

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

Docket No.:4611

Petition of the KENT COUNTY WATER AUTHORITY
Rate Application

COVENTRY FIRE DISTRICT'S MOTION REGARDING
COVENTRY FIRE DISTRICT'S
AMENDED FIRST SET OF DATA REQUESTS

Respectfully represents Intervenor Coventry Fire District ("CFD") as follows:

1. It is a quasi-municipal entity organized by the Legislature and existing in the furtherance of the public health safety and welfare within its jurisdictional boundary.
2. CFD is a taxpayer supported entity whose budget is, for its current fiscal year, \$2,250,000.
3. Petitioner's seeks authority from this Commission to increase the hydrant rental fees which it charges CFD by approximately eighty (80%) percent (in the first year) or from \$127,069 (or 5.76% of CFD's budget) to approximately \$229,113 (or 10.18% of CFD's budget) or, alternatively, to charge the taxpayers directly.
4. CFD has a fiduciary responsibility to its taxpayers to protect their financial interest to the best of its ability.
5. In furtherance of that responsibility, CFD has intervened herein and has made certain data requests which, it believes, were relevant, pointed, concise and limited to those areas which CFD believed bore on understanding why and how Petitioner ("KCWA") charged CFD a hydrant rental fee and what calculus it used in determining what fair and appropriate hydrant rental fee to assess.

6. In seeking to discover the answers to those question, CFD posed a its first amended data request to KCWA (a copy of which is attached hereto as Exhibit A).
7. To that data request, KCWA responded (a copy of which is attached hereto as Exhibit B).
8. KCWA's response to each of CFD's twenty requests was the same, i.e.:
This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before this Commission is seeking a rate increase which has no relation to rental fees.
9. This Commission's Rules of Practice and Procedure provide for discovery at Rule 1.18. It "... favors prompt and complete disclosure and exchange of information" in the furtherance of its policy to encourage ... discovery as a means toward effective presentations..." Rule 1.18 (a) (1).
10. Data Requests are among the favored discovery tools. Rule 1.18 (c).
11. "Any requested material [sought by a data request] to which objection is not made **as set forth below shall** be produced ..." Rule 1.18 (c) (2).
12. "Objection to a data request ... **shall** be made by **motion**..." Rule 1.18 (c) (3).
[Emphasis added]
13. KCWA did not object to CFD's data request by motion.
14. "The relevancy of a [data] request shall be determined under the standards established under [R. C. P. 26]..." Rule 1.18 (c) (3).

Wherefore, CFD respectfully moves as follows:

- 1) That KCWA's responses to CFD may be found to violate Rule 1.18 in that

KCWA's objections were not raised by motion and KCWA be compelled to responded to CFD's data request or, in the alternative,

- 2) That KCWA's responses to CFD may be construed to be a motion under Rule 1.18 and that it may decided on its face and with consideration given to this miscellaneous motion;
- 3) That KCWA's objections to CFD's requests may be found to be without basis, that CFD's request be determined to be relevant under the standards established by R.C.P. 26 and that KCWA be compelled to respond to such data requests within such period as the Commission deems meet in the circumstances.
- 4) That the Commission may grant such other and further relief as it may deem meet in the circumstances.

/s/ Arthur M. Read, II
Arthur M. Read, II (0830)
Attorney for Intervenor Coventry
Fire District
Del Sesto & Read, Incorporated
100 Jefferson Blvd., Suite 200
Warwick, RI 02888
(401)739-2020
Art@Delamrlaw.com
June 28, 2016

Certification

I certify that I forward a copy of the foregoing Motion via e-mail to all on the following service list on June 28, 2016

/s/ Arthur M. Read, II

**Docket No. 3942 - Kent County Water Authority – Miscellaneous Petition
for Relief
Service List 1/20/16**

Name/Address	E-mail Address	Phone
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
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Peter D. Ruggiero, City Solicitor RUGGIERO BROCHU 20 Centerville Road Warwick, RI 02886	peter@rubroc.com ;	401-737-8700
	maryann@rubroc.com ;	
Original & nine (9) copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
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	Sharon.ColbyCamara@puc.ri.gov ;	
Arthur M. Read, Esq.	art@delamrlaw.com ;	401-439-2020

EXHIBIT A

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

Docket No.:4611

Petition of the KENT COUNTY WATER AUTHORITY
Rate Application

COVENTRY FIRE DISTRICT'S
AMENDED FIRST SET OF DATA REQUESTS

The following data requests are limited to the Petitioner's application as it relates to public fire hydrants, only.

OWNERSHIP

- 1) List each public fire hydrant for which you seek to charge each Intervenor a rental fee by street and other identifying data in such manner that a layman can locate and identify the fire hydrant.
- 2) As to each such public fire hydrant, set forth all facts, documents, deeds, grants, easements, licenses, bills of sale or other indicia upon which you rely in asserting by implication, or otherwise, that you own such fire hydrant and attach copies of the same.
- 3) As to each such public fire hydrant, identify those which you contend were built, constructed or installed by any person, firm or entity other than you, set forth all facts, documents, deeds, grants, easements, licenses, bills of sale or other indicia upon which you rely in asserting by implication, or otherwise, that such fire hydrant was sold, conveyed or demised to you by any means whatsoever, including any consideration therefore, and attach copies of the same.
- 4) As to each such public fire hydrant, which you contend was built, constructed or installed

by any person, firm or entity other than you; identify the name and last known address of such person, firm or entity.

- 5) Except as provided in response to a previous data request, as to each such public fire hydrant, which you contend was built, constructed or installed by any person, firm or entity other than you and which was conveyed to you, set forth the consideration for such conveyance.

COSTS OF CONSTRUCTION

- 6) As to each such public fire hydrant, which you contend you built, constructed or installed, advise of the date of construction, date the hydrant was placed in service (if different), set forth all costs of construction, set forth all costs of maintenance since construction (itemized by year), set forth the hydrant's life expectancy and attach records of all maintenance performed on said hydrants.
- 7) Identify the number of public fire hydrants within each fire district whose cost of construction or installation has been recovered.
- 8) Identify the number of public fire hydrants within each fire district whose cost of construction or installation has not been recovered and the remaining balance thereof.

RATE CALCULATION

- 9) Set forth in detail your analysis, your assumption and the calculations which you made in arriving at the proposed tariff for public fire hydrant charges and attach any documents in your possession which you rely on in support thereof (including work papers)
- 10) Set forth and list by year, each tariff authorizing you to charge for public fire hydrants, the amount of the charge authorized by the tariff.

- 11) Set forth all facts or other matters which have arisen or which have changed or altered, since the next most recent tariff regarding public fire hydrants (believed to be December 7, 2013) which have occasioned the necessity for you to seek an increase in the amount which you charge for public fire hydrants from \$139.12 per quarter per hydrant plus \$6.12 billing (a total of \$580.96 per hydrant per year) to \$251.22 per quarter per hydrant plus \$9.06 billing (a total of \$1,041.12 per hydrant per year) and attach any documents which support the existence of such change in facts.
- 12) Are you seeking a public fire hydrant billing increase of \$460.16 per hydrant per year?
- 13) If your response to the prior data request is in the affirmative, does that amount to a percentage rate increase of 79.21%?

AMORTIZATION

- 14) Set forth in detail the total cost for construction the public fire hydrant system in each municipality or district, your projected cost of maintenance and repair, the cost of money for any borrowing made by you to pay for the construction of the fire hydrant system, and the money which you have recovered, to date, in amortizing or paying off the total cost of such construction.
- 15) If there is a percentage of profit which you have included in your response to the prior data request, set forth that percentage.

CONTRACTURAL ARRANGEMENTS

- 16) Under what theory do you bill fire districts for public fire hydrants?
- 17) Set forth each contract or other form of agreement whereby any fire district affected by your pending application agreed to pay a fee for any public fire hydrant.
- 18) When did you first begin to charge each fire district a rental or other fee (not tied to

usage) for public fire hydrants?

BUSINESS EFFICENCIES

- 19) What management or other similar studies have you done or had done to provide you with options that would allow you to run your business more efficiently?
- 20) Have you ever considered selling yourself to a larger water company (such as the Providence Water Company or Providence Water Supply Board) in order to obtain efficiencies of scale which are unavailable to you now? If not, why not?

/s/ Arthur M. Read, II
Arthur M. Read, II (0830)
Attorney for Intervenor Coventry
Fire District
Del Sesto & Read, Incorporated
100 Jefferson Blvd., Suite 200
Warwick, RI 02888
(401)739-2020
Art@Delamrlaw.com
June 3, 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 June 3, 2016

/s/ Arthur M. Read, II

**Docket No. 3942 - Kent County Water Authority – Miscellaneous Petition
for Relief
Service List 1/20/16**

Name/Address	E-mail Address	Phone
Mary B. Shekarchi, Esq. 33 College hill Rd., Suite 15-E Warwick, RI 02886	marybali@aol.com ;	401-828-5030
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	maryann@rubroc.com ;	
Original & nine (9) copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Sharon.ColbyCamara@puc.ri.gov ;	
Arthur M. Read, Esq.	art@delamrlaw.com ;	401-439-2020

Mary B. Shekarchi

Attorney at Law
EXHIBIT B

EXHIBIT B

33 College Hill Road, Suite 15-E
Warwick, Rhode Island 02886

Tel: (401) 828-5030

Fax: (401) 823-1400

Email: LAWOFFICEMARYB@HOTMAIL.COM

June 13, 2016


Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

RE: Kent County Water Authority – Docket No. 4611

Dear Ms. Massaro:

Please find enclosed an original and nine (9) copies of the Kent County Water Authority's Response to the Coventry Fire District's Data Request (Set 1). An electronic copy has been provided to the service list. Should you have any questions, please contact me. Thank you.

Sincerely,


Mary B. Shekarchi
Attorney at Law

MBS/mdc
Enclosure

Cc: Docket 4611 Service List (via electronic mail)

KENT COUNTY WATER AUTHORITY

Docket No. 4611

Response to First Set of Data Requests

From Coventry Fire District

June 7, 2016

CFD-1) List each public fire hydrant for which you seek to charge each Intervenor a rental fee by street and other identifying data in such manner that a layman can locate and identify the fire hydrant.

Response: Objection.

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before this Commission is seeking a rate increase which has no relation to rental fees.

Prepared by: Mary B. Shekarchi, Esquire

CFD-2) As to each such public fire hydrant, set forth all facts, documents, deeds, grants, easements, licenses, bills of sale or other indicia upon which you rely in asserting by implication, or otherwise, that you own such fire hydrant and attach copies of the same.

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase which has no relevance to this request.

Prepared by: Mary B. Shekarchi, Esquire

CFD-3) As to each such public fire hydrant, identify those which you contend were built, constructed or installed by any person, firm or entity other than you, set forth all facts, documents, deeds, grants, easements, licenses, bills of sale or other indicia upon which you rely in asserting by implication, or otherwise, that such fire hydrant was sold, conveyed or demised to you by any means whatsoever, including any consideration therefore, and attach copies of the same.

Response: Objection

This request is irrelevant and immaterial to under Rule 1.18 (c) of the Commission's Practice and Procedure. The Kent Count Water Authority's request before the Commission is seeking a rate increase and this request has no relevance to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-4) As to each such public fire hydrant, which you contend was built, constructed or installed by any person, firm or entity other than you; identify the name and last known address of such person, firm or entity.

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and this request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-5) Except as provided in response to a previous data request, as to each such public fire hydrant, which you contend was built, constructed or installed by any person, firm or entity other than you and which was conveyed to you, set forth the consideration for such conveyance.

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-6) As to each such public fire hydrant, which you contend you built, constructed or installed, advise of the date of construction, date the hydrant was placed in service (if different), set forth all costs of construction, set forth all costs of maintenance since construction (itemized by year), set forth the hydrant's life expectancy and attach records of all maintenance performed on said hydrants.

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-7) Identify the number of public fire hydrants within each fire district whose cost of construction or installation has been recovered.

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-8) Identify the number of public fire hydrants within each fire district whose cost of construction or installation has not been recovered and the remaining balance thereof.

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-9) Set forth in detail your analysis, your assumption and the calculations which you made in arriving at the proposed tariff for public fire hydrant charges and attach any documents in your possession which you rely on in support thereof (including work papers).

Response: Please see both volumes of the Testimony and Data in Support of the Kent County Water Authority's Rate Filing with the Rhode Island Public Utilities Commission dated April 8, 2016. Considerable effort went into the preparation of this filing to provide the assumptions, background data, and calculations to support the Authority's proposed rates and charges, including the proposed public fire protection charges.

The Coventry Fire District should pay particular attention to the testimony of the four witnesses in addition to the attachments required by the RI PUC Rules of Practice and Procedure. The testimony of Mr. Woodcock includes 15 main schedules with numerous supporting schedules. While Schedules 4, 4A, 4B and 14 to Mr. Woodcock's testimony draw on information from other schedules, they contain many of the calculations and assumptions that were used to derive the public fire protection charges that are proposed by the Authority.

During the course of discovery, various data requests have been propounded on the Authority that may also contain data that is useful to the Coventry Fire District. A review of the attachment to Div 1-1 would be most helpful to the Fire District in following the calculations.

Prepared by Witness: C. Woodcock

CFD-10) Set forth and list by year, each tariff authorizing you to charge for public fire hydrants, the amount of the charge authorized by the tariff.

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-11) Set forth all facts or other matters which have arisen or which have changed or altered, since the next most recent tariff regarding public fire hydrants (believed to be December 7, 2013) which have occasioned the necessity for you to seek an increase in the amount which you charge for public fire hydrants from \$139.12 per quarter per hydrant plus \$6.12 billing (a total of \$580.96 per hydrant per year) to \$251.22 per quarter per hydrant plus \$9.06 billing (a total of \$1,041.12 per hydrant per year) and attach any documents which support the existence of such change in facts.

Response: The question contains incorrect assumptions regarding the current and proposed public fire protection charges. The amount for the current public fire charge per hydrant is incorrect – please see the existing tariff in the filing. In addition, there is a charge per quarter for each hydrant plus a single billing charge for each municipality or fire district. The billing charge is NOT per hydrant.

Please see the full file of Docket 4142

(<http://www.ripuc.org/eventsactions/docket/4142page.html>) and Docket 4417

(<http://www.ripuc.org/eventsactions/docket/4417page.html>) to see the basis for the existing tariffs that would be replaced with this filing. The Coventry Fire District should compare the documents in those filings with those in the current filing. There have been numerous changes in expenses, sales, numbers of services/hydrants/fire connections/etc. as well as the resulting allocation of costs that have caused the proposed changes. Page 6 of Mr. Woodcock's prefiled, direct testimony provides a summary of the changes in the revenues and expenses. The response to Div 1-1 will direct you to the derivation of these amounts.

Prepared by Witness: C. Woodcock

CFD- 12) Are you seeking a public fire hydrant billing increase of \$460.16 per hydrant per year?

Response: No.

Prepared by Witness: C. Woodcock

CFD-13) If your response to the prior data request is in the affirmative, does that amount to a percentage rate increase of 79.21%?

Response: While the response to the prior request is NOT in the affirmative, the percentage increase in the question is NOT correct. Please see Schedule 9, page 2 of the filing.

Prepared by Witness: C. Woodcock

CFD-14) Set forth in detail the total cost for construction (sic) the public fire hydrant system in each municipality or district, your projected cost of maintenance and repair, the cost of money for any borrowing made by you to pay for the construction of the fire hydrant system, and the money which you have recovered, to date, in amortizing or paying off the total cost of such construction.

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-15) If there is a percentage of profit which you have included in your response to the prior data request, set forth that percentage.

Response: The Kent County Water Authority is a non-profit entity. There is no profit element in any of the Authority's rates and charges.

Prepared by Witnesses: C. Woodcock/T. Brown

CFD-16) Under what theory do you bill fire districts for public fire hydrants?

Response: Potable water systems typically provide a dual role or function: the provision of potable water for domestic and non-domestic uses and the provision of water for fire protection. The recovery of the costs related to fire protection goes back more than 100 years. Recovering public fire protection costs through charges to municipal entities with taxing authority allows for the recovery of these costs from the beneficiaries of the service in relation to the value of the property being protected. This is believed to be an equitable cost recovery mechanism that has been in place and approved for over a century. The Fire District is referred to the American Water Works Association's M1 Manual – Principles of Water Rates, Fees and Charges (<http://www.awwa.org/store/productdetail.aspx?productid=28731>) for a more complete discussion of the theory and practice.

Prepared by Witness: C. Woodcock

CFD-17) Set forth each contract or other form of agreement whereby any fire district affected by your pending application agreed to pay a fee for any public fire hydrant.

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-18) When did you first begin to charge each fire district a rental or other fee (not tied to usage) for public fire hydrants?

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-19) What management or other similar studies have you done or had done to provide you with options that would allow you to run your business more efficiently?

Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

CFD-20) Have you ever considered selling yourself to a larger water company (such as the Providence Water Company or Providence Water Supply Board) in order to obtain efficiencies of scale which are unavailable to you now? If not, why not?

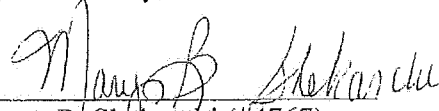
Response: Objection

This request is irrelevant and immaterial under Rule 1.18 (c) of the Commission's Rules of Practice and Procedure. The Kent County Water Authority's request before the Commission is seeking a rate increase and the within request is irrelevant to the instant matter.

Prepared by: Mary B. Shekarchi, Esquire

Respectfully submitted,
Kent County Water Authority

By its attorney,

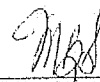


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Dated: June 13, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June, 2016, I sent a copy of the within Responses to the parties listed on the attached service list.



Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan
 Service List 5/17/16

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
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Central Coventry Fire District (CCFD) David M. D'Agostino, Esq. Nicholas Gorham, Esq.	daviddagostino@gorhamlaw.com ;	401-647-1400

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