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April 30, 2021

VIA E-MAIL AND FIRST CLASS MAIL

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

Re: *In Re: Providence Water Supply Board*, PUC Docket No. 4994

Dear Ms. Massaro:

On behalf of the Greenville Water District and the Lincoln Water Commission, enclosed please find an original plus nine copies of the following documents, which are to be filed in the above-entitled docket:

- Entry of Appearance by Adam M. Ramos
- Greenville Water District's and Lincoln Water Commission's Motion to Intervene

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Adam M. Ramos".

Adam M. Ramos

AMR:cw
Enclosures

cc: Docket No. 4994 Service List

60945546 (14569.185676)

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE WATER SUPPLY BOARD : Docket No. 4994
: :
:

ENTRY OF APPEARANCE

Adam M. Ramos hereby enters his appearance on behalf of the Greenville Water District
and the Lincoln Water Commission in the above-captioned matter.



Adam M. Ramos, Esq. (#7591)
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Dated: April 30, 2021

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that an original and nine (9) copies of the within document was mailed to the Commission Clerk for filing, and a true copy of the within document was served via electronic mail upon all parties set forth in the Service List on the 30th day of April, 2021.



Adam M. Ramos

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VIA ELECTRONIC MAIL:

Docket No. 4994 – Providence Water Supply Board – General Rate Filing

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STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE WATER SUPPLY BOARD :
: Docket No. 4994
:

**THE GREENVILLE WATER DISTRICT’S AND LINCOLN WATER COMMISSION’S
MOTION TO INTERVENE**

NOW COMES the Greenville Water District (“GWD”) and the Lincoln Water Commission (“LWC”), by and through their undersigned counsel, and hereby moves this Honorable Commission to allow the GWD and LWC to intervene in the above-captioned proceeding, pursuant to Rule 1.14 of the Rhode Island Public Utilities Commission’s (“PUC”) Rules of Practice and Procedure (“Rules”). In support of its Motion, the GWD and LWC state the following:

1. The GWD is a public water authority created by the state’s Legislature through enabling legislation.
2. The LWC is a subdivision of the Town of Lincoln that was voted on and approved on November 4, 2014.
3. Rule 1.14(A) of the Rhode Island Public Utilities Commission (“PUC”) Rules states that “[p]articipation in a proceeding as an intervenor may be initiated by order of the Commission upon a motion to intervene.”
4. On December 2, 2019, the Providence Water Supply Board (“PWSB”), filed an Application to Implement a Multi-Year Increased Rate Plan Pursuant to R.I.G.L. § 39-15.1-4.
5. GWD and LWC are wholesale customers of PWSB, but they did not seek to intervene in the proceeding to approve that multi-year rate plan.

6. As part of the order in that proceeding, the PUC directed PWSB to conduct a new Cost of Service Study (“COSS”) and file it with the PUC for potential use in allocating costs when setting future rates as part of the approved rate plan.

7. The GWD and LWC did not participate in the COSS and were unaware of the methodologies used in performing that study or its potential impacts until after the COSS was complete.

8. GWD and LWC have performed a preliminary review of the COSS and believes there are substantial questions about the appropriateness of the methodologies used to reach its conclusions. In particular, GWD and LWC are unaware of the particular methodologies employed in the COSS ever having been used in the past and believes that they are inappropriate and do not accurately capture a fair allocation of the costs to serve PWSB’s customers for purposes of setting fair and reasonable rates.

7. On April, 2021, Applicant submitted the COSS and supporting hydraulic model, which, if implemented, will create a substantial rate increase for both GWD and LWC.

8. The PUC has instituted this proceeding to review the COSS separately from the second step of the previously approved multiyear rate plan.

9. The GWD and LWC and their customers purchase all of their water from the PWSB at wholesale for resale to their respective customers. PWSB is the sole source of water for GWD and LWC.

10. The GWD and LWC will be directly affected by any outcome of this proceeding because it will impact the rates the GWD and LWC pay for the water they purchase from PWSB.

11. The GWD and LWC, therefore, possess an interest that will be directly affected by the PUC’s actions in this proceeding.

12. The interests of GWD and LWC are not adequately represented by existing parties, as GWD and LWC are separate and distinct wholesale customers of PWSB, and the COSS affects each wholesale customer uniquely.¹

13. GWD's and LWC's intervention in this proceeding is also in the public interest of their customers, as the outcome of this proceeding will affect the rates that all of the GWD and LWC customers will pay for water.

14. Additionally, counsel for the GWD and LWC state that the Providence Water Supply Board and the Bristol County Water Authority do not object to the subject motion.

WHEREFORE, based on the above statements, GWD and LWC respectfully request that the PUC grant this Motion to Intervene.

Respectfully submitted,

GREENVILLE WATER DISTRICT and
LINCOLN WATER COMMISSION

By and through their counsel:




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Dated: April 30, 2021

¹ GWD and LWC have consented to joint representation in this matter.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that an original and nine (9) copies of the within document was mailed to the Commission Clerk for filing, and a true copy of the within document was served via electronic mail upon all parties set forth in the Service List on the 30th day of April, 2021.



Adam M. Ramos

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Docket No. 4994 – Providence Water Supply Board – General Rate Filing

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