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February 12, 2020

Ms. Luly Massaro, Clerk
RI Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

RE: Kent County Water Authority – Docket No. 5012

Dear Ms. Massaro:

Please find enclosed herewith an original and nine (9) copies of the Kent County Water Authority's Petition for Waiver. An electronic copy has been provided to the service list. Should you have any questions, please contact me. Thank you.

Sincerely,

Mary B. Shekarchi
Attorney at Law

MBS/mdc
Enclosure

Cc: Docket 5012 Service List (via electronic mail)

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: KENT COUNTY WATER AUTHORITY
Docket No. 5012

KENT COUNTY WATER AUTHORITY'S PETITION FOR
WAIVER FROM THE ABBREVIATED FILING REQUIREMENTS

Pursuant to the RI Public Utilities Commission Rules of Practice and Procedure Rule 1.11 ("Rules"), the Kent County Water Authority ("KCWA") hereby requests, the Rhode Island Public Utilities Commission ("Commission") waive certain restrictions on abbreviated filings under Rule 5.10 (D) of its Rules.

In the instant Docket # 5012, KCWA submitted an abbreviated filing requesting an overall rate reduction to small and bypass meters; the expansion to the current meter replacement and testing program for all meters sizes and types; creation of a new one rate for single registers and compound registers for large and medium meter customers; creation of a new restricted meter account for the future replacement of all sized meters and meter types; and the establishment of a wholesale rate for the Quonset Development Corporation ("QDC").

Specifically, under Rule 5.10 (D) (3) an abbreviate filing is not available to a utility "if the utility proposes a significant change in revenue recovery among rate classes." Although KCWA's proposed establishment of a single rate for single register and compound register large and medium customers and its proposed creation of a wholesale rate for QDC fits within the strict structure of Rule 5.10 (D) (3), waiving this restriction is in the best interest of the rate payers. Allowing consideration of the proposed new rate classes in the subject abbreviated filing will be more efficient and less expensive than filing an additional full rate case. All savings will ultimately be passed to all rate payers.

The proposed single rate class for medium and large compound meters is designed to allow for a blended rate that will satisfy KCWA's new technology for meter registration and for

its updated billing system which is currently in process. The effect on 97% of the customers in this class will not have a rate increase; instead the compounded rates they are currently paying will simply be blending the current rates into one rate. This will eliminate the need for 2 meter readings with 2 different rates and will allow for a faster more efficient billing process.

The effect on the remaining 3% or approximately 19 customers will accurately reflect the rate for the size of their meters. A more proficient billing system that meets KCWA's new technology will benefit all ratepayers.

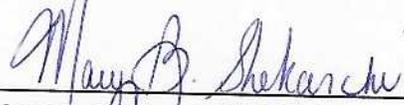
Considering the new proposed wholesale rate for QDC in the abbreviated filing will again save rate payers the expense of filing a general rate case and, if approved, then KCWA sales will increase which ultimately benefits all ratepayers.

For the reasons set forth above, respectfully requests that the Commission grant within petition for a waiver and any other relief it deems fair and just.

Dated: February 12, 2020

KENT COUNTY WATER AUTHORITY

By its attorney,



Mary B. Shekarchi (#4767)

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CERTIFICATION OF SERVICE

I hereby certify that on this 12th day of February, 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 2/6/2020**

Name/Address	E-mail Address	Phone
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