

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: CITY OF NEWPORT, UTILITIES DEPARTMENT : Docket No. 24-30-WW
Water Division, Application to Change Rate Schedules :

NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.5(A)(1) of the Public Utilities Commission Rules of Practice and Procedure, please enter the appearance of Peter Brent Regan, Esq. of Sayer Regan & Thayer, LLP on behalf of Town of Middletown.

TOWN OF MIDDLETOWN,
By Its Attorneys,

Dated: July 25, 2024

/s/ Peter Brent Regan
Peter Brent Regan (#3421)
SAYER REGAN & THAYER, LLP
130 Bellevue Avenue
Newport, Rhode Island 02840
(401) 849-3040
pregan@srt-law.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I emailed of copy of the within Notice of Appearance to all parties set forth on the attached Service List on the 25th day of July, 2024.

/s/ Leanna Kehm
Leanna Kehm, Paralegal

Docket No. 24-30-WW - City of Newport Water Division – Multi-year Rate Filing Service List updated 7/25/2024

| Parties/Address | E-mail Distribution | Phone |
|---|--|--------------|
| Newport Water Division Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861 | jkeoughjr@keoughsweeney.com ; | 401-724-3600 |
| Robert Schultz, Acting Director of Public Works Newport Water Department 70 Halsey St. Newport, RI 02840 | rschultz@CityofNewport.com ; | 401-845-5600 |
| | lsitrin@CityofNewport.com ; | |
| | dbarrett@CityofNewport.com ; | |
| Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte, NC 28203 | Hsmith@raftelis.com ; | 704-373-1199 |
| Division of Public Utilities (Division) Leo Wold, Esq. John Bell | Leo.Wold@dpuc.ri.gov ; | 401-222-2424 |
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| | Khojasteh.R.Davoodi.civ@us.navy.mil ; | |
| Portsmouth Water & Fire District (PWFD) Adam M. Ramos, Esq. Christine E. Dieter, Esq. Hinckley, Allen & Snyder 100 Westminster St., Suite 1500 Providence, RI 02903 | aramos@haslaw.com ; | |
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| Jason Mumm, FCS Group | JasonM@fcsgroup.com ; | |
| Town of Middletown (Middletown) Peter Regan, Esq. Michael Monti, Esq. Sayer Regan & Thayer, LLP 130 Bellevue Ave. Newport, RI 02840 | pregan@srt-law.com ; | 401-849-3040 |
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| David Russell, P.E. Russell Consulting LLC | Davidrussell015@comcast.net ; | |

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: CITY OF NEWPORT, UTILITIES DEPARTMENT : Docket No. 24-30-WW
Water Division, Application to Change Rate Schedules :

NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.5(A)(1) of the Public Utilities Commission Rules of Practice and Procedure, please enter the appearance of Michael Monti, Esq. of Sayer Regan & Thayer, LLP on behalf of Town of Middletown.

TOWN OF MIDDLETOWN,
By Its Attorneys,

Dated: July 25, 2024

/s/ Michael Monti

Michael Monti (#10095)
SAYER REGAN & THAYER, LLP
130 Bellevue Avenue
Newport, Rhode Island 02840
(401) 849-3040
mmonti@srt-law.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I emailed of copy of the within Notice of Appearance to all parties set forth on the attached Service List on the 25th day of July, 2024.

/s/ Leanna Kehm

Leanna Kehm, Paralegal

Docket No. 24-30-WW - City of Newport Water Division – Multi-year Rate Filing Service List updated 7/25/2024

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| David Russell, P.E. Russell Consulting LLC | Davidrussell015@comcast.net ; | |

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

IN RE: City of Newport, Utilities Department : Docket No. 24-30-WW4933
Water Division – Application to Change Rate Schedules :

TOWN OF MIDDLETOWN’S MOTION TO INTERVENE

NOW COMES the Town of Middletown (the “Town”), by and through its undersigned counsel, and hereby moves to intervene in the above-captioned proceeding, pursuant to Rule 1.14 of the Rhode Island Public Utilities Commission Rules of Practice and Procedure (the “PUC Rules”). In support of its Motion, the Town states as follows:

1. Rule 1.14(A) of the PUC Rules states that “[p]articipation in a proceeding as an intervenor may be initiated by order of the Commission upon a motion to intervene.”
2. On June 18, 2024, the City of Newport, Utilities Department, Water Division (the “Applicant”), filed an Application to Changes Rate Schedules.
3. The Town and the Town’s residents purchase all of their water from the Applicant, as retail users.
4. The Applicant is the Town’s sole water supplier.
5. The Town will be directly affected by any outcome of this proceeding because it will impact the rates the Town and its residents pays for the water purchased from the Applicant.
6. The Town, therefore, possesses an interest that will be directly affected by the Commission’s actions in this proceeding.
7. Said interests of the Town would not be adequately represented by existing parties to this proceeding.

8. The Town's intervention in this proceeding is also in the public interest of the residents of the Town, as the outcome of this proceeding will affect the rates that all of the Town's residents will pay for water.

TOWN OF MIDDLETOWN,
By Their Attorneys,

Dated: July 25, 2024

/s/ Peter Brent Regan

Peter Brent Regan (#3421)
Michael E. Monti (#10095)
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mmonti@srt-law.com

CERTIFICATE OF SERVICE

I hereby certify that I mailed an original and nine (9) copies of the within Motion to Intervene to the Public Utilities Commission Clerk at the address listed below and I emailed a copy of the within Motion to Intervene the Public Utilities Commission Clerk and to all parties set forth on the attached Service List on the 25th day of July, 2024.

VIA FIRST CLASS MAIL:

Luly.massaro@puc.ri.gov
Luly E. Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

/s/ Leanna Kehm

Leanna Kehm, Paralegal

Docket No. 24-30-WW - City of Newport Water Division – Multi-year Rate Filing Service List updated 7/25/2024

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