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November 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 Supplemental Response to the Coventry Fire District's DR-6 as required by Commissioner DeSimone in the Memorandum dated July 22, 2016. An electronic copy has been provided to the service list. Should you have any questions, please contact me. Thank you.

Mauro.

Attorney at Law

MBS/mdc Enclosure

Cc: Docket 4611 Service List (via electronic mail)

CFD- DR 1): List each public fire hydrant for which you seek to charge each Interevenor a rental fee by street and other identifying data in such manner that a layman can locate and identify the fire hydrants.

CFD – DR 2): As to each such public fire hydrant, set forth all facts, documents, grants, easements, licenses, bills of sale or other indicia upon which you rely in asserting by implication, or otherwise, that you own such fire hydrant and attach copies of the same.

CFD – DR 3): As to each such public fire hydrant, identity those which you contend were built, constructed or installed by any person, firm or entity other than you, set forth all facts, documents, deeds, grants easements, licenses, bills of sale or other indicia upon which you rely in asserting by implication or otherwise, that such fire hydrant was sold, conveyed or demised to you by any means whosoever, including any consideration therefore, and attach copies of the same.

CFD – DR 4): As to each public fire hydrant, which you content was built, constructed or installed by any person, firm or entity other than you; identify the name and last known address of such person, firm or entity.

CFD –DR 5): Except as provided in response to a previous data request, as to each such public fire hydrant, which you contend was built, constructed or installed by any person, firm or entity other than you and which was conveyed to you, set forth the consideration for such conveyance.

<u>Supplemental Response</u>:

Kent County Water Authority provided all of its available records relating to ownership of fire hydrants in its earlier responses to data requests.

Witness Responsible: Timothy J. Brown, PE

CFD - DR 6): As To each such public fire hydrant, which you contend you built,

constructed or installed, advise of the date of construction, date the hydrant was

placed in service (if different), set forth all costs of construction, set forth all costs

of maintenance since construction (itemization by year), set forth the hydrant's life

expectancy and attach records of all maintenance performed on said hydrants.

Supplemental Response:

Maintenance and replacement costs cannot be itemized by municipality because

Kent County Water Authority does not have any such records and thus can not be

provided. Further, KCWA has provided all of its records related to the costs of

construction, maintenance of records, and/or life expectancy as they relate to

installation of public hydrants.

Witness Responsible: Timothy J. Brown, PE

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET NO. 4611

Dated: November 28, 2016

Respectfully submitted,

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CERTIFICATION OF SERVICE

I hereby certify that on this 28th day of November, 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 10/27/16

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