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August 22, 2016

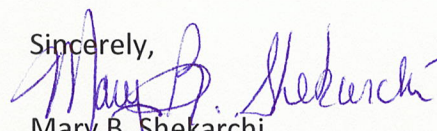
Ms. Luly Massaro, Clerk
RI Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

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 Objection to Coventry Fire District's Motion to Compel More Responsive Answers and its Memorandum in support thereof. 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 RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: KENT COUNTY WATER AUTHORITY

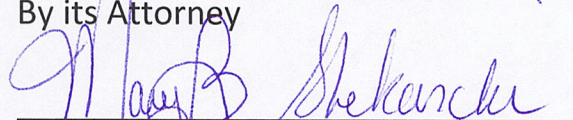
DOCKET No. 4611

KENT COUNTY WATER AUTHORITY'S OBJECTION TO THE COVENTRY FIRE
DISTRICT'S MOTION TO COMPEL MORE RESPONSIVE ANSWERS TO ITS DATA
REQUESTS

Now comes Kent County Water Authority ("KCWA") who hereby objects to the Coventry Fire District's ("CFD") motion to compel KCWA to provide more responsive answers to CFD's data requests and CFD's request to suspend all dues dates for discovery, hearings and the like. Specifically, KCWA objects to CFD's unsupported assertion that KCWA responses were unresponsive and incomplete. KCWA contends that its responses filed on August 9, 2016, were compliant with the Commission's Order in the July 22, 2016 Memorandum. In support hereof, KCWA submits the accompanying Memorandum of Law.

Dated: August 25, 2016

Respectfully submitted,
KENT COUNTY WATER AUTHORITY
By its Attorney



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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: KENT COUNTY WATER AUTHORITY

DOCKET No. 4611

MEMORANDUM IN SUPPORT OF KENT COUNTY WATER AUTHORITY'S OBJECTION
TO THE COVENTRY FIRE DISTRICT'S MOTION TO COMPEL MORE RESPONSIVE
ANSWERS TO COVENTRY FIRE DISTRICT'S ("CFD") REQUESTS.

On July 22, 2016, the Public Utilities Commission issued a Memorandum detailing Commissioner DeSimone's ruling regarding the relevancy of Coventry's Fire District's ("CFD") data requests directed to Kent County Water Authority ("KCWA"). Despite the Commissioner's overruling many of KCWA's objections, the ruling limited some of the information required. On August 9, 2016, KCWA complied with the Commissioner's ruling and provided responses. Without any basis, CFD now alleges that KCWA responses to its Data Requests 1-6 are somehow unresponsive. KCWA strongly objects to this allegation and respectfully requests the Commission dismiss CFD's Motion to Compel.

Specifically, the Commissioner's ruled that:

*CFD-1, CFD-2, CFD-3, CFD-4, CDF-5: The objections are overruled **to the extent** that CFD is seeking any information KCWA has regarding ownership of the public fire hydrants within each municipality or fire district to which public fire protection bills are sent.*

KCWA shall provide any and all records relating to ownership of fire hydrants. (See: PUC Memo dated 7/22/16, emphasis added).

In compliance with Commissioner DeSimone's ruling, KCWA, in its August 9, 2016 response, provided all of its records relating to the ownership of fire hydrants. For CFD to suggest that KCWA's response as ordered is "cleverly unresponsive" has absolutely no merit. Instead, CFD is attempting to utilize this rate case to argue its position in an unrelated collection case that has been tried before the RI Courts who ruled in favor of KCWA.

In addition, the Commissioner ruled that:

*CFD-6: Objection is overruled **to the extent** that KCWA shall provide, in the aggregate, by year for each year since 2000, the total amount of maintenance or replacement costs related to fire hydrants. Such information shall be broken out by municipality or fire district **where possible**. The remainder of the question relating to installation shall be responded to in full and KCWA shall provide all records relating to the installation of hydrants. (See: PUC Memo dated 7/22/16, emphasis added).*

Again, KCWA complied with the Commissioner's 7/22/16 ruling by providing all of its records relating to the maintenance and replacement costs in the aggregate for all fire hydrants since 2000. KCWA did not provide such information broken out by municipality because it does not exist and, thus, is not possible.

KCWA further provided all of its records related to the installation of fire hydrants. KCWA does not have records related to the fire hydrant's costs of construction, maintenance records or life expectancy. Therefore, for CFD to allege that KCWA's response is "deficient" is baseless. Perhaps if CFD carefully reviewed the detailed testimony and attached tables submitted by KCWA's consultant in its rate filing, CFD may find the information it is seeking, such as, what factors are considered in the requested rate increase.

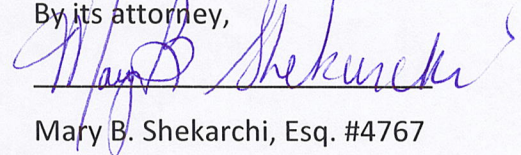
For these reasons, KCWA respectfully objects to CFD's Motion to Compel more responsive answers, its request to suspend any and all existing due dates established, and further moves this Commission to dismiss the Motion and grant any further relief that may be deemed appropriate.

Dated: August 25, 2016

Respectfully submitted,

Kent County Water Authority

By its attorney,



Mary B. Shekarchi, Esq. #4767

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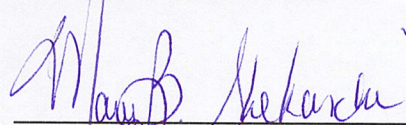
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STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET NO. 4611

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Respectfully submitted,



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CERTIFICATION OF SERVICE

I hereby certify that on this 25th day of August, 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**

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
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	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

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