



DEPARTMENT OF THE NAVY
OFFICE OF THE GENERAL COUNSEL
COUNSEL FOR THE
NAVAL FACILITIES ENGINEERING COMMAND
ATLANTIC
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VIA FIRST-CLASS MAIL AND ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
State of Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

March 19, 2019

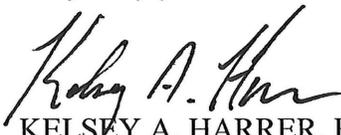
Re: DOCKET NO. 4933, IN RE: CITY OF NEWPORT, UTILITIES DEPARTMENT,
WATER DIVISION, APPLICATION TO CHANGE RATE SCHEDULES

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter, please find an original plus nine (9) copies of the Department of the Navy's Notice of Appearance of Counsel and Motion to Intervene on behalf of the Federal Executive Agencies.

Please call me at (757) 322-4119 if you have any questions or concerns regarding this filing. Thank you for your assistance.

Very truly yours,


KELSEY A. HARRER, ESQ.
Department of the Navy
Filing on Behalf of the
Federal Executive Agencies
(757) 322-4119
kelsey.a.harrer@navy.mil

cc: Service List for Docket No. 4933

Enclosures

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

IN RE: CITY OF NEWPORT, UTILITIES DEPARTMENT, :
WATER DIVISION, APPLICATION TO CHANGE : DOCKET NO. 4933
RATE SCHEDULES :

NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.5 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, please enter my appearance on behalf of the Department of the Navy, filing on behalf of the Federal Executive Agencies.

Dated: March 19, 2019

Respectfully submitted,



KELSEY A. HARRER, ESQ.

Assistant Counsel
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Norfolk, VA 23508
(757) 322-4119
kelsey.a.harrer@navy.mil

CERTIFICATE OF SERVICE
RI PUC Docket No. 4933

I hereby certify on this 19th day of March, 2019, I mailed this original Notice of Appearance of Counsel and nine (9) copies to the Rhode Island Public Utilities Commission, and sent a true copy of the document by electronic mail to the parties on the service list, as of March 19, 2019, for Docket No. 4933.


KELSEY A. HARRER, ESQ.
Department of the Navy

tenant commands and activities. Accordingly, the matters that are the subject of this docket could have a substantial impact on rates paid by the DON for water.

4. There are no other means available whereby the DON's interests may be protected. It is necessary and appropriate to grant the DON's motion to intervene because the DON has a direct and significant interest in this proceeding that is not represented by the existing parties and it is likely that the DON's positions will be different from those endorsed by any other party.

5. The DON has participated in several rate cases in the past that involved Newport Water.

6. Rule 1.14(E) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted. Pursuant to Rule 1.16(B), counsel for the DON contacted Newport Water and the Division of Public Utilities and Carriers to determine whether either party would object to the proposed intervention. Both parties have indicated that they have no objection to the DON's intervention.

WHEREFORE, based on the reasons stated herein, the DON respectfully requests that the Rhode Island Public Utilities Commission grant this motion and allow the DON to intervene in this matter.

It is respectfully requested that all pleadings and other documents issued in this proceeding be served on counsel for the DON and the two other individuals listed below, and that the Rhode Island Public Utilities Commission's official service list be modified to reflect the same.

Kelsey A. Harrer, Esq.
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Dr. Kay Davoodi
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Dated: March 19, 2019

Respectfully submitted,
THE DEPARTMENT OF THE NAVY

By Counsel,



Kelsey A. Harrer, Esq.
Department of the Navy
Filing on Behalf of the
Federal Executive Agencies

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Norfolk, VA 23508-1278
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CERTIFICATE OF SERVICE
RI PUC Docket No. 4933

I hereby certify on this 19th day of March, 2019, I mailed this original Motion to Intervene and nine (9) copies to the Rhode Island Public Utilities Commission, and sent a true copy of the document by electronic mail to the parties on the service list, as of March 19, 2019, for Docket No. 4933.



KELSEY A. HARRER, ESQ.
Department of the Navy