

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

In re: City of Woonsocket Water Division
- Application to Implement Multi-
Year Rate Plan

Docket No. 4879

**CITY OF WOONSOCKET WATER DIVISION'S
("WWD") RESPONSE TO THE DIVISION OF PUBLIC
UTILITIES AND CARRIERS' 3rd SET OF DATA REQUESTS**

3-1:	Please identify the diameter size of the transmission main serving each wholesale customer.
WWD Response 3-1:	North Smithfield is serviced by an 8-inch diameter water main while Cumberland is serviced by a 12-inch diameter water main.
Respondent:	David Bebyn, CPA
Date:	November 21, 2018

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3-2:	Reference Schedule DGB-COS-2 and DGB-COS-5. Please explain why the fire protection cost of service does not include any services costs for private fire protection.
WWD Response 3-2:	Much of this allocation has already been reflected in the allocations as part of the 1 st step in allocating costs on Schedule DGB-COS-1. Much of the service maintenance costs are included in the labor costs. Allocator L from Schedule DGB-COS-1-c allocates a portion of maintenance costs, 25% to services and 25% to fire. I believe that this allocation covers the need for a secondary allocation of the service costs to private fire protection.
Respondent:	David Bebyn, CPA
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3-3:	Reference Schedule DGB-COS-2B and pages 17-29 of Appendix L of the updated IFR plan provided in response to DIV 1-3. Please explain why fire protection is only allocated one percent of transmission TD & TD-IFR costs when 12-inch transmission mains are relied upon to a significant extent to provide fire protection service as described in Appendix L.
WWD Response 3-3:	Historically, the past rate allocation plans, which had been approved in prior dockets, considered any main above 10-inch diameter to be a transmission main. These prior allocations, which have been continued in the current model, considered their primary purpose to cover water transmission instead of the need for fire flow. The discussions in Appendix L, particularly on page 22, in many cases discuss the conditions of the 12-inch main as well as the 8-inch and 6-inch mains they service. WWD, however, would be receptive to the inclusion of some percentage of the 12-inch to be included in the distribution calculation since the WWD is considering upgrading mainly 12-inch mains to correct the fire flow issues as detailed on figure 5 in Appendix L.
Respondent:	David Bebyn, CPA
Date:	November 21, 2018

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3-4:	Reference pages 17-29, of Appendix L of the updated IFR plan provided in response to DIV 1-3. For each construction/replacement project described therein, please identify the main size(s) installed as part of those projects.
WWD Response 3-4:	Privilege St – 12-inch East School St – 12-inch Winter St – 12-inch Smithfield Rd – 12-inch Park Ave – 12-inch Blakeley St – 12-inch Cottage St – 12-inch River St – 16-inch Singleton St – 16-inch Gaskill St – 16-inch Woodlawn Rd – 16-inch Blackstone St – 16-inch Main St – 16-inch Rhodes Ave – 16-inch South Main St – 16-inch 2nd Ave – 8-inch 8th Ave – 8-inch Roberta Ave – 8-inch Mason St – 8-inch Crest Rd – 8-inch
Respondent:	David Bebyn, CPA
Date:	November 21, 2018

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3-5:	Reference Schedule DGB-COS-2C. Please explain why it is reasonable to allocate no Mt. St. Charles pumping facility costs to fire protection.
WWD Response 3-5:	Historically, the past rate allocation plans, which had been approved in prior dockets, considered this pumping facility to have the primary purpose to cover water transmission instead of the need for fire flow. The location of the current plant, a lower elevation than Mt. St. Charles zone, was the driving factor for this position. This position may have understated the fire protection design of this zone. However, once the new facility is completed, the pumping to this high zone of the City will come from pumping raw water to the new facility which will be located almost at the same elevation as the Mt. St. Charles pumping facility. For this reason, no adjustment was made to increase the allocation of the Mt. St. Charles pumping facility costs to fire protection.
Respondent:	David Bebyn, CPA
Date:	November 21, 2018

CITY OF WOONSOCKET, WATER
DIVISION
By its Attorneys,

/s/ Alan M. Shoer

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Dated: November 21, 2018

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2018, I delivered a true copy of the foregoing response to the **Division of Public Utilities and Carriers' THIRD Set of Data Requests** via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer