

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

IN RE: KENT COUNTY WATER AUTHORITY
APPLICATION TO CHANGE RATE SCHEDULES

DOCKET NO. 4611

**COVENTRY FIRE DISTRICT'S RESPONSE TO
COMMISSION'S FIRST SET OF DATA REQUESTS DIRECTED TO
COVENTRY FIRE DISTRICT**

- 1.1 Please provide all documents or records regarding the ownership, replacement, repair or maintenance of fire hydrants in the Coventry Fire District service area.

Response: The District does not now own nor has it replaced, repaired nor maintained any fire hydrants in its service area. It does not, therefore, have any records of its own in that regard.

The District does not have any records supplied by any other party with regard to that party's ownership, replacement, repair or maintenance of fire hydrants in the Coventry Fire District service area.

The District did employ a title examiner to examine the Coventry Land Evidence records to determine whether there were any public records which bore on the issue of the ownership or installation of fire hydrants in the Coventry Fire District service area. A copy of the examiner's report is attached hereto and incorporated herein by reference

- 1.2 Please indicate all purposes for which the Coventry Fire District uses the public fire protection system, including hydrants within the Coventry Fire District's service area.

Response: The only purpose to which the Coventry Fire District uses the public fire protection system, including hydrants within the Coventry Fire District's service area is to supply water to suppress fires.

- 1.3 Please indicate how many fires Coventry Fire District has responded to for which it has relied upon the KCWA public fire protection system since 2000. For each, please indicate whether sufficient water supply was available for the fighting of the fire.

Response: The Coventry Fire District does not keep these records. Without making an examination of its records, the District would estimate that it has responded to as many as forty (40) working fires in the period 2000 to the present. Of those, the District would estimate that it has relied upon the KCWA public fire protection system for as many as twenty five (25) working fires.

We believe that there was a sufficient water supply available for the fighting of those twenty five (25) working fires.

- 1.4 What rate of flow is deemed necessary to provide fire suppression service from a fire truck?

Response: This is a more difficult request to accurately respond. A fire truck (and, in particular, our pumper truck) discharges water for fire suppression at the rate of 1,500 gal/min. What is deemed “necessary” depends upon the fire’s nature and location. The minimum “necessary” rate of flow could be as low as 90 gal/min or as high as 1,500 gal/min. In any event, our fire truck or pumper is able to accommodate the necessary rate of flow in any and all of these situations.

Jocelyn Williams
Real Estate Title Examinations
114 Peck Hill Road
Johnston, RI 02919

April 10, 2016

The Coventry Fire District
C/o Arthur M. Read, II, Esq.
Del Sesto & Read
Jefferson Place
100 Jefferson Blvd., Ste 200
Warwick, RI 02888

Gentlemen:

You engaged me to examine records in the Coventry Land Evidence Records in an effort to determine if there were any publicly recorded records bearing on the ownership of fire hydrants within the district. In particular you asked me to search for records in the name of the Coventry Fire District and the Kent County Water Authority.

I examined the Coventry Land Evidence Records under the name of the Coventry Fire District for the period 1889 through the present on April 6th and 8th, 2016 and was unable to find any records whatsoever that dealt with or spoke to fire hydrants in any way. I did not find any conveyances (deeds or otherwise), easements or other recorded instruments that bore on this matter.

I examined the Coventry Land Evidence Records under the name of Kent County Water Authority for the period 1945 through the present on April 8th, 2016 and was unable to find any records whatsoever that dealt with or spoke to fire hydrants in any way. I did not find any conveyances (deeds or otherwise), easements or other recorded instruments that bore on this matter.

I enclose a copy of my title report herewith.

If there is anything further to do in this regard, please advise.

Yours truly,



Jocelyn Williams

EXAMINER: Jocelyn Williams

4/10/2016

Coventry Fire District/Fire Hydrant Ownership

CITY/TOWN/DISTRICT: Coventry

TITLE RUN TO: 4/20/2016

START: 1/1/1889

TITLE IN: Kent County Water Authority (KCWA)

FROM: "Warwick and Coventry Water Company" (WCWC)

BOOK: 51

PAGE: 132

RECORDED 6/14/1950

SUBJECT TO:

EXECUTION: Bk/pg: 2026/136 Recorded: 11/30/2015

Kent County Water Authority V. Coventry Fire District

Attorney: Patrick J. Sullivan, 300 Centerville Road, Suite 300W, Summit West, Warwick, RI, 02886

\$140,998.10

Lien No.: KC-2015-0487

WARRANTY DEED: 118/879 Recorded: 3/31/1978

Grantor: Colonial Arms Realty, Inc., Francis L. Peltier & Claire H. Peltier

Grantee: KCWA

EASEMENT DEED: 111/751 Recorded: 10/28/1976

Grantor: Town of Coventry

Grantee: KCWA

EASEMENT: 59/507 Recorded: 3/8/1960

Grantor: Regis Forcier, Inc.

Grantee: KCWA

WARRANTY DEED: 51/132 Recorded: 6/14/1950

Grantor: WCWC

Grantee: KCWA

ALSO ATTACHED are all the deeds that where recorded in the Town of Coventry that certain town land owners give their property to "Warwick and Coventry Water Company" (WCWC) prior to the WCWC giving their interests over to KCWA in book 51 page 132.

**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan
Service List 8/12/16**

Name/Address	E-mail Address	Phone
Kent County Water Authority (KCWA) Mary B. Shekarchi, Esq. 33 College hill Rd., Suite 15-E Warwick, RI 02886	marybali@aol.com ;	401-828-5030
Timothy Brown, P.E. General Manager Chief Engineer Kent County Water Authority PO Box 192 West Warwick, RI 02893-0192	tbrown@kentcountywater.org ;	401-821-9300
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	chris@w-a.com ;	508-393-3337
Division of Public Utilities & Carriers (Division) Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov ;	401-274-4400 Ext. 2218
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	lmorgan@exeterassociates.com ;	
City of Warwick Peter D. Ruggiero, City Solicitor Ruggiero, Brochu & Petrarca 20 Centerville Road Warwick, RI 02886	peter@rubroc.com ;	401-737-8700
	maryann@rubroc.com ;	
Coventry Fire District (CFD) Arthur M. Read, Esq. Del Sesto & Read, Inc. 612 Greenwich Avenue Warwick, RI 02886	art@delamrlaw.com ;	401-340-1019

<p>Central Coventry Fire District (CCFD) David M. D'Agostino, Esq. Nicholas Gorham, Esq. Gorham & Gorham, Inc. P.O. Box 46 25 Danielson Pike, Scituate, RI 02857</p>	<p>daviddagostino@gorhamlaw.com;</p>	<p>401-647-1400</p>
<p>Town of Coventry Nicholas Gorham, Esq. Gorham & Gorham, Inc. P.O. Box 46 25 Danielson Pike, Scituate, RI 02857</p>	<p>nickgorham@gorhamlaw.com;</p>	<p>401-647-1400</p>
<p>Original & nine (9) copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888</p>	<p>Luly.massaro@puc.ri.gov;</p>	<p>401-780-2107</p>
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