



**State of Rhode Island and Providence Plantations  
Water Resources Board**

Justice William E. Powers Building, Third Floor  
One Capitol Hill  
Providence, RI 02908  
(401) 574-8400 • FAX: (401) 574-8401

September 25, 2007

Mr. Thomas Ahern, Administrator  
Division of Public Utilities  
89 Jefferson Blvd.  
Warwick, RI 02888

Dear Mr. Ahern:

The Rhode Island Water Resources Board (WRB) has reviewed the Division of Public Utilities and Carriers (DPUC) plan to adopt new rules and regulations prescribing standards for water utilities and repeal the related existing rules and regulations, "Rules and Regulations Prescribing Standards for Water Utilities," (effective March 1, 1966). We are submitting the following comments and recommendations:

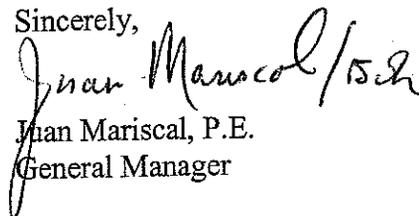
- Page 4, Section III. B. 2 - Information to Customers  
Recommend the word "on request" be removed. We believe that all customers should be informed on what they are paying for. The method of reading meters and calculating the bill should be a standard business practice.
- Page 6, Section III. F. 2 - Meter Readings and Bill Forms  
We strongly recommend quarterly billing of all customer accounts so customers can understand the amounts of water being used during the summer season. We also support the minimum of two actual reads annually given most suppliers have not yet installed radio read meters.
- Page 7, Section III. H. Termination of Service  
We support the "termination of service" rule if the meter is not made accessible after proper notice to the customer.
- Page 10, Section IV Quality of Water Service. A. Water Pressure Requirements  
We support the minimum 20 psi for normal operating pressure rule although we understand variations do occur for a variety of operational reasons, including fire fighting.
- Page 23, Section VII. Records and Reports. Measuring Devices:  
The wording in this section is unclear. There is a difference between water withdrawn from a source and water produced. Sometimes this is a major difference. For example, Woonsocket has a meter installed at the source for water withdrawals, and upon entering the plant to measure water produced. Large water loss can occur from the withdrawal point to the plant production point if the meter is not properly calibrated. The wording should be changed to include a measuring device for water withdrawn at each source and a measuring device for water produced at each source.

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- Page 23. Section VII Records and Reports. The WRB also requires annual reporting from the 28 major water suppliers providing 50 million gallons or more water annually. We strongly recommend coordination between the DPUC and WRB to minimize duplicative reporting and that water supply measurement records be submitted annually. The Water Allocation Program Advisory Committee recommended monthly reporting based on a calendar year be used, and the WRB is heading towards that goal.
- The WRB requests the DPUC provide notice to the WRB for all water utility actions coming before the DPUC, and that the DPUC will accept comment on these actions and filings.
- The WRB requests the DPUC amend the rules to include increased coordination with the WRB on “conservation” measure requirements and rules. Increasingly, Rhode Island citizens will be asked to support water use efficiency, water reuse, and water conservation efforts.
- Finally, the WRB asks the DPUC to increase emphasis on water conservation and demand reduction related to rates/rate relief. We have been working with several water utilities on water conservation efforts, and it is essential that if water utilities are asked to reduce the amount of water they are selling (reduced demand) they must be granted rate relief as part of the equation.

Thank you for your time and consideration of these comments which have been submitted on behalf of the Rhode Island Water Resources Board. If you have any questions, please contact Beverly O’Keefe, Supervising Planner, 574-8405.

Sincerely,

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Juan Mariscal, P.E.  
General Manager