



Sayer Regan & Thayer, LLP
ATTORNEYS AND COUNSELLORS AT LAW

November 21, 2024

Via regular mail and email: stephanie.delarosa@puc.ri.gov

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

Re: *City of Newport, Utilities Department, Water Division*
PUC Docket No. 24-30-WW

Dear Ms. De La Rosa:

Please find enclosed for filing in the above-referenced case, (1) original and (9) copies the following:

1. The Town of Middletown's response to the City of Newport, Utilities Division, Water Department's First Set of Data Requests.

Should you have any questions, or need further information, please do not hesitate to contact this office. Thank you for your attention to this matter.

SAYER REGAN & THAYER, LLP

A handwritten signature in cursive script that reads 'Leanna Kehm'.

Leanna Kehm
lkeh@srt-law.com

lk:
Service List via Email
Enclosures

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

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NWD 1 Regarding Mr. Russell's testimony on Pg. 7 and 8 and the table on page 9, please provide all supporting workpapers and calculations for the table on page 9 where he calculates the annual charge for 90,000 gallons of water for each utility listed.

RESPONSE:

The annual charges were computed by using the rates shown on the RIPUC's website for RI Regulated Water Suppliers; by applying the 90,000 gallon usage level to the listed volumetric charges and adding the annual fixed charges amount (multiplied by 4 for quarterly customers and by 12 for monthly customers), which results in the total annual charges shown on Page 9.

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NWD-2 Regarding Mr. Russell's testimony on pages 7-11 in which he compares Newport Water's rates to that of other utilities:

- a. Please fully describe the process Mr. Russell undertook to examine all similarities and differences between Newport and each of the utilities he used for comparison to ensure that the comparison between rates was a fair comparison.
- b. Please provide all documentation Mr. Russell analyzed and relied on in making his comparisons between Newport Water's rates and the rates of each of the utilities he used for comparison.
- c. Of the Connecticut utilities listed on page 10, which of these utilities is regulated.
- d. Please provide a list of all treatises, technical books, periodicals, pamphlets or other writings relied upon by Mr. Russell that indicate that comparison of water rates among utilities should be used as a factor by a regulatory body in setting rates.
- e. Please state why you used 90,000 gallons of usage for your comparison and set forth all facts and provide all documents that support using 90,000 gallons of usage in your comparison.

RESPONSE:

- a. This was a random sample of water charges paid by residential customer in the neighboring State of Connecticut. It was not intended to only show systems that were exactly the same as Newport Water. It was intended to simply show that like its counterparts in Rhode Island, many, if not most of the communities in both states pay a lot more for water service than what residential customers of Newport Water pay for the same level of potable water, and therefore the financial burden on Newport's residential customers, particularly low-income customers, is much higher for them than nearly all surrounding communities. Thus, the affordability issue for customers of Newport Water is likely to be a much bigger problem for their customers than almost all other communities in the region.
- b. Please see TOM's response to subpart (a).

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- c. Again, this was a random sample. I suspect some are regulated and some are not.

- d. No where in my testimony did I state that comparison of water rates among utilities should be used as a factor by a regulatory body in setting rates. Therefore, there was no need to rely on any of the documents that you list in this Data Request. However, it is my opinion that it is useful for a regulatory body to be aware of what a sizable sample of what most systems in the same state or an adjacent State are paying for their water service in comparison to what a water utility, that is asking that regulatory body for a large increase, is charging its customers for the same level of service. It is particularly useful if affordability and/or rate mitigation issues become a concern to that regulatory body during a pending rate case. Also, see response to part a.

- e. As I explained in my testimony that while 90,000 gallons of usage in a year is somewhat higher than what is used by average residential customers in many systems, it is not an excessive level and many residential customers use close to or more than that level annually. Furthermore, it is a level that has been used for many years in nationally recognized surveys of cities and towns in every State in the Country. Lastly, in all of my reports and testimonies for more than 30 years it is the level I have used almost exclusively for listing customer impacts.

Prepared by: David Russell

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NWD-3 On pages 12-13 of his testimony, Mr. Russell regarding Newport's proposal to add six new positions he recommends "...that hiring of one or more of these positions be delayed for at least one or 2 years in order to mitigate some of the impact to customers in the short run (this fiscal year and possibly the next), and "To the extent it aids in makes such a delay possible, NWD should consider increasing its use of part time employees and or additional use of student internships."

- a. Please demonstrate the savings and the resulting impact on rates for this proposal showing all calculations without factoring in costs for part-time employees.
- b. Please demonstrate the net savings that factor in the use of part time employees and the resulting impact on rates for this proposal showing all calculations.
- c. Please set forth all facts Mr. Russell relied on to support his suggestion that student internships could be used to make a delay in hiring possible.

RESPONSE:

- a. The savings would largely consist of the salaries and benefits associated with each position that is not filled/delayed. The impact on rates would be relatively small, depending on the position that is delayed, the number of positions delayed and the number of years that each position is delayed. In total the impact on rates would be in proportion to the total salaries and benefits delayed as a percentage of the total revenue requirement.
- b. The net savings would largely consist of the salaries and benefits associated with each position that is not filled/delayed minus the cost associated with the use of part time employees. The impact on rates would be similar to the impact described in response to part b.
- c. This was just a simple suggestion. "To the extent it aids in making such a delay possible, NWD should consider....." If NWD doesn't believe such actions would be helpful or appropriate, it can decide not to use them. Also, see responses to parts a. and b.

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NWD-4 Regarding Mr. Russell's testimony on Pgs. 14-16 that "Utilities typically divide assets into two general categories... "Large Fixed Assets" ... [and] "Minor Fixed Assets...":

- a. Please state all facts supporting this testimony.
- b. Please provide supporting documentation relied upon by Mr. Russell in support of this testimony.
- c. Please identify the dollar amount and years of usefulness that separate "Large Fixed Assets" from "Minor Fixed Assets."
- d. Please provide a list of all treatises, technical books, periodicals, pamphlets or other writings relied upon by Mr. Russell for this testimony.

RESPONSE:

- a. These are two general categories that I use to refer to the two general types of assets that are generally/typically funded in two very different ways. The only fact is the different way these two general categories are funded or paid for. It has been my experience that many utilities (perhaps not all) "typically" separate their capital improvements into two basic groups. I distinguish them by referring to one group as "Large Fixed Assets," as those capital improvements that usually have long lives and usually are very expensive – that group is generally funded by use of long-term debt. I recognize that there can be disputes over what is considered long-lived and what is a large investment compared to a not so large investment. I use the term to refer to what many or most would consider long-lived assets (perhaps 20, 30 or more years), and what many or most would consider a large investment (perhaps a few Million dollars, to several million dollars or much more). On the other hand I use the term "Minor Fixed Assets" to refer in general to relatively shorter-lived assets (20 years or less) and requiring relatively smaller investments (say a few million dollars or less). Clearly not all Large Fixed Assets are funded with Debt, but many or most are. And, not all Minor Fixed Assets are funded with cash, but many are. So the nomenclature I use here is not used by all utilities, but it has been my experience that it applies in most cases. I use the terms for ease of reference, and recognize they don't apply to every utility or circumstance.
- b. Please see TOM's response to subpart (a).

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- c. Please see response to part a. Additionally, there clearly can be exceptions. For example, there are larger systems that may fund relatively large project (say \$20 million) that has an expected life of perhaps 15 or 20 years with current revenues, and there may be small systems that fund a relatively small capital improvement that has a short life (say 10 years) with debt.

- d. Please see TOM's responses to subparts (a). and (c).

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NWD-5 On Page 16-17, Mr. Russell suggests that Newport borrow funds to pay for one of three proposed projects.

- a. Please state how much Newport will pay in total for this project over the life of the loan including in your answer all principal, interest, and each and every cost associated with the loan, including, but not limited to, loan origination fees, cost of issuance, attorney fees and financial advisor fees.
- b. Please provide a detailed calculation and provide all workpapers that support your contention that "The short-term costs of financing either of these projects would be considerably lower than the annual expenses paid from current (pay as you go) revenues under the cash option that NWD proposes."
- c. Please provide a detailed calculation and provide all workpapers that demonstrates the savings and the resulting impact on rates for your proposal that Newport fund one of the referenced projects through debt rather than rates.
- d. Please provide a detailed calculation and provide all workpapers that supports your testimony that "...in the short run (2 or more years), it will significantly lower the level of current revenues (revenue requirements) to pay for its construction, which in turn will lower the level of increase in rates adopted in this case. Hence, reducing some of the customer impact associated with this case."
- e. Mr. Russell's testimony also stated: "I would be glad to demonstrate how this could result in lower annual costs in the short run and possibly the long run as well for a particular capital project." To the extent not covered by the calculations requested above, please provide this demonstration showing detailed calculations and providing all supporting workpapers.

RESPONSE:

- a. As I stated in my testimony (page 16 lines 12 -17), "The short-term costs of financing either of these improvements would be considerably less than the annual expenses paid from current (pay-as-you-go) revenues under the cash option that NWD proposes. The total cost of the project would likely be greater

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in the long-run under the financing option, but after factoring in the time value of money, the difference is likely to be relatively small.” The difference in total costs would take into account the closing cost you refer to and the interest associated with the debt financing option. Also, in my testimony (page 16 line 27 to page 17 line 5) I stated, “This issue was brought up in the prior case, but there was little interest at that time. Again, however, because of the high impacts associated with this case, its adoption for one or more Capital projects slated to be funded with current revenues could be implemented to reduce or mitigate some of the high customer impacts associated with this case. If the NWD or any of the interveners would like to explore this alternative funding option for one or more of the three eligible projects in settlement negotiations or in litigating the case, I would be glad to demonstrate how this could result in lower annual costs in the short run and possibly the long run (by factoring the time value of money) as well for a particular capital project.” Lastly, I did give a fairly detailed example of funding two capital improvement projects with debt in comparison with cash funding proposed by NWD – see testimony of David F. Russell, PE in case Docket No. – 49339, dated July 10, 2019, pages 21, line 2 through page 22, line 17.

- b. Please see TOM's response to subpart (a).

- c. Please see TOM's response to subpart (a).

- d. Please see TOM's response to subpart (a).

- e. Please see TOM's response to subpart (a).

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NWD-6 Regarding Mr. Russell's testimony on Pgs. 17-18 that Newport delay one or more of its planned capital improvements to "mitigate some of the impact to customers in the short run (this fiscal year and possibly the next)":

- a. What is Mr. Russell's estimate for how much project costs will increase by this delay?
- b. Can Mr. Russell guarantee that the Newport won't incur higher project costs if projects are delayed?
- c. Please provide a detailed calculation and provide all workpapers that demonstrates the savings and the resulting impact on customer rates for your proposal that Newport delay one or more of its capital projects.
- d. Please provide all calculations that support your testimony that "The postponement of one or two projects would lower NWD's total Revenue requirements by several hundred thousand dollars in the rate year and possibly the following year."
- e. Please provide a detailed calculation showing the impact on customer rates in the years these delayed capital projects are undertaken.

RESPONSE:

- a. It could increase by the realized escalation in the cost of labor and materials. For one or two years this is likely to be quite small and possibly close to zero, given current and projected (short term) economic conditions, particularly general inflation levels.
- b. In my professional opinion, no one can (nor should they) provide such a guarantee. Furthermore, no one can (nor should they) provide a guarantee that Newport won't realize lower project costs if projects are delayed. Also, see the response to part a.
- c. Please see TOM's response to subpart (a). With respect to customer rates, the impact would be directly related to the annual reduction in annual revenue requirements as a proportion of the total revenue requirement without the savings. Also, see the response to part a.
- d. Assuming all else being equal, if postponing 1 of more projects by one year allows NWD to not spend say, \$200,000 in 2025 or 2026 on one or more of the projects delayed, then NWD could lower its rate revenue requirements by

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\$200,000 in either or both years. This also assumes that the funding level for this capital fund is reduced by at least \$200,000 in the year the project is delayed.

- e. Please see response to part d. Additionally – Middletown has not yet prepared an alternative revenue requirement reflecting its position, due to the fact that it is continuing to evaluate the magnitude of some of its proposed adjustments (including this one) and expects to receive further information through testimonies of other parties and from Newport Water. If this matter proceeds to a fully litigated case, Middletown will consider providing this analysis at an appropriate time.

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NWD-7 Mr. Russell's testimony on Pg.18 that "...I also recognize that there are other criteria or principles of ratemaking that may under certain circumstances lead to rates that are not based solely on following the exact rates produced by a Cost-of-Service Study. Also, there may be other social, economic or environmental considerations that may warrant considerable deviation from rates that are based solely or exactly on cost of providing water service to a particular customer or class of customers.":

- a. Please identify all other criteria or principles of ratemaking that may apply to proposed Cost of Service in this case that lead to rates that are not based solely on rates produced by the Cost-of- Service Study used in this Docket.
- b. Please identify all social, economic or environmental considerations that may warrant considerable deviation from rates that are based on the cost of providing water service to Newport's customers and Newport's customer classes.

RESPONSE:

- a. First, I prefaced that statement with, "In general, I tend to follow the cost causation principle of ratemaking." Second, within the industry it is generally accepted that performing a Cost of Service Study (COSS) is not an exact science. It is in large part also an Art. Many assumptions must be made and many ratios (cost splits) must be estimated making much of the analysis subjective in nature; which, often leads to very different results depending on who is performing the COSS. Some examples of other criteria (considerations) or principles that may apply in certain circumstances include Rate Continuity, Rate simplicity, ease of administration, revenue stability, customer impact mitigation measures, gradualism or phasing-in, conservation of resources, customer affordability, customer assistance programs, business incentives, general Fund contributions, intentional subsidies, marginal pricing, seasonal pricing, time of use pricing, and budget pricing to list several.
- b. Please see the response to part a. Many of these other criteria or considerations listed in Part a. have aspects of their nature or purpose related to social, economic and environmental objectives or incentives.

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NWD-8 Regarding Mr. Russell's testimony on Pg. 22, and in particular his table of recommended adjustments, please provide the following in the same format as HJS Schedule A-2A that shows the results of Mr. Russell's recommendations:

- a. The rates that result from Mr. Russell's proposal using Newport's rate year revenue requirement as set forth in Newport's revised rate model.
- b. The rates that result from Mr. Russell's rate year revenue requirement, which incorporates all of the changes set forth in his direct testimony

RESPONSE:

- a. Middletown has not yet prepared an alternative revenue requirement reflecting its position, due to the fact that it is continuing to evaluate the magnitude of some of its proposed adjustments and expects to receive further information through testimonies of other parties and from Newport Water. If this matter proceeds to a fully litigated case, Middletown will consider providing this analysis at an appropriate time.
- b. Please see TOM's response to subpart (a).

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NWD-9 Regarding Mr. Russell's testimony on Pgs. 19-20, that Newport adopt a two or three-block increasing rate structure:

- a. Please explain why an increasing block rate structure is needed.
- b. Please identify what the different rates will be.
- c. Please provide a schedule in the same format as HJS Schedule A-2A that shows the results of Mr. Russell's proposal for a two block increasing rate structure and also a three block rate structure including the revenues to be produced by each block using Newport's rate year revenue requirement as set forth in the revised rate model.
- d. Please provide a schedule in the same format as HJS Schedule A-2A that shows the results of Mr. Russell's proposal for a two block and also a three block increasing rate structure including the revenues to be produced by each block that result from Mr. Russell's rate year revenue requirement, which incorporates all of the changes set forth in his direct testimony.

RESPONSE:

- a. My reasons for recommending a two or three tier increasing block rate structure, particularly for residential customers in this case, are explicitly stated in my testimony at page 19, line 21 through page 20 line 21.
- b. Please see the response to part a. In the cited paragraph, I set out what I believe the general parameters of the rate structure should be, but also suggest the final design should be accomplished by the NWD, and unless the NWD and/or other interveners prefer to include it as part of this case, it may be better to request that the Commission require NW to include such a rate structure as part of the second step increase case.
- c. Please see TOM's response to subpart (b).
- d. Please see TOM's response to subpart (b).

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NWD-10 Regarding Mr. Russell's testimony on Pgs. 21-22 regarding a "lifeline rate or a discount percentage to low income customers":

- a. Please identify any Rhode Island State laws that would allow Newport to offer these discount rates.
- b. Please identify any Rhode Island State laws that would prevent Newport from offering these discount rates.

RESPONSE:

- a. I am not aware of any such Rhode Island State Laws.
- b. I am not aware of any such Rhode Island State Laws.

Prepared by: David Russell

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NWD-11 Regarding Mr. Russell's testimony on Pgs. 21-22, regarding a "lifeline rate or a discount percentage to low income customers":

- a. What is the "level of consumption approximated by the level of use needed for health and sanitation purposes" recommended by Mr. Russell.
- b. What is the "reasonable mark-up (additional amount) to compensate for variability of household demographics and usage patterns" recommended by Mr. Russell?
- c. For the "reasonable mark-up (additional amount) to compensate for variability of household demographics and usage patterns", please provide a worksheet showing how Mr. Russell arrived at the markup including the household demographics and usage patterns he used.
- d. What is the unit rate that will be charged to eligible customers?
- e. Please provide a worksheet showing how Mr. Russell arrived at the unit rate identified in subsection d.
- f. How many of Newport's customers will qualify for the lifeline or low-income rate?
- g. How will Newport determine which customers qualify for the rate?

RESPONSE:

- a. I don't have a specific level in mind, but a reasonable level could be estimated by assuming that about one-third to about one-half of the average use by residential customers during winter months on your system is used primarily for health and sanitation purposes (for example, drinking water, washing hands, limited showering/bathing and necessary toilet flushing). Alternatively, you could perform a literature search on the subject and apply what a typical person in developed countries needs/uses daily just for health and sanitation; multiply that number by 30 days per month; and multiply that product by the average number of persons per residential customer on your system. The result would be the monthly level of water use on your system that a residential customer requires for health and sanitation purposes. Also, in response to this subpart and the other six subparts of this Data Request, it is my opinion that if NWD decides to, or is required to institute such a rate structure or a customer

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assistance measure/program, NWD should be allowed to propose what it believes would be the best or preferred rate structure or measure (detailed parameters such as block break points, block intervals, unit rates and discount levels) for its system and all of their residential customers. This would then be accepted, rejected or modified by the interested parties, and ultimately would need approval by the RIPUC.

- b. In my opinion anywhere between 10% to 20% would be reasonable for that purpose. Also see response to subpart a.

- c. Mr. Russell did not perform a detailed scientific study to estimate a reasonable level for such a mark-up. It is simply his professional opinion that the low end of such a reasonable mark-up is at or around 10% and the high end of such a reasonable mark-up is at or around 20%. Also see response to subpart a.

- d. The determination of the unit rate is best left to NWD as part of its related proposal, if it volunteers or is required to implement such a rate or measure. Also see response to subpart a.

- e. Mr. Russell did not derive such a unit rate. Also, please see responses to subparts a, through d.

- f. The determination of how many of Newport's customers will qualify is best left to NWD as part of its related proposal, if it volunteers or is required to implement such a rate or measure. Also see response to subpart a.

- g. The determination of which customers qualify for the rate is best left to NWD as part of its related proposal, if it volunteers or is required to implement such a rate or measure. Also see response to subpart a.

Prepared by: David Russell

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NWD-12 Regarding Mr. Russell's testimony on Pgs. 21-22, regarding a "lifeline rate or a discount percentage to low income customers":

- a. If Newport implemented a lifeline rate or a discount percentage to low income customers, does Mr. Russell agree that the rates charged to other classes of customers would have to increase to ensure that Newport recovers the overall revenue requirement ultimately approved by the Commission.
- b. If Mr. Russell agrees that the rates charged to other classes of customers would have to increase if Newport implemented a lifeline rate or a discount percentage to low income customers to ensure that Newport recovers the overall revenue requirement ultimately approved, please provide a schedule in the same format as HJS Schedule A-2A that shows the results of Mr. Russell's proposal for a lifeline rate or a discount percentage to low income customers, including the revenues to be produced by each class of customers, using Newport's rate year revenue requirement as set forth in the revised rate model.
- c. If Mr. Russell agrees that the rates charged to other classes of customers would have to increase if Newport implemented a lifeline rate or a discount percentage to low income customers to ensure that Newport recovers the overall revenue requirement ultimately approved, please provide a schedule in the same format as HJS Schedule A-2A that shows the results of Mr. Russell's proposal for a lifeline rate or a discount percentage to low income customers, including the revenues to be produced by each class of customers, that results from Mr. Russell's rate year revenue requirement, which incorporates all of the changes set forth in his direct testimony.
- d. If Mr. Russell does not agree that the rates charged to other classes of customers would have to increase if Newport implemented a lifeline rate or a discount percentage to low income customers to ensure that Newport recovers the overall revenue requirement ultimately approved, please state in detail why he does not agree.

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RESPONSE:

- a. Yes, Mr. Russell agrees with this statement. However, the number of participating customers and the total amount of revenues that will need to be reallocated is usually not large enough to adversely impact those customers that receive incrementally higher rates because of the reallocation. Additionally, by design those customers that receive incrementally higher rates, are better able to afford the relatively small increase resulting therefrom.
- b. Similar to his response to Data Request 11, it is Mr. Russell's opinion that if NWD decides to, or is required to institute a lifeline rate or discount percentage, NWD should be allowed to propose what it believes would be the best or preferred rate structure or measure (detailed parameters such as block break points, block intervals, unit rates and discount levels) for its system and all of their residential customers. This would then be accepted, rejected or modified by the interested parties, and ultimately would need the approval of the RIPUC.
- c. See TOM's response to subpart (b).
- d. See TOM's response to subpart (a).

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NWD-13 Regarding Mr. Russell's testimony on Pgs. 21-22, that "the simplest and easiest to administer [a lifeline rate or a discount percentage to low income customers] would be to piggy-back on an existing program, like those administered by electric or gas utilities:

- a. Please explain in detail why this is the simplest and easiest way for Newport to administer such a program.
- b. Please describe what steps you took to investigate whether Newport could "piggy-back" on existing programs administered by National Grid including any conversations or communications you had with employees or representatives of National Grid.
- c. Please explain in detail how Newport would "piggy-back" on existing programs administered by National Grid.

RESPONSE:

- a. This opinion of Mr. Russell is based primarily on the fact that if NWD was able to piggy-back on an existing program, much of the work necessary to administer such a program is already being performed by the utility/agency that Newport would be piggy-backing on. Clearly, if there were no such utility/agency to piggy-back onto, this would not be the simplest and easiest way for Newport to administer such a program.
- b. Mr. Russell did not perform the specific investigation described in this Data Request. Also, see response to part a.
- c. Mr. Russell has not specifically looked into how this is accomplished. However, in at least a few other jurisdictions he has been led to believe that the process is relatively straightforward and not expensive to accomplish.

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NWD-14 On Pg. 22 , Mr. Russell testifies that “The following Table summarizes my estimates of reductions to the proposed increase that would result from each of the recommendations provided above (as of today’s date). Most of these estimates depend on many variables that will only be known near the end of the hearing process. Thus, each will need to be re-estimated as those variables become known.” Please list each of these variables.

RESPONSE:

Much of this Table has already been modified as a result of my further review of responses to various data Requests [by NWD (including those from Middletown), the Division and PWFD], Testimonies of the Division and PWFD and further review of prior cases. While there are others, the primary variables are projected sales, many expense estimates, some revenue estimates, labor negotiations, filled and vacant positions, interest income, modifications to capital improvement expenditures and plans, services to Newport, and UAW.

Prepared by: David Russell

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NWD-15 Regarding Mr. Russell's testimony on Pg. 22, he summarized his recommendations to Newport's proposed changes to the Newport's revenue request, cost allocations and rate design. As such, please provide a schedule of the rates that result from all of Mr. Russell's recommendations in the same format as HJS Schedule A-2A, including an electronic copy of the spreadsheet (with any and all linked spreadsheets and all formulas intact).

RESPONSE:

As indicated in the response to Data Request 14, Mr. Russell's recommendations have already been modified (since his testimony was filed) as a result of further review of responses to various data Requests, Testimonies of the Division and PWFD and further review of prior cases. And, based on further analysis, discussions relative to settlement negotiations and NWD's Rebuttal due in one week, it is likely that one or more of those recommendations will be further modified. Thus, Middletown is not prepared at this time to provide the information requested in this data Request.

Prepared by: David Russell

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NWD-16 Regarding Mr. Russell's testimony on Pg. 23, that "Responses to several information requests were not received prior to the required filing date of this testimony," a. Does Mr. Russell agree that the only data requests issued by Middletown was its first set which was not served on Newport until October 8, 2024.

RESPONSE:

That is my understanding, yes.

Prepared by: David Russell

TOWN OF MIDDLETOWN,
By Their Attorneys,

/s/ Peter Brent Regan

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CERTIFICATE OF SERVICE

I hereby certify that I mailed an original and nine (9) copies of the within Data Requests to the Public Utilities Commission Clerk at the address listed below and I emailed a copy of the within Data Requests to the Public Utilities Commission Clerk and to all parties set forth on the attached Service List on the 21st day of November, 2024.

VIA FIRST CLASS MAIL:

Stephanie.delarosa@puc.ri.gov
Stephanie De La Rosa, 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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