

Mary B. Shekarchi
Attorney at Law

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

Tel: (401) 828-5030
Fax: (401) 823-1400
Email: LAWOFFICEMARYB@HOTMAIL.COM

May 15, 2017


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

RE: Kent County Water Authority – Docket No. 4611

Dear Ms. Massaro:

Please find enclosed herewith an original and nine (9) copies of the Kent County Water Authority's Supplemental Filing to the Compliance Filing dated February 7, 2017. In the within Docket. 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
SUPPLEMENTAL FILING TO THE
COMPLIANCE FILING DATED FEBRUARY 7, 2017
DOCKET NO. 4611**

**RECOMMENDATIONS TO THE
COMPOUND METER FIRE
SERVICE INVESTIGATION
COMPLIANCE FILING
DOCKET NO. 4611 (Dated 2/7/17)**

DATED

May 15, 2017

Compound Meter Fire Line Evaluation Recommendations

Kent County Water Authority (“KCWA”) respectfully submits the following recommendations based on the findings from the KCWA February 7, 2017 Compound Meter Fire Service Investigation to address the Paragraph # 24(d) in Settlement Agreement in Docket # 4611 & dated 12/6/16 and the Public Utilities Commission Order reflected in the minutes from the December 20, 2016 open meeting:

- All compound meter connections that provide fire service and/or fire and domestic service shall be assessed the service charge equal to the approved private fire service tariff rate based on the service size. This provides consistency and conformance with units of service in the allocation of revenue requirements reflected in the service charges for the cost of service.
- Actions must be taken to compel customers with unmetered fire lines to retrofit these services with the compound meters to mitigate the unaccounted for water use consequential to revenue losses that must be recovered in the tariff rate applied across the general customer base and to assure compliance with RI General Laws (“RIGL”) requiring that all water supply must be metered. RIGL 46-15.3-5.1(2)(D)(iv). The retro fit can be in conjunction with the mandatory installation of containment backflow device reflected in the RI Department of Health rules and regulations and RIGL 46-13-22. Regulated water suppliers will need Division support in the form of regulatory change to facilitate consistent application of this requirement by all regulated water utilities.

- Present a request for rule change to the Division of Public Utilities and Carriers Rules & Regulations Prescribing Standards for Water Utilities to include the words “domestic and fire service” as descriptors to section: III D Measurement of Service. Adding these descriptors to this section of the regulations will clarify and delineate compliance requirements for all customers and provide relief from the occurrence of contested interpretation.

Due to the unknown impacts these recommendations may have on the recent approved settlement agreement, the KCWA intends to present these recommendations for action during our next general rate filing. We feel this would be the best opportunity to fully vet these recommendations and assess tariff changes in support of the adjustment to cost of service.

Prepared By:

Timothy J. Brown, P.E.
General Manager/Chief Engineer
Kent County Water Authority

CERTIFICATION OF SERVICE

I hereby certify that on this 15th day of May, 2017, I sent a copy of within to the Parties listed on the attached service list.

ms.

**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan
Service List 10/27/16**

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
	john.bell@dpuc.ri.gov ;	Ext. 2218
	steve.scialabba@dpuc.ri.gov ;	
	al.mancini@dpuc.ri.gov ;	
	Sam.lapatin@dpuc.ri.gov ;	
	jmunoz@riag.ri.gov ;	
Jerome Mierzwa Layfayette Morgan Exeter Associates, Inc. 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044	jmierzwa@exeterassociates.com ;	
	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
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	daviddagostino@gorhamlaw.com ;	401-647-1400

Town of Coventry Nicholas Gorham, Esq. Gorham & Gorham, Inc. P.O. Box 46 25 Danielson Pike, Scituate, RI 02857	nickgorham@gorhamlaw.com ;	401-647-1400
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 ;	
Kathleen Crawley Water Resources Board	Kathleen.crawley@wrb.ri.gov ;	401-222-6696