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July 30, 2025

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

RE: The Providence Water Supply Board – Docket 24-51-WW

Dear Ms. De La Rosa:

Enclosed please find and original and nine copies of the following:

1. The Bristol County Water Authority's Objection To The Providence Water Supply Board's Compliance Filing And Request For Miscellaneous Relief.

A copy has been provided to the service list. Thank you for your attention to this matter.

Sincerely,

Joseph A. Keough, Jr.

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cc: Service List (via email)

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE WATER SUPPLY BOARD

APPLICATION TO INCREASE RATES : DOCKET No. 24-51-WW

THE BRISTOL COUNTY WATER AUTHORITY'S OBJECTION TO THE PROVIDENCE WATER SUPPLY BOARD'S COMPLIANCE FILING AND REQUEST FOR MISCELLANEOUS RELIEF

NOW COMES the Bristol County Water Authority ("BCWA"), and objects to the Compliance Filing and Revised Compliance Filing submitted by the Providence Water Supply Board ("Providence") in the above captioned Docket and seeks the miscellaneous relief prayed for herein:

- On July 29, 2025, Providence submitted a Compliance Filing in the above captioned Docket, and on July 30, 2025, Providence submitted a revised Compliance Filing.
- Both of these Compliance Filings contain Schedules HJS-10 a. through j. (the "HJS-10 Schedules"), which memorialize Providence's restricted funds.
- 3. As established at the hearings in the above captioned Docket, the HJS-10 Schedules in the Settlement Agreement contained inaccurate balances in Providence's restricted funds as of June 30, 2025, which resulted in inaccurate carry-over balances into Fiscal Year 2026, which is the first step of the two-year increase approved by the Commission.
- 4. The Compliance Filing and Revised Compliance Filing include the HJS-10 Schedules from the Settlement Agreement, which have the inaccurate June 30, 2025 balances and the inaccurate carry-over balances for FY 2026.
- 5. At the July 24, 2025 Open Meeting, the Commission held that Providence's restricted account balances will be reexamined as part of the Step Two Increase Compliance Filing.

- 6. As part of this reexamination, Providence will be required to update its restricted funds to then-current balances at the time of its Step Two Increase Compliance Filings and state its position on each fund as to whether there should be any adjustments to the revenue requirement or transfers among restricted funds in Fiscal Year 2027, the second step of the increase.
- 7. As such, it is BCWA's position that the Compliance Filing for Step One should include the accurate balances in each restricted fund as of June 30, 2025 that will carry over into Fiscal Year 2026.
- 8. It is important to have accurate baseline Compliance Filing Schedules, particularly with respect to the restricted funds, so that the parties can accurately evaluate Providence's FY 2027 Compliance and evaluate Providence's position on each account as to whether there should be any adjustments to the revenue requirement or transfers among restricted funds in Fiscal Year 2027.

Wherefore, for the reasons set forth herein above, the Bristol County Water Authority objects to the Providence Water Supply Board's Compliance Filing and Revised Compliance Filing and further prays that the Rhode Island Public Utilities Commission order the Providence Water Supply Board to submit a further Revised Compliance Filing that incorporates the actual balances as of June 30, 2025, and carryover balances into Fiscal Year 2026, in the HJS-10 Schedules and all other relief the Commission deems meet and just.

BRISTOL COUNTY WATER AUTHORITY By its attorney,

Joseph A. Keough, Jr. (#4925)

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RULE 1.16 CERTIFICATION

The undersigned certifies that he made a good faith effort to determine whether the relief sought herein is opposed and sought the concurrence of the Providence Water Supply Board, which was denied.

Joseph A. Keough, Jr. (#4925)

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CERTIFICATION

I hereby certify that on July 30, 2025, 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.

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