

KEOUGH + SWEENEY, LTD.

ATTORNEYS AND COUNSELORS AT LAW

41 MENDON AVENUE

PAWTUCKET, RHODE ISLAND 02861

TELEPHONE (401) 724-3600

FACSIMILE (401) 724-9909

www.keoughsweeney.com

RAYNHAM OFFICE:
90 NEW STATE HIGHWAY
RAYNHAM, MA 02109
TEL. (508) 822-2813
FAX (508) 822-2832

JOSEPH A. KEOUGH JR.*
JEROME V. SWEENEY III*

SEAN P. KEOUGH*

JEROME V. SWEENEY II
OF COUNSEL

*ADMITTED TO PRACTICE IN
RHODE ISLAND & MASSACHUSETTS

BOSTON OFFICE:
171 MILK STREET
SUITE 30
BOSTON, MA 02109
TEL. (617) 574-0054
FAX (617) 451-1914

May 28, 2019

Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

*Re: City of Newport, Utilities Department, Water Division
Docket 4933*

Dear Ms. Massaro:

Enclosed please find an original and nine copies of:

1. City of Newport, Utilities Division, Water Department's Response to the United States Navy's Data Request (Set 2, requests 2-1, 2-2 and 2-6).

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK:prc

Enclosure

cc: Docket 4933 Service List (*via electronic mail*)

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET NO. 4933
Response Of The City Of Newport,
Utilities Division, Water Department
To The United States Navy's
Data Requests
Set 2

Navy 2-1: NWD has provided Navy's hourly and daily metered usage for NWD Fiscal Year 2018 in its workpapers. For NWD Fiscal Years 2017, and 2019 to date, please provide Navy's hourly and daily metered water consumption in Excel format with all formulas intact.

Response: See Excel file named "Navy_Hourly_Usage_FY17 and FY19". Note that NWD was unable to download data for the period 7/1/16-12/3/16; therefore the data for FY 17 is only for a partial year.

Prepared by: Harold Smith

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET NO. 4933
Response Of The City Of Newport,
Utilities Division, Water Department
To The United States Navy's
Data Requests
Set 2

Navy 2-2: Please describe and quantify any adjustments made to Navy's metered water consumption included in the response to NAVY 2-1 above.

Response: No adjustments were made to the data provided in response to Navy 2-1. Newport Water provided Raftelis with individual data files for each Navy meter which Raftelis compiled into one Excel file with tabs for each period for which data was requested.

Prepared by: Harold Smith

Navy 2-6: Please quantify the required revenue adjustment to NWD's filed rate case if responsibility for all NWD customer accounts receiving wheeling service from Navy listed in the response to NAVY 2-3 were transferred from NWD to Navy.

Response: If all NWD customer accounts currently receiving service through the wheeling agreement between the Navy and NWD were transferred from NWD to the Navy, the total revenue adjustment required in this rate case would be \$2,456,405. This amount is \$24,384 more than the amount requested in NWD's original rate filing in this docket and \$23,496 more than the adjustment reflected in the supplemental filing submitted on April 10, 2019.

The revised adjustment was determined in the following way:

- The meters for the 26 wheeling accounts were removed from the Non-Residential class to reflect that these meters will no longer be the responsibility of NWD.
- Projected rate year demand for the Navy was increased by an amount equal to the average consumption for the wheeling accounts in FY 16-FY 18 and projected rate year demand for the Non-Residential class was reduced by the same amount.
- Rates were calculated using the previously approved COS model. The two revisions described above resulted in rate year revenue at existing rates being approximately \$75,000 lower than in the supplemental model. Additionally, all rates, with the exception of the PWFD Base Charge increased slightly.

Prepared by: Harold Smith

CERTIFICATION

I hereby certify that on May 28, 2019, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

Parties/Address	E-mail Distribution	Phone
Julia Fogue, Director of Public Works Newport Water Department 70 Halsey St. Newport, RI 02840	jfogue@cityofnewport.com ;	401-845-5601
	lsitrin@CityofNewport.com ;	
	rschultz@CityofNewport.com ;	
	wyost@CityofNewport.com ;	
Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte, NC 28203	Hsmith@raftelis.com ;	704-373-1199
Tiffany Parenteau, Esq. Christy Hetherington, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Chetherington@riag.ri.gov ;	401-222-2424
	TParenteau@riag.ri.gov ;	
	pat.smith@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	al.mancini@dpuc.ri.gov ;	
	Mfolcarelli@riag.ri.gov ;	
Jerome Mierzwa Lafayette Morgan Exeter Associates, Inc. 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044	jmierzwa@exeterassociates.com ;	410-992-7500
	lmorgan@exeterassociates.com ;	

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET NO. 4933
Response Of The City Of Newport,
Utilities Division, Water Department
To The United States Navy's
Data Requests
Set 2

Dept. of Navy (DON) Kelsey A. Harrer, Assistant Counsel Department of the Navy, Office of the General Counsel 6506 Hampton Blvd. Norfolk, VA 23508-1278	Kelsey.a.harrer@navy.mil ;	757-322-4119
Dr. Kay Davoodi, Director Larry Allen, Public Utilities Specialist Utilities Rates and Studies Office NAVFAC HQ, Department of the Navy 1322 Patterson Avenue SE Suite 1000 Washington Navy Yard, D.C. 20374	Khojasteh.davoodi@navy.mil ;	
	Larry.r.allen@navy.mil ;	
Maurice Brubaker Brian Collins Brubaker and Associates, Inc. PO Box 412000 St. Louis, MO 63141-2000	mbrubaker@consultbai.com ;	401-724-3600
	bcollins@consultbai.com ;	
Portsmouth Water & Fire District (PWFD) Adam M. Ramos, Esq. Christine E. Dieter, Esq. Hinckley, Allen & Snyder 100 Westminster St., Suite 1500 Providence, RI 02903	aramos@haslaw.com ;	
	cdieter@hinckleyallen.com ;	
	cwhaley@hinckleyallen.com ;	
	stroke@hinckleyallen.com ;	
Jessica C. Lynch, PWFD	jlynch@portsmouthwater.org ;	
Christopher P.N. Woodcock	Woodcock@w-a.com ;	508-393-3337
David Bebyn	dbebyn@gmail.com ;	
Town of Middletown (Middletown) Peter Regan, Esq. Mark Boivin, Esq. Sayer Regan & Thayer, LLP 130 Bellevue Ave. Newport, RI 02840	Pregan@SRT-law.com ;	401-849-3040 x-233
	mboivin@srt-law.com ;	
	arichardson@srt-law.com ;	
David Russell, P.E. Russell Consulting LLC	Davidrussell015@comcast.net ;	

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET NO. 4933
Response Of The City Of Newport,
Utilities Division, Water Department
To The United States Navy's
Data Requests
Set 2

File an original and nine (9) copies w/: Luly E. Massaro, Commission Clerk John Harrington, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	John.harrington@puc.ri.gov ;	
	Margaret.hogan@puc.ri.gov ;	
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Sharon.ColbyCamara@puc.ri.gov ;	



Joseph A. Keough, Jr., Esquire # 4925
KEOUGH + SWEENEY, LTD.
41 Mendon Avenue
Pawtucket, RI 02861
(401) 724-3600 (phone)
(401) 724-9909 (fax)
jkeoughjr@keoughsweeney.com