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February 26, 2018

Luly E. Massaro, Commission Clerk
RI Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**Re: SUEZ Water Rhode Island 2018 Rate Filing – Docket No. 4800
Town of South Kingstown Petition to Intervene**

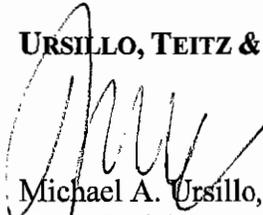
Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of a petition to the Public Utilities Commission on behalf of the Town of South Kingstown intervening as an interested party in the above-referenced matter.

Your cooperation in bringing this matter before the Commission and facilitating communication to the Town regarding the SUEZ Water Rhode Island Rate Filing is greatly appreciated.

Yours sincerely,

URSILLO, TEITZ & RITCH, LTD.


Michael A. Ursillo,
Town Solicitor

MAU/gb
Enclosure

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

**In Re: SUEZ Water Rhode Island, Inc.
Application to Change Rates**

Docket No. 4800

AMENDED

**Motion to Intervene by The Town of South Kingstown, Rhode Island
Rule 1.13**

Now comes the Town of South Kingstown (“South Kingstown”), a Rhode Island Municipal Corporation, pursuant to Rule 1.13 of the Public Utilities Commission Rules of Practice and Procedure and hereby files its request to intervene in the above-captioned matter. In support, South Kingstown states as follows:

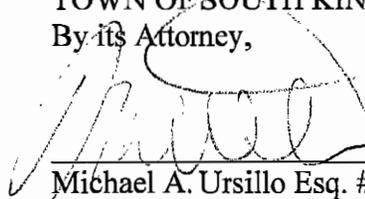
1. Applicant SUEZ Water Rhode Island, Inc. (applicant) is a public utility corporation providing utility service to the residents and taxpayers of South Kingstown as well as ratepayers located elsewhere in the State of Rhode Island.
2. South Kingstown purchases all water used in both the Middlebridge and South Shore Water systems wholesale from applicant.
3. Applicant’s proposed rate increases would have a detrimental effect on South Kingstown as well as the town’s taxpayers. As the purchaser of water from applicant in the area where the proposed rate increases will occur, South Kingstown has “an interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission’s action in the proceeding.” (Rule 1.13(b)(2)) South Kingstown is also concerned with the necessary increase in rates that would need to be charged to its citizens and the potential deficit in the town budget that would

be caused by the proposed rate increases. Accordingly, South Kingstown has “[an]other interest of such a nature that [its] participation” in the proceedings before the Commission are “in the public interest.” (Rule 1.13(b)(3))

4. Therefore, South Kingstown would be directly harmed by the proposed rate increases and the citizens of South Kingstown would be burdened by the increased price of water and the potential deficit that would be created in South Kingstown’s budget.
5. In conclusion, South Kingstown believes that its intervention is both as of right and in the public interest, as protective of the interests of the Town, its taxpayers, and its residents.

Respectfully submitted,

TOWN OF SOUTH KINGSTOWN,
By its Attorney,



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Dated: February 26, 2018

Certificate of Service

I hereby certify that a true and accurate copy of the within was emailed to the following on this 26th day of February 2018.

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