

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

July 6, 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 Objection to Pawtucket Water Supply Board's data request 1-1(a).

An electronic version of this Objection 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 :

**TOWN OF CUMBERLAND'S OBJECTION TO
PAWTUCKET WATER SUPPLY BOARD'S DATA REQUEST TO
THE TOWN OF CUMBERLAND 1-1(a)**

1-1 In Mr. Russell's testimony, he made a number of suggested changes to the PWSB'S revenue request, cost allocations and rate design. He also made several suggestions regarding mitigation measures. As such:

- a. Please provide a copy of the rates that result from all of Mr. Russell's recommendations, including an electronic copy of the spreadsheet (with any and all linked spreadsheets and all formulas intact).

OBJECTION:

The Town of Cumberland objects to this request because it is unreasonable and burdensome. Mr. Russell estimates that if he were required to prepare an independent rate model, it would take him at least a week of work. Also, since he did not design the spreadsheet model, he could make mistakes. Mr. Russell is capable of estimating the impacts of his recommendations without utilizing a model, and if any party wishes to challenge Mr. Russell's estimates, they are free to do so.

Prepared by: Michael R. McElroy, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of July, 2015, I sent a copy of the foregoing by to the attached service list.



Michael R. McElroy


Cumberland/Pawtucket Water Supply Board 4550/Objection

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

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