

# 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

September 20, 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 nine copies of the following:

1. The City of Newport, Utilities Department, Water Division's response to the Portsmouth Water and Fire District's Data Requests (Set 2).

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosures

cc: Service List (via email)

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 24-30-WW  
Response Of The City Of Newport,  
Utilities Division, Water Department  
To The Portsmouth Water and  
Fire District's Data Requests  
Set 2

**PWFD 2-1:** Refer to PWFD 1-2. In addition to the items listed, please provide the annual depreciation expense for each asset.

**Response:** As noted in the response to PWFD 1-2, the asset listing attached to the response was developed during Docket 4933 based on a partial asset listing from FY 2010. This list was updated using contractor invoices to include assets installed or retired from FY2100 through FY 2018. It does not include information on accumulated depreciation or net book value.

**Prepared by:** Harold Smith

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 24-30-WW  
Response Of The City Of Newport,  
Utilities Division, Water Department  
To The Portsmouth Water and  
Fire District's Data Requests  
Set 2

**PWFD 2-2:** Refer to HJS Schedule B-5. Please provide Newport's capital improvements plan for FY2024-FY2029 assigning the projects and their estimated costs into the same functional categories shown in HJS Schedule B-5. For each capital project, please list the funding sources that Newport will use to pay for the project costs, including any future debt, use of Capital Spending Restricted Account, and any other sources.

**Response:** Please see attached.

**Prepared by:** Robert Schultz

City of Newport									
Recommended CIP Schedule									
Water Fund									
FY 2024 - 2029									
Project Title	Funding Source	Functional Category	Current FY 24	Proposed FY 25	Proposed FY 26	Proposed FY 27	Proposed FY 28	Proposed FY 29	Total
Meter Replacement Program	Rates	Meters	\$125,000.00	\$200,000.00	\$200,000.00	\$200,000.00	\$200,000.00	\$300,000.00	\$1,225,000.00
Dam Rehabilitation	Rates	Source of Supply	\$150,000.00	\$250,000.00	\$450,000.00	\$350,000.00	\$350,000.00	\$450,000.00	\$2,000,000.00
Water Trench Restoration	Rates	Transmission / Distribution	\$200,000.00	\$225,000.00	\$250,000.00	\$275,000.00	\$300,000.00	\$325,000.00	\$1,575,000.00
System Wide Main Improvements	Rates	Transmission / Distribution	\$200,000.00	\$200,000.00	\$400,000.00	\$200,000.00	\$500,000.00	\$500,000.00	\$2,000,000.00
Lead Service Line Replacement	Rates	Services	\$792,270.00	\$200,000.00	\$900,000.00	\$300,000.00	\$200,000.00	\$300,000.00	\$2,692,270.00
Fire Hydrant Replacement	Rates	Fire	\$150,000.00	\$175,000.00	\$200,000.00	\$200,000.00	\$200,000.00	\$300,000.00	\$1,225,000.00
Pump Station SCADA Project	Rates	T&D Pumping	\$0.00	\$0.00	\$100,000.00	\$100,000.00	\$250,000.00	\$700,000.00	\$1,150,000.00
IRP 5 Year Update	Rates	All	\$100,000.00	\$0.00	\$0.00	\$0.00	\$200,000.00	\$0.00	\$300,000.00
Goulart Lane 1MG Tank (High Pressure Zone)	Rates	Transmission / Distribution	\$0.00	\$0.00	\$400,000.00	\$400,000.00	\$250,000.00	\$0.00	\$1,050,000.00
Forest Ave Pump Station	Rates	T&D Pumping	\$0.00	\$0.00	\$300,000.00	\$1,100,000.00	\$700,000.00	\$75,000.00	\$2,175,000.00
Asset Management and Information Services	Rates	T&D Pumping	\$200,000.00	\$250,000.00	\$350,000.00	\$325,000.00	\$250,000.00	\$250,000.00	\$1,625,000.00
Accounting/Billing System (Share)	Rates	Billing	\$126,500.00	\$126,500.00	\$0.00	\$0.00	\$0.00	\$0.00	\$253,000.00
WSSMP 5 Year Update	Rates	All	\$100,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$200,000.00	\$300,000.00
Equipment Replacement-Water	Rates	All	\$400,000.00	\$250,000.00	\$350,000.00	\$450,000.00	\$500,000.00	\$500,000.00	\$2,450,000.00
<b>Total Funded Water Projects</b>			<b>\$2,543,770.00</b>	<b>\$1,876,500.00</b>	<b>\$3,900,000.00</b>	<b>\$3,900,000.00</b>	<b>\$3,900,000.00</b>	<b>\$3,900,000.00</b>	<b>\$20,020,270.00</b>
System Wide Main Improvements	SRF	Transmission / Distribution	\$2,500,000.00	\$250,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,750,000.00
System Wide Main Improvements	CDS Grant	Transmission / Distribution	\$0.00	\$602,636.00	\$0.00	\$0.00	\$0.00	\$0.00	\$602,636.00
Lead Service Line Replacement	CDS Grant	Services	\$0.00	\$300,000.00	\$617,364.00	\$0.00	\$0.00	\$0.00	\$917,364.00
<b>Total Grant Funded Water Projects</b>			<b>\$2,500,000.00</b>	<b>\$1,152,636.00</b>	<b>\$617,364.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$4,270,000.00</b>
<b>Dam Rehabilitation, Resilience &amp; Reinforcement</b>	<b>Unknown</b>	<b>Source of Supply</b>		<b>\$7,000,000.00</b>	<b>\$7,000,000.00</b>	<b>\$7,000,000.00</b>	<b>\$7,000,000.00</b>	<b>\$7,000,000.00</b>	<b>\$35,000,000.00</b>
<b>System Wide Main Improvements</b>	<b>Unknown</b>	<b>Transmission / Distribution</b>		<b>\$12,500,000.00</b>	<b>\$12,500,000.00</b>	<b>\$12,500,000.00</b>	<b>\$12,500,000.00</b>	<b>\$12,500,000.00</b>	<b>\$62,500,000.00</b>
<b>Lead Service Line Replacement - Public</b>	<b>Unknown</b>	<b>Services</b>		<b>\$1,875,000.00</b>	<b>\$1,875,000.00</b>	<b>\$1,875,000.00</b>	<b>\$1,875,000.00</b>	<b>\$1,875,000.00</b>	<b>\$9,375,000.00</b>
<b>Lead Service Line Replacement - Private</b>	<b>Unknown</b>	<b>Services</b>		<b>\$3,850,000.00</b>	<b>\$3,850,000.00</b>	<b>\$3,850,000.00</b>	<b>\$3,850,000.00</b>	<b>\$3,850,000.00</b>	<b>\$19,250,000.00</b>
<b>Water Infrastructure Resilience Projects</b>	<b>Unknown</b>	<b>All</b>		<b>\$500,000.00</b>	<b>\$1,500,000.00</b>	<b>\$500,000.00</b>	<b>\$1,500,000.00</b>	<b>\$500,000.00</b>	<b>\$4,500,000.00</b>
<b>Per &amp; Polfluoroalkyl Substances - AKA PFAS</b>	<b>Unknown</b>	<b>Treatment Both</b>		<b>\$500,000.00</b>	<b>\$1,000,000.00</b>	<b>\$1,000,000.00</b>	<b>\$5,000,000.00</b>	<b>\$5,000,000.00</b>	<b>\$12,500,000.00</b>
<b>Infrastructure Gap (Total Unfunded Projects)</b>	<b>Unknown</b>			<b>\$26,225,000.00</b>	<b>\$27,725,000.00</b>	<b>\$26,725,000.00</b>	<b>\$31,725,000.00</b>	<b>\$30,725,000.00</b>	<b>\$143,125,000.00</b>
<b>Total Spending Required to Sustain Level of Service</b>				<b>\$29,254,136.00</b>	<b>\$32,242,364.00</b>	<b>\$30,625,000.00</b>	<b>\$35,625,000.00</b>	<b>\$34,625,000.00</b>	<b>\$162,371,500.00</b>

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 24-30-WW  
Response Of The City Of Newport,  
Utilities Division, Water Department  
To The Portsmouth Water and  
Fire District's Data Requests  
Set 2

**PWFD 2-3:** Refer to HJS Schedule A-1A. For each account:

- a. Please show the inflation rate used for the "Rate Year Adjustments" relative to the "Normalized Test Year" and cite the source for the inflation rate.
- b. Please separately identify the revenue required due to inflation and the revenue required due to real cost factors.

**Response:** Please see Newport's response to PWFD 1-1.

**Prepared by:** Robert C. Schultz, Jr.

**CERTIFICATION**

I hereby certify that on September 20, 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.

<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, 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
	<a href="mailto:lsitrin@CityofNewport.com">lsitrin@CityofNewport.com</a> ;	
	<a href="mailto:dbarrett@CityofNewport.com">dbarrett@CityofNewport.com</a> ;	
Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte, NC 28203	<a href="mailto:Hsmith@raftelis.com">Hsmith@raftelis.com</a> ;	704-373-1199
<b>Division of Public Utilities (Division)</b>  Leo Wold, Esq. John Bell	<a href="mailto:Leo.Wold@dpuc.ri.gov">Leo.Wold@dpuc.ri.gov</a> ;	401-222-2424
	<a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov</a> ;	
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov</a> ;	
	<a href="mailto:Joel.munoz@dpuc.ri.gov">Joel.munoz@dpuc.ri.gov</a> ;	
	<a href="mailto:pat.smith@dpuc.ri.gov">pat.smith@dpuc.ri.gov</a> ;	
	<a href="mailto:Steven.Parrillo@dpuc.ri.gov">Steven.Parrillo@dpuc.ri.gov</a> ;	
	<a href="mailto:Machaela.Seaton@dpuc.ri.gov">Machaela.Seaton@dpuc.ri.gov</a> ;	
	<a href="mailto:ellen.golde@dpuc.ri.gov">ellen.golde@dpuc.ri.gov</a> ;	
<b>Dept. of Navy (DON)</b> Larry Allen Kay Davoodi Legal Counsel TBD	<a href="mailto:Larry.R.Allen5.civ@us.navy.mil">Larry.R.Allen5.civ@us.navy.mil</a> ;	
	<a href="mailto:Khojasteh.R.Davoodi.civ@us.navy.mil">Khojasteh.R.Davoodi.civ@us.navy.mil</a> ;	

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 24-30-WW  
Response Of The City Of Newport,  
Utilities Division, Water Department  
To The Portsmouth Water and  
Fire District's Data Requests  
Set 2

<b>Portsmouth Water &amp; Fire District (PWFD)</b> Adam M. Ramos, Esq. Christine E. Dieter, Esq. Hinckley, Allen & Snyder 100 Westminster St., Suite 1500 Providence, RI 02903	<a href="mailto:aramos@haslaw.com">aramos@haslaw.com</a> ; <a href="mailto:ksavage@hinckleyallen.com">ksavage@hinckleyallen.com</a> ;	
	<a href="mailto:JasonM@fcsgroup.com">JasonM@fcsgroup.com</a> ;	
Jessica C. Lynch, PWFD	<a href="mailto:jlynch@portsmouthwater.org">jlynch@portsmouthwater.org</a> ;	
Jason Mumm, FCS Group	<a href="mailto:JasonM@fcsgroup.com">JasonM@fcsgroup.com</a> ;	
<b>Town of Middletown (Middletown)</b> Peter Regan, Esq. Mark Boivin, Esq. Sayer Regan & Thayer, LLP 130 Bellevue Ave. Newport, RI 02840	<a href="mailto:Pregan@SRT-law.com">Pregan@SRT-law.com</a> ;	401-849-3040 x-233
	<a href="mailto:mboivin@srt-law.com">mboivin@srt-law.com</a> ;	
	<a href="mailto:arichardson@srt-law.com">arichardson@srt-law.com</a> ;	
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> Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Stephanie.delarosa@puc.ri.gov">Stephanie.delarosa@puc.ri.gov</a> ,	401-780-2107
	<a href="mailto:John.harrington@puc.ri.gov">John.harrington@puc.ri.gov</a> ;	
	<a href="mailto:Christopher.Caramello@puc.ri.gov">Christopher.Caramello@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	

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