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June 14, 2023

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

**Re: *Docket No. 22-47-WW- The Narragansett Bay Commission
General Rate Filing***

Dear Ms. Massaro:

Enclosed please find an original and nine copies of the following:

1. The Narragansett Bay Commission's Response to the Rhode Island Public Utilities Commission's Data Request 4-1 and 4-9.

Please note that an electronic copy of this document has been provided to the service list.
Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

cc: Docket 22-47-WW Service List (*via electronic mail*)

Comm. 4-1: For each new FTE position listed in the attachment to PUC 2-3, please explain why the job functions could not be performed by existing FTEs.

Response: FY 2020

Billing Analyst – Migration to new billing software required additional resources with a higher-level skillset for the loading and editing of meter readings, performance of bill calculation operations, and the issuance of customer invoices.

Billing Analyst – Cash – Migration to new billing software and expansion of bill payment options required additional resources with a higher-level skillset to ensure timely and accurate processing of customer payments.

Control Systems Associate – NBC has installed more sophisticated equipment to comply with monitoring and stringent discharge requirements. This required a higher-level skillset to troubleshoot, maintain, and update the sophisticated equipment.

Facilities Engineer – Completion of new facilities and the maintenance of aging infrastructure.

Microbiology Lab Supervisor – Training, scheduling, testing, data validation, and troubleshooting of all laboratory work including Analytical Chemistry, Wet Chemistry, and Biological testing. These tasks could not be performed by existing FTEs due to staffing constraints imposed by the laboratory operating 7 days a week, on holidays, and during inclement weather to meet permit requirements. The Microbiology Laboratory Supervisor helps to keep equipment and testing online to prevent interruption of NBC workflows.

Senior Financial Analyst – Additional resources required to support financial activities due to growth and complexity of operations and the financing of the capital improvement program.

Technical Advisor for Operations - This position supports both WWTFs to provide in-depth monitoring of plant performance to ensure its ability to maintain stringent regulatory requirements and forecast upcoming needs.

FY 2021

Administrative Assistant – This position was created as a result of the reorganization of duties and responsibilities of the existing FTE. This position supports NBC's executive personnel to include point of contact for Executive Director and Deputy Director, routine and confidential administrative functions, manage purchases for the department and other functions as needed.

Asset Management Specialist – The reorganization of NBC's Permitting department included an Asset Management Specialist to support the permitting program. This position has a skillset specific to reviewing plans, permit applications and supplying pertinent information necessary to support the permitting process.

Biologist – The Biologist position is required to perform laboratory preparation tasks including test tube sterilizing, media preparation, general biological work as it pertains to permit regulations. These tasks could not be performed by existing FTEs due to staffing constraints imposed by the laboratory operating 7 days a week, on holidays, and during inclement weather to meet permit requirements. The Biologist processes over 15,000 sample test tubes a year and must be dedicated to very specific biological tasks to keep up with the work demand.

Interceptor Maintenance Clerk – Efforts to merge these duties with other positions were unsuccessful. This position focuses on supporting IM Management with the operating and capital budgets, paperwork, customer support and other administrative duties.

Facilities System Administrator - This position is specific to managing the plant SCADA side of NBC's infrastructure assuring safe, secure, and efficient SCADA system operations.

Principal Budget Analyst – This was the reallocation of a Senior Financial Analyst position.

Principal Facilities Engineer (listed as Principal Environmental Engineer in COM 2-3) - Due to aging infrastructure and resiliency concerns, 15 planning and design projects were developed, which resulted in the need for a Principal Facilities Engineer to manage the projects.

Resident Representative - Due to the number of construction contracts an additional inspector was necessary to cover the workload.

Retirement Benefits Specialist – This position was required to consolidate the duties and responsibilities of plan administration of NBC's three retirement plans due to reorganization, staff retirements, and succession planning.

Treasury and Debt Analyst – This position was created to consolidate the cash management and investment activities as well as assist with the \$1 billion financing required to support NBC's capital improvement program.

Assistant Purchasing Coordinator – Additional resources required to support the management of NBC's insurance portfolio as well as the administration of the P-card program. The P-card program has increased in volume since its inception in 2018 and is now the primary method of purchase. The insurance portfolio includes twenty-six policies. Additional resources also required to provide technical and administrative support to the Purchasing Coordinator and assist with the preparation of technical specifications to acquire products and services in conformance with NBC's Purchasing Rules and Regulations and State Law.

Facilities Management Administrator - This position is required to manage all incoming requests from NBC's new online facilities help desk. The Facilities Management Administrator is responsible for creating tickets, scheduling repairs, cleaning, moving furniture, communicating with NBC personnel and outside vendors, etc. to support the maintenance of all NBC facilities

Assistant Customer Service Manager - Migration to the new billing software required a higher-level skillset for all aspects of customer care including billing, research, payments, and collections. This position was needed to assist with managing testing and other technical aspects of developing business processes in the billing software and assist with training. The position was required to provide support for the Customer Service Manager as well as manage the department in the absence of the Manager and support the customer care and payments functions when needed.

FY 2022

Assistant Construction Manager - This position was resurrected due to workload for the CSO program and succession planning.

Planning Manager - This is a previous position that was resurrected. Efforts to incorporate this workload into other positions were unsuccessful due to the workload requirements.

Senior Inspector – This position is required to provide additional support with internal and external projects on NBC's collection system.

FY 2023

Assistant Administrative Coordinator - This position is needed to coordinate all NBC Board of Commissioner activities/actions and provide direct support assistance to NBC's Chairman of the Board, Executive Director, Deputy Director, and Board of Commissioners.

Customer Service Representative – This position was required to assist with daily workflow volume and provide coverage. This includes enhanced collection activity through incoming and outgoing customer contact activity, establishment of payment arrangements, collection exemption inquiries and questions from customers regarding payment options. Customer needs have become more involved, increasing the customer interaction time. Additional staff is required to provide the proper level of service.

Deputy Director - Existing employee promoted from Director of Administration to Deputy Director.

Environmental Engineer - Due to aging infrastructure and resiliency concerns, 15 planning and design projects were developed, which resulted in the need for an additional Environmental Engineer.

HR Training Coordinator – This position was needed to assist the HR Training Facilitator with managing NBC's training programs which have increased significantly over the past four years to expand employee development capabilities. During this time, NBC's Learning and Development function has increased to include a Leadership Development Program, implementation of a Learning Management System with 4,500 training modules, online training courses that include HR, Safety and Cybersecurity compliance. Increased demand for training justified the need for a full-time support person. The Training Coordinator position provides administrative support for the Learning Management System, class-room-based training events and courseware development. The addition of this position allows the Training Facilitator the

time needed to expand current programs and design solutions for those NBC functions not currently serviced due to bandwidth constraints.

Principal Environmental Engineer - Due to aging infrastructure and resiliency concerns, 15 planning and design projects were developed, which resulted in the need for an additional Principal Environmental Engineer.

Resident Representative - Due to the number of construction contracts an additional inspector was necessary to cover the work.

Revenue Analyst – Additional FTE required to meet increased analytical needs related to revenue and modeling to ensure sufficient funding for operations, capital, and compliance with rate covenants.

Utility Operator – Existing staff levels do not allow enough flexibility to keep up with needed cleaning and safety checks. This position will perform those tasks as well as assist with operational duties.

Prepared by: James McCaughey

Comm. 4-9: The amounts requested by NBC for several expense line items have changed during the pendency of this docket.

a. Please provide a table identifying each instance where NBC has updated (either up or down) its cost of service from its original filing to its Rebuttal (please include the most recent supplemental response to DIV 1-52 filed June 1st).

b. The table should include the originally requested amount, the updated requested amount and the difference between requested and updated.

c. Also, for each item updated, please provide a brief explanation for the rationale / justification for the update.

d. Please provide totals as appropriate.

Response: The Narragansett Bay Commission and Rhode Island Division of Public Utilities and Carriers are currently working on finalizing a settlement agreement that will contain the requested information.

Prepared by: Karen Giebink

CERTIFICATION

I hereby certify that on June 14, 2023, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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