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PUBLIC UTILITIES COMMISSION
September 21, 2007

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Via Hand Delivery and Electronic Mail

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

Re: Docket No. D-07-35: Comments of Woonsocket Water Division

Dear Luly:

On behalf of the City of Woonsocket's Water Division ("WWD"), I am enclosing an original and nine copies of WWD's comments regarding the Division's proposed Rules and Regulations Prescribing Standards for Water Utilities.

Please do not hesitate to contact me if you have any questions or comments.

Respectfully submitted,



Alan M. Shoer #3248

Attorney for Woonsocket Water Division

AMS/bck

Enclosure

cc: Service List (via electronic mail) (with enclosures)

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DIVISION OF PUBLIC UTILITIES AND CARRIERS**

In Re: Rules and Regulations Prescribing Standards for Water Utilities)))	Docket No. D-07-35
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COMMENTS OF WOONSOCKET WATER DIVISION

On behalf of the City of Woonsocket Water Division (“WWD”), and in accordance with the Division’s Public Notice, dated August 24, 2007, WWD provides the following initial comments to the Division’s proposed “Rules and Regulations Prescribing Standards for Water Utilities.”

Application of Rules and Regulations (Section I)

Penalty for Violation. The proposed rules seek to amend the existing rules by adding a new penalty section (section (I)(D) Penalty for Violation). WWD believes that the Division already has penalty authority, pursuant to R.I.G.L. 39-2-8 and does not understand what the purpose of expanding on the penalty language in the statute in these proposed rules.

Service Provisions (Section III)

Liability for Past Use – Liens. Proposed Section (III)(E) relates to “Liability for Water Charges Including Past Due Charges.” Proposed Section III(E)(2) states that “If authorized by statute for a water utility, the rates assessed against a customer for the water delivered to the customer for consumption may constitute a lien on the property to which the property was delivered . . .” WWD agrees that this is required language in any proposed rules, however WWD recommends that the Division include a specific reference to the existing statute that provides for the authority to impose a lien for such past due charges, R.I. Gen. Laws 39-15-12.

Bills based on Estimated Reads. Proposed Section III(F)(2) would require that bills based on “estimated reads shall not exceed six (6) consecutive months on any residential, commercial or industrial account.” WWD believes that six (6) months is an unrealistically short period. WWD is billing customers on a quarterly basis and not all meters will always be operational. In situations where meters are not functioning properly, it may take WWD more than six (6) months to discover this fact, and more time will be required to visit the premises and inspect the meter and make necessary corrections. All this will take more than six (6) months. WWD suggests that a period of twelve (12) months is a more reasonable time-frame for this proposed rule change.

Bills – Information Required. Proposed Section (III)(F)(4) would require that bills to customers contain (1) the date of the current meter reading; (2) the meter reading (the amount or quantity of service for the billing period; **(3) the type of meter reading (i.e. actual or estimated)**; (4) the billing period; (5) a list of itemized charges; and **(6) consumption history (the amount or quantity of service in the past four billing periods).**

WWD objects to the requirement to include items (3) (the type of meter reading) and (6) consumption history (the amount or quantity of service in the past four billing periods), not because WWD thinks this information is not valuable information for customers, but because the programming support for WWD’s current billing program --MUNIS-COBAL -- is not compatible with implementing these type of changes to current systems to WWD’s billing system. In order to provide this type of information, WWD would require a new billing system, which is not funded in current rates.

Quality of Water Service (Section IV)

Pressure Variation – The proposed rules have deleted two sections from the existing rules, and WWD does not understand the reason for these deletions. The first deletion is the provision in existing rules (section IV(12)(b)(2)) that allows for “infrequent fluctuations not exceeding five (5) minutes duration.”

The second deletion is the provision in existing rules (section IV(12)(c)) that allows for pressure variation in systems (like WWD’s) of widely varying elevations, but only if the customer is fully advised of the conditions under which average service may be expected. WWD believes that these sections should also remain in the proposed rules.

Meter Installation, Accuracy and Testing (Section V)

Retention Period for Changed/Removed Meters. Proposed Section (V)(d)(4) would require that “all meters that are changed out, or removed from service for any reason, shall be retained for inspection by the Division for a minimum of six (6) months. WWD opposes this minimum six (6) month hold. If the meter is defective, and is under warranty, WWD will need to return the meter promptly in order to secure a replacement under the warranty. Allowing the Division to hold the meter for at least six (s) months may prevent WWD from obtaining a new meter under warranty. The rules should require the Division to return such meters to the utility promptly so that they can be replaced.

AMR Meters – time period for unbilled amounts – Proposed Section on (V)(E)(2)(c)(2) states that if a meter is equipped with an AMR is found not registering, the water utility may make a charge to the customer for the unbilled amount for only the previous six (6) months. For reasons similar to WWD’s objection above, WWD may not discover the problem, and secure

access to fix the problem, on the AMR meter within six months. WWD suggests that it be allowed to bill the customer for an unbilled amount for the previous twelve (12) months.

General (Section VIII)

Reporting – Accidents. The proposed section on reporting for accidents (VIII)(C) would require a report filed with the Division for “any property damage,” however slight, occurs. The existing rules provide for reporting for “any serious property damage” which WWD believes is an appropriate standard. WWD does not understand why the Division wants to remove the qualifier “serious” from this reporting requirement.