

July 31, 2024

**Via E-mail/Federal Express**

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

***In re: Docket Nos.: 24-19-WW/4879***

Dear Luly:

On behalf of the Woonsocket Water Division (“WWD”), enclosed please find an original and three (3) copies of WWD’s Responses to the Public Utilities Commission’s Third Set of Data Requests issued on July 10, 2024 in the above docket.

Very truly yours,



ALAN M. SHOER  
[ashoer@apslaw.com](mailto:ashoer@apslaw.com)

Enclosures

cc: Service List

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: CITY OF WOONSOCKET, WATER DIVISION :  
PETITION TO AMEND MULTI-YEAR RATE PLAN : DOCKET NO. 24-19-WW  
: DOCKET NO. 4879**

**CITY OF WOONSOCKET, WATER DIVISION’S (“WWD”) RESPONSES TO  
THE COMMISSION’S THIRD SET OF DATA REQUESTS  
(Issued July 10, 2024)**

PUC: 3-1	Please provide a schedule in the same form as PUC 1-3 for the IFR fund. Please include the transfer of funds from Debt Service Reserve to IFR as identified in DIV 1-13.
WWD Response: 3-1	See attached Schedule to 24-19-WW PUC 3-1
Respondent:	David G. Bebyn, CPA (B&E Consulting)
Date:	July 31, 2024

PUC: 3-2	Referencing PUC 1-7, for each deferred project, please provide a timeline for completion and a schedule of cash flows associated with expected payments to be made.
WWD Response: 3-2	The projects listed in the response to PUC 1-7 have been included in the attachment to the response to PUC 3-1. The current funding would be able to cover the smaller projects in the fiscal year 2025; however, the next project, Park Save upgrade, would take several years to accumulate funds to complete this project. Furthermore, the subsequent projects would not be able to be fully funded at current rates until after fiscal year 2030. The WWD is reviewing these projects and the possibility of partial debt funding to accelerate these projects. This review will be reflected in a subsequent general rate case mentioned in the response to PUC 3-3.
Respondent:	David G. Bebyn, CPA (B&E Consulting)
Date:	July 31, 2024

PUC: 3-3	Referencing DIV 1-7, what date is WWD targeting to file its rate case? What test year is it planning to use?
WWD Response: 3-3	WWD has had discussions with the Commission and Division about this matter. WWD, as a result of those discussions, is planning to file a general rate case in the month of October, and will use the fiscal year ending June 30, 2024, as a test year.
Respondent:	David G. Bebyn, CPA (B&E Consulting)
Date:	July 31, 2024

CITY OF WOONSOCKET, WATER DIVISION  
By its Attorneys



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Providence, RI 02903-1345  
Tel: (401) 274-7200  
Fax: (401) 751-0604  
Dated: July 31, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2024, I delivered a true copy of the foregoing responses to the **COMMISSION'S 3<sup>rd</sup> Set of Data Requests** issued on July 10, 2024, to the Commission and via electronic email to the parties in the Commission's service list for this docket.



**Woonsocket Water Division - Docket No. 4879 – Rate Filing  
Service List 6/11/2024**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
<b>Woonsocket Water Division:</b> Alan Shoer, Esq. Adler Pollock & Sheehan One Citizens Plaza, 8 <sup>th</sup> Floor Providence, RI 02903-1345	<a href="mailto:Ashoer@apslaw.com">Ashoer@apslaw.com</a> ;	401-274-7200
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<b>Division of Public Utilities &amp; Carriers</b> Christy Hetherington Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Christy.hetherington@dpuc.ri.gov">Christy.hetherington@dpuc.ri.gov</a> ;	401-274-4400
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<b>Original &amp; nine (9) copies file w/:</b> Luly E. Massaro, Commission Clerk <b>Public Utilities Commission</b> 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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Cash Activity

OPENING BALANCE	6/30/2024
Required Transfer from Revenue	Agrees with PUC 1-1 \$ 1,525,116.78
FUNDING	-
INTEREST EARNED	5,587.98
EXPENDITURES	35,546.70
ENDING BALANCE	<u>\$ 1,566,251.46</u>

	9/30/2024	12/31/2024	3/31/2025	6/30/2025	9/30/2025	12/31/2025	3/31/2026	6/30/2026
OPENING BALANCE	\$ 1,566,251.46	\$ 2,701,576.46	\$ 3,040,326.46	\$ 3,379,076.46	\$ 1,334,826.46	\$ 1,673,576.46	\$ 2,012,326.46	\$ 2,351,076.46
FUNDING	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00
Debt Service Reserve	796,575.00							
INTEREST EARNED	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00
EXPENDITURES				2,383,000.00				
ENDING BALANCE	<u>\$ 2,701,576.46</u>	<u>\$ 3,040,326.46</u>	<u>\$ 3,379,076.46</u>	<u>\$ 1,334,826.46</u>	<u>\$ 1,673,576.46</u>	<u>\$ 2,012,326.46</u>	<u>\$ 2,351,076.46</u>	<u>\$ 2,689,826.46</u>

	9/30/2026	12/31/2026	3/31/2027	6/30/2027	9/30/2027	12/31/2027	3/31/2028	6/30/2028
OPENING BALANCE	\$ 2,689,826.46	\$ 3,028,576.46	\$ 3,367,326.46	\$ 3,706,076.46	\$ 4,044,826.46	\$ 4,383,576.46	\$ 4,722,326.46	\$ 5,061,076.46
FUNDING	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00
INTEREST EARNED	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00
EXPENDITURES								
ENDING BALANCE	<u>\$ 3,028,576.46</u>	<u>\$ 3,367,326.46</u>	<u>\$ 3,706,076.46</u>	<u>\$ 4,044,826.46</u>	<u>\$ 4,383,576.46</u>	<u>\$ 4,722,326.46</u>	<u>\$ 5,061,076.46</u>	<u>\$ 5,399,826.46</u>

	9/30/2028	12/31/2028	3/31/2029	6/30/2029	9/30/2029	12/31/2029	3/31/2030	6/31/2030
OPENING BALANCE	\$ 5,399,826.46	\$ 318,576.46	\$ 657,326.46	\$ 996,076.46	\$ 1,334,826.46	\$ 1,673,576.46	\$ 2,012,326.46	\$ 2,351,076.46
FUNDING	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00	333,750.00
INTEREST EARNED	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00
EXPENDITURES	5,420,000.00							
ENDING BALANCE	<u>\$ 318,576.46</u>	<u>\$ 657,326.46</u>	<u>\$ 996,076.46</u>	<u>\$ 1,334,826.46</u>	<u>\$ 1,673,576.46</u>	<u>\$ 2,012,326.46</u>	<u>\$ 2,351,076.46</u>	<u>\$ 2,689,826.46</u>

Projects identified in the response to DIV 1-7

Harris Pond Dam Rehabilitation. \$1,113,000  
 SCADA system replacement. ? \$500,000  
 Security system source through distribution system wide replacement.? \$500,000  
 Rockland Ave/Roberta Ave area water main upgrade and replacement. \$270,000

Park Ave area water main upgrade and replacement \$5,420,000

Industrial Park Storage Tank replacement. \$3,300,000

Fairmount St. water main upgrade and replace. \$3,440,000