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August 21, 2013

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

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PUBLIC UTILITIES COMMISSION

**Re: United Water - Rhode Island (UW - RI) 2013 Rate Filing
Town of South Kingstown Petition to Intervene**

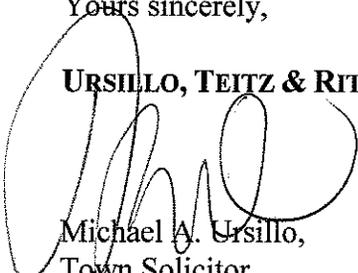
Dear Ms. Massaro:

Enclosed please find a petition to the Public Utilities Commission on behalf of the Town of South Kingstown intervening as an interested party in the above-referenced matter.

Your cooperation in bringing this matter before the Commission and facilitating communication to the Town regarding the UW-RI Rate Filing is greatly appreciated.

Yours sincerely,

URSILLO, TEITZ & RITCH, LTD.



Michael A. Ursillo,
Town Solicitor

MAU/gb

cc: The Honorable Stephen A. Alfred, Town Manager
Jon R. Schock, Public Services Director
Mark M. McSally, Solicitor, Town of Narragansett

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

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

Docket No. 4434

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

Now comes the Town of South Kingstown ("South Kingstown"), 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, South Kingstown 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 South Kingstown as well as ratepayers located elsewhere in the State of Rhode Island.
2. South Kingstown purchases all water used in both the Middlebridge and South Shore Water systems wholesale from applicant.
3. Applicant's proposed rate increases would have a detrimental effect on South Kingstown as well as the town's taxpayers. As the purchaser of water from applicant in the area where the proposed rate increases will occur, South Kingstown 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)) South Kingstown 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, South Kingstown 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))

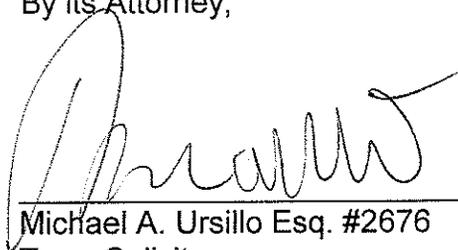
4. Therefore, South Kingstown would be directly harmed by the proposed rate increases and the citizens of South Kingstown would be burdened by the increased price of water and the potential deficit that would be created in South Kingstown’s budget.

5. In conclusion, South Kingstown 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 South Kingstown,

By its Attorney,



Michael A. Ursillo Esq. #2676

Town Solicitor

Ursillo, Teitz & Ritch, Ltd.

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Providence, RI 02903

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mikeursillo@utrlaw.com

Dated: August 21, 2013

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the within was mailed to the following on this 22nd 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. Esq.
KEOUGH & SWEENEY, Ltd.
41 Mendon Avenue
Pawtucket, RI 02861

A handwritten signature in cursive script that reads "Gwendolyn Bruno". The signature is written in black ink and is positioned above a horizontal line.