

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

Petition of the KENT COUNTY WATER
Authority-Rate Application

Docket No.:4611

MOTION TO INTERVENE

Now comes the Town of Coventry (the “Town”), by and through its Town Solicitor, and hereby moves to intervene in the above-captioned matter. As grounds, the Town avers that it has an interest which will be directly affected and which is not represented by any existing party in this proceeding. The issue concerns the Kent County Water Authority’s (the “Authority”) request to seek a rate hike to collect additional revenues of \$3,296,334 during their upcoming budget year. According to the Authority’s notice filed pursuant to this rate request, this rate increase would amount to a \$58.44 increase in the average residential customer’s yearly billing expense. Several thousand customers of the Authority are located within the municipal boundaries of the Town. These residents and businesses served by the Authority are located in the easterly areas of the Town including Anthony, Tiogue, Washington, and beyond. These customers will have to bear any increase in the rate for water purchased by the Authority.

Based on this situation the Town requests intervention status to examine the need and justification for the sought after rate hike approval by the Authority. If the Town’s Motion to Intervene is not granted, the Town’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). The Town thus has direct interest in the resulting consequences to the Authority’s customers located within the Town should this rate hike 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.

Respectfully submitted,
Town of Coventry
By and Through its Attorney,

/s/ Nicholas Gorham
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May 6, 2016

Dated: May 6, 2016

Certification

I, the undersigned, do hereby certify that I did forward a copy of the within Motion to Intervene via e-mail to all on the following service list on the 6th day of May, 2016.

/s/ Nicholas Gorham