

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

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PUBLIC UTILITIES COMMISSION

IN RE: United Water Rhode Island Inc.,
Application to Change Rates

Docket No. 4434

Motion to Intervene by The Town of Narragansett, Rhode Island
Rule 1.13

Now comes the Town of Narragansett ("Narragansett"), a Rhode Island Municipal Corporation, pursuant to Rule 1.13 of the Public Utilities Commission Rules of Practice and Procedure and hereby files its request to intervene in the above-captioned matter. In support, Narragansett states as follows:

1. Applicant United Water Rhode Island Inc. (applicant) is a public utility corporation providing utility service to the residents and taxpayers of Narragansett as well as ratepayers located elsewhere in the State of Rhode Island.
2. Narragansett purchases water from the applicant and pays for fire hydrants owned by applicant.
3. Applicant's proposed rate increases would have a detrimental effect on Narragansett as well as the town's taxpayers. As the purchaser of water from applicant in the area where the proposed rate increases will occur, Narragansett has "an interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding." (Rule 1.13(b)(2)) Narragansett is also concerned with the necessary increase in rates that would need to be charged to its citizens and the potential deficit in the town budget that would be caused by the proposed rate increases. Accordingly, Narragansett has "[an]other interest of such a nature that [its] participation" in the proceedings before the Commission are "in the public interest." (Rule 1.13(b)(3))

4. Therefore, Narragansett would be directly harmed by the proposed rate increases, and the citizens of Narragansett would be burdened by the increased price of water and the potential deficit that would be created in Narragansett's budget.

5. In conclusion, Narragansett believes that its intervention is both as of right and in the public interest, as protective of the interests of the Town, its taxpayers, and its residents.

Respectfully submitted,
The Town of Narragansett,
By its Attorneys,



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Dated: August 30, 2013

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the within was mailed to the following on this 30th day of August, 2013.

Gary S. Prettyman
United Water Management & Services Inc.
200 Old Hook Road
Harrington Park, NJ 07640

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

Joseph A. Keough, Jr., Esquire
Keough & Sweendy, Ltd.
41 Mendon avenue
Pawtucket, RI 02861

