

# **GENERAL RATE FILING**

**DIRECT TESTIMONY  
OF STANLEY KNOX**

August 2013

Submitted to:  
State of Rhode Island and Providence  
Plantations Public Utilities Commission

RIPUC Docket No.

Submitted by:

United Water Rhode Island Inc.

UNITED WATER RHODE ISLAND INC.  
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1 **Q. Please state your name and business address.**

2 A. My name is Stanley J. Knox and my business address is P.O. Box 429, 17 Arnold  
3 St. Wakefield, RI.

4  
5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by United Water Rhode Island (UWRI or the "Company") as its  
7 General Manager.

8  
9 **Q. Please describe your duties as General Manager.**

10 A. My overall responsibility is to oversee the day-to-day operations of our water  
11 system. This includes supervising the daily operations and maintenance of the  
12 system, and planning for future improvements and additions to the system that  
13 are necessary to provide adequate and reliable value for money service to our  
14 customers. UWRI has a small locally based staff, I am supported managerially  
15 and technically by Divisional staff and Management and Services staff.  
16 Specifically, I work with the financial and engineering staff of United Water  
17 Management and Services Company in the planning of capital improvements. It's  
18 also my responsibility to keep the expenditures for such projects within budget  
19 and monitor expenses to remain within the annual operating budget that I prepare.  
20 As part of this responsibility, I control the Company's purchases, inventory and  
21 accounts receivable and payable. My duties include communicating with  
22 customers and assisting them with their overall water service needs. Also, as a  
23 General Manager I am involved in coordinating with the regulatory agencies that

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1 oversee water company operations and the responsibility for the filings made with  
2 those agencies. These agencies include the Rhode Island Department of Health  
3 (RIDOH), Department of Environmental Management (DEM), Rhode Island Water  
4 Resources, Federal Environmental Protection agency (EPA), Occupational Safety  
5 and Health Administration (OSHA) and Rhode Island Public Utilities Commission.

6  
7 **Q. Briefly describe your business experience with the Company.**

8 A. I have held my current position since August 1979. Before transferring to  
9 Wakefield, I held the position of District Accountant of the Maine District for the  
10 former General Waterworks Corporation. The Maine District included nineteen  
11 (19) small to mid-size companies scattered throughout the State. It was my duty  
12 to coordinate and oversee all of the financial functions for those nineteen  
13 properties. I acted as coordinator of the operating and capital planning activities,  
14 employee training in financial and reporting matters, all accounting reconciliations  
15 and audit requirements.

16  
17 **Q. What is the purpose of your direct testimony?**

18 A. I will address the need and drivers for this rate proceeding, provide a history and  
19 description of the Company, discuss cost control measures, current Company  
20 initiatives/infrastructure improvements, and affiliated relationships.

21  
22 **Q. Please briefly describe the history of UWRI.**

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1 A. UWRI, formerly The Wakefield Water Company, was incorporated in 1887 by four  
2 local investors. The original purpose of the utility was to furnish a supply of high  
3 quality water to the Town of South Kingstown and “vicinity”. The “vicinity” became  
4 the Town of Narragansett in the year 1901. In 1956, General Waterworks  
5 purchased The Wakefield Water Company and steadily improved the system to  
6 accommodate growth and regulatory requirements. In April 1994, United Water  
7 Resources Inc. merged with GWC Corporation, the parent of General  
8 Waterworks. In March, 1995 the Wakefield Water Company was renamed United  
9 Water Rhode Island (UWRI). UWRI employs ten (10) full time employees who  
10 serve our customer’s needs.

11

12 **Q. Briefly describe the Company’s service area and facilities.**

13 A. As of December 31, 2012, the end of the test year established in this proceeding,  
14 the Company was serving 7,399 metered residential customers, 717 commercial  
15 customers, 10 industrial customers, 88 municipal customers, 2 wholesale and 185  
16 private fire customers, all in the towns of South Kingstown and Narragansett. The  
17 Company also provides public and private fire protection in both of these  
18 communities.

19 Water service to these customers is provided by seven (7) wells located in  
20 two (2) well fields. The Tuckertown Well Field has four (4) gravel packed wells.  
21 These wells are located in gravel and coarse sand, inter-bedded with less  
22 permeable, finer grained outwash. These wells range from 48-70 feet in depth,  
23 and are located in the Mink Brook Aquifer. The Howland Well Field contains the

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1 remaining three (3) wells. These wells are also located in the Mink Brook Aquifer,  
2 but are set primarily in fine sand, with small amounts of course sand and gravel,  
3 and are in a depth range of 85' and 100'. Currently production capacity of both  
4 well fields yields approximately 7.3 million gallons per day to the system.

5  
6 **Q. Does the Company have additional property or the ability to develop**  
7 **additional supply if needed?**

8 A. Yes, in the early 1970's the Company performed a survey to see if there was any  
9 area or location within the existing system, or nearby, that could provide the  
10 quality and quantity of water that was needed for the future. The study found two  
11 such areas. One was a site off Tuckertown Road, which the Company purchased  
12 and developed with three wells currently called the Howland Well Field. The other  
13 location was on Plains Road in Kingston, along the Chipuxet River, about four  
14 miles north of the existing well fields. After performing the usual testing at this  
15 location, the Company determined that this property could provide the additional  
16 high quality supply needed for the future. This property, the May Farm Property, is  
17 located adjacent to the University of Rhode Island well supply.

18  
19 **Q. Does the Company treat the water, and if so, what type of treatment?**

20 A. Yes, the Company treats its water. Sodium hypochlorite (chlorine) is used for  
21 disinfection, aeration is used for releasing much of the carbon dioxide from the  
22 water, hydrated lime is used for ph adjustment and zinc orthophosphate is used  
23 as a corrosion inhibitor.

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**Q. Were any of the treatment techniques modified since the last rate case?**

A. No they have not been.

**Q. Are you currently in compliance with the state and federal water quality regulations?**

A. Yes. There are no violation issues with State or Federal water quality regulations.

**Q. Are there any other State or Federal regulations other than water quality that have been mandated since the last rate case?**

A. No. There have been no added regulations since the last rate case. The Company continues to diligently monitor and train all employees regarding the Emergency Response Plan which deals with Company action, should any type of an emergency take place. The Company trains in this plan on a regular basis and is part of the monthly safety training. At least two tabletop exercises are held each year. These exercises deal with issues such as Company action should a major hurricane hit our service area resulting in loss of power, certain roads being rendered impassable, etc., and how the Company will still maintain quality, dependable water to its customers. The Company remains concerned regarding Company Security and still maintains its contract with the security company, ADT, to provide back up security where needed. All Company facilities have entry alarms on doors and windows. The Company installed a keyless system on all facility doors. Tank hatches on all of the storage tanks were changed to more

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1 secure units. New emergency lighting was installed in certain critical areas such  
2 as around the storage tanks and around well field buildings. Also, on a regular  
3 basis I or our superintendent will conduct a walk around off all of our facilities  
4 making sure all safe guards are in place and in working order as well as making  
5 sure nothing has been compromised.

6  
7 **Q. In addition to physical security what other major related items are being**  
8 **done?**

9 A. Two major related areas which are extremely important to the Company are Safety  
10 and Compliance.

11  
12 **Q. What is the Company doing regarding Safety?**

13 A. Employee and Company safety is of high importance to the Company. The  
14 Company has adopted a slogan of, 100% Safe 100% of the time. This slogan is  
15 repeated over and over so that it's foremost in all employees' minds. Also each  
16 month there is at least one safety meeting where it's mandatory that each  
17 employee attend and must take part. The past months safety issues are  
18 discussed and any near misses gone over to make sure that all employees aware  
19 of and also discussed are upcoming things to take place. The Company also does  
20 job site analysis making sure all work conditions will be safe. I or Company  
21 superintendent will also check job sites making sure all safety protection  
22 equipment is being used and all safety precautions being taken.

23

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1 **Q. Are there any other safety initiatives being taken?**

2 A. Yes. Each employee is required to take a minimum of one safety training hour per  
3 month. These training hours can be achieved by in-house training such as tail  
4 gate sessions, by outside consultants being brought in, and also by electronic  
5 means. The Company has contracted with a safety training provider called Pure  
6 Safety so each of our employees can go on-line onto their website and take one  
7 of their many safety courses.

8

9 **Q. Is there any evidence that the Safety Training has been Effective?**

10 A. Yes there is. As of June 30, 2013 the Company has had 2,014 consecutive days  
11 without lost time due to employee injuries.

12

13 **Q. What is the Company doing regarding Compliance?**

14 A. In September of 2011 there was an Environmental Compliance Audit conducted at  
15 the Company. This was a full three day audit by five members of an audit team  
16 from our parent Company. This team reviewed all of the Company's permits,  
17 regulations, practices to make sure proper procedures and policies were being  
18 followed. The finding of the audit was very favorable with a few follow-up issues  
19 but for the most part very favorable.

20

21 **Q. What has the Company changed regarding Compliance since the last case?**

22 A. The Company is currently involved in an Environmental Compliance Assurance  
23 Program. If an incident regarding compliance such as a bad sample, boil water

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1 order, etc. the Company will fill an Environmental Incident Report and make a  
2 self-disclosure with the Environment Protection Agency(EPA) explaining the time  
3 the incident happened, what the incident was, it's possible harm to the  
4 environment and what the Company is doing to take care of the situation. This is  
5 an initiative which all the United Water properties are part of.

6  
7 **Q. What steps has the Company taken to ensure the cost effectiveness of its**  
8 **operations?**

9 A. United Water Rhode Island, as part of a larger national company, has been able  
10 to leverage its company size and volumes to negotiate better unit prices for  
11 chemicals, energy, paving, contractors' charges and transportation costs.

12 Although prices have risen significantly, these increases would have been greater  
13 if not for our ability to leverage our purchasing power. The resulting savings in  
14 both operating expenses and capital are passed on to our customers through  
15 lower expense needs.

16  
17 Energy - The Company has made considerable efforts to control energy  
18 costs. The Company continues to install high efficiency motors wherever possible.  
19 In addition, United Water has a very strong Hedging Management Team that  
20 constantly watches the markets for pricing changes. As favorable pricing and  
21 conditions arise, the Hedging Team will re-evaluate the Company's energy  
22 options to look for pricing reductions. Locking in prices and blending/extending will  
23 be used for the benefit of customers. It must be stressed that hedging is not an

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1 exact science and can carry some risk if energy prices decline. However, hedging  
2 has been used effectively to benefit our customers by managing energy price risk.

3  
4 Pension / Post-Retirement Benefits - In recognition of the trying economic  
5 times, United has taken the proactive approach to reduce its overall benefits cost.  
6 In May of 2009, the Company decided to eliminate its Post-Retirement Health  
7 care plan for all new employees. Additionally, in January 2010, Pension eligibility  
8 was discontinued for new employees. This will help keep future costs manageable  
9 and results in a lower overall increase in the costs associated with employee  
10 replacements in the future.

11  
12 Personnel - At the end of 2012, the Rhode Island operation employed 10  
13 people, with 8,401 customers at year end. This equates to a ratio of 840  
14 customers per Employee, and is far more favorable than other utilities its size.  
15 There are no current plans for this employee count to change for 2013.

16  
17 **Q. Could you please explain a little about the wholesale customers you serve?**

18 **A.** Yes. UWRI has provided water to the Municipality of Narragansett to supply their  
19 system in Point Judith located in the most southerly part of town, and also the  
20 most northerly section of the town. Both of these sections combined serve  
21 approximately 4,100 customers. This customer has been served by UWRI since it  
22 was developed in the early 1900's. The other wholesale customer is the Town of  
23 South Kingstown, which owns and operate the Middle bridge System, developed

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1 in the late 1960's which is located along the Narrow River in the center of the  
2 UWRI system. UWRI entered into an additional agreement with South Kingstown  
3 to supply water to its South Shore System, which is located at the most southerly  
4 section of town. This section of South Kingstown has only been supplied by UWRI  
5 since 2005. A connection was made with South Kingstown to provide higher  
6 quality water as they were suffering from lead and manganese issues. Both of the  
7 South Kingstown supplies serve approximately 3,500 customers. As a result of  
8 growth in these Towns and entering into additional wholesale agreement, UWRI  
9 customers have benefitted from the additional revenue by off-setting cost  
10 increases and the need to file for rates at an earlier point in time.

11  
12 **Q. Has the Company made any major additions to Plant In-Service since the**  
13 **last case?**

14 A. Yes, there are a number of examples. In 2012 UWRI undertook a major project for  
15 the replacement of approximately 2,600 ft. of 4" and 8" cast iron with 2,600 ft. of  
16 Ductile Iron water main on Boston Neck Rd in Narragansett. This increased water  
17 flows to the North End of the Company's Narragansett customers as well as  
18 increasing fire flows.

19  
20 Another major project in 2012 was the replacement of 2,000 ft. of 8"  
21 Asbestos Cement Pipe on Kenyon Avenue in South Kingstown and tying in two  
22 dead ends. This improved flows to the South End of Narragansett as well as the

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1 immediate area in South Kingstown and improved customer service and fire  
2 protection.

3

4 **Q. Has the Company made any other major additions to Plant In-Service?**

5 A. Yes. One of the largest and most interesting projects was the replacement in 2012  
6 and 2013 of the half million gallon Tower Hill Tank standpipe in South Kingstown  
7 with a million gallon elevated tank. This new tank will increase pressure, give the  
8 Company an additional half million gallons in storage and better serve the entire  
9 UWRI customers.

10

11 **Q. Please discuss the Company's capital expenditure program in relation to its  
12 value to the customer.**

13 A. The Company's capital expenditure program will address infrastructure  
14 improvements and replacements in the areas of mains, service lines, system  
15 valves, and hydrants. It will also address compliance with regulations which  
16 includes meter replacements and treatment equipment upgrades as well as other  
17 equipment needs of the Company. These expenditures will ensure the Company  
18 will be able to meet its public commitment to customers to provide high quality  
19 water and water service in a cost efficient manner. These capital investments will  
20 provide improved flow and pressure, ensure timely and accurate meter readings,  
21 and provide redundancy within the distribution system. One area in which we  
22 have been aggressively involved in the past few years has been an Asbestos  
23 Cement (AC) main replacement program. In the mid-1940s up through the 1970s,

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1 AC main was widely used in our system, as it was countrywide. This type of main  
2 has some limitation with certain soil types; we've found that in areas where  
3 aggressive ground water and aggressive soil is present, the pipe deteriorates from  
4 the outside. Over time, it becomes susceptible to failure, if pressure fluctuations  
5 take place, trench settlement occurs, or when tapping the main. As a result, we've  
6 identified the areas with aggressive soils and incorporated the appropriate pipe  
7 materials in our new main replacement program. Our strategy has been to  
8 complete at least one project per year, and some years perform more projects.  
9 Since our last rate case, we have replace 2,000 ft. of 8" water main. We are also  
10 continuing our meter replacement program that has been ongoing since our last  
11 case. Approximately 80% of our residential meters have been replaced with radio  
12 frequency transmitting meters. These new meters enable our reader to take a  
13 reading on a scheduled route each morning and then have the ability at the end of  
14 the day to download the data from the reading device directly to our billing  
15 system, that night the bills are processed and mailed out the next day. This year  
16 we will replace approximately 550 - 700 meters. The more efficient automatic  
17 reading devices have produced more accurate reads and provide us with a  
18 technology platform that we can develop into a fixed meter network in the future.  
19 We will also continue with hydrant and valve replacement as needed. These  
20 replacements are scheduled based on serviceability and age.

21

22 **Q. What is the R&I Alliance?**

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1 A. United Water's parent company, Suez Environnement, offers research grants to  
2 its operating companies for a variety of drinking water-related projects. Funding is  
3 available each year through several research programs. Research conducted by  
4 United Water under the R&I Alliance and other Suez Environnement programs  
5 provides added value to the Company in several ways: Research results are  
6 applied to specific capital projects to reduce capital expenditures. Research on  
7 water treatment processes is used to optimize operations, reduce operating costs  
8 and improve water quality. Research on new technologies is used to reduce the  
9 testing required by the Company to obtain regulatory approvals to apply these  
10 technologies.

11  
12 **Q. How do the R&I Alliance specifically benefit United Water Rhode Island**  
13 **customers?**

14 A. The R&I Alliance benefits United Water Rhode Island customers in the following  
15 ways:

16  
17 Pipe Asset Management – There are numerous studies by R&I Alliance  
18 concerning the practical age of various types of pipes and services. One particular  
19 study considered the potential impact that chlorine has on the lifespan of  
20 polyethylene pipe, which the Company uses. The results of also provide valuable  
21 information in forecasting the renewal of polyethylene pipe. In addition, there have  
22 been several studies on the lifespan of asbestos cement and cast iron water

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1 mains. This information as well as other industry information will be used in  
2 pipeline renewal/replacement programs for UWRI infrastructure.

3  
4 Storage Tank Operations – Currently, research is being performed to  
5 evaluate the use of mixing technologies to provide more effective operations of  
6 finished water storage tanks. The results will demonstrate the use of new  
7 technology to improve distribution system water quality through mixing in storage  
8 tanks. Well Optimization Current research is being conducted to develop a tool  
9 that would optimize the use of wells to reduce operating costs and to better  
10 manage aquifer conditions. This tool is being tested at another United Water  
11 ground-water system, but potentially can be applied to UWRI.

12  
13 Energy Efficiency – In 2006 and 2007, research was performed to consider  
14 the level of energy consumption relative to other similar systems in the U.S. and  
15 the world. The mathematical model was developed via a collaborative effort with  
16 R&I Alliance.

17  
18 **Q. Are there any R&I projects planned for the future where UWRI customers**  
19 **will benefit?**

20 **A.** Yes. The following R&I projects are planned: United Water was awarded a Suez  
21 Environnement research grant to study the use of a special membrane to remove  
22 volatile substances from drinking water. This technology may be applicable for  
23 some of the UWRI wells to remove carbon dioxide from the water, thereby raising

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1 the pH and reducing the need for lime addition. United Water is participating in an  
2 R&I project that involves the evaluation of fixed metering networks which provide  
3 the customer with real-time information about their water usage and allows the  
4 Company to assist the customer in identifying costly leaks. This technology could  
5 be applied to UWRI in the future to enhance customer service and reduce non-  
6 revenue water. In 2009, United Water established a research center to further  
7 facilitate the conduct of research in the U.S. with direct benefit to operating  
8 companies like United Water Rhode Island. This research center, the Water and  
9 Environment Research Centers (WERCs) will “tap” the expertise through United  
10 Water to participate in research that will further our efforts to continually improve.  
11 Finally, United Water strongly believes that the conduct of appropriate research is  
12 central to ensuring that the various operating companies have the best available  
13 methods and technologies at their disposal to successfully manage water quality,  
14 infrastructure and technology. To this end, support by staff to allow the costs  
15 associated with research activities sends the important message that such efforts  
16 are valued and should continue.

17  
18 **Q. Is the Company continuing its commitment to conservation and the “wise**  
19 **use of water”?**

20 **A.** Yes. The Company continues the distribution of low flow household water fixtures  
21 at the customer’s request. In cases where the Company feels a household’s  
22 water use is higher than normal, it will recommend the use of these fixtures, and  
23 offer them free of charge. The Company continues the use of ‘Bill stuffers’ as a

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1 vehicle to distribute seasonal water saving tips. Outdoor use tips are included with  
2 spring and summer bills and inside use tips are included with the fall and winter  
3 bills. The Company also has a policy where all leaks, whether on service lines or  
4 mains, are responded to immediately. If the leak is located on Company property,  
5 repairs will be made within twenty-four hours, keeping the find to fix time as short  
6 as possible. If not, notification to the customer is made immediately, if repairs are  
7 the responsibility of the customer. UWRI's current Non Revenue water is 10.15%,  
8 this very low level of system losses not only provides a water conservation  
9 benefit, but also reduces the energy and chemical usage. As a result lower CO<sub>2</sub>  
10 emissions are transported to the environment. Additionally, the current rate  
11 structure approved at the last rate filing does work and customers are very aware  
12 of the cost per CCF.

13

14 **Q. Is there any indication that the conservation efforts are working?**

15 A. Yes. It's most likely a combination of several factors, with conservation being the  
16 leading factor, however, the economy and weather conditions play a part. The  
17 average usage in 2010 was 157 gallons per service connection per day. This  
18 amounts to less than the national average of 60 gallons per person per day.

19

20 **Q. Are there any regulators seeking added conservation?**

21 A. Yes. Currently, there is a move by the RI Water Resources (RIWR) to get  
22 legislation enacted to set a limit on what the residential customer should use  
23 every year. The usage number that we keep hearing is 65 gallons per person per

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1 day. Considering that, the Company would have no problems meeting that  
2 threshold based on the census the withdrawal limits are still being worked on, but  
3 if this allocation requirement is to take place, it could place a tremendous burden  
4 on groundwater suppliers throughout the state.

5  
6 **Q. Does the Company currently have an Outreach and Education Program?**

7 A. Yes. The Company's goal for our outreach and education program is to keep  
8 customers and other stakeholders informed about company activities and  
9 performance including conservation etc. The Company utilizes an array of  
10 communication channels, including: Annual consumer confidence reports  
11 (containing water quality results), Company website, Rapid alert (Reverse 911),  
12 News media, Meetings with local officials and School programs. Through these  
13 media, we provide our customers with up-to-date information on the value of  
14 water, water quality, system improvements, conservation tips and products,  
15 customer rights, customer service matters such as payments, billing, meter  
16 reading, hardship programs and rate change information. Copies of consumer  
17 confidence reports are mailed directly to our customers and copies are also made  
18 available in municipal offices, libraries, schools and at local company offices. In  
19 case of an emergency, customers are kept informed via banner alerts on the  
20 company website and/or reverse 911, Rapid Alert System, as well as through  
21 local media. On a regular basis, I will meet with local officials to discuss Company  
22 programs as well as solicit areas of concern expressed by their constituents. For  
23 the past several years, a representative from the Company will conduct a water

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1 education session, usually with the 5<sup>th</sup> grade class at each of our area elementary  
2 schools. In addition, classes have been invited to tour our pumping and treatment  
3 facilities.

4  
5 **Q. Has the Company conducted any customer surveys since the last case to**  
6 **determine UWRI's customer satisfaction?**

7 A. Yes. Every year for the past few years, United Water's corporate Customer  
8 Service group has conducted customer satisfaction surveys for all of its regulated  
9 companies. A group of customers are randomly polled to see how they rated the  
10 Company on such things as overall satisfaction rating, telephone etiquette, and  
11 response to service order requests, time delay in getting new service installed,  
12 time to get meters tested, water quality and many other items. On virtually every  
13 survey, UWRI tends to be the number one company. The Company receives very  
14 few complaints, with only four high bill complaints reaching the Division level for  
15 resolution last year. The Company takes great pride in this accomplishment and  
16 each year strives to not only meet customer satisfaction, but to surpass it.

17  
18 **Q. Who will be the witnesses in this filing and what areas will each be**  
19 **covering?**

20 A. I will be testifying on overall Company operations and objectives. Mr. Gary  
21 Prettyman is testifying on the overall revenue requirement, Federal Income Taxes  
22 and is the case manager. Mr. Obioma (Obie) Ugboaja is testifying on operating  
23 revenues. Ms. Elda Gil is testifying on operations and maintenance expenses as

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1 well as taxes other than income. Mr. Tim Michaelson will be testifying on rate  
2 base and depreciation. Ms. Paula McEvoy will be testifying on capital projects.  
3 Ms. Pauline Ahern from AUS Consultants will be testifying on Rate of Return.  
4

5 **Q Please list the service and functions provided to UWRI by United Water**  
6 **Management and Services Company.**

7 A. United Water Management and Services Company (UWM&S) provides UWRI  
8 with various services in the following general areas: Technical Operations Support  
9 (hydraulic modeling etc.), Customer Service, Risk Management, Information  
10 Technology, Water Quality, Environmental Compliance, Human Resources and  
11 Employee Relations, Accounting, Data Processing, Planning and Treasury,  
12 Engineering/Master Planning, Customer Communications, Procurement/Accounts  
13 payable.  
14

15 **Q. Are these services and functions provided to UWRI required on a regular**  
16 **and timely basis?**

17 A. Yes. Without the support, guidance, administration and expertise of UWM&S,  
18 UWRI would be unable to effectively continue to meet the more stringent and ever  
19 changing state and federal regulations. In addition, if the M&S Company did not  
20 perform these necessary functions, additional highly educated and experienced  
21 Staff would have to be hired and/or outside firms would have to be engaged.  
22

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1 **Q. Briefly explain the Sector Agreement between United Water New York and**  
2 **UWRI.**

3 A. United Water New York (UWNY) provides operational, engineering and  
4 management support on an as needed basis. UWNY maintains an organization  
5 where the senior management employees are familiar with all facets of water  
6 utility operations and are qualified to render the services necessary in an  
7 economical manner (cost plus payroll overhead rates). The Sector Agreement  
8 was signed in 1998, and is intended to supplement the services provided by the  
9 management Company, particularly in the area of operations. Each sector  
10 includes a larger sector utility, such as United Water New York (UWNY) and  
11 several smaller companies that are assisted in their operations by the larger utility.  
12 UWNY's sector includes UWRI.

13 **Q. Is there any duplication of services provided between United Water**  
14 **Management & Services Company, United Water New York and United**  
15 **Water Rhode Island?**

16 A. No.

17  
18 **Q. Was the aforementioned Sector Agreement filed with the Rhode Island**  
19 **Public Utilities Commission?**

20 A. Yes, on January 22, 1998, the agreement was filed with the Secretary, Rhode  
21 Island Public Utilities Commission.

22

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1 **Q. Has the company included in this application a copy of its rules and**  
2 **regulations?**

3 A. Yes, the Company has included a copy of its rules and regulations and has not  
4 proposed any changes.

5

6 **Q. Does this conclude your testimony?**

7 A. Yes.