

*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

July 18, 2016

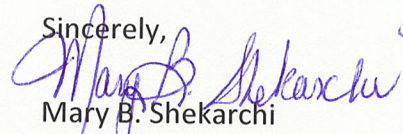
Ms. Luly Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

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 Responses to the Division of Public Utilities and Carriers 4<sup>th</sup> set of Data Requests. 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**

**Fourth Set of Data Requests**

**Division of Public Utilities and Carriers**

**July 6, 2016**

1. Reference the response to DIV-1-3. Please describe what is reflected in the “Water Protection” column of the monthly billing reports.

Response:

1. Three categories are reflected in the Water Protection column:
  - i. Total consumption billed to customers who are not exempt of the Water Protection charge for the month to calculate Water Protection charges.
  - ii. Total billed amount to customers who are not exempt of the Water Protection charge for the month and is calculated based on customer consumption.
  - iii. The number of customers who are billed for Water Protection for the month.

Witness Responsible: C. Heard

2. Reference the response to DIV-1-5:
  - a. Please identify the number of customers that have compound meters.
  - b. Are the rate charges to compound meter customers different than the rates of customers without compound meters?
  - c. If the response to subpart (b) is no, please explain why compound meter customers are not charged for the additional meter(s).

Response:

- a. We have 234 customers with compound meters.
- b. No, the rates are the same.
- c. A compound meter is one meter with two registers so there is only one service charge, which is based on the size of the meter.

Witness Responsible: C. Heard

3. Reference the response to DIV-1-6. For each of the last three fiscal years, please identify the quantity of water lost due to third-party breaks of mains and services, and identify the revenues recovered from the third-parties.

Response:

	GALLONS	WATER CHARGE	UNCOLLECTED
FY 2014	2,500	\$17.45	
FY 2015	10,200	\$71.61	
FY 2016	59,821	\$419.88	\$391.20

Witness Responsible: C. Heard

4. Reference the response to DIV-1-15. Please provide documentation for the statement “The fire demand is the maximum required by ISO for water suppliers,” and a calculation supporting the 3,500 gal/min identified in Sch. 3B.

Response: The maximum demand required by the ISO for a water system is 3500 gpm. If a property requires a greater volume it is up to the property owner to provide that additional volume. See <https://www.isomitigation.com/downloads/ppc3001.pdf> (page 24)

Witness Responsible: C. Woodcock

5. Reference the response to DIV-1-14. Please provide a breakdown of public hydrants by fire district.

Response:

West Warwick Fire District	663	
Coventry		
	Anthony Fire District	228
	Hopkins Hill Fire District	69
	Central Coventry Fire District	347
Town of West Greenwich	49	
City of Cranston	64	
Town of Scituate	59	
Town of East Greenwich	431	
Warwick Fire Department	438	
North Kingstown Water Dept.	4	
	Total	2352

Witness Responsible: C. Heard

6. Please identify what percentages of the small, medium, and large customer classes are residential, commercial, and industrial customers.

Response: Please see responses to Div 1-3 for the underlying data. Any party may calculate those percentages from that data.

Witness Responsible: C. Heard

7. Please identify the weekly usage adjustment factor that KCWA believes is appropriate for the small, medium, and large customer classes (per *AWWA M-1*, page 317). Please provide the basis for the factors.

Response: We did not use the AWWA's M-1 manual to derive any adjustment factors. Note that the AWWA's M1 Manual specifically states "The examples presented are used only to demonstrate the generally accepted methodologies discussed in this manual. The underlying data and assumptions are not endorsed or recommended either by the AWWA or the Rates and Charges Committee for use elsewhere." Accordingly, it would be inappropriate and incorrect to simply rely on the examples in the M1 Manual. In addition, the question references an example on page 317 that relates to calculating maximum day and peak hour demand ratios from monthly billing data. KCWA did no such calculations for this filing. Lastly, please see the response to Div 1-16.

Witness Responsible: C. Woodcock



8. Please identify the estimated MH/MD ratio that KCWA believes is appropriate for the small, medium, and large customer classes (per *AWWA M-1*, page 318). Please provide the basis for the ratios.

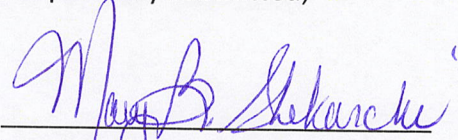
Response: See response to previous questions (Div 1-12, Div 1-16 and Div 4-7). KCWA did not calculate, provide, or estimate any MH/MD ratios for this docket. KCWA did not use the example methodology that is referenced in the question.

Witness Responsible: C. Woodcock

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4611

Dated: July 18, 2016

Respectfully submitted,



Mary B. Shekarchi (#4767)

Attorney at Law

33 College Hill Rd., Suite #15E

Warwick, RI 02886

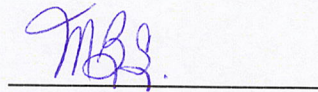
Tel. (401) 828-5030

Fax (401) 823-1400

[marybali@aol.com](mailto:marybali@aol.com)

CERTIFICATION OF SERVICE

I hereby certify that on this <sup>18<sup>th</sup></sup> day of July, 2016, I sent a copy of within Objection to the Parties listed on the attached service list.



**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan  
Service List 6/9/16**

<b>Name/Address</b>	<b>E-mail Address</b>	<b>Phone</b>
<b>Kent County Water Authority (KCWA)</b> Mary B. Shekarchi, Esq. 33 College hill Rd., Suite 15-E Warwick, RI 02886	<a href="mailto:marybali@aol.com">marybali@aol.com</a> ;	401-828-5030
Timothy Brown, P.E. General Manager Chief Engineer Kent County Water Authority PO Box 192 West Warwick, RI 02893-0192	<a href="mailto:tbrown@kentcountywater.org">tbrown@kentcountywater.org</a> ;	401-821-9300
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	<a href="mailto:chris@w-a.com">chris@w-a.com</a> ;	508-393-3337
<b>Division of Public Utilities &amp; Carriers (Division)</b> Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Lwold@riag.ri.gov">Lwold@riag.ri.gov</a> ;	401-274-4400 Ext. 2218
	<a href="mailto:Avitali@riag.ri.gov">Avitali@riag.ri.gov</a> ;	
	<a href="mailto:john.bell@dpuc.ri.gov">john.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:steve.scialabba@dpuc.ri.gov">steve.scialabba@dpuc.ri.gov</a> ;	
	<a href="mailto:al.mancini@dpuc.ri.gov">al.mancini@dpuc.ri.gov</a> ;	
	<a href="mailto:Sam.lapatin@dpuc.ri.gov">Sam.lapatin@dpuc.ri.gov</a> ;	
	<a href="mailto:jmunoz@riag.ri.gov">jmunoz@riag.ri.gov</a> ;	
Jerome Mierzwa Layfayette Morgan Exeter Associates, Inc. 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044	<a href="mailto:jmierzwa@exeterassociates.com">jmierzwa@exeterassociates.com</a> ;	
	<a href="mailto:lmorgan@exeterassociates.com">lmorgan@exeterassociates.com</a> ;	
<b>City of Warwick</b> Peter D. Ruggiero, City Solicitor Ruggiero, Brochu & Petrarca 20 Centerville Road Warwick, RI 02886	<a href="mailto:peter@rubroc.com">peter@rubroc.com</a> ;	401-737-8700
	<a href="mailto:maryann@rubroc.com">maryann@rubroc.com</a> ;	
<b>Coventry Fire District (CFD)</b> Arthur M. Read, Esq. Del Sesto & Read, Inc. 100 Jefferson Blvd., Suite 200 Warwick, RI 02888	<a href="mailto:art@delamrlaw.com">art@delamrlaw.com</a> ;	401-439-2020

<p><b>Central Coventry Fire District (CCFD)</b>  David M. D'Agostino, Esq.  Nicholas Gorham, Esq.  Gorham &amp; Gorham, Inc.  P.O. Box 46  25 Danielson Pike,  Scituate, RI 02857</p>	<p><a href="mailto:daviddagostino@gorhamlaw.com">daviddagostino@gorhamlaw.com</a>;</p>	<p>401-647-1400</p>
<p><b>Town of Coventry</b>  Nicholas Gorham, Esq.  Gorham &amp; Gorham, Inc.  P.O. Box 46  25 Danielson Pike,  Scituate, RI 02857</p>	<p><a href="mailto:nickgorham@gorhamlaw.com">nickgorham@gorhamlaw.com</a>;</p>	<p>401-647-1400</p>
<p><b>Original &amp; nine (9) copies file w/:</b>  Luly E. Massaro, Commission Clerk  Public Utilities Commission  89 Jefferson Blvd.  Warwick, RI 02888</p>	<p><a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a>;</p>	<p>401-780-2107</p>
	<p><a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a>;</p>	
	<p><a href="mailto:Sharon.ColbyCamara@puc.ri.gov">Sharon.ColbyCamara@puc.ri.gov</a>;</p>	

[M1]