



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

**PUBLIC UTILITIES COMMISSION**  
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**Chairperson Margaret E. Curran**  
**Commissioner Herbert F. DeSimone, Jr.**  
**Commissioner Marion S. Gold**

**MEMORANDUM**

To: Docket No. 4611 Service List  
From: Cynthia Wilson-Frias  
Date: July 22, 2016  
Re: Coventry Fire District's (CFD) First Set of Data Requests Directed to Kent County Water Authority (KCWA) – Presiding Commissioner's Ruling on KCWA's Objections

Commissioner DeSimone has determined that the allocation of costs to the public fire protection charge is a relevant issue in the pending proceeding. The nature of the costs so allocated may be dependent upon ownership or cost responsibility for assets related to fire protection. Questions about ownership, replacement, or maintenance of hydrants are not per se irrelevant for purposes of discovery. However, the term "rental fee" does not appear to be used in connection with fire protection charges. Additionally, some of the requests may be overly burdensome as propounded. Therefore, Commissioner DeSimone has determined that while many of the objections are overruled, the ruling limits some of the information required to be provided. Any determination of the relevancy or admissibility of any information received through discovery will be addressed during the evidentiary hearings.

CFD-1, CFD-2, CFD-3, CFD-4, CFD-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.

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.

CFD-7, CFD-8: Objection is overruled to the extent that CFD is seeking for the total number of public fire hydrants, KCWA shall identify how many have been fully amortized.

CFD-10: Objection is overruled to the extent that KCWA shall provide copies of its fire protection tariffs approved for effect since 2000, or in the alternative, where available, links to KCWA's compliance tariffs located on the PUC website.

CFD-14: Objection is sustained on the basis that the public fire hydrant system is not separate from the KCWA water system. However, to the extent that it appears CFD is seeking an

explanation of the costs allocated to the public fire protection service that are included in the current rate request, KCWA shall so respond.

CFD-17: Objection is sustained as irrelevant. The approved tariffs and terms and conditions of service are the documents that govern the customer relationship with the users of the system.

CFD-18: Objection is sustained as irrelevant. Fire protection service is an unmetered service.

CFD-19: Objection overruled.

CFD-20: Objection sustained as irrelevant.

CFD-22, CFD-23: Objection overruled to the extent Coventry Fire District is requesting further explanation of the reason for the increase to fire protection charge from the costs used to set the current rates and the costs used to propose the rate year rates and proposed step increases.

CFD-24: Objection is overruled, but KCWA shall provide the breakdown of costs requested in the aggregate, by year. If the information is available by municipality or fire district, such information shall be provided.

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

DOCKET NO. 4611

COMMISSION'S FIRST SET OF DATA REQUESTS DIRECTED TO  
COVENTRY FIRE DISTRICT

- 1-1. Please provide all documents or records regarding the ownership, replacement, repair or maintenance of fire hydrants in the Coventry Fire District service area.
- 1-2. Please indicate all purposes for which the Coventry Fire District uses the public fire protection system, including hydrants within the Coventry Fire District's service area.
- 1-3. Please indicate how many fires Coventry Fire District has responded to for which it has relied upon the KCWA public fire protection system since 2000. For each, please indicate whether sufficient water supply was available for the fighting of the fire.
- 1-4. What rate of flow is deemed necessary to provide fire suppression service from a fire truck?