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July 23, 2024

***Via Electronic Mail and Hand Delivery***

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

**Re: Docket No. 24-30-WW – City of Newport Utilities Department, Water Division,  
Application to Change Rate Schedules**

Dear Ms. Massaro:

On behalf of Portsmouth Water and Fire District, enclosed for filing in the above-referenced docket are an original and nine copies of the following:

- Motion to Intervene of Portsmouth Water and Fire District;
- Notice of Appearance for Adam M. Ramos; and
- Notice of Appearance for Kat B. Savage.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Adam M. Ramos", written over a light blue horizontal line.

Adam M. Ramos

Attachment

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

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IN RE: City of Newport, Utilities Department,	:	Docket No. 24-30-WW
Water Division, Application to Change Rate Schedules	:	
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	:	

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**PORTSMOUTH WATER AND FIRE DISTRICT’S MOTION TO INTERVENE**

Pursuant to Rule 1.14 of the Rhode Island Public Utilities Commission Rules of Practice and Procedure, 810 RICR 00-00-1.4 the Portsmouth Water and Fire District (“PWFD”) moves to intervene in this proceeding. In support of this motion, PWFD states the following:

1. PWFD purchases at wholesale all the water that it supplies to customers within the Portsmouth Water and Fire District.
2. The City of Newport, Utilities Department, Water Division (Newport), is PWFD’s sole water supplier.
3. The outcome of this proceeding will affect PWFD directly because it will impact the rates PWFD pays for the water it purchases from Newport.
4. PWFD therefore possesses an interest that may be directly affected by the Rhode Island Public Utilities Commission’s action in this proceeding, and that interest is not adequately represented by the existing parties because PWFD is a uniquely situated wholesale customer of Newport.
5. PWFD’s participation in this proceeding is also in the public interest because the outcome of this proceeding will impact the rates that all its customers pay for water.

Respectfully submitted,

PORTSMOUTH WATER AND FIRE  
DISTRICT

By its Attorneys,

/s/ Adam M. Ramos  
Adam M. Ramos (#7591)  
Kat B. Savage (#9793)  
Hinckley, Allen & Snyder LLP  
100 Westminster Street, Suite 1500  
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401-274-2000  
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aramos@hinckleyallen.com  
ksavage@hinckleyallen.com

Dated: July 23, 2024

**CERTIFICATION**

I hereby certify that I emailed a copy of the within Motion to Intervene to all parties set forth on the attached Service List on the 23rd day of July, 2024.

/s/ Kat B. Savage

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

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IN RE: City of Newport, Utilities Department,	:	Docket No. 24-30-WW
Water Division, Application to Change Rate Schedules	:	
	:	
	:	

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**NOTICE OF APPEARANCE**

Pursuant to Rule 1.5(A)(1) of the Public Utilities Commission Rules of Practice and Procedure, please enter the appearance of Adam M. Ramos, Esq., of Hinckley, Allen, & Snyder LLP on behalf of Portsmouth Water & Fire District.

Respectfully Submitted,

PORTSMOUTH WATER & FIRE DISTRICT

By its attorney,

/s/Adam M. Ramos  
Adam M. Ramos (#7591)  
Hinckley, Allen, & Snyder LLP  
100 Westminster Street, Suite 1500  
Providence, RI 02903  
401-274-2000  
[aramos@hinckleyallen.com](mailto:aramos@hinckleyallen.com)

**CERTIFICATION**

I hereby certify that I emailed a copy of the within Notice of Appearance to all parties set forth on the attached Service List on the 23 day of July, 2019.

/s/ Kat B. Savage

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

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IN RE: City of Newport, Utilities Department,	:	Docket No. 24-30-WW
Water Division, Application to Change Rate Schedules	:	
	:	
	:	

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**NOTICE OF APPEARANCE**

Pursuant to Rule 1.5(A)(1) of the Public Utilities Commission Rules of Practice and Procedure, please enter the appearance of Kat B. Savage, Esq., of Hinckley, Allen, & Snyder LLP on behalf of Portsmouth Water & Fire District.

Respectfully Submitted,

PORTSMOUTH WATER & FIRE DISTRICT

By its attorney,

/s/ Kat B. Savage  
Kat B. Savage (#9793)  
Hinckley, Allen, & Snyder LLP  
100 Westminster Street, Suite 1500  
Providence, RI 02903  
401-274-2000  
[ksavage@hinckleyallen.com](mailto:ksavage@hinckleyallen.com)

**CERTIFICATION**

I hereby certify that I emailed a copy of the within Notice of Appearance to all parties set forth on the attached Service List on the 23 day of July, 2019.

/s/ Kat B. Savage

**Docket No. 24-30-WW - City of Newport Water Division – Multi-year Rate Filing  
Service List updated 6/29/2024**

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
<b>Newport Water Division</b> Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a> ;	401-724-3600
Robert Schultz, Acting Director of Public Works Newport Water Department 70 Halsey St. Newport, RI 02840	<a href="mailto:rschultz@CityofNewport.com">rschultz@CityofNewport.com</a> ;	401-845-5600
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David Russell, P.E. Russell Consulting LLC	<a href="mailto:Davidrussell015@comcast.net">Davidrussell015@comcast.net</a> ;	

<b>File an original and nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
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