

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No.:4611

Petition of the KENT COUNTY WATER AUTHORITY
Rate Application

MOTION TO INTERVENE

The Central Coventry Fire District (“CCFD”) respectfully moves to intervene in the above-entitled matter.

As grounds, the CCFD avers that it has an interest which will be directly affected and which is not represented by any existing party in this proceeding.

The CCFD is a quasi-governmental entity created by the General Assembly through a legislative charter in 1959. CCFD provides fire suppression and emergency medical services, to residents and taxpayers within a geographical region in the Town of Coventry.

In addition to the aforementioned services, CCFD also provides certain incidental services to the residents and taxpayers in that it has been given legislative authority to construct, own and maintain water distribution systems incidental to its public safety purpose.

The Kent County Water Authority (“KCWA”) currently assesses CCFD a fee for its purported ownership and maintenance of the said water distribution (i.e. fire hydrant) system. The cost billed to CCFD in a given year approximates \$500,000, which includes costs related to fire hydrants and water usage; however, most of the costs are related to fire hydrants, not water use. This represents a significant amount of the CCFD annual budget appropriation.

In the instant Rate Application, KCWA seeks an effective rate hike that includes an increase for fire hydrant (rental) fees of approximately 80% in the first year, increasing annually thereafter.

This increase is materially significant and must be absorbed ultimately by the taxpayers of the CCFD. Many of these CCFD taxpayers are also responsible for direct consumer rate increases and costs as users of the KCWA water facilities for residential uses.

The CCFD is requesting intervention because the Board of Directors owes a fiduciary duty to its electors and taxpayers to ensure that the Rate Application and fee increase requested

by KCWA is reasonable and justified.

Based on the foregoing, CCFD respectfully that it be permitted to intervene in this proceeding in order that it might examine the need and justification for the requested rate increase sought by KCWA.

If CCFD's Motion to Intervene is not granted, then CCFD's residents and businesses served by KCWA will not be represented by an existing party to this proceeding.¹ (R.I. Gen Laws § 45-6-1 (1999 & Supp. 2008) (Rule 1.13 Rules of Practice and Procedure).

CCFD thus has a direct interest in the resulting consequences to KCWA's customers located within CCFD should the instant Rate Application be approved.

For these reasons and pursuant to PUC Rule 1.13, the Central Coventry Fire District hereby requests the PUC to grant its Motion to Intervene.

CENTRAL COVENTRY FIRE DISTRICT
BOARD OF DIRECTORS

By its Attorney and Solicitor,

/s/ David M. D'Agostino, Esq.

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Date: May 11, 2016

¹ We note that while the Coventry Fire District and the Town of Coventry have both moved to Intervene in this proceeding, each represents a different constituency responsible for the levy and assessment of taxes and funding of the respective quasi-municipal and municipal operations.

CERTIFICATION

I certify that on the 11th day of May, 2016, I forwarded a copy of the within Motion to Intervene via e-mail to all of those parties on the following service list.

/s/ David M. D'Agostino

**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan
Service List 5/11/16**

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