

# *Schacht & McElroy*

*Michael R. McElroy  
Leah J. Donaldson*

*Attorneys at Law*

*Michael@McElroyLawOffice.com  
Leah@McElroyLawOffice.com*

*Members of the Rhode Island  
and Massachusetts Bars*

*21 Dryden Lane  
Post Office Box 6721  
Providence, RI 02940-6721*

*(401) 351-4100  
fax (401) 421-5696*

September 16, 2015

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

Re: Pawtucket Water Supply Board – Docket No. 4550

Dear Luly:

As you know, this office represents the Town of Cumberland in this matter.

Enclosed are an original and nine copies of the Town of Cumberland's Responses to the 5<sup>th</sup> set of data requests from Pawtucket Water Supply Board.

An electronic version has been provided to the service list. Hard copies are being sent to you and the Attorney General.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg  
cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: PAWTUCKET WATER SUPPLY BOARD : DOCKET No. 4550  
GENERAL RATE FILING :

**THE TOWN OF CUMBERLAND'S RESPONSES TO THE**  
**5<sup>th</sup> SET OF DATA REQUESTS FROM THE**  
**DIVISION OF PUBLIC UTILITIES AND CARRIERS**

5-1 Reference page 20, lines 25-28, of Mr. Russell's surrebuttal. Specifically, to which demand factors is Mr. Russell referring when referring to the demand factors now proposed by Mr. Woodcock—those in PWSB's initial filing, in discovery, or in rebuttal?

**RESPONSE:**

Mr. Russell is referring to the demand factors proposed by Mr. Woodcock in his rebuttal testimony.

Prepared by David F. Russell, P.E.

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION  
DOCKET No. 4550  
RESPONSES OF THE TOWN OF CUMBERLAND  
TO THE DIVISION OF PUBLIC UTILITIES AND CARRIERS  
Data Requests  
Set 5

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5-2 Please provide a copy of Cumberland's new purchase water contract with Woonsocket Water ("WW).

**RESPONSE:**

The Cumberland Water Department (CWD) does not have a purchase water contract with the City of Woonsocket Water Department (WWD) at this time (nor does CWD have a purchase water contract with the PWSB at this time). Water is purchased on an as needed basis and CWD is charged at WWD's wholesale rate. Similarly water is purchased on an as needed basis from the PWSB and CWD is charged at PWSB's wholesale rate. Based on PWSB's proposed rate increase, and given the additional pumping costs associated with water supplied by PWSB, the total cost of water from these 2 suppliers will soon be essentially the same from CWD's perspective (see Cumberland's response to Division 3-6). This relative cost is not expected to change over the next few years. Beyond that, it all depends on the results of future rate cases. However, the Town of Cumberland is currently negotiating a contract to purchase wholesale water from the Town of Woonsocket on a firm basis. It is my understanding that WWD has more than enough excess capacity to supply CWD with at least 0.5 million gallons per day (MGD) and that could soon be increased to about 1.0 MGD. While the exact terms of the contract have not been finalized at this point, it is Cumberland's intention to purchase at least 0.5 MGD from Woonsocket going forward (as it currently does) during the whole summer peak period and potentially considerably more (up to about 1.0 MGD). It is Cumberland's intention to have that contract signed within a month or two.

Prepared by David F. Russell, P.E.

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**5-3** Please provide monthly water purchases by Cumberland from WW for August 2015.

**RESPONSE:**

CWD purchased 10,006,000 gallons of water from WWD in August of 2015 (between August 11, 2015 and August 31, 2015), typically around 500,000 gallons per day. If CWD had not purchased water from WWD, its peak day demand from PWSB for those 20 days would have been 2,655,000 gallons instead of the actual purchases from PWSB of 2,076,000 gallons on that day. Thus, for those 20 days the peak demand that CWD put on PWSB's system was 22% lower than it would have been if CWD hadn't purchased water from WWD. As stated in the prior response, CWD fully intends to purchase at least 0.5 MGD from WWD every day during the peak summer months going forward, and up to 1.0 MGD in about a year. These purchases will greatly reduce CWD's peak daily demands placed on the PWSB system going forward, and from what they were in prior years because of CWD's new ability to purchase wholesale water from WWD on a daily basis during all summer peak periods.

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5-4 Please provide copies of any operating plans that identify projected water purchases by Cumberland from WW for the next three years.

**RESPONSE:**

As indicated in prior responses it has for some time been CWD's plan to augment its total water supply by purchasing at least 0.5 MGD of wholesale water from WWD during summer peak periods. The physical interconnection was planned with the WWD and preliminary to a formal contract WWD began delivering wholesale water to CWD about a month ago. The term of the contract with Woonsocket is currently being negotiated, but is not expected to be less than three years.

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**5-5** Please provide a copy of any studies prepared by or for Cumberland which evaluate the extent to which Cumberland will be able to reduce its summer water purchases from PWSB with purchases from WW.

**RESPONSE:**

Please see Cumberland's responses to the three prior information requests.

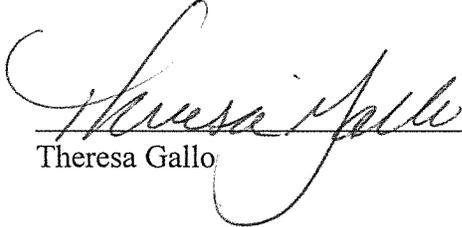
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CERTIFICATION

I hereby certify that on the 16<sup>th</sup> day of September, 2015, I sent a copy of the foregoing to the attached service list.

  
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Theresa Gallo

*Cumberland/Pawtucket Water Supply Board 4550/Response Division 5*

**DOCKET NO. 4550 - Pawtucket Water Supply Board – Multi-Year Rate Filing  
Service List updated 3/12/15**

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a>	401-724-3600
James L. DeCelles, P.E. Chief Engineer Pawtucket Water Supply Board 85 Branch St. Pawtucket, RI 02860	<a href="mailto:decelles@pwsb.org">decelles@pwsb.org</a>	401-729-5001
	<a href="mailto:rbenson@pwsb.org">rbenson@pwsb.org</a>	
Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Klyons@riag.ri.gov">Klyons@riag.ri.gov</a>	401-222-2424
	<a href="mailto:steve.scialabba@dpuc.ri.gov">steve.scialabba@dpuc.ri.gov</a>	
	<a href="mailto:john.bell@dpuc.ri.gov">john.bell@dpuc.ri.gov</a>	
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov</a>	
	<a href="mailto:Pat.smith@dpuc.ri.gov">Pat.smith@dpuc.ri.gov</a>	
	<a href="mailto:Jmunoz@riag.ri.gov">Jmunoz@riag.ri.gov</a>	
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	<a href="mailto:Woodcock@w-a.com">Woodcock@w-a.com</a>	508-393-3337
David Bebyn B&E Consulting 21 Dryden Lane Providence, RI 02904	<a href="mailto:dbebyn@beconsulting.biz">dbebyn@beconsulting.biz</a>	401-785-0800
Thomas S. Catlin Exeter Associates, Inc. 10480 Little Patuxent Parkway Suite 300 Columbia, MD 21044	<a href="mailto:tcatlin@exeterassociates.com">tcatlin@exeterassociates.com</a>	410-992-7500
	<a href="mailto:jmierzwa@exeterassociates.com">jmierzwa@exeterassociates.com</a>	
	<a href="mailto:lmorgan@exeterassociates.com">lmorgan@exeterassociates.com</a>	
Mike McElroy Schacht & McElroy PO Box 6721 Providence, RI 02940-6721	<a href="mailto:Michael@McElroyLawOffice.com">Michael@McElroyLawOffice.com</a>	401-351-4100
Thomas Hefner Town of Cumberland	<a href="mailto:thefner@cumberlandri.org">thefner@cumberlandri.org</a>	
David Russell	<a href="mailto:Davidrussell015@comcast.net">Davidrussell015@comcast.net</a>	
File original and nine (9) copies w/ Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a>	401-780-2104
	<a href="mailto:Amy.dalessandro@puc.ri.gov">Amy.dalessandro@puc.ri.gov</a>	401-941-1691
	<a href="mailto:Sharon.colbycamara@puc.ri.gov">Sharon.colbycamara@puc.ri.gov</a>	