

**REBUTTAL TESTIMONY  
OF  
TIMOTHY J. BROWN, P.E.**

1 REBUTTAL TESTIMONY

2 TIMOTHY J. BROWN, PE

3  
4 **Q. Mr. Brown have you provided a pre-filed testimony in this case?**

5 A. Yes.

6  
7 **Q. Are you filing a rebuttal testimony in this case?**

8 A. Yes.

9  
10 **Q. Referring to Mr. Morgan's direct testimony in this case, page 21, lines 10-16, what are**  
11 **your concerns on his proposal regarding salvage value of the meters and his reduction**  
12 **of \$600,000 from the step 2 increase?**

13 A. I agree that there is salvage value with the meters upon disposal, but there are also labor  
14 costs and storage costs associated with the breakdown of the meters to recycle components  
15 prior to disposal. There is also a continued cost fluctuation of the salvageable parts and  
16 what the cost of scrap value is for the materials. To this extent, our current position is to bid  
17 the installation of the meters where the selected contractor will be required to dispose of the  
18 replaced meters and any salvage costs reflected in the total bid price for the services bid.

19  
20 **Q. Are you indicating that the process of installation includes disposal of the old meter at**  
21 **a single per meter bottom-line cost?**

22 A. Yes, it will be all inclusive for the installation, materials, transportation, removal and  
23 disposal of the old meter with the service contract as bid.

24  
25 **Q. Did you review any calculations or documentation where Mr. Morgan estimated the**  
26 **salvage value at \$600,000 in his testimony on page 21, lines 15 & 16?**

27 A. No. As stated, cost fluctuations will occur on salvage value throughout the years for the  
28 meter replacement program. Those risks would be borne by the contractor in the bidding  
29 process and not the Kent County Water Authority. We have every intention of highlighting  
30 the salvage value requirement in the bid documents.

- 1 **Q. Do you have a recommendation for the Commission on that section of Mr. Morgan’s**  
2 **testimony, page 21, lines 10-16?**
- 3 A. I would recommend that Mr. Morgan revise his testimony on that particular item and that  
4 the Commission disregard his recommendation to decrease \$600,000 of the step 2 increase  
5 proposed by the Kent County Water Authority.  
6
- 7 **Q. Mr. Morgan states that your testimony and Mr. Woodcock’s testimony indicates**  
8 **that KCWA is not seeking funding to increase the IFR funding in this docket above**  
9 **\$5.4million per year. Are you in agreement with that?**
- 10 A. No, on page 9 of my testimony lines 21 and 22 I state, “Acceptance of our infrastructure  
11 program and consideration of the continued funding of the program at the requested  
12 docket amount.”  
13 We are requesting an increase in step 1 and 2 of the docket for infrastructure replacement,  
14 if the Commission approves both steps. We are not requesting an increase in the docket  
15 for the rate year.  
16
- 17 **Q. What is the requested IFR step increase amounts requested?**
- 18 A. Step 1 \$533,333 and Step 2 \$533,333.  
19
- 20 **Q. Do you have a recommendation for the Commission on this question of Mr.**  
21 **Morgan?**
- 22 A. I would recommend the Commission approve the original proposal as filed, with the step  
23 increases.  
24
- 25 **Q. Beginning on page 10 of Mr. Morgan’s testimony, he is questioning the operation**  
26 **studies outlined in the docket and the need for them. Please review KCWA needs**  
27 **and reasoning for the studies?**
- 28 A. The water supply system management plan and the infrastructure replacement plan are  
29 required documents via state law and regulation. For Mr. Morgan to dismiss them as a  
30 prior period costs is inaccurate. I frankly do not know how Mr. Morgan believes KCWA

1 can accomplish state law requirements without funding being provided. Past practice has  
2 always funded these efforts. See attached cost breakdown.

3 The conservation program is a program that should be funded to establish a current  
4 program for KCWA to comply with the findings and intent of the 2009 water efficiency  
5 act. Good business practice dictates this. The cost is estimated at \$25,000.

6 The vulnerability assessment is proposed to update the mandated assessment (protected)  
7 provide via federal law after 9/11. We plan on reviewing our current infrastructure  
8 vulnerabilities for operations, nature related, security and acts of terrorism. The  
9 recommendation will provide a direction going forward to protect system assets and  
10 public health. Our estimated cost is \$50,000 and is considered a new document. No law  
11 or regulation requires it but public health demands it.

12  
13 **Q. With regards to the 5 year CIP study recommendation of Mr. Morgan's testimony,**  
14 **page 11, what are your concerns?**

15 A. Both witnesses of the Division seem to be on opposite sides on this study. We concur  
16 with Mr. Mancini and his recommendation that the study be updated or reevaluated every  
17 5 years. Mr. Morgan's testimony should be disregarded by the Commission and funding  
18 provided as originally proposed in the docket.

19  
20 **Q. Please explain the IFR program.**

21 A. KCWA current IFR program was done in-house based on RI Department of Health  
22 modifications to the program. We do expect to revise the program on the next submission  
23 utilizing a consultant for a complete review of the program connecting with our GIS  
24 database and system model. This will provide a graphical analysis tool to evaluate and  
25 develop programs for improvement. The cost is estimated to be \$75,000 for development,  
26 submission and the graphic/model interface.

27  
28 **Q. Does this conclude your rebuttal testimony?**

29 A. Yes.



Kent County Water Authority  
Water Supply System Management Plan

Professional Services Performed by: C & E Engineering  
Capital Improvement Plan Update 2012-2017  
Update Existing KCWA-CIP

9/1/2011 through 9/30/2011	\$780.00
10/1/2011 through 10/31/2011	\$1,020.00
11/1/2011 through 11/31/2011	\$1,190.00
12/1/2011 through 12/31/2011	\$1,235.00
1/1/2012 through 1/31/2012	\$2,275.00
	<u>\$6,500.00</u>

Professional Services Performed by: James J. Geremia & Associates, Inc.  
Update Water Supply System Management Plan 2012-2017

Period Ending April 28, 2012	\$1,060.00
Period Ending May 31, 2012	\$9,865.00
Period Ending June 30, 2012	\$4,155.00
Period Ending July 28, 2012	\$1,247.00
Period Ending April 30, 2014	\$1,273.00
	<u>\$17,600.00</u>
Total	\$24,100.00

To: **Kent County Water Authority**  
**Attn: Timothy Brown, Gen. Mgr. Chief Eng**  
**1072 Main Street**  
**PO Box 192**  
**West Warwick, RI 02893-0192**

**Date: Oct. 6, 2011**  
**FEIN: 05-0520564**  
**Invoice No: 07115**

**Invoice for Professional Services Performed  
 in the period September 1, 2011 through September 30, 2011**

-----  
**Project No: J0711.02 KCWA - CIP Update**  
**Ref: Update Existing KCWA - Capital Improvement Plan**

<b>Total Lump Sum Fee</b>	<b>\$6,500.00</b>
<b>Percent Complete</b>	<b>15.0%</b>
<b>Total Fee To Date</b>	<b>\$780.00</b>
<b>Total Previously Invoiced</b>	<b>\$0.00</b>
<b>Total Amount Due this Invoice:</b>	<b>\$780.00</b>
<b>Total Amount this Invoice</b>	<b>\$780.00</b>

3001

Date Received	10/20/11
Purchase Order No.	
Voucher No.	
O.K.	<i>MB</i>
Date Paid	10/31/11
Check No.	3316
Ent'd Gen'l Books	<i>me</i>
ACCOUNT	AMOUNT
1107-	
235A	780.00



342 Park Ave. Woonsocket, RI 02895  
 Phone: 401 762-1711 Fax: 401 235-9088  
 www.ceengineer.com

To: **Kent County Water Authority**  
**Attn: Timothy Brown, Gen. Mgr. Chief Eng**  
**Po Box 192**  
**West Warwick, RI 02893**

**Date: Nov. 3, 2011**  
**FEIN: 05-0520564**  
**Invoice No: 07136**

**Invoice for Professional Services Performed  
 in the period October 1, 2011 through October 31, 2011**

-----  
**Project No: J0711.02 KCWA - CIP Update**  
**Ref: Update Existing KCWA-CIP**

<b>Total Lump Sum Fee</b>	<b>\$6,500.00</b>
<b>Percent Complete</b>	<b>28.0%</b>
<b>Total Fee To Date</b>	<b>\$1,800.00</b>
<b>Total Previously Invoiced</b>	<b>\$780.00</b>
<b>Total Amount Due this Invoice:</b>	<b>\$1,020.00</b>

**Total Amount this Invoice \$1,020.00**

3001

Date Received	11/10/11
Purchase Order No.	
Voucher No.	
O.K.	<i>MB</i>
Date Paid	11/15/11
Check No.	3410
Ent'd Gen'l Books	<i>MB</i>
ACCOUNT	AMOUNT
1107-	
235A	1020.00

To: **Kent County Water Authority**  
**Attn: Timothy Brown, Gen. Mgr. Chief Eng**  
**Po Box 192**  
**West Warwick, RI 02893**

**Date: Dec. 8, 2011**  
**FEIN: 05-0520564**  
**Invoice No: 07156**

**Invoice for Professional Services Performed  
 in the period November 1, 2011 through November 30, 2011**

-----  
**Project No: J0711.02 KCWA - CIP Update**  
**Ref: Update Existing KCWA-CIP**

Total Lump Sum Fee	\$6,500.00
Percent Complete	46.0%
Total Fee To Date	\$2,990.00
Total Previously Invoiced	\$1,800.00
<b>Total Amount Due this Invoice:</b>	<b>\$1,190.00</b>

**Total Amount this Invoice \$1,190.00**

3001

Date Received	12/22/11
Purchase Order No.	
Voucher No.	
O.K.	TRB
Date Paid	12/30/11
Check No.	3536
Ent'd Gen'l Books	mg
ACCOUNT	AMOUNT
1107-	
235A	1190 00



To: **Kent County Water Authority**  
**Attn: Timothy Brown, Gen. Mgr. Chief Eng**  
**Po Box 192**  
**West Warwick, RI 02893**

**Date: Jan. 5, 2012**  
**FEIN: 05-0520564**  
**Invoice No: 07176**

**Invoice for Professional Services Performed  
 in the period December 1, 2011 through December 31, 2011**

-----  
**Project No: J0711.02 KCWA - CIP Update**  
**Ref: Update Existing KCWA-CIP**

Total Lump Sum Fee	\$6,500.00
Percent Complete	65.0%
Total Fee To Date	\$4,225.00
Total Previously Invoiced	\$2,990.00
<b>Total Amount Due this Invoice:</b>	<b>\$1,235.00</b>

**Total Amount this Invoice \$1,235.00**

300 /

Date Received	1/26/12
Purchase Order No.	
Voucher No.	
O.K.	TB
Date Paid	
Check No.	
Ent'd Gen'l Books	<i>mg</i>
ACCOUNT	AMOUNT
1107-235A	1235.00

To: **Kent County Water Authority**  
**Attn: Timothy Brown, Gen. Mgr. Chief Eng**  
**Po Box 192**  
**West Warwick, RI 02893**

**Date: Feb. 9, 2012**  
**FEIN: 05-0520564**  
**Invoice No: 07199**

**Invoice for Professional Services Performed**  
**in the period January 1, 2012 through January 31, 2012**

-----  
**Project No: J0711.02 KCWA - Capital Improvement Plan Update 2012 - 2017**  
**Ref: Update Existing KCWA-CIP**

<b>Total Lump Sum Fee</b>	<b>\$6,500.00</b>
<b>Percent Complete</b>	<b>100.0%</b>
<b>Total Fee To Date</b>	<b>\$6,500.00</b>
<b>Total Previously Invoiced</b>	<b>\$4,225.00</b>
<b>Total Amount Due this Invoice:</b>	<b>\$2,275.00</b>

**Total Amount this Invoice** **\$2,275.00**

300/

Date Received	2/29/12
Purchase Order No.	
Voucher No.	
O.K.	TS
Date Paid	2/29/12
Check No.	3731
Ent'd Gen'l Books	Jmy
ACCOUNT	AMOUNT
1107-	
235A	2275.00



**JAMES J. GEREMIA & ASSOCIATES, INC.**  
CONSULTING ENVIRONMENTAL ENGINEERS & SCIENTISTS

2035

Date Received	5/14/12
Purchase Order No.	
Voucher No.	
O.K.	77
Date Paid	5/15/12
Check No.	03996
Ent'd Gen'l Books	Jag
ACCOUNT	AMOUNT
19230	1060 00

Date: April 30, 2012

To: Finance Department  
Kent County Water Authority  
P.O. Box 192  
West Warwick, RI 02893-0192

Re: For Professional Services rendered in connection  
Update Water Supply System Management Plan

**INVOICE**

Invoice # 1

Period Ending: 28-Apr-12

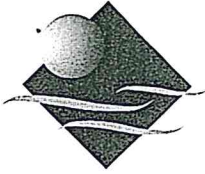
JGA Job #12-004

Item #	Description	Contract Amount	Previous Invoice	Current Invoice	Total to Date	Percent Complete	Balance to Complete
1	Update Water Supply System Management Plan	\$ 15,600.00	\$ -	\$ 1,060.00	\$ 1,060.00	0.00%	\$ 14,540.00
2	Printing	\$ 2,000.00	\$ -	\$ -	\$ -	0.00%	\$ 2,000.00
<b>TOTALS</b>		<b>\$ 17,600.00</b>	<b>\$ -</b>	<b>\$ 1,060.00</b>	<b>\$ 1,060.00</b>	<b>6.02%</b>	<b>\$ 16,540.00</b>

TOTAL COMPLETED TO DATE	thru: 28-Apr-12	\$ 1,060.00
LESS: PREVIOUS CERTIFICATES FOR PAYMENT		\$ -
<b>NET CURRENT AMOUNT DUE</b>	<b>Invoice # 1</b>	<b>\$ 1,060.00</b>

<u>Man-Hour Breakdown</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
Project Administrator	2.00	\$ 150.00	\$ 300.00
Project Manager	4.00	\$ 100.00	\$ 400.00
CADD Design	0.00	\$ 50.00	\$ -
Clerical	6.00	\$ 60.00	\$ 360.00
	<u>12.00</u>		<u>\$ 1,060.00</u>





**JAMES J. GEREMIA & ASSOCIATES, INC.**  
 CONSULTING ENVIRONMENTAL ENGINEERS & SCIENTISTS

Date: May 31, 2012

To: Finance Department  
 Kent County Water Authority  
 P.O. Box 192  
 West Warwick, RI 02893-0192

Re: For Professional Services rendered in connection  
 Update Water Supply System Management Plan

2035

Date Received	6/29/12
Purchase Order No.	
Voucher No.	
O.K.	
Date Paid	
Check No.	
Ent'd Gen'l Books	Jmg
ACCOUNT	AMOUNT
237A	9865.00

**INVOICE**

Invoice # 2

Period Ending: 31-May-12

JGA Job #12-004

Item #	Description	Contract Amount	Previous Invoice	Current Invoice	Total to Date	Percent Complete	Balance to Complete
1	Update Water Supply System Management Plan	\$ 15,600.00	\$ 1,060.00	\$ 9,865.00	\$ 10,925.00	0.00%	\$ 4,675.00
2	Printing	\$ 2,000.00	\$ -	\$ -	\$ -	0.00%	\$ 2,000.00
<b>TOTALS</b>		<b>\$ 17,600.00</b>	<b>\$ 1,060.00</b>	<b>\$ 9,865.00</b>	<b>\$ 10,925.00</b>	<b>62.07%</b>	<b>\$ 6,675.00</b>

TOTAL COMPLETED TO DATE	thru: 31-May-12	\$ 10,925.00
LESS: PREVIOUS CERTIFICATES FOR PAYMENT		\$ 1,060.00
<b>NET CURRENT AMOUNT DUE</b>	<b>Invoice # 2</b>	<b>\$ 9,865.00</b>

<u>Man-Hour Breakdown</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
Project Administrator	42.50	\$ 150.00	\$ 6,375.00
Project Manager	1.00	\$ 100.00	\$ 100.00
CADD Design	0.00	\$ 50.00	\$ -
Clerical	56.50	\$ 60.00	\$ 3,390.00
	<u>100.00</u>		<u>\$ 9,865.00</u>





**JAMES J. GEREMIA & ASSOCIATES, INC.**  
 CONSULTING ENVIRONMENTAL ENGINEERS & SCIENTISTS

Date: June 30, 2012

To: Finance Department  
 Kent County Water Authority  
 P.O. Box 192  
 West Warwick, RI 02893-0192

Re: For Professional Services rendered in connection  
 Update Water Supply System Management Plan

Date Received	7/27/12
Purchase Order No.	
Voucher No.	
O.K.	JG
Date Paid	
Check No.	
Ent'd Gen'l Books	JG
ACCOUNT	AMOUNT
1923-	4155.00

**INVOICE**

Invoice # 3

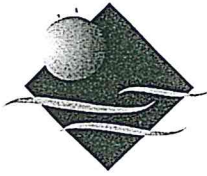
Period Ending: 30-Jun-12

JGA Job #12-004

Item #	Description	Contract Amount	Previous Invoice	Current Invoice	Total to Date	Percent Complete	Balance to Complete
1	Update Water Supply System Management Plan	\$ 15,600.00	\$ 10,925.00	\$ 4,155.00	\$ 15,080.00	0.00%	\$ 520.00
2	Printing	\$ 2,000.00	\$ -	\$ -	\$ -	0.00%	\$ 2,000.00
<b>TOTALS</b>		<b>\$ 17,600.00</b>	<b>\$ 10,925.00</b>	<b>\$ 4,155.00</b>	<b>\$ 15,080.00</b>	<b>85.68%</b>	<b>\$ 2,520.00</b>

TOTAL COMPLETED TO DATE	thru: 30-Jun-12	\$ 15,080.00
LESS: PREVIOUS CERTIFICATES FOR PAYMENT		\$ 10,925.00
<b>NET CURRENT AMOUNT DUE</b>	<b>Invoice # 3</b>	<b>\$ 4,155.00</b>

<u>Man-Hour Breakdown</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
Project Administrator	24.50	\$ 150.00	\$ 3,675.00
Project Manager	0.00	\$ 100.00	\$ -
CADD Design	0.00	\$ 50.00	\$ -
Clerical	8.00	\$ 60.00	\$ 480.00
	<u>32.50</u>		<u>\$ 4,155.00</u>



**JAMES J. GEREMIA & ASSOCIATES, INC.**  
 CONSULTING ENVIRONMENTAL ENGINEERS & SCIENTISTS

2035

Date: July 31, 2012

Date Received	8/29/12
Purchase Order No.	
Voucher No.	
O.K.	M
Date Paid	8/30/12
Check No.	004375
En'd Gen'l Books	me
ACCOUNT	AMOUNT
19230	1247.00

To: Finance Department  
 Kent County Water Authority  
 P.O. Box 192  
 West Warwick, RI 02893-0192

Re: For Professional Services rendered in connection  
 Update Water Supply System Management Plan

**INVOICE**

Invoice # 4

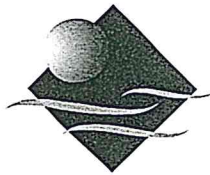
Period Ending: 28-Jul-12

JGA Job #12-004

Item #	Description	Contract Amount	Previous Invoice	Current Invoice	Total to Date	Percent Complete	Balance to Complete
1	Update Water Supply System Management Plan	\$ 15,600.00	\$ 15,080.00	\$ 210.00	\$ 15,290.00	98.01%	\$ 310.00
2	Printing	\$ 2,000.00	\$ -	\$ 1,037.00	\$ 1,037.00	51.85%	\$ 963.00
<b>TOTALS</b>		<b>\$ 17,600.00</b>	<b>\$ 15,080.00</b>	<b>\$ 1,247.00</b>	<b>\$ 16,327.00</b>	<b>92.77%</b>	<b>\$ 1,273.00</b>

TOTAL COMPLETED TO DATE	thru: 28-Jul-12	\$ 16,327.00
LESS: PREVIOUS CERTIFICATES FOR PAYMENT		\$ 15,080.00
<b>NET CURRENT AMOUNT DUE</b>	<b>Invoice # 4</b>	<b>\$ 1,247.00</b>

<u>Man-Hour Breakdown</u>	<u>Hours</u>	<u>Rate</u>	<u>Cost</u>
Project Administrator	0.00	\$ 150.00	\$ -
Project Manager	0.00	\$ 100.00	\$ -
CADD Design	0.00	\$ 50.00	\$ -
Clerical	3.50	\$ 60.00	\$ 210.00
	<u>3.50</u>		<u>\$ 210.00</u>



**JAMES J. GEREMIA & ASSOCIATES, INC.**  
CONSULTING ENVIRONMENTAL ENGINEERS & SCIENTISTS

ap

2035

Date Received	5/23/14
Purchase Order No.	
Voucher No.	
O.K.	<i>JB</i>
Date Paid	4/30/14
Check No.	0068768
Ent'd Gen'l Books	<i>md</i>
ACCOUNT	AMOUNT
19130	1273.00

Date: April 30, 2014

To: Finance Department  
Kent County Water Authority  
P.O. Box 192  
West Warwick, RI 02893-0192

Re: For Professional Services rendered in connection  
Update Water Supply System Management Plan

**INVOICE**

Invoice # 5

Period Ending: 30-Apr-14

JGA Job #12-004

Item #	Description	Contract Amount	Previous Invoice	Current Invoice	Total to Date	Percent Complete	Balance to Complete
1	Update Water Supply System Management Plan	\$ 15,600.00	\$ 15,290.00	\$ 310.00	\$ 15,600.00	100.00%	\$ -
2	Printing	\$ 2,000.00	\$ 1,037.00	\$ 963.00	\$ 2,000.00	100.00%	\$ -
<b>TOTALS</b>		<b>\$ 17,600.00</b>	<b>\$ 16,327.00</b>	<b>\$ 1,273.00</b>	<b>\$ 17,600.00</b>	<b>100.00%</b>	<b>\$ -</b>

TOTAL COMPLETED TO DATE	thru: 30-Apr-14	\$ 17,600.00
LESS: PREVIOUS CERTIFICATES FOR PAYMENT		\$ 16,327.00
<b>NET CURRENT AMOUNT DUE</b>	<b>Invoice # 5</b>	<b>\$ 1,273.00</b>

Man-Hour Breakdown	Hours	Rate	Cost
Project Administrator	1.50	\$ 150.00	\$ 225.00
Project Manager	0.00	\$ 100.00	\$ -
CADD Design	0.00	\$ 50.00	\$ -
Clerical	6.00	\$ 60.00	\$ 360.00
	<u>7.50</u>		<u>\$ 585.00</u>