



**DEPARTMENT OF THE NAVY**

NAVAL FACILITIES ENGINEERING COMMAND  
1322 PATTERSON AVENUE, SE, SUITE 1000  
WASHINGTON NAVY YARD, DC 20374-5065

**VIA FIRST CLASS MAIL AND ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
State of Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

January 13, 2016

Re: City of Newport, Utilities Department Water Division Application to Change Rate Schedules, Docket No. 4595

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter is an original plus nine (9) copies of each of the following: Notice of Appearance of Counsel, and a Motion to Intervene.

Please call me at (202) 685-9122 if you have any questions concerning this filing. Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Genco", with a long horizontal flourish extending to the right.

Allison M. Genco, Esq.  
Department of the Navy  
Filing on Behalf of the  
Federal Executive Agencies

cc: Service List for Docket No. 4595

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

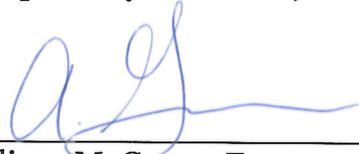
IN RE: CITY OF NEWPORT, UTILITIES DEPARTMENT :  
WATER DIVISION APPLICATION TO CHANGE : DOCKET NO. 4595  
RATE SCHEDULES :

**NOTICE OF APPEARANCE OF COUNSEL**

Pursuant to Rule 1.4 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, please enter my appearance on behalf of the Department of the Navy, filing on behalf of the Federal Executive Agencies.

Dated: January 13, 2016

Respectfully submitted,

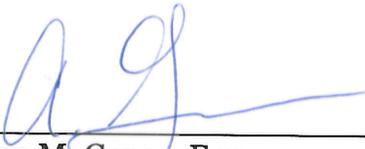


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Allison M. Genco, Esq.  
Department of the Navy  
Filing on Behalf of the  
Federal Executive Agencies  
1322 Patterson Avenue SE  
Suite 1000  
Washington Navy Yard, D.C. 20374  
(202) 685-9122  
allison.genco@navy.mil

**CERTIFICATE OF SERVICE**  
RI PUC Docket No. 4595

I hereby certify on this 13<sup>th</sup> day of January, 2016, I mailed this original Notice of Appearance of Counsel and nine (9) copies to the Rhode Island Public Utilities Commission, and sent a true copy of the document by electronic mail or first-class mail to the parties on the service list, as of January 7, 2016, for Docket No. 4595.

  
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Allison M. Genco, Esq.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

IN RE: CITY OF NEWPORT, UTILITIES DEPARTMENT :  
WATER DIVISION APPLICATION TO CHANGE : DOCKET NO. 4595  
RATE SCHEDULES :

**MOTION TO INTERVENE**

Pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission Rules of Practice and Procedure (“Rules”), the Department of the Navy (“DON”), on behalf of the Federal Executive Agencies, moves, by counsel, to intervene in the above-captioned proceeding. In support of this motion, the DON states as follows:

1. The DON maintains a military installation within the State of Rhode Island which obtains and uses water from the City of Newport;
2. The DON will be specifically affected by the filing in the above Docket as the filing may affect rates paid by the DON for water.
3. It is necessary and appropriate to grant the DON’s Motion to Intervene because the DON has a direct and significant interest in this proceeding that is not represented by other parties.

WHEREFORE, based on the reasons stated herein, the DON respectfully requests that the Rhode Island Public Utilities Commission grant this motion and allow the DON to intervene in this matter.

It is respectfully requested that all pleadings and other documents issued in this proceeding be served on counsel for the DON and the two individuals listed below, and that the Commission’s official service list be modified to reflect the same.

Allison M. Genco, Esq.  
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NAVFAC HQ, Dept. of the Navy  
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Kay Davoodi  
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Washington Navy Yard, D.C. 20374  
larry.r.allen@navy.mil

Dated: January 13, 2016

Respectfully submitted,  
THE DEPARTMENT OF THE NAVY

By Counsel,



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Allison M. Genco, Esq.  
Department of the Navy  
Filing on Behalf of the  
Federal Executive Agencies

**CERTIFICATE OF SERVICE**  
RI PUC Docket No. 4595

I hereby certify on this 13<sup>th</sup> day of January, 2016 I mailed this original Motion to Intervene and nine (9) copies to the Rhode Island Public Utilities Commission, and sent a true copy of the document by electronic mail or first-class mail to the parties on the service list, as of January 7, 2016, for Docket No. 4595.

  
\_\_\_\_\_  
Allison M. Genco, Esq.