KEOUGH + SWEENEY, LTD.

ATTORNEYS AND COUNSELORS AT LAW
41 MENDON AVENUE
PAWTUCKET, RHODE ISLAND 02861
TELEPHONE (401) 724-3600
FACSIMILE (401) 724-9909
www.keoughsweeney.com

RAYNHAM OFFICE: 90 NEW STATE HIGHWAY RAYNHAM, MA 02109 TEL. (508) 822-2813 FAX (508) 822-2832 JOSEPH A. KEOUGH JR.* JEROME V. SWEENEY III*

SEAN P. KEOUGH*

JEROME V. SWEENEY II OF COUNSEL

*ADMITTED TO PRACTICE IN RHODE ISLAND & MASSACHUSETTS

BOSTON OFFICE: 171 MILK STREET SUITE 30 BOSTON, MA 02109 TEL. (617) 574-0054 FAX (617) 451-1914

March 6, 2024

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

Re: Docket No. 22-30-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 Division of Public Utilities and Carriers' Data Requests (Set Nine).

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,

Sough allyh Jr

Joseph A. Keough, Jr.

cc: Service List (via electronic mail)

Div. 9-1:

Refer to the response to DIV 3-2. Please provide the studies, analyses, reports and/or other decision-making documents used to determine the 15% allocation to PWSB.

Response:

As set forth in the response to Div. 3-2, the 15% allocation was applied to services provided for Personnel, Payroll and Purchasing, and each are addressed herein below:

Personnel – the Personnel Department provides the following services to the PWSB:

- Posts all open positions internally and externally
- Handles all applicants for PWSB positions, sets up interviews and issues letters to applicants
- Enrolls and administers all PWSB employees' health, dental, and life insurance benefits
- Processes all necessary forms with the Rhode Island State Retirement Board for PWSB employees including the new TIAA CREF benefits
- Completes all unemployment forms for PWSB employees
- Complete all ACA compliance forms

The 15% allocation was based on the number of PWSB employees as compared to the total number of City employees. In reviewing this allocation, it has changed from 15% to 10% based on the current number of PWSB employees (52) as compared to the current number of City of Pawtucket employees (552). However, the PWSB suggests keeping the same dollar amount of \$63,288 for this allocation rather than \$42,192 as other dollar amounts of updated allocations as set forth in the responses to Div. 9-2 and 9-3 will increase, and the PWSB is not requesting an increase to those allocations. Rather, the PWSB suggests that the overall request of \$354,494 for Municipal Charges – Admin Support as set forth in DF Sch. 1.0 remain the same.

Payroll – the Payroll Department provides the following services to the PWSB:

- Process weekly payroll for all PWSB employees, including the issuing of employee payroll checks, direct deposits, employee withholdings, taxes, and pensions
- Handle all payroll inquiries regarding verification of employment, earnings, changes to W-4, and any other voluntary employee withholdings
- Complete all unemployment forms for PWSB employees
- Complete all ACA compliance forms

The 15% allocation was based on the number of PWSB employees as compared to the total number of City employees. In reviewing this allocation, it has changed from 15% to 10% based on the current number of PWSB employees (52) as compared to the current number of City of Pawtucket employees (552). However, the PWSB suggests keeping the same dollar amount of \$33,489.45 for this allocation rather than \$22,326.30 as other dollar amounts of updated allocations as set forth in the responses to Div. 9-2 and 9-3 will increase, and the PWSB is not requesting an increase to those allocations. Rather, the PWSB suggests that the overall request of \$354,494 for Municipal Charges – Admin Support as set forth in DF Sch. 1.0 remain the same.

Purchasing – the Purchasing Department provides the following services to the PWSB:

- Administer all PWSB bids, including advertising, fielding questions from vendors, and providing answers to all bidders
- Approve all purchase requisitions and mail all purchase orders
- Purchasing Board oversees all bid openings and approves the award of all bids

In reviewing the most recent FY2023 figures, the total of PWSB bids (23) as compared to the total number of City bids (164) is 14%, which is only a slight decrease from the 15% used.

Prepared by:

James DeCelles, based on information provided by Jeannine Bourski, City of Pawtucket, Deputy Finance Director

Div. 9-2:

Refer to DIV 2-11, Attachment 6. Please provide the studies, analyses, reports and/or other decision-making documents used to determine the 100% allocation of the Cashier/Clerk's time to PWSB.

Response:

The Collections Department provides the following services to the PWSB:

- Accepts monthly water bill payments
- Posts daily cash receipt batches to accounts receivable system
- Posts to general ledger
- Balances all lockbox water payments and credit card payments and
- Reconciles to accounts receivable system
- Assists with water lien sales

It should first be noted that the total salary allocation of \$49,909.91 for the Collections Department, as set forth in the attachment to Div. 2-11, was incorrect. A formula was missing in the spreadsheet that should have added the allocations for the Treasurer, Cash Reconciliation Clerk, Tax Sales Clerk and Cashier Clerk. The total allocation for these four positions should have been \$68,146.16.

The 100% allocation of the Cashier/Clerk had been based on a previous configuration of the collections department. There had been three cashiers, and the analysis was that approximately 1/3 of the transactions were attributable to PWSB. So one of the Clerks was allocated 100% to PWSB. There has been a reorganization in this department, which results in the removal of allocations for a cash reconciliation clerk and a tax sales clerk, and two new allocations as set forth on Div. 9-2 Attachment:

The Cashier/Clerk is now the Tax Collections representative, and there is a 32% allocation to the PWB based on the total payments taken over the counter at City Hall (2,426) as compared to the total over the counter payments (7,656).

The Assistant Treasurer allocation is based on the total number of payment receipt batches for lockbox payments, credit card payments and cash payments for the PWSB (223,578) as compared to the total number of batches for the City of Pawtucket (302,996), which results in a 74% allocation.

This results in an increase from \$99,365.08 (which should have been \$117,601.43 with the correct salary allocation) to \$139,610.07. However, the

PWSB does not seek to increase this allocation. Rather, as set forth in the response to Div. 9-1, the PWSB suggests that the overall request of \$354,494 for Municipal Charges – Admin Support as set forth in DF Sch. 1.0 remain the same.

Prepared by:

James DeCelles, based on information provided by Jeannine Bourski, City of Pawtucket, Deputy Finance Director

CITY OF PAWTUCKET WATER DEPARTMENT CHARGE BACK FOR FISCAL YEAR ENDING 06/30/23 Budget COLLECTIONS

	GROSS	TIME			TOTAL
SALARIES	SALARY	ALLOCATED	ALLOCATION		ALLOCATION
Treasurer	103,860.43	15%	15,579.06		
Assistant Treasurer	78,660.20	74%	58,208.55		
Tax Collections Representative	49,624.67	32%	15,879.89		89,667.51
SHARED BENEFITS	FICA - 6.2%	MEDICARE 1.45%	MERS - 14.28%	TIAA -1%	
	Of Allocation	Of Allocation	Of Allocation	Of Allocation	
Treasurer	965.90	225.90		155.79	
Assistant Treasurer	3,608.93	844.02	8,312.18	582.09	
Tax Collections Representative	984.55	230.26	2,267.65	158.80	
Totals	5,559.39	1,300.18	12,804.52	896.68	20,560.76
MEDICAL BENEFITS	YEARLY COST	TIME ALLOCATED	ALLOCATION		
Treasurer	23,372.40	15%	3,505.86		
Assistant Treasurer	23,372.40	74%	17,295.58		
Tax Collections Representative	23,372.40	32%	7,479.17		28,280.60
DENTAL BENEFITS	YEARLY COST	TIME ALLOCATED	ALLOCATION		
Treasurer	910.08	15%	136.51		
Assistant Treasurer	910.08	74%	673.46		
Tax Collections Representative	910.08	32%	291.23		1,101.20
TOTAL COLLECTIONS DIVISION CHARGEBACK				139,610.07	

Duties include: accept monthly water bill payments, post daily cash receipt batches to accounts receivable system and post to general ledger, balance all lockbox water payments and credit card payments and reconcile to accounts receivable system, and assist with water sale.

Total payments taken over the counter at City Hall	2,426 Total	7656
Total payments taken over the counter at WSB	5,230	
Percent for City Hall	32%	

Div. 9-3:

Refer to DIV 2-11, Attachment 7. Please provide the studies, analyses, reports and/or other decision-making documents used to determine the following charges to PWSB.

- a. 30% for Accountant II.
- b. 40% for Senior Acct Pay Clerk.
- c. 25% for Accountant II.

Response:

The Accounting Department provides the following services to the PWSB:

- Preparing journal entries to enter into the General Ledger
- Approving all PWSB journal entries and posting them to the General Ledger
- Preparing General Ledger backup for auditors
- Processing, preparing, and mailing all vendor payments
- Recording all invoices for the Bank of NY payments
- Entering the PWSB adopted budget and recording all budget transfers

In responding to this request, the City has reviewed, and changed, some of the allocations in the Accounting Department based on a change in duties for certain positions. This results in a small increase in the overall dollar amount allocated as set forth in the Div. 9-3 Attachment:

Accountant II (original allocation 30% for one Accountant II position and 25% for a second Accountant II position, revised to 74% for one Accountant II position) – this position is responsible for posting and reconciling all receipts (e.g. lockbox, credit cards and cash payments). As set forth in the response to Div. 9-2, the total number of payment receipt batches for lockbox payments, credit card payments and cash payments for the PWSB (223,578) as compared to the total number of batches for the City of Pawtucket (302,996), results in a 74% allocation. It should also be noted that the current Accountant II does not have insurance through the City's plan, so medical and dental benefits were not allocated, although this could change in the future.

Senior Account Pay Clerk (original allocation 40%, revised allocation 15%) – this position approves every invoice and issues checks for payment. For an average check run, which is done every other week, the total number of

PWSB invoices (91) as compared to the total number of invoices (616) results in a 15% allocation.

Deputy Finance Director (no previous allocation, revised allocation 10%) – this allocation is based on the Deputy Finance Director's estimation that she spends approximately 10% of her overall time on PWSB tasks. Some individual tasks for the PWSB take up more of percentage of her time, such as:

- Posting all wires paid without a check (approximately 5 out of 20 wire batches, or 25%)
- Posting cash for all checks, sorting and mailing (approximately 91 invoices out of 616, or 15%)
- Setting up the budget and posting budget items (approximately 1 out of 5, or 20%)

However, the overall estimate of the total percentage of time spent on PWSB items is 10%.

The PWSB does not seek to increase this allocation. Rather, as set forth in the response to Div. 9-1, the PWSB suggests that the overall request of \$354,494 for Municipal Charges – Admin Support as set forth in DF Sch. 1.0 remain the same.

Prepared by:

James DeCelles, based on information provided by Jeannine Bourski, City of Pawtucket, Deputy Finance Director

116,892.82

CITY OF PAWTUCKET WATER DEPARTMENT CHARGE BACK FOR FISCAL YEAR 2023 Budget ACCOUNTING

SALARIES	GROSS SALARY	TIME ALLOCATED	ALLOCATION	<u>TOTALS</u>
Chief Accountant	82,452.66	15%	12,367.90	
Accountant II	66,649.45	74%	49,320.59	
Senior Acct Pay Clerk	50,183.12	15%	7,527.47	
Finance Office Assistant	51,326.92	15%	7,699.04	
Deputy Finance Director	114,246.47	10%	11,424.65	88,339.65
SHARED BENEFITS	TOTAL WAGES	<u>RATE</u>	ALLOCATION	
FICA	88,339.65	6.20%	5,477.06	
MEDICARE	88,339.65	1.45%	1,280.92	
MERS	88,339.65	14.28%	12,614.90	
TIAA	88,339.65	1.00%	883.40	20,256.28
MEDICAL BENEFITS	YEARLY COST	TIME ALLOCATED	ALLOCATION	
Chief Accountant	24,548.28	15%	3,682.24	
Accountant II	, -	74%	, -	
Senior Acct Pay Clerk	9,289.92	15%	1,393.49	
Finance Office Assistant	3,000.00	15%	450.00	
Deputy Finance Director	24,548.28	10%	2,454.83	7,980.56
DENTAL BENEFITS	YEARLY COST	TIME ALLOCATED	ALLOCATION	
Chief Accountant	910.08	15%	136.51	
Accountant II	-	74%	-	
Senior Acct Pay Clerk	292.08	15%	43.81	
Finance Office Assistant	300.00	15%	45.00	
Deputy Finance Director	910.08	10%	91.01	316.33

Duties include: prepare journal entries to enter into the G/L, approce all PWSB journal entries and post them to the G/L. prepare general ledger backup for auditors, process, prepare, and mail all vendor payments, record all invoices for the Bank of NY payments, enter the PWSB adopted budget and record all budget transfers.

TOTAL ACCOUNTING DIVISION CHARGEBACK

CERTIFICATION

I hereby certify that on March 6, 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
Pawtucket Water Supply Board Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861	jkeoughjr@keoughsweeney.com;	401-724-3600
James L. DeCelles, P.E. Chief Engineer Pawtucket Water Supply Board 85 Branch St. Pawtucket, RI 02860	decelles@pwsb.org; mlecours@pwsb.org	401-729-5001
David Fox, Consultant Raftelis Financial Consultants	Dfox@raftelis.com;	
Division of Public Utilities & Carriers: Gregory Schultz, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	gschultz@riag.ri.gov; Al.mancini@dpuc.ri.gov; John.bell@dpuc.ri.gov; Al.contente@dpuc.ri.gov: ellen.golde@dpuc.ri.gov; Steven.Parrillo@dpuc.ri.gov; Machaela.Seaton@dpuc.ri.gov; Margaret.L.Hogan@dpuc.ri.gov;	401-222-2424

Jerome Mierzwa Lafayette Morgan Exeter Associates, Inc. 10480 Little Patuxent Pkwy, Suite 300 Columbia, MD 21044	imierzwa@exeterassociates.com; Imorgan@exeterassociates.com;	410-992-7500
File original and nine (9) copies	Luly.massaro@puc.ri.gov;	401-780-2107
w/: Luly E. Massaro, Commission	Patricia.lucarelli@puc.ri.gov;	
Clerk		
Public Utilities Commission	Christopher.caramello@puc.ri.gov;	
89 Jefferson Boulevard	Alan.nault@puc.ri.gov;	
Warwick, RI 02888	Alan.nault@puc.n.gov,	

Joseph A. Keough, Jr., Esquire # 4925

Jougnallyn J.

KEOUGH & SWEENEY, LTD.

41 Mendon Avenue

Pawtucket, RI 02861

(401) 724-3600 (phone)

(401) 724-9909 (fax)

jkeoughjr@keoughsweeney.com