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[www.provwater.com](http://www.provwater.com)

August 5, 2013

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Mrs. Luly Massaro  
Commission Clerk  
RI Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

RE: Dk 4406 Kent County Water Authority; Set 4

Dear Mrs. Massaro:

Enclosed is an original and seven copies of Providence Water's responses to the fourth set of data request from Kent County Water Authority.

If you have any questions you can contact me at extension 7217.

Sincerely,

  
Mary L. Deignan-White  
Senior Manager of Regulatory

cc: service list

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Providence Water Docket 4406

**Data Requests of the  
Kent County Water Authority  
Set 4**

KCWA 4-1. Regarding the length of pipe by size included on the Tab “Inch-Miles Calculations” of the spreadsheets provided by Mr. Smith: Please provide an updated listing by length and size for the most recent period available.

Response: Please see Providence Water’s response to BCWA 1-8. The pipe length data in the provided spreadsheets are current as of July 18, 2013. Note that the date shown on the “Inch-Miles Calculations” tab of “PWSB Response to DIV 3-1” is incorrect. It will be revised in my rebuttal testimony.

## Providence Water Docket 4406

### **Data Requests of the Kent County Water Authority Set 4**

KCWA 4-2: Does Providence Water have an estimate of the total length of customer service pipe including the full length for the tapped main all the way to the customer's building, not just to the property line? If Providence Water does not have such an estimate please provide Providence Water's opinion on the best way to estimate this length and provide the estimate.

Response: Providence Water owns from the water main to the curb stop. The building owner owns from the curb stop to the building. Providence Water has an estimate of the total length (ranging in size from 0.5 inch to 42 inch) of service pipe from the main to the curb stop. This length is approximately 225 miles.

It would require tremendous effort and man-hours to estimate the length of service pipe from the curb stop to the building. In addition, the length that would be estimated, would be subject to a large degree of error.

Providence Water Docket 4406

**Data Requests of the  
Kent County Water Authority  
Set 4**

KCWA 4-3. Please explain why the allocation symbols X1 and X2 on the spreadsheet provided in response to DIV 3-1 only refer to one year (2012) rather than the three years in the prior versions of Providence's model.

Response: Allocators X1 and X2 are linked to Allocators HM, HOC and HMC. As of Providence Water's supplemental filing (i.e. all versions prior to DIV3-1) these allocators had not yet been updated. As a result, X1 and X2 were "hardcoded" from Docket 3832.

In response to DIV 3-1, Providence Water developed HM, HOC and HMC allocators, as well as updated X1 and X2 allocators. The updated allocators are linked to the 2012 HM (for X1) and HOC (for X2) Allocators. In Docket 3832, X1 and X2 were based on the most recent year for which data were available. This methodology has been maintained for this filing.

Providence Water Docket 4406

**Data Requests of the  
Kent County Water Authority  
Set 4**

KCWA 4-4. In the response to KCWA 1-13, Mr. Smith stated that he would update his rebuttal testimony so the allocation factors for HM, HOC and HMC would reflect the three year period FY 2010-2012. Please provide an updated version of the spreadsheet provided in response to DIV 3-1 that is consistent with that response and shows the three year average for these factors and not a different period from that provided in response to KCWA 1-13.

Response: Please see the electronic spreadsheet forwarded via email (PSWB Response to KCWA 4-4.xlsx), which reflects the three year average for these allocators. Note that Providence Water reserves the right to adjust this average in a manner that is consistent with fair and equitable cost allocations in rebuttal testimony.