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April 24, 2015

Ms. Luly Massaro, Clerk  
Division of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: *Pawtucket Water Supply Board, General Rate Filing***  
***Docket No. 4550***

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the following document:

1. Pawtucket Water Supply Board's Response to the Town of Cumberland's Data Request (Set 1).

Please note that an electronic copy of this document has been sent to the service list.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough Jr.

JAK/kf  
Enclosure

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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**Cumb. 1-1:** [Ref. -Testimony Page 1] Please provide a copy of PWSB's FY2014 audited financial statements.

**Response:** Please see attached.

**Prepared by:** Robert Benson

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**Cumb. 1-2:** [Ref. - Schedule DGB-1] Why are the "Adjusted Test Year" revenues from Meter Sales over \$100,000 less than "Test Year" revenues? Please provide your best estimates (\$ amounts) for the three primary factors causing this difference.

**Response:** There is only one factor which is causing this variance. The Test Year revenues were obtained from the PWSB's audited trial balance. This trial balance utilizes accruals while the Adjusted Test Year uses the actual monthly consumption for the year and applies the current docket rates in effect. Since these accruals sometimes use estimates I believe using the actual consumption and recalculating the revenues based on current rates provides for a more accurate Adjusted Test Year.

**Prepared by:** David Bebyn

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**Cumb. 1-3:** [Ref. - Schedule DGB-1] Why are the "Adjusted Test Year" revenues from Sales for Resale over 10% less than "Test Year" revenues? Please provide your best estimates (\$ amounts) for the three primary factors causing this difference.

**Response:** Please see the response to Cumb. 1-2.

**Prepared by:** David Bebyn

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**Cumb. 1-4:** [Ref. - Schedule DGB-6] Why did you choose to use the most recent 4 years to derive an average level of "Penalties" revenues? What would the average level have been if you used the 3 most recent years to calculate this average? What would the average level have been if you used the 5 most recent years to calculate this average?"

**Response:** When dealing with these non-consumption based revenue accounts (Penalty, Service installation and Miscellaneous), I have consistently applied a four year average barring any extraordinary onetime events. I don't think it would be proper to apply different years for each of these accounts. For example, with respect to service installation revenue the 4 year average actually generates additional revenue for the PWSB. The average for the 3 most recent years would have generated average revenue of \$324,240. The average for the 5 most recent years would have generated average revenue of \$267,843.

**Prepared by:** David Bebyn

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**Cumb. 1-5:** [Ref. – Schedules DGB-2 and DGB-6] Please reconcile the different numbers shown on these two schedules for the level of Misc Revenues in FY2012 (\$543,036 and \$286,507). If the amount on Schedule DGB-2 is the correct amount, please change your calculation of average misc revenues shown on DGB-6.

**Response:** Schedule DGB-6 at the bottom of the page already displays this reconciliation. Furthermore, page 3 of my testimony lines 7 through 11 describes in detail the need for adjusting FY 2012 in obtaining the four year average. I believe the average on DGB-6 is correct as calculated and no correction is necessary.

**Prepared by:** David Bebyn

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**Cumb. 1-6:** [Ref. - Schedule DGB-6] Why did you choose to use the most recent 4 years to derive an average level of "Misc Revenues?" What would the average level have been if you used the 3 most recent years to calculate this average? What would the average level have been if you used the 5 most recent years to calculate this average?"

**Response:** Please see the response to Cumb. 1-4 regarding my reasons for selecting a 4 year average. The average for the 3 most recent years would have generated average revenue of \$242,555. The average for the 5 most recent years would have generated average revenue of \$237,057.

**Prepared by:** David Bebyn

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**Cumb. 1-7:** [Ref. -Testimony Page 3, lines 15 - 18] What were the levels of funds maintained in each of the restricted accounts at the end of FY2014? What were the required funding levels for each of the restricted accounts at the end of FY2014? If the funds maintained in any of the restricted accounts exceed the required levels at the end of a fiscal year, can the amount in excess of the required amounts be used for other purposes?

**Response:**

1. See the attached Schedule CUMB 1-7 for the amount of funds held in each of the restricted accounts at the end of FY2014.
2. The funding levels in the restricted accounts are established by the Trust Indenture including all Supplemental Indentures and the Report and Order issued by the PUC in Docket 4171. See also the response to Cumb. 1-24.
3. No. In accordance with the terms of Section 512 of the Trust Indenture the moneys in the restricted funds (including all income earned on investment of the Debt Service Reserve Fund) can only be used for the restricted purpose of each fund.

**Prepared by:** Robert Benson

Schedule CUMB 1-7

**PAWTUCKET WATER SUPPLY BOARD**  
**Restricted Account Balances**  
**For the year ended June 30, 2014**

YTD Total

**DEBT SERVICE RESERVE FUND**

<u>2003A Debt Service Reserve Account</u>	<u>1,798,753.45</u>
<u>2003B Debt Service Reserve Account</u>	<u>765,501.05</u>
<u>2004A Debt Service Reserve Account</u>	<u>3,176,081.81</u>
<u>2005A Debt Service Reserve Account</u>	<u>2,295,305.75</u>
<u>2009A Debt Service Reserve Account</u>	<u>326,054.09</u>
<u>2011A Debt Service Reserve Account</u>	<u>524,553.25</u>
<u>2012A Debt Service Reserve Account</u>	<u>130,996.17</u>
<u>2013A Debt Service Reserve Account</u>	<u>\$ 545,879.98</u>

**DEBT SERVICE FUND**

<u>Debt Service Sinking Fund Account</u>	<u>25,207.84</u>
<u>Debt Service Stabilization Account</u>	<u>2,552,938.69</u>
<u>RICWFA Debt Service Account</u>	<u>5,005,890.26</u>

**DEBT SERVICE FUND**

<u>Debt Service Sinking Fund Account</u>	<u>25,207.84</u>
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**OPERATIONS and MAINTENANCE RESERVE FUND**

<u>Trust Indenture O&amp;M Reserve Account</u>	<u>2,708,185.21</u>
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**PROJECT FUND**

<u>Infrastructure Replacement Fund Account</u>	<u>2,367,407.71</u>
<u>Plant Decommissioning Reserve</u>	<u>25,207.84</u>

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**Cumb. 1-8:** [Ref. -Testimony Page 3, lines 19 - 23] Please provide a detailed breakdown of what the Grant Revenues (\$54,636) in FY2014 were used for?

**Response:** The grant revenues are debt forgiveness from RICWFA Bonds issues 2009A, 2012A and 2013A. See copies of the debt service schedules for each of these Bond issues in Tab D, Index Item 2.9(f), of the original filing.

**Prepared by:** Robert Benson

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**Cumb. 1-9:** [Ref. -Testimony Page 3, lines 29 - 30] Please provide the detailed calculations used to derive the more than a half million in adjustments (J) to Salaries and Wages Expenses.

**Response:** When preparing for the PWSB audit, these exact amounts of \$306,882 for T&D salary expense and \$213,813 for engineering salary expense were adjusted from these expense accounts and placed in fixed assets. Because the PWSB is regulated on a cash basis it was necessary to restore these expenses.

**Prepared by:** David Bebyn

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**Cumb. 1-10:** [Ref. -Testimony Page 4, lines 3 - 4] Please provide a detailed breakdown of what the Amortization Expense (\$67,769) in FY2014 was used to pay for?

**Response:** The amortization is for a refunding loss that resulted from the PWSB's 2003 refunding of the Pawtucket Public Building Authority bonds over the remaining life of the old loans.

**Prepared by:** Robert Benson

**Cumb. 1-11:** [Ref. -Testimony Page 4, lines 5 -9] Please provide a detailed breakdown of the three accounting adjustments [dollar amounts, specific accounts adjusted and the year(s) involved] specified in this Test Year "Adjustment" (M), along with an explanation of how each specifically affects the IFR Adjustment of \$2.5 million. The three accounting adjustments referred to are:

- The "road surface restoration expenditures which I moved from T&D expenses to this account."
- "Capitalized labor in the last filing was included in base salaries."
- "Engineering salary for Project Manager was already charged to this account."

**Response:** Regarding these three adjustments, I will start with capitalized labor. In the prior filings no labor aside from the Engineering salary for Project Manager was assigned to the IFR account. My point here is to state that these labor costs, normally capitalized during an audit, were part of the base salaries in the last filing and not part of the IFR account.

The adjustment for the Engineering salary for Project Manager is not an adjustment since the PSWB normally charges this expenditure to the IFR account. I make this point in my testimony to point out that there would be no further adjustment needed from the engineering salary expense account. Furthermore, subsequent to the last filing, this project regarding the Engineering Project Manager was completed prior to the Test Year.

The last adjustment for road surface restoration is need since in the last filing this expense account was fully funded by the IFR account. As a result I had removed the expense from the test year and placed it properly in the IFR account. This adjustment accounted for \$7,632.

Lastly regarding the remaining portion of the total adjustment for \$2.5 million, as I previously stated in my response to Div. 2-6, since this account is restricted the account should be funded for the level approved in the last rate case. Mr. Benson in the response to Cumb 1-24 goes into further detail on the funding of this account.

**Prepared by:** David Bebyn

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**Cumb. 1-12:** [Ref. -Testimony Page 5, lines 15 - 18] Did you identify any "major variances" in any revenue or expense amounts/("items") in this investigation that could indicate the appropriateness of a rate year adjustment? If there were any such variances, what were they, and what adjustments were subsequently made to rate year levels? Which of these items were discussed with Mr. Benson and/or Mr. Woodcock? Please provide the results of any such discussions.

**Response:** I did not identify any major variances which would make for an appropriate rate year adjustment. All identified variances were addressed by test year adjustments.

**Prepared by:** David Bebyn

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**Cumb. 1-13:** [Ref. -Testimony Page 1, lines 12-15] How many customers by class does PWSB serve in each of the three communities you refer to in this paragraph?

**Response:**

***CUSTOMERS BY CLASS BY COMMUNITY***

User Class	Residential	Commercial	Industrial	TOTAL CUSTOMERS
PAWTUCKET	16,156	1,155	150	17,461
CENTRAL FALLS	2,374	260	36	2,670
CUMBERLAND	2,665	130	16	2,811
<b>TOTAL</b>	<b>21,195</b>	<b>1,545</b>	<b>202</b>	<b>22,942</b>

**Prepared by:** Robert Benson

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**Cumb. 1-14:** [Ref. -Testimony Page 2, lines 15-24] What are the dollar amounts and percentages you assign to the five components necessitating this rate increase. The five components are:

- Revenue loss due to decreased consumption
- Operation of the treatment facilities
- Non-labor related expense
- Salaries, benefits and payroll taxes
- All others

**Response:** Please see the response to Div. 1-1 (excel file). See Tab "Costs" cells J152:N168.

**Prepared by:** C. Woodcock

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**Cumb. 1-15:** Note: Cumberland's First Set of Data Requests did not contain a request 1-15.

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**Cumb. 1-16:** [Ref. -Testimony Page 3, lines 11-16] While "..... PWSB has seen a steady decline in customer consumption for over a decade," would you also agree with Mr. Bebyn where he states in his Testimony (Page 4 , lines 20-21), "Upon further review, when looking at total retail consumption it appears to have leveled off in the past two years." (?) If you do not agree, please explain in detail why you disagree.

**Response:** Yes.

**Prepared by:** James DeCelles

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**Cumb. 1-17:** [Ref. -Testimony Page 4, lines 16-24] What level of increase, if any, was assigned to the Local 1012 contract for FY 2018. If a positive level of increase was applied in FY2018, what justification or rationale did PWSB rely on in selecting that level? What years will the pending negotiations with the Teamsters union cover? If they are the same as Local 1012, what level of increase, if any, was assigned to the teamsters labor costs for FY2018? If a positive level of increase was applied in FY2018, what justification or rationale did PWSB rely on in selecting that level?

**Response:**

1. The Local 1012 contract was increased by the GDP index for FY2018. See Woodcock Schedule 1.1.
2. See data response to Div. 2-17.
3. The pending negotiations for the Teamster union contract will cover July1, 2012 through June 30, 2017.
4. The same increase was used for the Teamster contract as used for the Local 1012 contract.
5. See item #2 above.

**Prepared by:** Robert Benson

**Cumb. 1-18:** [Ref. -Testimony Page 4, lines 26-29] What are the levels of annual savings associated with each of the three changes in the labor contracts specified in this paragraph? These are: elimination of 2.5 Holidays; increase in health care co-payments; and modifications to longevity payments. Identify where in the filing these savings are accounted for and specifically result in lowering rate year revenue requirements.

**Response:** The testimony on page 4, lines 26-29, did not indicate that the PWSB realized savings or that the changes would result in lower rate year revenue requirements. Further details on the three changes are as follows:

1. The elimination of 2.5 holidays will not result in any cost savings. It will be a paid work day rather than a paid holiday.
2. The FY2016 medical and dental insurance expense was calculated without an increase from the FY2015 premiums based on an estimate that any cost increases will be offset by the increased employee co-pay.
3. The modification to longevity payments only applies to new employees hired after ratification of the agreement. Thus, no short term cost savings will be realized from this contract modification.

**Prepared by:** Robert Benson and James DeCelles

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**Cumb. 1-19:** [Ref. – Testimony Page 6, lines 1-7] From FY2010 through FY2014 list the total annual expenditures that were incurred each year for IFR projects and the amount of funds withdrawn from the IFR Fund.

**Response:** Here are the capital expenditures and withdrawals from the IFR Fund (along with RICWFA Bond expenditures) by fiscal year.

	<u>FY10</u>	<u>FY11</u>	<u>FY12</u>	<u>FY13</u>	<u>FY14</u>
<b>Total Capital Expenditures</b>	<u>\$ 5,311,522</u>	<u>\$ 4,761,660</u>	<u>\$ 4,866,172</u>	<u>\$ 6,959,192</u>	<u>\$ 6,576,359</u>
<b>Funds withdrawn from IFR Fund</b>	<u>\$ 734,488</u>	<u>\$ 881,139</u>	<u>\$ 1,286,580</u>	<u>\$ 2,995,990</u>	<u>\$ 2,584,274</u>
<b>Expenditures from RICWFA Bond Proceeds</b>	<u>\$ 4,577,034</u>	<u>\$ 3,880,520</u>	<u>\$ 3,579,592</u>	<u>\$ 3,963,202</u>	<u>\$ 3,992,085</u>

**Prepared by:** Robert Benson

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**Cumb. 1-20:** [Ref. – Testimony Page 5, lines 20 27] Please provide a detailed description of what is included in Main Replacement Project 10 (MR-10) (location, size and type of pipe, related appurtenances, other specifications and the currently planned construction schedule, etc.) Also provide a detailed breakdown of cost estimate that totals \$5.4 million. If it was delayed by a year, what impact would that delay have on PWSB's system and the overall rehabilitation program? Please be specific. [For example - likely additional expensive leaks, significantly higher UAW, significant pressure or flow problems, or significant additional customer dissatisfaction with water quality or delivery, etc.]

**Response:** Please reference the attached listing of all streets included in the MR-10 project as well as the detailed project cost estimate. The project will consist of replacing approximately 33,000 lf of distribution piping. The project consists mainly of replacing aging 6" and 8" unlined cast iron piping installed in the early 1900's. This piping has become very tuberculated over the years and has resulted in decreased carrying capacity as well as water quality problems. The new pipes will be cement lined ductile iron and will significantly increase the flow capacity as well as eliminate water quality issues associated with unlined cast iron. The replacement will also increase the fire-fighting capabilities in these areas.

If the project were to be delayed it would extend the PWSB Distribution System Rehabilitation program, which began in 2003. We are currently in the final phases of this program that has consisted of the lining or replacement of the majority of the transmission and distribution systems in the PWSB's service areas. While no one can be certain, the delay would likely result in increased construction costs due to inflation, as well as the potential for unnecessary maintenance costs due to leaks and other issues. Any delays in the projects could also result in increased interest rates for the project loans.

**Prepared by:** James DeCelles





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**Cumb. 1-21:** [Ref. – Testimony Page 5, lines 20 27] Please provide a detailed description of what is included in the Cleaning and Lining Project 6 (CL-6) (location, size and type of pipe, related appurtenances, other specifications and the currently planned construction schedule, etc.) Also provide a detailed breakdown of cost estimate that totals \$4.3 million. If it was delayed by a year, what impact would that delay have on PWSB's system and the overall rehabilitation program? Please be specific. [For example - likely additional expensive leaks, significantly higher UAW, significant pressure or flow problems, or significant additional customer dissatisfaction with water quality or delivery, etc.]

**Response:** Please reference the attached listing of all streets included in the CL-6 project. Since the plans and specifications for this project have not been developed yet, we can't provide a detailed cost estimate like we did for MR-10, but rather have provided a per foot cost estimate. This project will consist of the cleaning and lining of approximately 42,000 lf of distribution piping at an estimated cost of \$86/foot. The project consists mainly of cleaning and lining aging 6" and 8" unlined cast iron piping installed in the early 1900's. This piping has become very tuberculated over the years and has resulted in decreased carrying capacity and water quality problems. The cleaned and lined pipes will significantly increase the flow capacity as well as eliminate water quality issues associated with unlined cast iron. The improvement will also increase the fire-fighting capabilities in these areas.

If the project were to be delayed it would extend the PWSB Rehab program, which began in 2003. We are currently in the final phases of this program that has consisted of the lining or replacement of the majority of the transmission and distribution systems in the PWSB's service area. While no one can be certain, the delay would likely result in increased construction costs due to inflation, as well as the potential for unnecessary maintenance costs due to leaks and other issues. Any delays in the projects could also result in increased interest rates for the project loans.

**Prepared by:** James DeCelles



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**Cumb. 1-22:** [Ref. – Testimony Page 6, lines 1-7] For each year from 2015 through 2020 how much does PWSB plan on spending for “further work on its distribution system after it completes these two projects?” [the subjects of the two preceding information requests] To the extent they are known or anticipated, provide an annual listing of these projects; the type of improvements; and their expected costs. Is it correct that all of this “further work” will be paid for by withdrawals from the IFR Fund? If you disagree, please explain why. Is it also correct that PWSB’s projected rate revenues are designed to provide \$2.5 million additional annual deposits (increases) to the IFR account? If you disagree, please explain why.

**Response:** FY 2016 and 17 will consist of the construction of MR-10 and CL-6 as previously outlined. We then plan to complete \$582,500 per year in 2018 and 2019 and \$627,500 in 2020. These will be smaller main replacement projects as we begin the process of replacing our oldest lined pipes or any other problem areas. At this point, the PWSB anticipates completing these projects with IFR funds. It is not correct that the PWSB is requesting an additional \$2.5 million in IFR revenue. The current docket authorizes this amount but we have been unable to fully fund the IFR due to decreased consumption.

**Prepared by:** James DeCelles

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**Cumb. 1-23:** [Ref. – Testimony Page 6, lines 1-7] Are you fully confident that you will be able to make such “further work” improvements totaling \$2.5 million each year from FY2016 through FY2018? Or, is it a reasonable assumption that the level of such “further work” in the three years spanning FY2016 through FY2018 may not exceed \$2.0 million per year on average over those three years? If you disagree, please explain in detail your reason(s) for doing so.

**Response:** Yes. The PWSB is fully confident that we will be able to make improvements totaling \$2.5 million each year. The PWSB has a backlog of IFR projects that could easily exceed the \$2.5 million per year collected. In addition to our main replacement program, the PWSB also has plans to complete extensive rehab work on all four of our dams as well as our nine wells.

**Prepared by:** James DeCelles

**Cumb. 1-24:** [Ref. – Testimony Page 6, lines 11-14] What levels of funding does PWSB's Bond Indentures require each of the three listed funds (O&M Budget Fund, the Debt Service Fund and the O&M Reserve Fund) be funded to? In addition to the IFR account what are the "remaining restricted accounts? If the IFR account was funded at \$2.0 million in FY 2016, would that one year reduction of \$0.5 million (20%) have very significant or minimal impacts on the PWSB's ongoing maintenance program in the long run (say 20 years)? Please explain your answer in detail. If the IFR account was funded at \$2.0 million in FY 2016 and FY2017, would that two year reduction of \$0.5 million (20%) per year have very significant or minimal impacts on the PWSB's ongoing maintenance program in the long run (say 20 years)? Please explain your answer in detail.

**Response:** The Bond Indentures require funding these three funds as follows:

1. The Bond Indenture does not establish a funding level for the O&M Budget Fund. However, the Section 605 of the Bond Indenture requires that the City/PWSB shall operate and maintain the System properly and in a sound, efficient and economical manner.
2. The Bond Indenture requires the debt service fund to funded at levels to meet the payment of interest and principal on the payment dates of all outstanding RICWFA loans.
3. The Bond Indenture requires the O&M Reserve Fund to be funded at 25% of the annual O&M budget. The O&M Reserve Fund is fully funded and, therefore, there is no revenue requirement for this fund at this time.
4. The remaining restricted accounts are required by the Public Utility Commission. They are as follows:
  - a. The Plant Decommissioning Account which is restricted to pay for the decommissioning and demolition expenses of the original water treatment plant.
  - b. Revenue Stabilization/Operating Revenue Allowance account, which has not been funded as the actual collected revenues have not been sufficient to date.
5. The PWSB's capital improvement program is planned to ensure compliance with Section 605 of the Trust Indenture. The PWSB's ongoing maintenance program has already been affected due to the

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reduction in prior year revenues resulting from actual consumption at levels less than authorized in Docket 4171. So it is the PWSB's belief that a further reduction in funding would have a significant impact.

**Prepared by:** Robert Benson and James DeCelles

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**Cumb. 1-25:** [Ref. – Testimony Page 3, lines 15 -17 and Sch. RB-01] The older debt - RICWFA Series A and B – have relatively high interest rates (5% and 6%, respectively). How many years remain on each of those debts, and could either be refinanced to capture lower interest rates available in the current market? If either could be refinanced, why haven't one or both been refinanced?

**Response:** The 2003 Series A and Series B Bonds were conduit bonds at market rates. Because the 2003 Series A and Series B bonds refinanced prior debt, they were not eligible for subsidized interest rates. They were structured as interest only through 2024 with principal maturing from 2025 to 2035. This structure enabled the PWSB to wrap the 2003 bonds around the 20 year subsidized loans. The purpose of the structure was to smooth out the increases in debt service for the new water treatment plant. The PWSB reviews these bonds for potential refinancing on a regular basis. See copies of the debt service schedules for each of these Bond issues in Tab D of the original filing.

**Prepared by:** Robert Benson

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**Cumb. 1-26:** [Ref. – Testimony Page 3, lines 15 -17 and Sch. RB-01] What are the effective average interest rates on all of the other RICWFA bonds listed on Sch. RB-01? What are the effective average interest rates on all of the Pawt G. O. bonds listed on Sch. RB-01? Could PWSB borrow additional Funds through Pawtucket's G.O. bonding capacity? If affirmative, what amount of additional Debt could be borrowed with G.O. debt? What would the current market rate of interest be on such G.O. debt?

**Response:** Please see the response to Cumb. 1-1. The Schedule of Long-term obligations on page 24 of the FY2014 Audited Financial Statements provides the interest rates for each RICWFA Bond Issue and each City of Pawtucket G.O. Bond issue.

The RICWFA Bonds are revenue bonds and the terms of the PWSB's Trust Indenture limits the capacity to seek alternative financing as any other forms of debt to be paid from revenues would be subordinated to the RICWFA Bonds. In addition, the RICWFA's "AAA" Fitch Bond Rating is superior to the City of Pawtucket Fitch bond rating of "BBB+", and the PWSB can borrow from RICWFA at a subsidized interest rate of 25% below market-rate. Finally, the City has no authorized, but unissued, debt for water system improvements, so general assembly legislation and approval of Pawtucket's voters would be required.

**Prepared by:** Robert Benson

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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**Cumb. 1-27:** [Ref. – Testimony Page 3, lines 20 -30 and Sch. RB-02] Why are some of the Agency Service Fee Payments relatively high for some issues and much lower for other issues? For example, Series 2003A and B compared to Series 2004A or 2005A. How are these fees calculated for each series, and what service or cost do they compensate the Agency for?

**Response:** The Agency Service Fee Payments are a requirement of all RICWFA Bond issues and are included in the debt service schedule for each issue. The agency fee is 0.5% of the outstanding principal balance of each issue. See Tab D, Index Item 2.9(f), of the original rate filing for a copy of the debt service schedules for each bond issue. The required agency fee payments are included on each debt service schedule.

**Prepared by:** Robert Benson

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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**Cumb. 1-28:** [Ref. – Testimony Page 3, lines 20 -30 and Sch. RB-02] If it doesn't require a lot of time and effort, please restate Sch. RB-02 so that the yearly amounts reflect PWSB's fiscal years (for FY2014 through FY2018) rather than the periods shown.

**Response:** It will take an extensive amount of time and effort to restate Schedule RB-02. The schedule as prepared is timed to the actual principal and interest payments on March 1 (interest and agency fees only) and September 1 (principal, interest and agency fees). Schedule RB-02 is based upon the October to September twelve month time period to ensure compliance with the terms of the Trust Indenture.

**Prepared by:** Robert Benson

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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**Cumb. 1-29:** [Ref. – Testimony Page 3, lines 20 -30 and Sch. RB-02] Please explain in detail how the amounts at the bottom of Sch. RB-02 on the line (for the 3 years FY2016 through FY2018) titled "Transfers to Debt Service from Debt Stabilization" were derived due to lower than necessary revenue levels that would, if higher, negate the need to withdraw funds from the Debt Stabilization Fund. This should entail the relationship between the income statement and all reserve funds.

**Response:** The PUC requires that the PWSB restrict a portion of its overall revenue for debt service. In order to meet that requirement, the Stabilization Account is established within the Debt Service Fund. This account is required by the Trust Indenture and is funded from revenue restricted for debt service. See the response to the Division Data Request 2-11 for an explanation of how funds accumulate in this restricted cash account. The Trust Indenture does not establish a required funding level for the Stabilization Account as the PUC determines the amount of revenues the PWSB must restrict for debt service. If revenues deposited in the Debt Service Accounts on a monthly basis were not sufficient to cover an upcoming debt service payment, the Trustee would withdraw funds that have accumulated in the Stabilization Account. The Trust Indenture stipulates these funds are to be available for principal and interest payments should the debt service restricted account not have sufficient funds to make the required payments. The PWSB has been using some of these funds in the Stabilization Account to meet its current debt service requirements, while mitigating rate increases and the need for additional revenue in this rate application. However, it is not prudent to completely spend out this account because the Trust Indenture allows the PWSB to use amounts in the Stabilization Account to meet the Indenture's requirement for 1.25 times debt service coverage. Maintaining debt service coverage is important to ensure that Bond rating agencies maintain the PWSB's current rating of A Stable. Thus, the PWSB has calculated amounts to be withdrawn from this account so no additional rate revenue is required during FY2016, while maintaining coverage and an account balance sufficient to retain the existing bond rating.

**Prepared by:** Robert Benson

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**Cumb. 1-30:** [Ref. – Testimony Page 3, lines 20 -30 and Sch. RB-02] The average increase in Total Debt Service payments after the first year (ending 9/30/2014) shown is approximately \$276,000, which when divided by the total for the first year equals about 3.5%. Please verify if these numbers are correct. Is this the approximate amount you estimate you need to increase annual revenues by due to increased DS payments? If it is not, please explain why, and show the detailed calculations PWSB used to estimate this amount (that is what dollar amount revenues need to be increased by solely due to higher DS payments). [note – If the request in Cumb. 1-28 is provided, please use the revised PWSB fiscal year amounts.]

**Response:** The amounts reported on Schedule RB-02 are based upon the actual debt service schedules provided in Tab D of the rate filing application for each bond issue plus the proposed debt service schedules provided by Schedule RB-03. The only estimated amounts are the debt service schedules prepared for the proposed debt of \$10.6 million. The actual debt service schedules will be provided once the loan closing has been completed.

**Prepared by:** Robert Benson

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**Cumb. 1-31:** [Ref. – Testimony Page 4, lines 3 -17 and Sch. RB-01 and RB-02] Why were two bonds (RICWFA DL Series 2012 and Series 2012A) issued to fund projects MR-6 and MR-7 within the same 12 month period? Would it not have been less expensive to have consolidated those into one issue? Please explain in detail why this was not done.

**Response:** The original loan application for the Series 2012 included four projects: (1) Main Replacement Construction (including MR-6); (2) refinancing of a bridge loan issued to complete CL-5; (3) design and construction of a decant water discharge pipeline; and, (4) rehabilitation of wells 2 thru 9. After the loan closing, the PWSB decided to fund the decant water discharge pipeline and well rehabilitation projects with funds from IFR due to approval and timing issues with the Rhode Island Department of Health (RIDOH). As a result, there were funds available from the Series 2012 borrowing to begin MR7, but not enough to complete the entire project. Thus, the PWSB undertook the Series 2012 A borrowing to completely fund MR-7.

Yes it would have been less expensive to issue only one bond, but the application for the Series 2012 had been submitted, and the closing had taken place, before the PWSB encountered issues with RIDOH. Since MR7 was not on the original application, it was necessary to apply for a second loan to completely fund MR-7.

**Prepared by:** James DeCelles

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**Cumb. 1-31(a):**<sup>1</sup> [Ref. – Testimony Page 4, lines 3 -17 and Sch. RB-03] Has the new debt been issued (closed) before now? If it has, when was the closing date? If it hasn't been, what is the current expected issuance date for the \$10.6 million in planned new debt? If it didn't occur until later in the year (say not before the end of the 1<sup>st</sup> quarter of FY 2016 (about a 6 month delay), by what amount would the total debt service payments change by in Fiscal years 2016 through 2018? Is it likely or unlikely that the issuance date could be delayed until after June 30<sup>th</sup> of this year? Is it likely or unlikely that the issuance date could be delayed until after September 30<sup>th</sup> of this year?

**Response:** The original loan of \$10.6 million has been revised to \$5,907,000 and is expected to close before the end of June 2015. The PWSB does not have an actual issuance date at this time, but it is unlikely the issuance date will be delayed until after June 30, 2015. The CL-6 cleaning and lining project is currently not on the RI Department of Health Project Priority List and not eligible for SRF borrowing at this time. This project will be eligible for funding next year and a loan application will be submitted for funding in 2016.

**Prepared by:** Robert Benson

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<sup>1</sup> Please note that Cumberland's First Set of Data Request contained two requests labeled 1-31. For clarity, the PWSB has labeled the second of these 1-31(a)

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**Cumb. 1-32:** [Ref. – Testimony Page 4, lines 3 -17 and Sch. RB-03] By what amount would the total debt service payments change by in Fiscal year 2016 through 2018, if the new debt of \$10,600,000 was delayed by one year to the spring of 2016. By what amount would the total debt service payments change by in Fiscal years 2016 through 2018, if the new debt of \$10,600,000 was delayed by two years to the spring of 2017.

**Response:** The only project eligible for RICWFA borrowing at this time is the MR-10 main replacement project. Therefore, we will only incur additional debt of \$5,907,000 in FY2015. The CL-6 cleaning and lining project will not be eligible for SRF funds until FY16 and debt of \$4,918,000 will be delayed by one year to FY2016. As a result of these changes, there is an increased principal payment of 251,000 on September 1, 2016 to the debt service schedule which is offset by savings in interest (as interest rates have continued to decline) and agency fee payments over the terms of the separate loans. The change in debt service payments is as follows:

<u>Period</u>	<u>Amount</u>
10/1/14-9/30/15	\$21,802 payment savings
10/1/15-9/30/16	(\$197,484) *this is an increase over RB-02
10/1/16-9/30/17	\$17,318 payment savings
10/1/17-9/30/18	\$26,744 payment savings
10/1/18-9/30/35	\$1,166,089 payment savings

**Prepared by:** Robert Benson

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**Cumb. 1-33:** [Ref. – Testimony Page 4, lines 3 - 17 and Sch. RB-03] Would it be possible for the PWSB to initially fund projects M-10 and CL-6 with Bond Anticipation Notes (BANS) during part or all of the construction period and then issue permanent debt at a point near the end of the construction process (say July, 2017)? Assuming this was possible, what would the expected interest charges be on the BANS in FY2016 and FY2017, and what would the expected DS payments be on the Permanent debt be in FY2018? If such a financing was possible, why isn't it being used for this financing? If it is not possible, explain why and provide specific references to one or more controlling documents.

**Response:** As stated in my response to 1-26, alternative financing methods are limited due to the terms of the existing RICWFA Revenue Bonds. In addition, PWSB would incur costs to issue BANS and then incur additional costs for the RICWFA loans at the conclusion of the projects. In addition, the RICWFA loans function similar to BANS as actual interest charges are based on the actual funds drawn from the project fund and the principal payment during the construction period is only \$1,000. Finally, by issuing BANS, PWSB would only incur additional professional costs.

**Prepared by:** Robert Benson

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**Cumb. 1-34:** [Ref. – Testimony Page 4, lines 3 - 17 and Sch. RB-03] Given the long lives of the improvements associated with Projects M-10 and CL-6 did PWSB consider a longer amortization period (say 25 or 30 Years) for the repayment of new the \$10.6 million debt issue? If not, why not. If it did, why wasn't a longer amortization period selected? If a 30 year amortization period was used, what would the associated DS payments be reduced to in fiscal years FY2016 through FY2018?

**Response:** No. The SRF loan program with RICWFA only allows a 20 year payment term.

**Prepared by:** Robert Benson

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**Cumb. 1-35:** [Ref. – Testimony Page 4, lines 28 -32] Given that the AFSCME Union Local 1012 contract ends at the end of FY2017, what increase, if any, has been applied to payroll and fringe benefit expenses for employees of both unions in FY2018? Please explain in detail your basis/justification for any positive increase.

**Response:** Payroll and fringe benefits were increased by the cost of living adjustment for FY2018. See the response to the Division Data Request 2-16 documenting the cost of living adjustment factor.

**Prepared by:** Robert Benson

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**Cumb. 1-36:** [Ref. – Testimony Page 5, lines 28 -32] What is the “employee co-pay” level for medical and dental health insurance, both \$dollar amount and percentage of the total premium? How has that percentage level changed over the period FY2010 through FY2014 and currently (FY2015)?

**Response:** The City of Pawtucket is self-insured for employee medical and dental health insurance. Blue Cross Blue Shield administers the medical insurance program and Delta Dental administers the dental insurance program. Therefore, there are no premiums paid to these insurers, so we cannot provide a “percentage of the total premium.”

The employee co-pay for medical and dental health insurance is in accordance with terms of the collective bargaining agreements with each union. The terms in the current and past collective bargaining agreements established weekly co-pay amounts which are as follows:

	<u>FY10</u>	<u>FY11</u>	<u>FY12</u>	<u>FY13</u>	<u>FY14</u>	<u>FY15</u>
AFSCME Local 1012						
Individual weekly co-pay	\$5.00	\$14.42	\$15.38	\$15.38	\$15.38	\$18.39
Family weekly co-pay	\$10.00	\$28.85	\$30.77	\$30.77	\$30.77	\$36.77
Teamster Local 251						
Individual weekly co-pay	\$0.00	\$0.00	\$14.42	\$15.38	\$15.38	\$15.38
Family weekly co-pay	\$0.00	\$0.00	\$28.85	\$30.77	\$30.77	\$30.77

**Prepared by:** Robert Benson

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**Cumb. 1-37:** [Ref. – Testimony Page 6, lines 5 -13 and RB-07] Please provide an update of Sch. RB-07 that includes all monthly and annual data up to the last month for which monthly CPI factors are available. How soon (generally) after a month is completed does the index for that month become available?

**Response:** The PWSB will provide an update of RB-07 for the 2014 increased annual service fee once it receives the invoice from United Water. The CPI increase is calculated based on a calendar year average of the monthly CPI factors. The PWSB usually receives the invoice from United Water with the CPI factors in March or April. The PWSB then reviews the invoice and the CPI factors for accuracy. Once the PWSB receives this invoice for 2014, it will update RB-07. The PWSB does not receive, or calculate, monthly updates of the CPI index.

**Prepared by:** Robert Benson

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**Cumb. 1-38:** [Ref. – Testimony Page 6, lines 5 -13 and RB-07] In computing the actual charge for operating the treatment plant for any year is the total charge derived by taking the total charge in the prior year and multiplying it by one plus the percent increase in the CPI from the prior year? For example, was the total charge for operating the plant in 2010 derived by multiplying the total charge in 2009 by 1 plus (minus 0.0016) or 0.9984. If this is not correct, please provide the specific calculations used to compute the total charges for a given year.

**Response:** No, the computation of the actual charge for operating the treatment plant for any year is not derived by taking the total charge in the prior year and multiplying it by one plus the percent increase in the CPI from the prior year. Thus, the example provided is not correct. The methodology to calculate the service fee is specified in Schedule 11 attached to the treatment plant operations contract. Please see the PWSB's response to Div. 1-4 for a complete copy of the contract. Schedule RB-07 conforms to the methodology specified in Schedule 11 of the contract.

**Prepared by:** Robert Benson

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**Cumb. 1-39:** [Ref. – Testimony Page 6, lines 5 -13 and RB-07] In calculating the average inflation rate from the CPI data why was an average based on 10 years used? Please explain in detail, including why an average based on a number of fewer years was not used. If it had been based on the most recent 5 year average rate, what would the comparable inflation rate have been? If it is different from 1.73%, please provide the calculations that you used to compute the 5 year average.

**Response:** PWSB used an average of the CPI data since the inception of the treatment plant operations contract. Using the most recent 5 year average results is a distorted average since the first year in this average is the only year that resulted in a reduction to the annual service fee.

**Prepared by:** Robert Benson

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**Cumb. 1-40:** [Ref. – Testimony Page 7 and RB-08] Based on the number of months for which consumption data is now available in FY2015 and your best estimate of consumption for the months that have not been completed (for example 9 months actual and 3 months estimated), please provide the same data for FY 2015 as that provided for the other years on Sch. RB-08. [Note – also please update FY2015 consumption levels with 12 months of actual data as soon as it is available.] How soon will actual consumption data for FY2015 be available after the year is completed?

**Response:** Please see the schedules provided in response to the Division Data Requests 1-9 and 1-10 for actual consumption numbers through March 2015. The PWSB does not know what the consumption will be for the remainder of FY2015, and cannot accurately estimate consumption at this time. Actual consumption data for FY2015 will be available by the end of July 2015, and the PWSB will provide this information to the parties in this Docket.

**Prepared by:** Robert Benson

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**Cumb. 1-41:** [Ref. – Testimony Page 7 and RB-08] Over the last 3 years (FY2012 through FY2014) how would you characterize the variance in “Total HCF?” Would you characterize it as continuing to trend down, trend up or fairly flat?” Given the results over these 3 years, in your opinion, is it more likely that Total HCF for PWSB will be significantly lower in FY2016 than the 3 year average, significantly higher in FY2016 than the 3 year average, or about the same as the average of the 3 most recent fiscal years?

**Response:** As I stated in my testimony on page 6 (lines 18-22) there has been a steady decline in consumption from FY2004 through FY2014. For anticipated consumption, please see Mr. Woodcock's Schedule 2.1 attached to his direct testimony.

**Prepared by:** Robert Benson

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**Cumb. 1-42:** [Ref. – Testimony Page 7 and RB-08] Please check the number shown on Sch. RB-08 in FY2014 for the ANNUAL increase/(decrease) – (-\$590,509.36). Is the correct number an increase of 32,348.02 HCF? If not, provide the correct computations that should be used to compute this number.

**Response:** I reviewed the computations and the correct number should be an increase of 32,348.02 HCF.

**Prepared by:** Robert Benson

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**CERTIFICATION**

I hereby certify that on April 24, 2015, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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