

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*

May 13, 2016

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 Position Memorandum in this matter.

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

Very truly yours,



Michael R. McElroy

MRMc:tmg
cc: Service List

**DOCKET NO. 4550 - Pawtucket Water Supply Board – Multi-Year Rate Filing
Service List updated 4/22/16**

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 ;	
Christy Hetherington, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Chetherington@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 ;	

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

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

POSITION MEMORANDUM OF THE TOWN OF CUMBERLAND

Pursuant to the procedural schedule established in this matter, and pursuant to Rule 1.20(k), the Town of Cumberland hereby files its position memorandum in this docket.

The Public Utilities Commission previously approved a second step increase of 6.6%.

Pawtucket Water Supply Board (PWSB) filed a compliance filing on April 8, 2016. The filing sought to implement the second step with a 3.6% increase.

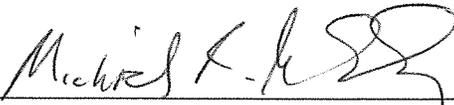
On April 26, 2016, PWSB made a supplemental filing. The impact on a typical customer was reduced to 2.8%.

Based on the Town's review and input from the Town's expert consultant, the Town is not opposed to the second step increase requested by PWSB.

However, the Town respectfully requests that the PUC include in its Order approving this filing that in PWSB's filing for the third step, the PWSB must show not only how expenses have changed for the third step, but also how sales and revenues have changed in comparison to levels previously projected and approved. In this regard, the Town requests that updated consumption and revenue figures by month be furnished with the filing for the third step.

Respectfully submitted,
Town of Cumberland
By its attorney

Dated: May 13, 2016



Michael R. McElroy, Esq. #2627
Schacht & McElroy
21 Dryden Lane
P.O. Box 6721
Providence, RI 02940-6721
Tel: (401) 351-4100
Fax: (401) 421-5696
Michael@McElroyLawOffice.com

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of May, 2016, I sent a copy of the foregoing by to the attached service list.



Theresa Gallo

Camberland Pawtucket Water Supply Board 4550 Position Memorandum