/OR STRIKE TESTIMONY**

Now comes the City of East Providence ("City") and hereby joins the Bristol County Water Authority's (BCWA) and Kent County Water Authority's (KCWA) Motions to Strike Objection, Compel Further Answers and/or Strike Testimony in the above-captioned Docket, specifically Providence Water's Response to the BCWA's Data Request 2-3. City of East Providence further references and adopts BCWA's supporting Memorandum in Support of its Motion and requests that the Commission strike Providence's objection to BCWA 2-3 and Compel their response. Should Providence Water Supply Board further refuse to comply, the City of East Providence requests that the Commission strike any and all testimony regarding Providence Water Supply Board's request for continued funding of \$2,450,000 for the COF.

WHEREFORE, for reasons set forth herein and expanded upon in BCWA's corresponding Motion and Memorandum, the City of East Providence prays that the Commission grant its Motion to Strike Objection and Compel Further Answers and/or Strike Testimony as requested hereinabove and all other relief the Commission deems just.

City of East Providence
By its Attorney,



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

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CERTIFICATION

I hereby certify that on September 11, 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, Peter D. Ruggiero, Esq. and Robert A. Watson, Esq. by electronic mail and regular mail.

Barbara Sousa

**Docket No. 4406 - Providence Water Supply Board – General Rate Filing
Service List updated 6/25/13**

***Requested to receive hard copy of all data responses.**

Parties/Address	E-mail Distribution	Phone
Providence Water Supply Board (PWSB) Michael McElroy, Esq. Schacht & McElroy PO Box 6721 Providence, RI 02940-6721	Michael@McElroyLawOffice.com	401-351-4100
Boyce Spinelli, General Manager Providence Water Supply Board 552 Academy Avenue Providence, RI 02908	bspinelli@provwater.com	401-521-6300
	pgadoury@provwater.com	
Jean Bondarevski, Director of Finance Providence Water Supply Board	jbondarevskis@provwater.com	
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Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte, NC 28203	Hsmith@raftelis.com	704-373-1199
Division of Public Utilities (Division) Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov	401-222-2424
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Jerry Mierzwa Exeter Associates, Inc.	jmierzwa@exeterassociates.com	
Kent County Water Authority (KCWA) *Robert A. Watson, Esq. (Hard copy) 1050 Main St. Suite 23 East Greenwich, RI 02818	Rwatson247@cox.net	401-884-1455
Timothy Brown, P.E. General Manager Chief Engineer Kent County Water Authority PO Box 192 West Warwick, RI 02893-0192	tbrown@kentcountywater.org	401-821-9300
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	Woodcock@w-a.com	508-393-3337

Bristol County Water Authority (BCWA) Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861	jkeoughjr@keoughsweeney.com	401-724-3600 401-724-9909
Pamela Marchand, Executive Director Bristol County Water Authority	pamelam6011@gmail.com	
David Russell, Russell Consulting	davidrussell015@comcast.net	
City of Warwick *Peter Ruggiero, City Solicitor (Hard copy) David R. Petrarca, Jr. Esq. RUGGIERO BROCHU 20 Centerville Road Warwick, RI 02886	peter@rubroc.com david@rubroc.com maryann@rubroc.com	401-737-8700
City of East Providence Timothy Chapman, Esq. East Providence City Solicitor 145 Taunton Avenue East Providence, RI 02914	tchapman@cityofeastprov.com	401-435-7523
File original and nine (9) copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	lmassaro@puc.state.ri.us cwilson@puc.state.ri.us sccamara@puc.state.ri.us	401-780-2107
Interested Parties:		
Douglas Jeffery Town of Johnston	djeffrey@johnston-ri.us	401-553-8866
Seth Lemoine, P.E. Director Smithfield Dept. of Public Works	slemoine@smithfieldri.com	401-233-1034 Ext. 102
Raymond DiSanto, General Mgr. East Smithfield Water District	rdisanto@eastsmithfieldwater.com	401-231-6990
Ken Burke, General Mgr. RI Water Resources Board	Ken.burke@wrb.ri.gov	401-222-4890