



100 Westminster Street, Suite 1500
Providence, RI 02903-2319

p: 401-274-2000 f: 401-277-9600
hinckleyallen.com

Adam M. Ramos

aramos@hinckleyallen.com
Direct Dial: 401-457-5164

July 15, 2016

Via Electronic Mail and First Class Mail

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

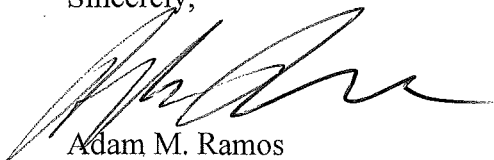
Re: Newport Water Division – Docket No. 4595

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter are an original and nine copies of Portsmouth Water & Fire District's ("PWFD") Responses to Newport Water's Third Set of Data Requests, issued on June 24, 2016, including a CD containing electronic files responsive to data request 3-2. Please note that the electronic files on the CD are in old formats that PWFD was unable to open or otherwise access.

Thank you for your attention to this matter.

Sincerely,



Adam M. Ramos

AMR:cw
Enclosures

cc: RIPUC Service List (electronically only)
Joseph A. Keough, Jr., Esq. (w/encls., via First Class Mail)
Christy Hetherington, Esq. (w/encls., via First Class Mail)
Allison Genco, Esq. (w/encls., via First Class Mail)

55910732 (38210.167824)

► ALBANY ► BOSTON ► CONCORD ► HARTFORD ► NEW YORK ► PROVIDENCE

HINCKLEY, ALLEN & SNYDER LLP, ATTORNEYS AT LAW

Docket No. 4595 - City of Newport Water Division – Rate Application
Updated 5/18/16

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
Julia Forgue, Director of Public Works Newport Water Department 70 Halsey St. Newport, RI 02840	jforgue@cityofnewport.com ;	401-845-5601
	lsitrin@CityofNewport.com ;	
	rschultz@CityofNewport.com ;	
	wyost@CityofNewport.com ;	
Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte, NC 28203	Hsmith@raftelis.com ;	704-373-1199
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 ;	
	pat.smith@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	al.mancini@dpuc.ri.gov ;	
	jmunoz@riag.ri.gov ;	
Stacy Sherwood Jerome Mierzwa Exeter Associates, Inc. 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044	Sherwood@exeterassociates.com ;	410-992-7500
	jmierzwa@exeterassociates.com ;	
Gerald Petros, Esq. Adam Ramos, Esq. Hinckley, Allen & Snyder 100 Westminster St., Suite 1500 Providence, RI 02903	gpetros@haslaw.com ;	401-274-2000
	aramos@hinckleyallen.com ;	
	cwhaley@hinckleyallen.com ;	
	jmansolf@hinckleyallen.com ;	
William McGlinn Portsmouth Water & Fire District 1944 East Main Rd. PO Box 99 Portsmouth, RI 02871	wmcglinn@portsmouthwater.org ;	401-683-2090 ext. 224
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	Woodcock@w-a.com ;	508-393-3337
Allison Genco, Esq. NAVFAC HQ- Building 33 Dept. of the Navy 1322 Patterson Ave SE, Suite 1000 Washington Navy Yard, D.C. 20374-5065	allison.genco@navy.mil ;	
Dr. Kay Davoodi, P.E., Director Utility Rates and Studies Office	Khojasteh.davoodi@navy.mil ;	

NAVFAC HQ- Building 33 Dept. of the Navy 1322 Patterson Ave SE, Suite 1000 Washington Navy Yard, D.C. 20374-5065		
Larry R. Allen, Public Utilities Specialist Dept. of the Navy	Larry.r.allen@navy.mil ;	
Maurice Brubaker Brubaker and Associates, Inc. PO Box 412000 St. Louis, MO 63141-2000	mbrubaker@consultbai.com ; bcollins@consultbai.com ;	401-724-3600
File an original and nine (9) copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ; Cynthia.WilsonFrias@puc.ri.gov ; Sharon.ColbyCamara@puc.ri.gov ;	401-780-2107

Newport Water 3-1

Request:

On pages 1 of his testimony, Mr. Woodcock describes having worked on “more than 500 water and wastewater rate and financial studies” and on page 2 describes having provided expert testimony before a number of state public utility commissions.” With regard to this testimony:

- a. Please provide a list of all such cases and studies involving the calculation of customer demand over the past 10 years.
- b. For each of the cases and studies identified in part (a) above, please identify each case or study in which Mr. Woodcock used the methodology set forth in American Water Works Association Manual M-1, Principles of Water Rates, Fees and Charges (Appendix A), Editions 5 and 6.
- c. For each of the cases and studies identified in part (b) above, please provide copies of any testimony or studies identified.

Response:

- a. Mr. Woodcock has been involved in 30 cases over the past 10 years involving the use of customer demand factors. Those 30 cases include the nine (9) Newport Water matters during that time period. Attached is a listing of all cases in which Mr. Woodcock has been involved over the last 10 years. The cases highlighted in yellow are the cases that involved the use of customer demand data. Mr. Woodcock did not calculate nor develop the demand factor in any of these cases.
- b. Mr. Woodcock did not use the methodology set forth in American Water Works Association Manual M-1, Principles of Water Rates, Fees and Charges (Appendix A), Editions 5 and 6 in any of these cases. It is Mr. Woodcock and Portsmouth Water and Fire District's (“PWFD”) position and understanding that estimation methods such as the method proposed by NWD in this docket should be applied only when actual data from a demand study is unavailable.
- c. None.

Number	Year	Client	Amount
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Kent County Water Authority

06-19	2006	Conservation Rates	
06-20	2007	PWSB Rates 2007	
06-21	2007	PW Pass though	
06-22	2009	Providence Water	
06-23	2009	PW Pass Through	
06-24	2009	Fire Hydrant re-rates	
06-25	2011	Providence Conservation Rates	
06-26	2012	Use of Restricted Funds	
06-27	2013	Providence Water Rates 2013	
06-28	2013	Pass Through Increase 2013	
06-29	2014	2014-15 Rate Filing	

Lancaster, MA

08-07	2008	Rates Update 2008	
08-08	2015	Rates Update 2015	

Springfield, MA

09-04	2008	Rate Contracts	
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Bangor Water District

10-06	2009	2009 Rate Case	
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Tata & Howard

20-03	2011	Spencer 2011	
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Mansfield, MA

21-15	2006	2006 Sewer Conn Fees	
21-16	2006	2006 Water Rates	
21-17	2006	2006 Sewer Rates	
21-18	2007	2007 Rates	
21-19	2008	2008 Water Rates	
21-20	2010	Connection Fees	
21-21	2012	Capital Charges	
21-22	2013	Sewer Rates	

Milford, NH

24-03	2006	2006 Impact Fee	
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Regional Water Authority

35-02	2009	Conservation Rates	
35-03	2011	Advice on rate case/new surcharge	

Colchester, CT

48-02	2006	Water Rates	
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United Water Co.

52-03	2011	Wakefield Water Case 2011	
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Raftelis Financial Consulting

53-05	2006	Winthrop MA
53-06	2006	Baltimore
53-07	2006	Dartmouth Model
53-08	2007	Canton MA
53-09	2007	North Kingstown RI
53-10	2009	Belmont MA
53-11	2010	Edmonton Regional Water
53-12	2011	Belmont 2012
53-13	2011	Peterborough NH
53-14	2011	Groton-Ledyard
53-15	2012	Edmonton/RWCG
53-16	2013	Pennichuck Water East
53-17	2015	Haverhill MA
53-18	2015	Tolland CT
53-19	2015	Northampton MA
53-20	2015	Wayland MA
53-21	2015	Stoughton MA
53-22	2015	Medford MA
53-23	2016	Melrose, MA
53-24	2016	Portland Water District ME
53-25	2016	Kittery Water District ME

Kaplin, Stewart, Meloff, et. Al.

54-02	1999-17	Walnut Crossing vs. Limerick Twp.
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Portsmouth Water & Fire District, RI

55-05	2006	Newport Rates 2007
55-06	2008	Newport Rates 2008
55-07	2009	Newport COS
55-08	2010	Newport Demand Study
55-09	2011	Newport Rates 2011
55-10	2011	Newport Water Contract
55-11	2013	District Rates 2014
55-12	2014	Newport Rates Doc 4243
55-13	2016	Newport Rates Doc 4595

East Providence, RI

56-02	2008	Retail Rate Review
56-03	2009	Sewer Bond Reviews
56-04	2009	Water Bonds
56-05	2010	Water Bonds 2010
56-06	2011	Bonds 2011
56-07	2013-14	Rates
56-08	2014	Water Bonds 2014

Northborough, MA

58-02	2012	Water Rates FST
58-03	2015	Water Rates
58-04	2016	Marlborough Contract
58-05	2016	Water & Sewer Rates for FY 17

Framingham, MA

62-04	2012	Nestles Sewer rates
62-05	2015	Apartment/Condo billing

Arlington, MA

64-02	2013	Water/Sewer Rates
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Norwood, MA

72-04	2013	Water & Sewer Rates
72-05	2014	Water & Sewer rates
72-06	2015	Water & Sewer rates
72-07	2016	Water & Sewer Rates

Heitkamp

73-03	2006	Bethel CT rate study
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N. Andover, MA

74-03	2009	follow-up
74-04	2010	followup 2010

Pawtucket Water Supply Board

75-08	2006	2007 Rates
75-09	2006	2006/7 Lease/Bonds
75-10	2009	Bonds
75-11	2010	2010 Rates
75-12	2011	2011-12 Bonds
75-13	2013	2013 Bonds

Shirley, MA

78-02	2008	Rates/Surplus
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Watertown, MA

84-04	2007	Rates Update/Billing
84-05	2008	FY 2009 Rates
84-06	2009	FY 2010 Rates
84-07	2010	FY 2011 Rates
84-08	2011	FY 2012 Rates
84-09	2012	FY 2013 Rates
84-10	2013	FY 2014 Rates
84-11	2014	FY 2015 Rates
84-12	2015	FY 2016 Rates
84-13	2016	FY 2017 Rates

Holliston, MA

87-03	2006	Updates/review
87-04	2010	Update/review

Ayer, MA

89-04	2007	2007/8 Rates
89-05	2008	W/S Connection Fees

Pare Engineering

91-02	2008	Smithfield RI Rates
91-03	2013	E. Smithfield RI – Rate Structure for merger

Dedham Westwood Water District

92-03	2013	Customer Complaint
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PB Consult

94-03	2006	WASA
94-04	2007	WASA
94-05	2007	WASA

Duxbury, MA

96-02	2006	Rate Update
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Weston & Sampson

100-03	2010	Abington-Rockland
100-04	2013	Makepeace Corp

Adler Pollock & Sheehan

106-01	2006	Woonsocket Rates
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Holden, MA

107-01	2006	Misc Fees
107-02	2015	Lawsuit v. Worcester – Sewer Rates

Winchester, MA

108-01	2006	Water & Sewer Rates
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Westford, MA

109-01	2006	System Development Charge Abbot Mills
109-02	2007	Water Rates
109-03	2007	JPI – SDC challenge
109-04	2009	Water rates for 2010
109-05	2011	Misc work 2011

Valley Water Co. CT

110-01	2006	Rate filing with DPUC
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Wilmington, MA

111-01	2006	Water Rates – MWRA
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Medford, MA

112-01	2006	Water & Sewer Rates
112-02	2009	Ph 2
112-03	2012	Tiered Rates

Coventry RI

114-01	2006	Sewer Rates/Assessments
114-02	2007	Bond Certificate 2007
114-03	2009	Bond Certificate 2009
114-04	2009	Sewer Rates
114-05	2011	Bond Certification 2011
114-06	2011	Sewer Rates
114-07	2012	2012 Sewer Bonds

Middletown, RI

115-01	2006	WW Contract with Newport
115-02	2006	Bond Certificate 2007
115-03	2007	Bond Certificate 2007B
115-04	2011	Stormwater Utility
115-05	2012	2012 Sewer Bonds
115-06	2013	2013 Sewer Bonds

McDonald's USA LLC

116-01	2007	Charlton Rates
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Edmonton Regional Customer Group

117-01	2007	EPCOR Rates
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Carver, MA

118-01	2007	Water District Finance
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Portsmouth, NH

119-01	2007	Impact Fee Consulting
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Sandwich Water District

120-01	2007	Water rates
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KKWWD, ME

121-01	2007	Cost of Service
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Wright Pierce Engineers

122-01	2008	KCWA IFR Plan
122-02	2009	Boothbay Water Dist
122-03	2009	Kittery Maine

Underwood Engineers, Inc.

125-01	2008	General Consulting
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Meredith, NH

126-01	2008	Sewer model
126-02	2009	General Consulting

Nashua, NH

127-01	2008	Sewer Model
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Newmarket, NH

128-01	2008	Water & Sewer Rates
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Maine Water Company (Aqua)

129-01	2008	Camden Rockland
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129-02	2010	Camden Rockland
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129-03	2014	Biddeford Saco
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Medway MA

130-01	2008	Sewer Rates/Betterments
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Spencer, MA

131-01	2008	Water Rates
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Startex-Jackson-Wellford-Duncan Water District SC

132-01	2008	Rate Review
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Fairfax Country Water Authority

133-01	2009	Falls Church Litigation Support
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Orono – Veazie Water District Maine

134-01	2009	Rate Study
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North East MD – Venable LLP

135-01	2009	Expert Witness – Water Rates
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Denver Water

136-01	2009	Arvada Litigation
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East Bridgewater, MA

137-01	2010	Connection Fees Water Rates
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Milford Water Company

138-01	2010	Hopedale Litigation
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Woodard & Curran

139-01	2010	Peterborough NH – sewer rates
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Walpole, MA

140-01	2010	Litigation – Connection Fees
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140-02	2015	Connection Fee Update
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East Northfield Water Company

141-01	2011	Water Rate Filing
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Ashland, MA

142-01	2011	Water & Sewer Rates Part 1
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<u>Waltham, MA</u>		
143-01	2011	Revenue Projections
<u>Aquarion Water – Mystic</u>		
144-01	2011	Wholesale/Contract Rates with Groton Utilities
<u>Millbury, MA</u>		
145-01	2011	Rates
<u>Templeton, MA</u>		
146-01	2011	Sewer Assessments
146-02	2012	Sewer Rates/Assessment
<u>Fairfax County</u>		
147-01	2012	Rate Reviews
<u>Whitinsville Water Co.</u>		
148-01	2012	Private Fire Charges
<u>Artesian Water Co. v. Chester Water Authority</u>		
149-01	2012	Arbitration
<u>Newton, MA</u>		
150-01	2012	water & sewer rates
<u>Krause Kalfayan Benink & Slavens</u>		
151-01	2013	Petaluma sewer/stormwater
<u>Greenville Water District</u>		
152-02	2013	Water Rates 2013
<u>Bethel, CT</u>		
153-01	2010	Bethel CT rates 2010
153-02	2013	Sale to Aquarion
153-03	2014	Water Rates 2014
<u>Grafton Water District (MA)</u>		
154-01	2013	Solar Power Contract
<u>Metropolitan Water District of SC</u>		
155-01	2013	San Diego County Water Auth Litig
<u>Westlake, OH</u>		
156-01	2013	Litigation with Cleveland over water
<u>Kalamazoo Regional Water & Wastewater Commission</u>		
157-01	2014	Litigation – Kalamazoo
<u>Salisbury, MA</u>		
158-01	2014	Sewer Rates

Lakes Region (NH) Water Co.

159-01	2014	Wholesale Water Rates NHPUC
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Pennichuck Water Co

160-01	2014	COSS for Tyngsborough
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160-02	2015	COSS for Hudson/PEU
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Stonehill College

161-01	2014	Water Rates from Brockton
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Horsley Witten Group, Inc

162-01	2014	N. Smithfield RI Sewer Assessments
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Bristol County Water Authority

163-01	2015	Intervene Providence Water
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Moosehead Sanitary District, ME

164-01	2015	Litigation Support
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Livermore Falls Water District, ME

165-01	2016	COS
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Newport Water 3-2
Page 1 of 3

Request:

Please provide the following publications and presentations authored or prepared by Mr. Woodcock:

- a. "Allocating Costs and Alternative Rate Structures", Small Systems Rates and Revenue Seminar, New England Water Association, March 7, 1991.
- b. "Introduction to AWWA Alternative Water Rates Manual", AWWA Convention, Philadelphia, PA, June 23, 1991.
- c. "Alternative Water Rate Structures", CT Section AWWA Annual Meeting, May 22, 1992.
- d. "Emerging Trends in Water Rates", Presentation to AWWA Rocky Mountain Section, November 4, 1992.
- e. Presentation on Rate Structure Alternatives, AWWA National Convention, New York, NY, June 19, 1994.
- f. "Rate Design Alternatives and Innovations", New England Water Works Association Seminar – Water Rates Committee, December 4, 1996, October 30, 1997, and April 29, 1998.
- g. Considerations in Water & Wastewater Tariff Design, presented to conference in Johannesburg, South Africa, May 18-22, 1998.
- h. "Developing Rate Structures", Maine Water Utilities Association, February 1999.
- i. "New Challenges in Water Utility Rate Making", New England Water Works Association Meeting, May 11, 1999.
- j. "Setting New Rates", Maine Water Utility Symposium, Portland, Maine, May 10, 2000.
- k. AWWA's New Super Manual on Rate Setting, AWWA National Convention, Denver, CO, June 2000.
- l. "Rates & Charges in the Legal Environment", AWWA National Convention, New Orleans, June 2002.

Newport Water 3-2
Page 2 of 3

- m. Water Rates for Small Systems, Seminar at AWWA National Convention, Anaheim, CA, June 2003.
- n. "Water Rates, Fees and The Legal Environment", contributing author, April 2005, American Water Works Association, Denver CO.
- o. New England Water Works Association as Teacher/Seminar Presenter, Water Utility Ratemaking, 1997 – present.
- p. "New Concepts in Utility Rate Adjustments", Atlantic States Rural Water & Wastewater Association, Warwick RI, March 29, 2006.
- q. "New Concepts in Utility Rate Adjustments", Atlantic States Rural Water & Wastewater Association, Burrville RI, April 26, 2006.
- r. "Setting Rates in a Tough Economy" AWWA Worldwide Webcast, May 13, 2009.
- s. "Setting Rates in a Tough Economy" AWWA Worldwide Webcast, May 13, 2009.

Response:

Mr. Woodcock has conducted a reasonable search for the publications and presentations listed in this request. He has been able to locate and produce some of them, but others either no longer exist, are unavailable, or Mr. Woodcock has located only electronic versions in older formats that he is no longer able to access and open. For those that Mr. Woodcock was able to locate and print, they are attached. For those that Mr. Woodcock has located, but was unable to open, PWFD has provided electronic files. Additionally, some of the items requested may have been presentations that did not have associated documents. Specific responses to each document requested are set forth below.

- a. No documents located and/or available.
- b. No documents located and/or available.
- c. No documents located and/or available.
- d. Electronic file produced; unable to open.

Newport Water 3-2

Page 3 of 3

- e. Electronic file produced; unable to open.
- f. Electronic file produced; unable to open.
- g. No documents located and/or available.
- h. No documents located and/or available.
- i. No documents located and/or available.
- j. Copy attached.
- k. No documents located and/or available.
- l. No documents located and/or available.
- m. No documents located and/or available.
- n. This document is a book that cannot be copied, but it is available at the AWWA website (awwa.org).
- o. No documents located and/or available.
- p. Copy attached.
- q. Copy attached (same as p.).
- r. No documents located and/or available.
- s. No documents located and/or available (same as r.).

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NEW CONCEPTS IN UTILITY RATE ADJUSTMENTS

ASRWWA

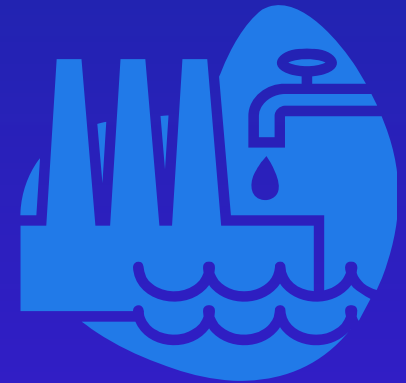
March 2006

Warwick RI

Christopher Woodcock
WOODCOCK & ASSOCIATES, INC.

Why Have New Concepts and Alternative Rate Designs Grown?

- **As Cost of Water Has Increased the Focus on Rates and Charges has Increased**
- **More Consumer Involvement**
- **Increase in Use of Alternative or Innovative Rate Structures**
- **AWWA Manual M34 - *Alternative Rates***
- ***Alternatives Now Included in M1 Rate Manual***



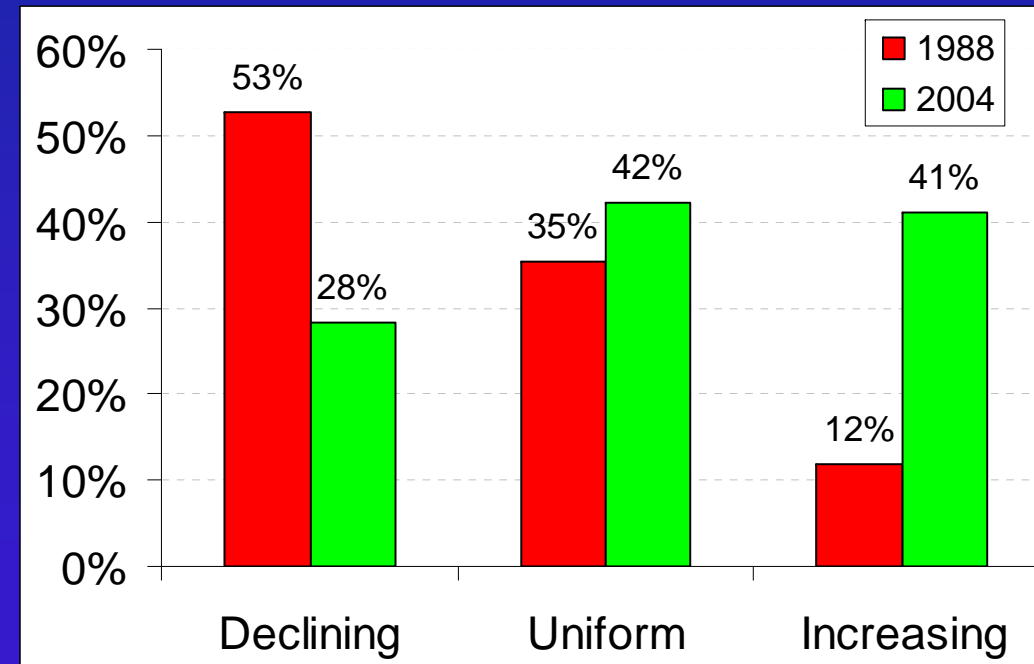
What Are Some of the Newer or Alternative Rates?

- Not so new in New England
 - Uniform Charges
 - Increasing Blocks
- Newer to New England
 - Seasonal
 - Rates by Class
 - Life-Line
 - Economic Development
 - Off-Peak or Interruptible
 - Marginal Cost



WHAT IS THE TREND WITH RATE STRUCTURES?

- Declining Block Rates Were Once Most Prevalent
- Still Presented in AWWA Manual M1 but now as an alternative
- Illegal or Discouraged in Many States



MORE TRENDS

■ Seasonal Rates

- In 1988 Survey 4% had seasonal rates
- In 2004 Survey 14% had seasonal rates

■ Life-line Rates

- In 2004 Survey: 15% have low income discounts, and 16 had low volume discounts

* From 1988 Ernst & Young and 2004 Raftelis Financial Consulting
Rate Surveys



WHAT'S BEST FOR ME?

- Examine Community Goals
- Examine Utility Goals
- Design Rates to Meet those Goals
- Goals Often are Conflicting
 - Community vs. Utility
 - Equity vs. Affordability
 - Conservation vs. Revenue Stability



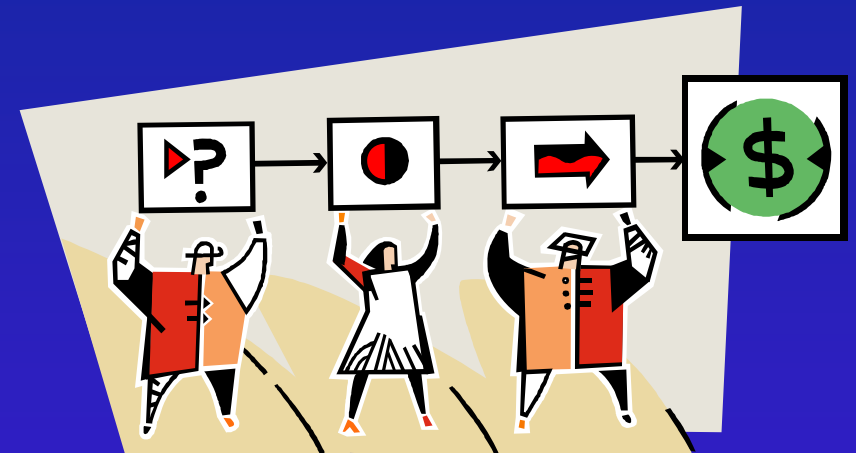
CRITERIA

- **Affordability**
- **Equity**
- **Simplicity**
- **Revenue Stability**
- **Tradition**
- **“Public Policy”**
- **Administration**
 - **Conservation**
 - **Economic Development**



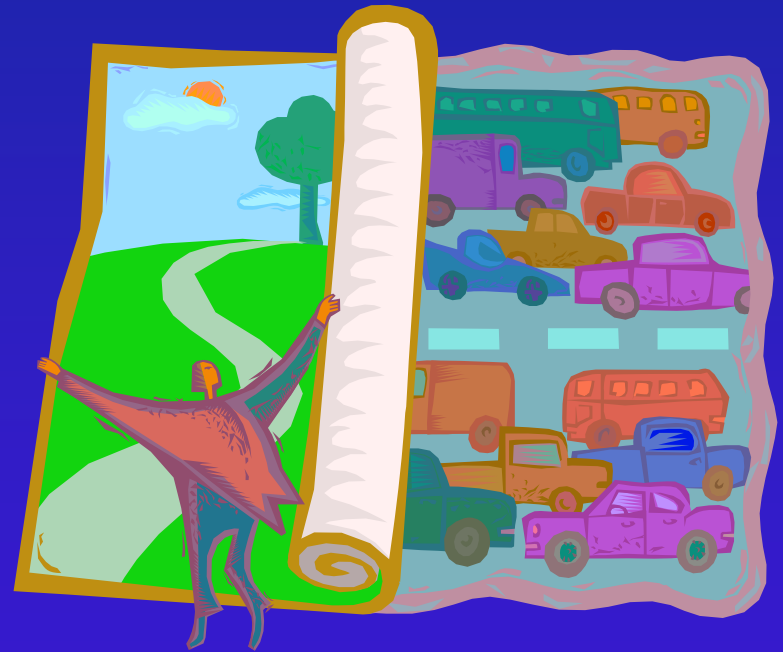
“FINANCING IDEAS”

- Privatization –
“Public/Private Partnership
- Foreign Investment
- Indexed Rate Increases
- More Frequent Increases
- Reserves
- Development Charges



DEVELOPMENT CHARGES

- Impact Fees, Connection Charges, System Development Fee
- Growth Pays For Growth
- RI – Title 45 (Chapter 45-22)
- Court Challenges



INCREASING BLOCK RATES

- Typically Used to Encourage Water Conservation - Summer Outdoor Use
- Best to do Rates by Class
 - Can encourage wasteful use if done incorrectly
 - Where blocks set is critical
 - Need frequent billing



EXAMPLE OF INCREASING BLOCK RATE IMPACTS

Monthly Water Use

gal/month	gal/day
1,000	32
2,000	65
4,000	129
6,000	194
8,000	258
10,000	323

Monthly Water Bill

Uniform	Incr. Block
\$13.04	\$11.90
\$16.18	\$13.89
\$22.46	\$17.89
\$28.74	\$29.50
\$35.02	\$41.11
\$41.30	\$52.72

LIFE-LINE RATES

- **Criteria**
 - Should be Income Based (not age)
 - Only Provide Sanitary Use – Do Not Promote Waste
- **Use Others to Determine Eligibility**
 - Electric, gas, phone bill
 - LIHEAP, SSI
- **Can Adjust**
 - Metered Rate
 - Service Charge
- **Typically Small Financial Impact**



SEASONAL RATES

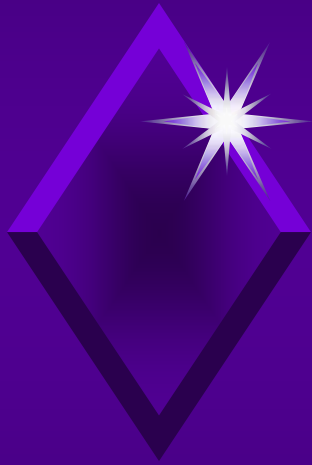
- Irrigation demands typically cause system peaks – most expensive water to provide
- Discretionary Use?
- Need good summer billing period – monthly billing
- All use at higher rate or excess use?



QUESTIONS?



SETTING WATER RATES

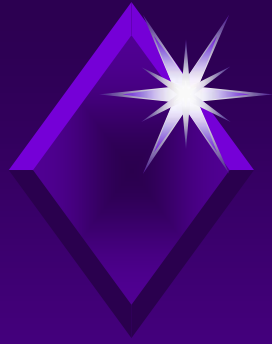


Maine Water Utility Symposium

Portland, Maine

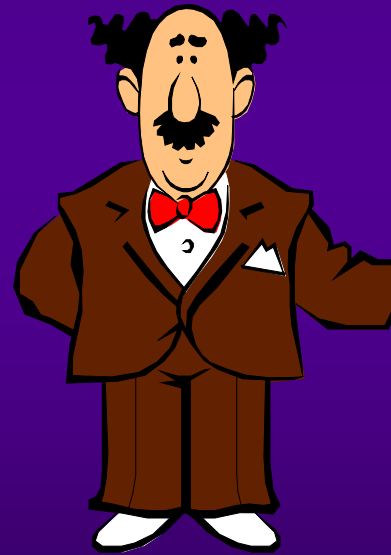
May 10, 2000

Christopher Woodcock
Woodcock & Associates, Inc.
Wayland, Massachusetts



What Does the Future Hold ?

- ◆ Costs Will Go Up
Faster Than Inflation
- ◆ Consumer
Involvement Will
Increase
- ◆ Affordability Will
Become Bigger Issue
- ◆ Alternative Rates &
Fees

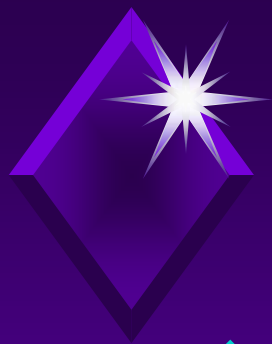




Municipal Charges

- ◆ Meter & Charge
Municipal Buildings
- ◆ Charge For Services
 - ◆ Sewer Billing
 - ◆ Backhoe
- ◆ Public Fire Protection





Unbundling Charges

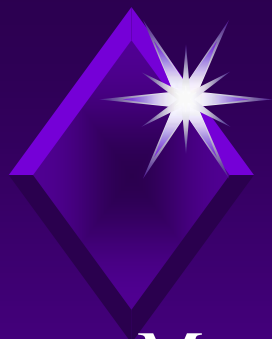
- ◆ More Demands for Specific Services
- ◆ Offer “Free” or Charge Individual?
 - ◆ Special Meter Reads
 - ◆ Meter Set/Test
 - ◆ Leak Detection
 - ◆ Seasonal Turn-On/Off
 - ◆ Late Payment
 - ◆ Connection Fee



What is the Future of Water Rates?

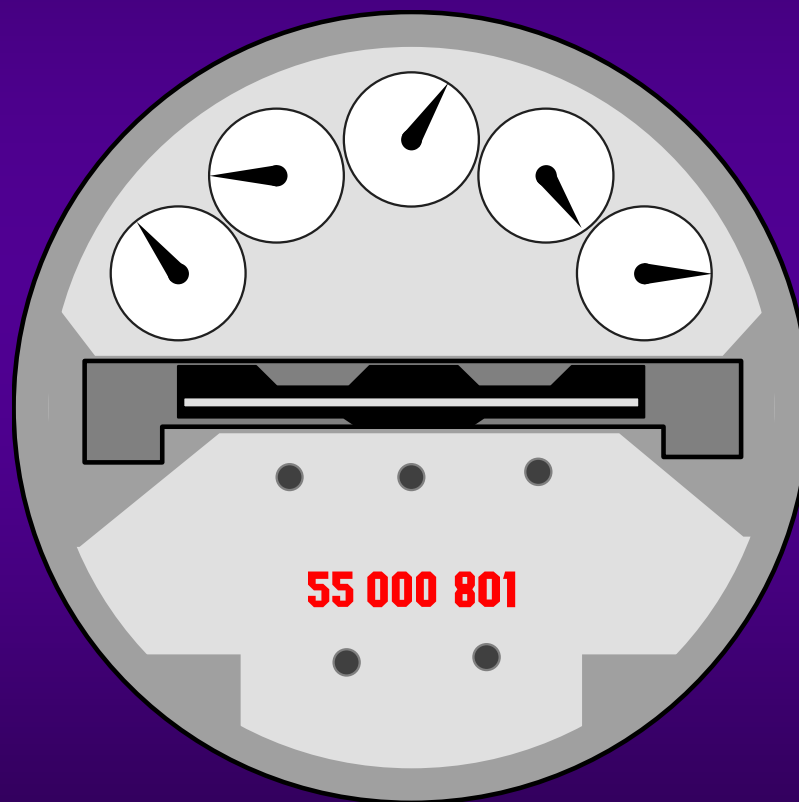
- ◆ Block Rates
- ◆ Affordability
- ◆ Fixed Charges
- ◆ Economic Development or Retention
- ◆ Class Rates
- ◆ Conservation Rates

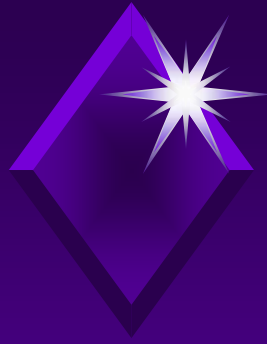




Rate Structures Trends

- ◆ More Frequent Billing
- ◆ Seasonal Rates
- ◆ Declining Blocks
 - ◆ No Longer Most Prevalent
 - ◆ Illegal in MA, RI, discouraged in others
- ◆ Inclining Block Rates

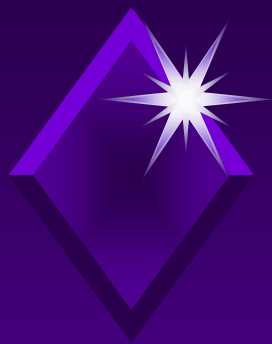




Why Affordability is Important to Utilities

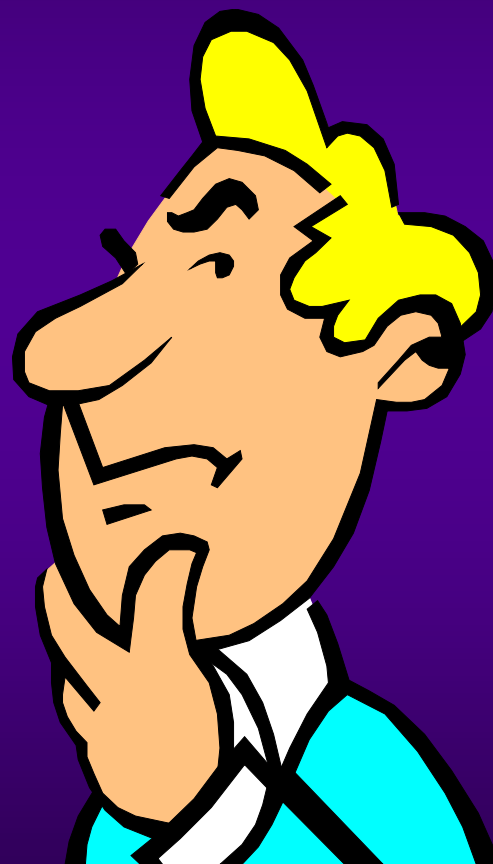
- ◆ Increased Costs --> Slower Payments
- ◆ Growing Receivables
- ◆ Increased Collection Costs
 - ◆ Disconnect Notices
 - ◆ Termination Proceedings
 - ◆ Turn-on - Turn-off Costs
- ◆ Low Income or Life-line Rates

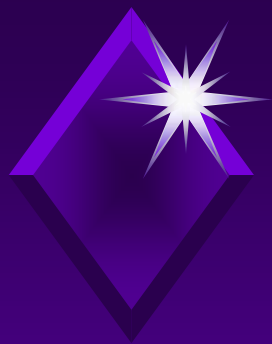




What is Affordable?

- ◆ SDWA: 2% Median Income
- ◆ USDA: 1.5% of Median Income
- ◆ AWWARF Manual: 2% for Lower Income

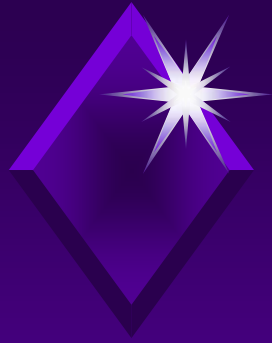




Easy Low Income Rates

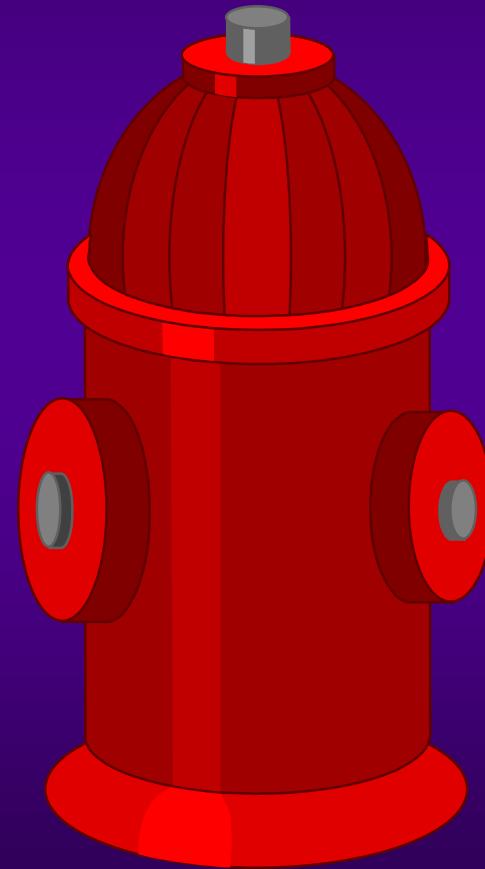
- ◆ Reduce Fixed or Use Portion of Bill or Both
- ◆ Base Eligibility on Income -- NOT Age
- ◆ Use Others to Verify
 - ◆ Electric
 - ◆ Gas
 - ◆ Phone





Fixed Charges

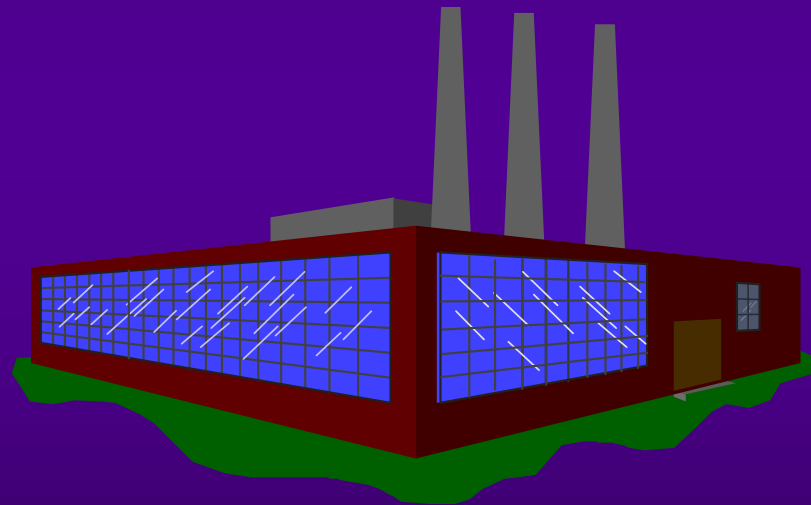
- ◆ Fixed Costs for Water Are High
- ◆ Predictable Revenues
- ◆ Minimum Charges --> Service Charges
- ◆ Capacity --> Fire Protection Charges

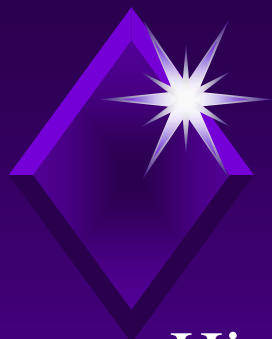




Economic Development or Retention Rates

- ◆ Using Water Rates to Further Public Policy & Goals
- ◆ Availability vs. Cost
- ◆ Who Pays For Subsidy? Who Benefits?
- ◆ Term of Reduction
- ◆ Guarantees

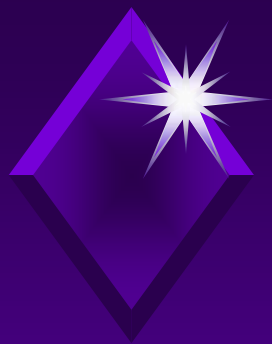




Rates By Customer Class

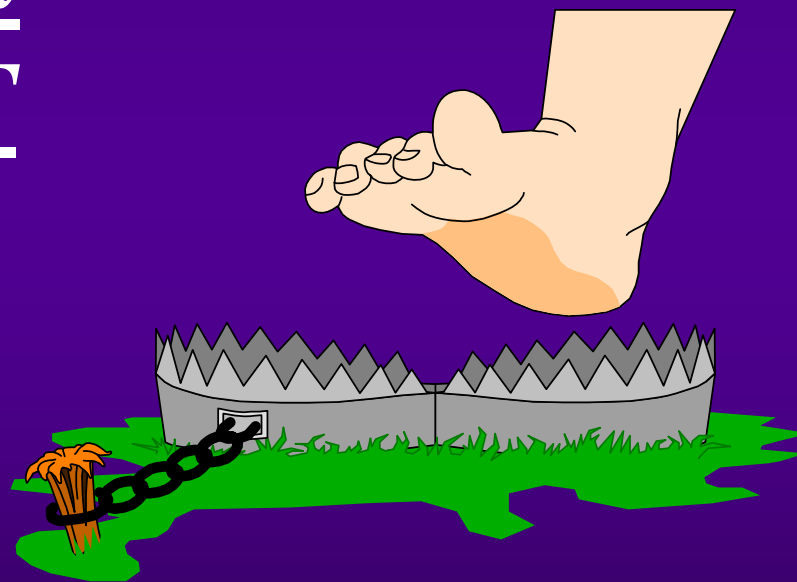
- ◆ Historic: One Rate Schedule for all Classes
- ◆ Emerging: Separate Rates for Each Class
 - ◆ Residential, Commercial, Industrial
- ◆ Allows Rates to Be Tailored for Different Uses

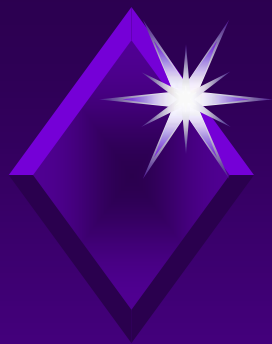




Conservation Rates

Increasing Block
Rates Are NOT
Necessarily
Conservation
Rates

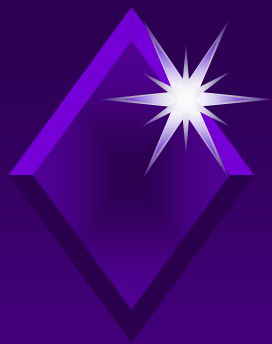




Conservation Rates

- ◆ Rates Should Target Specific Uses
- ◆ Price Elasticity of Water
- ◆ Non-essential vs. Essential Water Use
- ◆ Seasonal Conservation (Supply) or Peak Reduction

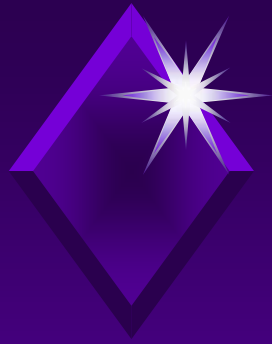




Types of Conservation Rates

- ◆ Seasonal
- ◆ Increasing Block *BY CLASS*
- ◆ Second Water Meter Rate
- ◆ Goal Based Rates





Where's The Gold?

- ◆ No Easy Answer
- ◆ Be Aware of Emerging Solutions
- ◆ Know Your Costs
- ◆ Know Your Customers

