

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET NO. 24-30-WW
Portsmouth Water and Fire District's
Responses to Newport Water's Second Set of Data Requests
January 13, 2025
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NWD 2-1. In Mr. Mumm's JGM Schedule A-1, line 1, he presents an adjustment to Admin Salaries and Wages in the amount of \$128,236 to "Remove newly created positions, keep compensation adjustments for existing positions."

- a. Please identify each position and the corresponding salary that makes up the \$128,236 adjustment.
- b. Please provide workpapers that show the derivation of PWFD's Proposed Admin. Rate Year Salaries and Wages Expense of \$320,706, including each rate year position and the corresponding salary.

PWFD RESPONSE:

- a. Admin salaries were taken from HJS D-7. However, the values were taken from the final rate model from Newport's initial rate filing rather than the PDF version filed with Mr. Smith's rebuttal. The correct amount of the adjustment should be \$158,499, as shown below. See **Attachment NWD 2-1**, which are revised JGM Schedules, with changed amounts highlighted in yellow, as well as **Attachments NWD 2-1-A** and **NWD 2-1-B**, which are revised versions of Portsmouth's Surrebuttal Testimony in redline and clean versions, respectively.

PWFD Position	Salary from HJS Schedule D-7 (Initial Rate Filing)	Salary from HJS Schedule D-7 (Rebuttal Filing)
Utilities Infrastructure Asset Manager	\$47,708	\$58,967
Utilities Engineer	\$44,618	\$55,148
Administrative Assistant	\$35,910	\$44,384
Total	\$128,236.00	\$158,499.00

- b. The derivation of \$320,706 is as shown on JGM Schedule A-1. The Normalized Test Year and Rate Year Adjustment values come from HJS Schedule A-1A as filed with Mr. Smith's rebuttal testimony. The PWFD Adjustments shown in response to 1a. above - \$128,236 - are subtracted from the sum of the two to arrive at \$320,706.

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NWD 2-2. In Mr. Mumm's JGM Schedule A-1, line 3, he presents an adjustment to Admin Employee Benefits in the amount of \$64,878 to "Remove newly created positions, keep compensation adjustments for existing positions."

- a. Please identify each position and the corresponding employee benefit(s) amount that makes up the \$64,878 adjustment.
- b. Please provide workpapers that show the derivation of PWFD's Proposed Rate Year Admin Employee Benefit Expense of \$172,818, including each rate year position and the corresponding benefit(s) amount

PWFD RESPONSE:

- a. See **Attachments NWD 2-1, NWD 2-1-A, and NWD 2-1-B.** Admin benefits were taken from HJS D-7. However, the values were taken from the final rate model from Newport's initial rate filing rather than the PDF version filed with Mr. Smith's rebuttal.. The correct amount of the adjustment should be \$77,854, as shown below.

Position	Employee Benefits from HJS Schedule D-7 (Initial Rate Filing)	Employee Benefits from HJS Schedule D-7 (Rebuttal Filing)
Utilities Infrastructure Asset Manager	\$25,264	\$30,317
Utilities Engineer	\$17,872	\$21,446
Administrative Assistant	\$21,742	\$26,091
Total	\$64,878.00	\$77,854.00

- b. The derivation of \$172,818 is as shown on JGM Schedule A-1. The Normalized Test Year and Rate Year Adjustment values come from HJS Schedule A-1A as filed with Mr. Smith's rebuttal testimony. The PWFD Adjustments shown in response to (a) above - \$64,878 - are subtracted from the sum of the two to arrive at \$172,818.

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NWD 2-3. In Mr. Mumm's JGM Schedule A-1, line 127, he presents an adjustment to Trans. & Dist. Salaries and Wages in the amount of \$140,751 to "Remove newly created positions, keep compensation adjustments for existing positions."

- a. Please identify each position and the corresponding salary that makes up the \$140,751 adjustment.
- b. Please provide workpapers that show the derivation of PWFD's Proposed Trans. & Dist. Rate Year Expense of \$520,323 including each rate year position and the corresponding salary.

PWFD RESPONSE:

- a. See **Attachments NWD 2-1, NWD 2-1-A, and NWD 2-1-B.** T&D salaries were taken from HJS D-14. However, the values were taken from the final rate model from Newport's initial rate filing rather than the PDF version filed with Mr. Smith's rebuttal. The correct amount of the adjustment should be \$144,972, as shown below.

Position	Salary from HJS Schedule D-14 (Initial Rate Filing)	Salary from HJS Schedule D-14 (Rebuttal Filing)
Utility Locator/Damage Prevention Tech.	\$34,789	\$35,832
Utility Operator I, II, III, or IV	\$52,981	\$54,570
Utility Operator I, II, III, or IV	\$52,981	\$54,570
Total	\$140,751.00	\$144,972.00

- b. The derivation of \$520,323 is as shown on JGM Schedule A-1. The Normalized Test Year and Rate Year Adjustment values come from HJS Schedule A-1A as filed with Mr. Smith's rebuttal testimony. The PWFD Adjustments shown in response to (a) above - \$140,751 - are subtracted from the sum of the two to arrive at \$520,323.

NWD 2-4 In Mr. Mumm's JGM Schedule A-1, line 131, he presents an adjustment to Trans. & Dist. Employee Benefits in the amount of \$73,187 to "Remove newly created positions, keep compensation adjustments for existing positions."

- a. Please identify each position and the corresponding employee benefit(s) amount that makes up the \$73,187 adjustment.
- b. Please provide workpapers that show the derivation of PWFD's Proposed Rate Year Trans. & Dist. Employee Benefit Expense of \$324,776, including each rate year position and the corresponding benefit(s) amount.

PWFD RESPONSE:

- a. T&D benefits were taken from HJS D-14.

Position	Employee Benefits from HJS Schedule D-14
Utility Locator/Damage Prevention Tech.	\$22,046
Utility Operator I, II, III, or IV	\$25,571
Utility Operator I, II, III, or IV	\$25,571
Total	\$73,188.00

- b. The derivation of \$324,776 is as shown on JGM Schedule A-1. The Normalized Test Year and Rate Year Adjustment values come from HJS Schedule A-1A as filed with Mr. Smith's rebuttal testimony. The PWFD Adjustments shown in response to 1a. above - \$73,187 (there is a minor variance due to rounding) - are subtracted from the sum of the two to arrive at \$324,776.