

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

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 32
BOSTON, MA 02109
TEL. (617) 574-0054

August 23, 2024

Via Email

And First Class Mail

Ms. Stephanie De La Rosa
Clerk
State of Rhode Island
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: City of Newport, Utilities Department, Water Division – Docket 24-30-WW

Dear Ms. De La Rosa:

Enclosed please find an original and three copies of the following:

1. The City of Newport, Utilities Department, Water Division's response to the Rhode Island Division of Public Utilities and Carriers' Data Requests (Set 2, Responses 2, 3 and 35).

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosures

cc: Service List (via email)

Div 2-2: Identify each vacant position by title at NWD as of June 30, 2020, 2021, 2022, 2023 and 2024.

Response: As of June 30, 2024 – Deputy Director of Utilities - Engineering and Engineering Technician.

As of June 30, 2023 – Deputy Director of Utilities - Engineering and Engineering Technician.

As of June 30, 2022 – Deputy Director of Utilities - Engineering and Engineering Technician.

As of June 30, 2021 – Engineering Technician, Foreman – Distribution/Collection and Laborer.

As of June 30, 2020 – Engineering Technician.

Prepared by: Robert C. Schultz, Jr.

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET NO. 24-30-WW
Response Of The City Of Newport,
Utilities Division, Water Department
To The State of Rhode Island
Division Of Public Utilities And Carriers'
Data Requests
Set 2

Div 2-3: Identify each filled position by title at NWD at the start of FY 2021, 2022, 2023 and 2024 that became vacant during that year and was filled during that year, indicating the reason why it became vacant and when it was filled.

Response: Please see Excel Spreadsheet entitled Div. 2-3 Attachment.

Prepared by: Robert C. Schultz, Jr.

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET NO. 24-30-WW
Response Of The City Of Newport,
Utilities Division, Water Department
To The State of Rhode Island
Division Of Public Utilities And Carriers'
Data Requests
Set 2

Div 2-35: Explain the NWD's proposed increase in Account 50307 (Natural Gas) between the Test Year and the Rate Year. Provide documentation for the proposed increase.

Response: The 2025 Gas Estimate was updated by using the most recent 3-year average Therms by month. For example, June 2022, 2023, and 2024, or September 2021, 2022, and 2023. The current charges, including the Customer Charge, LIHEAP Enhancement, etc., were applied to each account. Please see attached.

Prepared by: Robert C. Schultz, Jr.

Div. 2-35 Attachment

	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Totals
77780-19003: 70 Halsey Street	\$255.51	\$595.36	\$253.23	\$258.22	\$317.66	\$579.48	\$1,435.26	\$1,513.76	\$1,403.95	\$955.19	\$560.42	\$336.72	\$8,464.73
90253-70002: Bliss Mine Road	\$1,712.11	\$1,059.20	\$1,336.44	\$1,800.18	\$2,886.02	\$5,565.90	\$6,933.97	\$7,235.27	\$7,056.03	\$6,186.64	\$4,826.73	\$3,083.40	\$49,681.91
27945-07003: Ellery Road	\$242.79	\$242.79	\$242.79	\$244.60	\$249.60	\$411.13	\$610.78	\$679.30	\$663.87	\$544.99	\$345.79	\$258.67	\$4,737.11
30410-30007: Forest Avenue	\$244.61	\$244.60	\$245.06	\$243.70	\$244.15	\$243.70	\$244.15	\$244.60	\$243.70	\$307.68	\$263.21	\$247.33	\$3,016.47
75300-370067: Lawton Valley AWT	\$387.77	\$382.55	\$719.69	\$497.80	\$509.60	\$566.32	\$522.30	\$533.65	\$514.59	\$502.79	\$413.85	\$399.79	\$5,950.68
51302-46093: Lawton Valley Operations	\$649.55	\$460.70	\$483.84	\$399.89	\$671.24	\$2,541.17	\$2,437.71	\$2,851.53	\$2,507.59	\$1,951.74	\$1,669.05	\$972.53	\$17,596.53
08709-69001: Lawton Valley Maintenance	\$242.79	\$242.79	\$242.79	\$242.79	\$273.19	\$611.24	\$692.91	\$677.94	\$692.46	\$687.47	\$404.33	\$264.57	\$5,275.27
												Subtotal	\$94,722.71
												2% Variance Allowance	\$1,894.45
												Total	\$96,617.16

CERTIFICATION

I hereby certify that on August 23, 2024, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Stephanie De La Rosa, Commission Clerk, by electronic mail and regular mail.

Parties/Address	E-mail Distribution	Phone
Newport Water Division Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861	ikeoughjr@keoughsweeney.com ;	401-724-3600
Robert Schultz, 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
	Margaret.L.Hogan@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	Joel.munoz@dpuc.ri.gov ;	
	pat.smith@dpuc.ri.gov ;	
	Steven.Parrillo@dpuc.ri.gov ;	
	Machaela.Seaton@dpuc.ri.gov ;	
	ellen.golde@dpuc.ri.gov ;	
Dept. of Navy (DON) Larry Allen Kay Davoodi Legal Counsel TBD	Larry.R.Allen5.civ@us.navy.mil ;	
	Khojasteh.R.Davoodi.civ@us.navy.mil ;	

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET NO. 24-30-WW
Response Of The City Of Newport,
Utilities Division, Water Department
To The State of Rhode Island
Division Of Public Utilities And Carriers'
Data Requests
Set 2

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 ;	
	ksavage@hinckleyallen.com ;	
	JasonM@fcsgroup.com ;	
Jessica C. Lynch, PWFD	jlynch@portsmouthwater.org ;	
Jason Mumm, FCS Group	JasonM@fcsgroup.com ;	
Town of Middletown (Middletown) Peter Regan, Esq. Mark Boivin, Esq. Sayer Regan & Thayer, LLP 130 Bellevue Ave. Newport, RI 02840	Pregan@SRT-law.com ;	401-849-3040 x-233
	mboivin@srt-law.com ;	
	arichardson@srt-law.com ;	
David Russell, P.E. Russell Consulting LLC	Davidrussell015@comcast.net ;	
File an original and nine (9) copies w/: Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Stephanie.delarosa@puc.ri.gov ,	401-780-2107
	John.harrington@puc.ri.gov ;	
	Christopher.Caramello@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	

Joseph A. Keough, Jr., Esquire # 4925
KEOUGH & SWEENEY, LTD.
41 Mendon Avenue
Pawtucket, RI 02861
(401) 724-3600 (phone)
jkeoughjr@keoughsweeney.com