Mary B. Shekarchi Attorney at Law

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July 22, 2020

Ms. Luly Massaro, Clerk RI Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888

RE: Kent County Water Authority – Docket No. 5012

Dear Ms. Massaro:

Please find enclosed herewith Kent County Water Responses to the Commission's Third Set of Data Requests in the above-referenced Docket. Thank you.

Sincerely,

Attorney at Law

MBS/mdc Enclosure

Cc: Service List via electronic mail

In Docket #5012

IN RE: KENT COUNTY WATER AUTHORITY ABBREVIATED RATE FILING

: DOCKET NO. 5012

PUBLIC UTILITIES COMMISSION'S THIRD SET OF DATA REQUESTS DIRECTED TO KENT COUNTY WATER AUTHORITY (KCWA) (Issued July 20, 2020)

(Please respond no later than July 24, 2020, sooner if possible)

3-1. Why weren't the credit card/debit card and ACH fees included in the settlement agreement revenue requirement?

RESPONSE:

These fees were relatively a minor amount running around \$3,600 per month. KCWA had discussed this issue with the Division and it was agreed to be addressed in KCWA next general rate filing which is anticipated within the next three years due to additional capital requirements which will need to be addressed in that filing.

IN RE: KENT COUNTY WATER AUTHORITY

ABBREVIATED RATE FILING : DOCKET NO. 5012

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3-2. Please provide an itemized estimate of the annual fees to be absorbed by KCWA for credit card/debit card and ACH fees, providing all calculations and assumptions.

RESPONSE:

Please see attached

KENT COUNTY WATER AUTHORITY CREDIT CARD FEE ANALYSIS 1/1/20-4/30/20

	TRANSACTIONS	TO	TAL PROCESSED	TOTAL REMITTE	D TO KCWA	TOTAL RE	TAINED RI
KCWA OTC	219	\$	29,367.90	\$	28,647.55	\$	720.35
	219 x \$1.00	\$	219.00				
	TOTAL REMITTED X .0175%	\$	501.33				
		\$ \$	720.33				
	TOTAL RETAINED RI	\$	720.35				
	DIFFERENCE	\$	(0.02)	Rounding Factor			
	TRANSACTIONS	<u>TO</u>	TAL PROCESSED	TOTAL REMITTE	D TO KCWA	TOTAL RE	TAINED RI
KCWA E-CHECK	5332	\$	746,739.49	\$	744,108.99	\$	2,630.50
	5332 x \$.50	\$	2,666.00				
	TOTAL RETAINED RI	\$	2,630.50				
	DIFFERENCE	\$	35.50	Returned Checks/	Chargebacks		
	TRANSACTIONS		TAL PROCESSED	TOTAL REMITTE			TAINED RI
KCWA PMT CC	3364	\$	446,197.42	\$	435,217.97	\$	10,979.45
	3364 x \$1.00	\$	3,364.00				
	TOTAL REMITTED X .0175%	\$	7,616.31				
		\$	10,980.31	•			
	TOTAL RETAINED RI	\$ \$ \$	10,979.45				
	DIFFERENCE	\$	0.86	Rounding Factor			
TOTAL CREDIT CAR	D FEES					\$	14,330.30
						-	, x3
							42,990.90

\$42,990.90/12 months = \$3,582.58 per month

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- 3-3. Paragraph 19 of the Settlement, referencing the use of meter funds collected between January 1, 2020 and the start of the rate year, states: KCWA will report the actual amount collected and disbursed from these funds within 90 days of their payment in full.
 - a. If there are excess funds, what will they be used for?
 - b. If there are insufficient funds, from where will KCWA make up the difference?
 - c. Please provide KCWA's rate case expense to date (please include the estimated expense of a 4-hour hearing).

RESPONSE:

- a) The excess funds will be used to help payoff the 2017 Series A Bond with the understanding that the 2017 Series A Bond and the 2012 Series A Bond will be paid in full by June 2021. The payoff these bonds will also require the balances of three reserve accounts associated with these Bond Series, specifically the Renewal & Replacement Reserve 2012, the Operation & Maintenance Reserve, and the Debt Service Reserve accounts so no additional excess funds are anticipated. If there does end up any excess amount afterwards these would be transferred to the IFR account.
- b) If there are insufficient funds for the payoff of the 2017 Series A Bond and the 2012 Series A Bond after utilizing the meter funds collected between January 1, 2020 and the start of the rate year along with the balances of three reserve accounts associated with these Bond Series, the IFR and CIP accounts will be used to make up any difference. The difference will be split 60/40 percent with 60 percent from IFR restricted account for the 2017 Series and 40 percent from CIP restricted account for the 2012 Series. The estimated difference is attached.

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c) KCWA's rate case expense does not only include this filing but their costs associated for their intervention in Providence Water cases. These amounts are broken down and presented below.

\$ 10,025
\$ 7,523
\$ 28,569
\$ 33,013

KENT COUNTY WATER AUTHORITY 2012/2017 SERIES A BOND PAYOFF ANALYSIS 1/15/2021 PAYOFF DATE

Funds Available 6/30/20

R & R Reserve (112603)	\$	1,525,505
O & M Reserve (112606)	\$	2,776,597
2012 Debt Service Reserve (853023)	\$	2,381,647
7/15/20 bond payment (2012)		(2,030,000)
7/15/20 interest payment (2017)	\$	(71,530)
2012 Debt Svc Fund (853024)	\$	2,073,631
2012 Debt Service Fund (Jul20-Jan21)	\$	1,273,563
2017 Debt Service Fund (941365)	\$	966,584
2017 Debt Service Fund (Jul20-Jan21)	\$	1,078,035
Meter Replacement Funds Transfer (Jan20-Aug20)	\$	1,533,333
Total Funds Available	\$	11,507,365
Total Payoff Amount	\$	11,744,780
Amount To be Funded by KCWA	\$	237,415

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3-4. KCWA's response to Comm 2-5 states, in part, "The primary reduction to fire rates in the originally filed testimony were the additional accounts included from the addition of combined fire and domestic metered services identified as part of the Commission required (Docket#4611) investigation of fire services being provided by large and medium compound meters. Since fire was be subsidized there was an opportunity to reduce this subsidy as part of the settlement."

a. What does this mean?

RESPONSE:

What this means is that I believe that part of the reason fire services in the past received a subsidy was the overall allocation, which appeared reasonable allocated between costs centers, was causing rate shock to fire service accounts due to the number of accounts available to cover this cost. This issue of number of fire accounts warranted the Commission to require an investigation of fire services being provided by large and medium compound meters. KCWA addressed this investigation and included the additional fire accounts in the filing. Initially in my pre-filed testimony the subsidy was maintained in order to maintain few changes to the Cost of Service model from the previous docket. Later the reduction of the subsidy was addressed during settlement negotiations since the need for the subsidy was mitigated by the additional fire service accounts.

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- 3-5. Paragraph 5 of the Settlement states: The impact of this request on a typical residential customer who uses 2000 CF per year would have been a decrease of \$16 per year or 8.6%.
 - a. Should this be "per quarter" instead of "per year"?

RESPONSE:

No. The decrease is correctly stated at per year. The source of this figure comes from Mr. Bebyn's schedule DGB-COS-8 from his direct testimony. This schedule is calculated on an annual basis with four quarters of customer service charges.

Dated: July 22, 2020

Respectfully submitted, Kent County Water Authority By its Attorney,

Mary B. Shekarchi (#4767)

Attorney at Law

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Warwick, RI 02886 Tel. (401) 828-5030 Fax (401) 823-1400 marybali@aol.com

CERTIFICATION OF SERVICE

I hereby certify on this 22nd day of July, 2020, I sent a copy of the within to the Parties listed on the attached service list.

Docket No. 5012 - Kent County Water Authority – Abbreviated Rate Filing Service List 2/11/2020

Name/Address	E-mail Address	Phone
Kent County Water Authority (KCWA) Mary B. Shekarchi, Esq. 33 College hill Rd., Suite 15-E Warwick, RI 02886	marybali@aol.com;	401-828-5030
David L. Simmons, P.E. Executive Director/Chief Engineer Kent County Water Authority 1072 Main St. West Warwick, RI 02893-0192	dsimmons@kentcountywater.org;	401-821-9300
David Bebyn, CPA B&E Consulting, LLC 21 Dryden Lane Providence, RI 02904	dbebyn@gmail.com;	
Division of Public Utilities & Carriers (Division) Tiffanny Parenteau, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Tparenteau@riag.ri.gov; Chetherington@riag.ri.gov; John.bell@dpuc.ri.gov; Al.mancini@dpuc.ri.gov; Pat.smith@dpuc.ri.gov; Hakeem.ottun@dpuc.ri.gov; Robert.Bailey@dpuc.ri.gov; Mfolcarelli@riag.ri.gov; Dmacrae@riag.ri.gov;	401-274-4400 Ext. 2218
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