

MARGARET L. HOGAN, ESQUIRE
ATTORNEY AT LAW
HOGAN & HOGAN, LTD.

344 MAIN STREET, SUITE 200
WAKEFIELD, RI 02879

TELEPHONE (401) 782-4488
TELECOPIER (401) 782-4496



RECEIVED
2013 SEP -9 PM 4: 20
PUBLIC UTILITIES COMMISSION

September 6, 2013

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

**RE: United Water – Rhode Island (UW-RI) 2013 Rate Filing
The Union Fire District of South Kingstown Motion to Intervene**

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the following for filing relative to the above matter:

- Entry of Appearance
- Motion to Intervene by the Union Fire District of South Kingstown, Rhode Island Rule 1.13

Very truly yours,

A handwritten signature in black ink, appearing to read 'Margaret L. Hogan', written over a printed name.

Margaret L. Hogan

MLH/jnb

Enclosure(s)

Cc: Union Fire District

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

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

Docket No. 4434

RECEIVED
2018 SEP -9 PM 4: 20
PUBLIC UTILITIES COMMISSION

**Motion to Intervene by the Union Fire District of South Kingstown, Rhode Island
Rule 1.13**

Now comes the Union Fire District of South Kingstown (UFD), a Chartered Fire District, 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, UFD states as follows:

1. Applicant United Water Rhode Island Inc. (applicant) is a public utility corporation providing utility services to the residents and taxpayers of the Union Fire District of South Kingstown, as well as ratepayers located elsewhere in the State of Rhode Island.
2. The UFD rents fire hydrants from the applicant for public streets within the District.
3. Applicant's proposed rate increases would have a detrimental effect on the UFD as well as the District's taxpayers. As the lessee of hydrants from applicant in the area where the proposed rate increases will occur, the UFD 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)) The UFD is also concerned with the necessary increase in rates that would need to be charged to its citizens and the potential deficit in the UFD's budget that would be caused by the proposed rate increases. Accordingly, UFD 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, the UFD would be directly harmed by the proposed rate increases and the citizens of the District would be burdened by the increased price of hydrant rental and the deficit that would be created in the UFD's budget.

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

Respectfully submitted,
Union Fire District of South Kingstown
By its Solicitor,



Margaret L. Hogan, Esq. (#5006)
Hogan & Hogan, Ltd.
344 Main Street, Suite 200
Wakefield, RI 02879
(401) 782-4488 (Telephone)
(401) 782-4496 (Facsimile)

DATED: 9/6/13

CERTIFICATE OF SERVICE

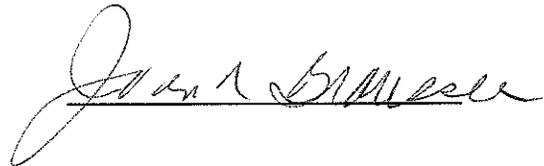
I hereby certify that a true and accurate copy of the within was mailed to the following on this 6TH day of September, 2013.

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 & SWEENEY, Ltd.
41 Mendon Avenue
Pawtucket, RI 02861

Michael A. Ursillo, Esquire
South Kingstown Town Solicitor
URSILLO, TEITZ & RITCH, LTD.
Two Williams Street
Providence, RI 02903



Joan R. Bamesse

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

PUBLIC UTILITIES COMMISSION

2013 SEP -9 PM 4: 20

RECEIVED

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

Docket No. 4434

Entry of Appearance

The undersigned hereby enters her appearance on behalf of the Union Fire District of South Kingstown.

Respectfully submitted,
Union Fire District of South Kingstown
By its Solicitor,



Margaret L. Hogan, Esq. (#5006)
Hogan & Hogan, Ltd.
344 Main Street, Suite 200
Wakefield, RI 02879
(401) 782-4488 (Telephone)
(401) 782-4496 (Facsimile)

DATED: September 6, 2013

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the within was mailed to the following on this 6th day of September, 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 & SWEENEY, Ltd.
41 Mendon Avenue
Pawtucket, RI 02861

Michael A. Ursillo, Esquire
South Kingstown Town Solicitor
URSILLO, TEITZ & RITCH, LTD.
Two Williams Street
Providence, RI 02903


John A. Billman