

*Mary B. Shekarchi*  
Attorney at Law

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

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

September 28, 2016

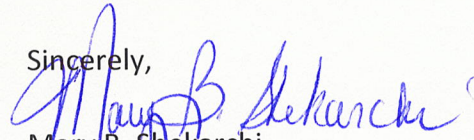
Ms. Luly Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

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 Public Utility Commission's First Set of Data Requests in Docket No. 4611. 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)

**STATE OF HODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

IN RE: KENT COUNTY WATER AUTHORITY  
APPLICATION TO CHANGE RATE SCHEDULES

DOCKET NO. 4611

RESPONSE TO  
COMMISSION'S FIRST SET OF DATA REQUESTS DIRECTED TO  
KENT COUNTY WATER AUTHORITY (KCWA)  
(Issue September 22, 2016)

1-1. Recently, there was an accident on Chestnut Drive in East Greenwich that impacted a fire hydrant. For this incident, please explain:

- a. The identity of those who repaired or replaced the hydrant (in-house or contractors)

Response: All repairs performed by KCWA staff. If paving is required, contractor engaged by KCWA completes paving required.

- b. The costs incurred by KCWA as a result of this incident

Response: See attached spreadsheet.

- c. Ownership of the hydrant

Response: All public hydrants owned by KCWA.

- d. How KCWA will seek reimbursement for the costs associated with this incident (i.e., insurance from the third party)

Response: Insurance billing.

- e. How the proceeds of any insurance payment are accounted for in rates (e.g., misc. expenses)

Response: When an insurance payment is received for hydrant bills generated by KCWA, they are applied to the cash account and decreases the accounts receivable. Other insurance payments received for damage to KCWA property are applied to cash account and the Miscellaneous Non-Operating Income Revenue Account.

1-2. In the past three years, how many incidents like the one in PUC 1-1 has KCWA experienced? What was the total cost over the three years related to damage to fire hydrants caused by a third party? What percentage of costs was recovered from insurance proceeds?

Response: See attached spreadsheet. Total cost billed has been recovered. Hit & run hydrant damage is assumed by KCWA.

Witness Responsible: T. Brown

STATE OF HOPE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: KENT COUNTY WATER AUTHORITY DOCKET NO. 4611  
APPLICATION TO CHANGE RATE SCHEDULES

RESPONSE TO

COMMISSION'S FIRST SET OF DATA REQUESTS DIRECTED TO  
KENT COUNTY WATER AUTHORITY (KCWA)  
(Issue September 22, 2016)

*Public Hydrants Hit from July 1, 2013 through June 30, 2016 - Repaired by KCWA Staff*

Location	Invoice Date	Bill Amount	Paid in Full Date	Paid By
Snow Plowing @ Tollgate High School, Warwick, RI	7/31/2013	\$2,527.40	8/30/2013	Third Party
Hope Furnace Road @ Howard Ave., Scituate, RI	9/30/2013	\$665.80	8/19/2014	Third Party
Hopkins Hill Road, Coventry, RI	11/5/2013	\$3,651.86	12/06/2013	Third Party
810 Wakefield Street, West Warwick, RI	2/03/2014	\$438.24	2/20/2014	Third Party
890 Centerville Road, Warwick, RI	2/03/2014	\$451.89	4/01/2014	Third Party
Old Mishnokok Highway, Coventry, RI	2/26/2014	\$467.80	5/13/2014	Third Party
81 Wakefield Street, West Warwick, RI	2/26/2014	\$371.50	5/30/2014	Third Party
13 Adelaide Avenue, Warwick, RI	7/16/2014	\$404.76	8/13/2014	Third Party
803 Tollgate Road, Warwick, RI	9/2/2014	\$7,842.46	10/21/2014	Progressive Insurance
430 Washington Street, Coventry, RI	4/10/2015	\$5,926.14	5/26/2015	Third Party
1564 Main Street, West Warwick, RI	4/24/2015	\$754.63	5/01/2015	Third Party
Fruit River Road, Coventry, RI	10/20/2015	\$468.47	12/22/2015	Progressive Insurance
Howland Road/Hemlock Drive, East Greenwich, RI	10/21/2015	\$1,855.89	1/21/2016	Geico Insurance
18 Bank Street, West Warwick, RI	10/21/2015	\$559.53	1/05/2016	Metropolitan Property Insurance
Centerville Road/Commonwealth Avenue, Warwick, RI	10/29/2015	\$668.87	12/22/2015	Progressive Insurance
80 Main Street, Hill Street, Scituate, RI	10/29/2015	\$583.30	11/10/2015	Allstate Insurance Company
108 Wood Cove Drive, Coventry, RI	10/29/2015	\$1,714.66	3/14/2016	American Commerce Insurance
1072 Main Street, West Warwick, RI	1/6/2016	\$423.73	1/11/2016	Liberty Mutual Insurance
Crompton Road, East Greenwich, RI	2/4/2016	\$2,844.00	4/19/2016	NGM Insurance
230 Chestnut Drive, East Greenwich, RI (9/04/2016)	9/27/2016	\$15,632.89		Sent to Insurance Company for Payment
Fruit Street @ Wilbur Avenue, Cranston, RI (9/08/2016)	9/27/2016	\$838.16		Sent to Insurance Company for Payment

\$49,091.98

*Public Hydrants Hit From July 1, 2013 thru June 30, 2016 - Repaired by KCWA Staff  
Hit and Run - No Police Report*

Location	Date Repaired	KCWA Cost
369 Love Lane, Warwick, RI	2/20/2014	\$314.50
212 Lippitt Avenue, Cranston, RI	3/20/2014	\$1,915.37
704 Main Street, West Warwick, RI	3/27/2014	\$394.24
1364 Greenwich Avenue, Warwick, RI	3/31/2014	\$332.97
701 Main Street, Coventry, RI	6/25/2014	\$322.35
875 Centerville Road, Warwick, RI	6/9/2015	\$5,193.70
Knotty Oak Shores @ Knotty Oak Road, Coventry, RI	6/24/2015	\$310.87
495 Tiogue Avenue, Coventry, RI	7/13/2015	\$3,038.11
22 Veteran's Memorial Drive, Warwick, RI	7/27/2015	\$339.41
Across from 26 East Main Street, West Warwick, RI	10/1/2015	\$555.99
1647 Main Street @ 6 Pulaski Street, West Warwick, RI	12/08/2015	\$459.57

\$13,377.08

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4611

Respectfully submitted,

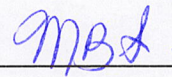


Mary B. Shekarchi (#4767)  
Attorney at Law  
33 College Hill Rd., Suite #15E  
Warwick, RI 02886  
Tel. (401) 828-5030  
Fax (401) 823-1400  
[marybali@aol.com](mailto:marybali@aol.com)

Dated: September 28, 2016

CERTIFICATION OF SERVICE

I hereby certify that on this 28th day of September, 2016, I sent a copy of within to the Parties listed on the attached service list.



**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan  
Service List 8/12/16**

<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: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. 612 Greenwich Avenue Warwick, RI 02886	<a href="mailto:art@delamrlaw.com">art@delamrlaw.com</a> ;	401-340-1019
<b>Central Coventry Fire District (CCFD)</b> David M. D'Agostino, Esq. Nicholas Gorham, Esq. Gorham & Gorham, Inc. P.O. Box 46 25 Danielson Pike, Scituate, RI 02857	<a href="mailto:daviddagostino@gorhamlaw.com">daviddagostino@gorhamlaw.com</a> ;	401-647-1400

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