

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

Docket No.:4611

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PUBLIC UTILITIES COMMISSION

Petition of the KENT COUNTY WATER AUTHORITY
Rate Application

MOTION TO INTERVENE

The Coventry Fire District ("CFD") respectfully moves to intervene in the above-entitled matter.

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

CFD is a quasi-municipal corporation, created by an Act of the Legislature as amended from time to time) which provides fire and rescue services to the residents of its district.

Incidental to that, it has been given legislative authority to construct, own and maintain water distribution systems incidental to its public safety purpose.

The Authority currently taxes CFD a fee it its purported ownership and maintenance of the said fire hydrant system. For the period October 1, 2014 to October 5, 2015 that rental totaled approximately \$150,000.00 or approximately 15% of CFD's total budget.

The Authority request to seek a rate hike would include an increase for hydrant rental fees of approximately 80% in the first year, increasing.

These increases are significant and will have to be borne by CFD's electors and taxpayers, their customers.

The Authority's claim of ownership of the fire hydrants has never been established to CFD's satisfaction and, therefore, the basis for the imposition of such onerous fees by the Authority is in question. CFD owes a fiduciary duty to its electors and taxpayers to ensure that the Authority's fees are reasonable and justified.

Based on the foregoing, CFD respectfully that it be permitted to intervene in this proceeding in order that it might examine the need and justification for the sought after rate hike approval sought by the Authority.

If CFD's Motion to Intervene is not granted, then CFD's residents and businesses served

by the Authority will not be represented by an existing party to this proceeding. (R.I. Gen Laws 45-6-1 (1999 & Supp. 2008) (Rule 1.13 Rules of Practice and Procedure).

CFD thus has a direct interest in the resulting consequences to the Authority's customers located within CFD should the Authority's Petition be approved.

For these reasons and pursuant to PUC Rule 1.13, the Town hereby requests the PUC to grant its Motion to Intervene.

/s/ Arthur M. Read, II
Arthur M. Read, II (0830)
Attorney for Intervenor Coventry Fire District
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Art@Delamrlaw.com
May 11, 2016

Certification

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

/s/ Arthur M. Read, II

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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PUBLIC UTILITIES COMMISSION

Docket No.:4611

Petition of the KENT COUNTY WATER AUTHORITY
Rate Application

ENTRY OF APPEARANCE

Enter my appearance on behalf of Intervenor the Coventry Fire District (“CFD”) pursuant to PUC Rule of Practice 1.4 (a).

As grounds, the CFD avers that it has an interest which will be directly affected and which is

/s/ Arthur M. Read, II
Arthur M. Read, II (0830)
Attorney for Intervenor Coventry Fire District
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Certification

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

/s/ Arthur M. Read, II

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

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