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May 7, 2024

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

Re: Docket No. 23-30-WW- Pawtucket Water Supply Board General Rate Filing

Dear Ms. Massaro:

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

1. The Pawtucket Water Supply Board's Response to The Rhode Island Public Utilities Commission's Data Requests (Set Two).

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,

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Joseph A. Keough, Jr.

cc: Service List (via electronic mail)

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET NO. 22-30-WW
Response Of The Pawtucket Water Supply Board
To The Rhode Island Public Utilities Commission's
Data Requests

Set 2

## Comm. 2-1:

In paragraphs 40 through 43, the Settlement Agreement maintains that Schedules 1.0 through 11.0 shows the three step increases and resulting revenue requirements being sought for approval. Paragraph 41 references a starting point revenue requirement of \$22,500,548. That first-year revenue requirement figure can be found in Schedule 1.0 on page 7 in the third column. However, paragraph 42 maintains that the second step increase is designed to collect an additional \$76,438 to support a revenue requirement of \$24,529,939. Mathematically, adding \$76,438 to the first-year revenue requirement does not equal \$24,529,939 and that figure of \$24,529,939 does not appear to be referenced anywhere in schedules 1.0 through 11.0. In addition, paragraph 43 references additional revenue of \$84,002, and a resulting revenue requirement of \$24,613,941. While mathematically, adding \$84,002 to the second referenced revenue requirement in paragraph 42 equals \$24,613,941, that figure of \$24,613,941 does not appear to be referenced in schedules 1.0 through 11.0. Please explain and reconcile the revenue requirement figures in paragraphs 41-43 with the revenue requirement numbers for the step increases shown in Schedule 11.0 of the Settlement Agreement. In reconciling the numbers, please also provide a schedule clearly showing how the referenced revenue requirement figures in paragraphs 42 and 43 were derived.

**Response:** 

Paragraphs 40 through 43 of the original Settlement Agreement contained errors, which have been corrected, and a corrected Settlement Agreement has been submitted to the Commission.

**Prepared by:** David Fox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET NO. 22-30-WW
Response Of The Pawtucket Water Supply Board
To The Rhode Island Public Utilities Commission's
Data Requests
Set 2

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## **CERTIFICATION**

I hereby certify that on May 7, 2024, 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.

Parties	Email Distribution	Phone
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## STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION DOCKET NO. 22-30-WW

Response Of The Pawtucket Water Supply Board To The Rhode Island Public Utilities Commission's Data Requests

Set 2

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