

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

JOSEPH A. KEOUGH JR.*
JEROME V. SWEENEY III*

SEAN P. KEOUGH*

JEROME V. SWEENEY II
OF COUNSEL

*ADMITTED TO PRACTICE IN
RHODE ISLAND & MASSACHUSETTS

RAYNHAM OFFICE:
90 NEW STATE HIGHWAY
RAYNHAM, MA 02109
TEL. (508) 822-2813

BOSTON OFFICE:
171 MILK STREET
SUITE 32
BOSTON, MA 02109
TEL. (617) 574-0054

September 2, 2025

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

Re: Veolia Water Rhode Island, Inc. – Docket 25-30-WW

Dear Ms. De La Rosa:

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

1. Veolia Water Rhode Island, Inc.'s response to the Division of Public Utilities and Carriers' Data Requests (Set 2).

An electronic copy of this filing has been provided to the Service List for this Docket.
Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosures

cc: Docket 25-30-WW Service List (electronic copy)

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**VEOLIA WATER RHODE ISLAND, INC.'S
APPLICATION TO CHANGE RATE SCHEDULES
DOCKET 25-30-WW**

**RESPONSE TO THE DIVISION OF PUBLIC UTILITIES AND CARRIERS'
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VEOLIA WATER RHODE ISLAND**

DIV 2-1 Reference page 8 of the direct testimony of Gregory R. Herbert, lines 1-8. Please explain how the 60% recovered portion of public fire protection was determined.

RESPONSE:

The 60% recovered portion of public fire protection was based on judgement during the rate design process. Setting the public fire rates to recover the full cost of service would have required an 82% increase to the present public fire rates. Because public fire protection provides a service to the other customer classes, a gradual increase from present rates is reasonable, and setting the proposed public fire rates under the 60/40 recovery ratio mitigates rate shock for the public fire customers.

Sponsored by: Gregory Herbert

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DIV 2-2 Reference Tariff Sheet No. 21, Revision No. 7.

- a. Please provide a copy of the agreement with Point Judith Country Club; and
- b. Please provide the monthly quantity of water delivered to Point Judith County Club by the Company for the most recent 3 years available.

RESPONSE:

- a. Please refer to DIV 2-2 Attachment A.
- b. Please refer to DIV 2-2 Attachment B.

Sponsored by: Jana Labella

AGREEMENT

This memorandum of agreement made this 13th day of December, A. D. 1949, by and between WAKEFIELD WATER COMPANY, a corporation, hereinafter called the utility company, of the one part, and POINT JUDITH COUNTRY CLUB, a corporation, hereinafter called the club, of the other part, WITNESSETH AS FOLLOWS:

In consideration of the mutual promises hereinafter expressed in this agreement between said parties, said parties hereby agree with each other as follows:

1. Said utility company hereby agrees to both install and maintain at its own expense a water main at least eight inches in diameter, below normal frost line, along and under the private road which runs in a general easterly-westerly direction from Ocean Road to a point near Point Judith Country Club house, in the Town of Narragansett, Rhode Island, and also to install and maintain, at its own expense, a standard fire hydrant at a point near said Point Judith Country Club house in order that all the presently located buildings and sheds of said club will be within a radius of five hundred feet from said hydrant as thus installed, and to connect said newly installed water main with the water piping system of said club; said installation of said water main and said hydrant to be completed by the 1st day of May, A. D. 1950.

2. Said club hereby agrees to pay a maximum of Five Hundred (\$500.00) Dollars per year for the next ensuing ten (10) years, that is, Five Hundred (\$500.00) Dollars on the first day of July, A. D. 1950, and Five Hundred (\$500.00) Dollars on each succeeding first day of July for each year for nine years thereafter, as a maximum advance charge for water furnished by said utility company to said club through said newly constructed water main and in said hydrant.

3. It is understood and agreed by and between said parties

that said newly constructed eight inch water main along said private road leading from Ocean Road westerly to said Point Judith Country Club house shall be located on the southerly side of said private road and shall connect up with the present meter box of said club on said club house grounds; and that said utility company shall have the right and privilege of continuing said water main along said private road for a further distance and also the right and privilege of servicing other houses or customers hereafter located along said private road; provided, however, that if, in the period of the next ten years ensuing after the date of this agreement, there are an appreciable number of other customers being serviced by said utility company from said newly constructed water main along said private road, an adjustment mutually satisfactory to each of the parties to this agreement shall be made revising downward said maximum annual water rate of Five Hundred (\$500.00) Dollars per year to be paid by said club.

IN TESTIMONY WHEREOF the parties hereto have caused their corporate names and corporate seals to be affixed hereto and this agreement to be executed on behalf of each of them by their respective officers for this purpose duly authorized, all done the day, month and year first hereinbefore written.

WAKEFIELD WATER COMPANY

By: *[Signature]*
[Signature]

POINT JUDITH COUNTRY CLUB

By: *[Signature]*
[Signature]

Point Judith Country Club

Consumption CCF

Meter No.	JAN-2024	FEB-2024	MAR-2024	APR-2024	MAY-2024	JUN-2024	JUL-2024	AUG-2024	SEP-2024	OCT-2024	NOV-2024	DEC-2024
4321730000	-	-	-	3.00	3.00	6.00	8.00	8.00	10.00	6.00	5.00	1.00
5321730000	9.00	-	1.00	2.00	1.00	1.00	1.00	-	1.00	-	1.00	-
5990830000	-	-	-	-	1.00	1.00	3.00	3.00	3.00	2.00	2.00	-
5260730000	9.00	3.00	3.00	4.00	2.00	5.00	12.00	7.00	31.00	14.00	52.00	49.00
Total	18.00	3.00	4.00	9.00	7.00	13.00	24.00	18.00	45.00	22.00	60.00	50.00

Meter No.	JAN-2023	FEB-2023	MAR-2023	APR-2023	MAY-2023	JUN-2023	JUL-2023	AUG-2023	SEP-2023	OCT-2023	NOV-2023	DEC-2023
4321730000	-	-	-	2.00	3.00	4.00	4.00	6.00	7.00	10.00	5.00	1.00
5321730000	6.00	-	1.00	2.00	-	1.00	1.00	1.00	-	1.00	-	3.00
5990830000	-	-	-	-	-	1.00	4.00	3.00	3.00	3.00	3.00	-
5260730000	3.00	3.00	1.00	2.00	17.00	11.00	9.00	12.00	5.00	3.00	2.00	4.00
Total	9.00	3.00	2.00	6.00	20.00	17.00	18.00	22.00	15.00	17.00	10.00	8.00

Meter No.	JAN-2022	FEB-2022	MAR-2022	APR-2022	MAY-2022	JUN-2022	JUL-2022	AUG-2022	SEP-2022	OCT-2022	NOV-2022	DEC-2022
4321730000	-	-	-	4.00	2.00	7.00	6.00	14.00	5.00	7.00	6.00	3.00
5321730000	10.00	1.00	1.00	2.00	-	1.00	-	1.00	1.00	-	-	1.00
5990830000	-	-	-	-	8.00	2.00	6.00	14.00	4.00	3.00	1.00	-
5260730000	6.00	5.00	8.00	7.00	18.00	21.00	16.00	2.00	2.00	2.00	4.00	3.00
Total	16.00	6.00	9.00	13.00	28.00	31.00	28.00	31.00	12.00	12.00	11.00	7.00

**STATE OF RHODE ISLAND
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VEOLIA WATER RHODE ISLAND**

DIV 2-3 Reference Exhibit 2 (Labella), Schedule 2. Please explain why the Public HYD Semi-Annual fire service accounts are not reflected in the Rate Year at Present Rates or Rate Year at Proposed Rates tables.

RESPONSE:

The rate for the Public HYD Semi-Annual fire service account is six times the monthly Public HYD rate, for this reason it was combined in the original application. For updated Exhibit 2 Schedule 2, please refer to DIV 2-3 Attachment (also provided in Excel format). This attachment shows Semi-Annual and Monthly HYD fire service accounts on individual lines.

Sponsored by: Jana Labella

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DIV 2-4 Please provide Appendix A of Exhibit No. 7 in Excel format with all formulas intact.

RESPONSE:

Please see the Excel Spreadsheet titled "DIV 2-4 Attachment A" for the Appendix A of Exhibit No. 7 in Excel format with all formulas intact.

Sponsored by: Gregory Herbert

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DIV 2-5 Please explain whether the Company is the sole source of supply for each of its Sales for Resale customers.

RESPONSE:

Veolia is the sole source supply for South Kingstown. The company supplies resale to Point Judith and a portion of the North End sections of Narragansett. North Kingstown supplies the remaining section of the Narragansett North End.

Sponsored by: Christopher Jacobs

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DIV 2-6 What is the Company's proposal with respect to the scale-back of rates in the event that the Commission authorizes an increase that is less than the requested increase?

RESPONSE:

If the Commission were to authorize an increase that is less than the requested increase, the Company would scale back the increase proportionately across the different revenue classes.

Sponsored by: David Njuguna

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DIV 2-7 Please identify the water quality testing costs and expenses reflected in the Company's water cost of service study.

RESPONSE:

The Company projected \$60,364 of water quality testing costs and is reflected in Outside Services under the source of supply - maintenance functional category. Water quality testing is allocated based on Factor 2, which is the allocation of costs associated with the facilities serving base and maximum day capacity functions.

Sponsored: Greg Herbert

**STATE OF RHODE ISLAND
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DIV 2-8 Please provide a breakdown of other water revenues by type and customer class for the most recent 12-months available. Also explain how the Other Revenues costs of service identified in Exhibit No. 7, Schedule A, page 1, was determined.

RESPONSE:

Please refer to DIV 2-8 Attachment for Other Revenues by type and customer class for the 12-month ended July 31, 2025.

Other Revenues costs of service identified in Exhibit No. 7, Schedule A, page 1, were sourced from Exhibit P2, Schedule 1.

Sponsored by: Jana Labella & Gregory Herbert

Other Revenue	Customer Type	12-M July 31, 2025
Other Sales (Pool Fills)	Commercial	2,738
Miscellaneous Revenue:		
Return Check Fee - Rhode Island	Commercial	80
Rhode Island-Water Turn-off Fee	Commercial	960
Rhode Island-Water Turn-on Fee	Commercial	1,040
Rhode Island-Water Frozen/Damaged Meter	Public Authority	134
Rhode Island-Water Turn-off Fee	Public Authority	640
Rhode Island-Water Turn-on Fee	Public Authority	480
Return Check Fee - Rhode Island	Residential	980
Rhode Island-Missed Appointment Fee	Residential	360
Rhode Island-Water Frozen/Damaged Meter	Residential	620
Rhode Island-Water Turn-off Fee	Residential	2,880
Rhode Island-Water Turn-on Fee	Residential	2,520
Return Check Fee - Rhode Island	Private Fire	40
Leak Allowance	Residential	(1,566)
Public Relations credit	Residential	(4,508)
Write Down adjustment	Residential	(81)
Back Billing Credit	Private Fire	(1,392)
WTRTAX- Water Quality Protection Charge Admin Fee [1]	Residential	7,396
WTRTAX- Water Quality Protection Charge Admin Fee [1]	Commercial	3,415
WTRTAX- Water Quality Protection Charge Admin Fee [1]	Industrial	79
WTRTAX- Water Quality Protection Charge Admin Fee [1]	Public Authority	426
Unbilled Revenue [2]	All	78,550
Total Other Revenue		95,789

I/S

95,789

Note:

[1] All suppliers may disburse the six and nine tenths percent (6.9%) of the charges collected and retained by the supplier as an administrative charge for any purpose relating to the operation of the supplier. (RI 46-15.3-9 part (c))

[2] Unbilled revenues are not recorded by customer type; total average water sold per day is multiplied by unbilled days and by average rate.

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DIV 2-9 Please identify non-revenue producing water for the past three years. Explain how this amount is calculated and provide all studies, documents, and analysis examining the causes of non-revenue producing water on the Company's system.

RESPONSE:

Non-Revenue producing water (NRW) for the past three years (2022-2024) is as follows:

2022: 117.732 MG or 11.44%
2023: 114.085 MG or 11.01%
2024: 98.107 MG or 9.55%

The NRW percentages are determined by first calculating the volume of water losses annually. This is done by subtracting the total billed consumption from the total production. The water loss volume is then divided by the total production to obtain the NRW percentage.

The 2024 NRW percentage for Veolia Water Rhode Island (9.55%) is below the minimum economic level of water loss for the VWRI system. The economic level of water loss represents the point at which further investment in water loss reduction is no longer prudent. VWRI plans to continue replacement of customer meters according to the PUC defined schedule to ensure metering accuracy, perform timely leak repairs where necessary, and continue to replace under-performing infrastructure, to sustain the minimum economic level of water loss.

Please also see Original Filing Item 5.8.A.22 which also provides a calculation of the Non-Revenue Water for the past 5 years.

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DIV 2-10 Please explain how the costs associated with non-revenue producing water are addressed in the Company's water cost of service study.

RESPONSE:

Costs associated with non-revenue producing water are included in the City's cost of service study as these are a necessary part of managing a water system. However, these costs are not explicitly shown as a separate line item in the cost of service study but are a component of the water utility's total expenses. These costs would include operating and maintenance costs for supplying, treating and pumping the non-revenue producing water. Also, the capital costs for repairing and replacing infrastructure due to leaks or main breaks that were the cause of any non-revenue producing water.

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DIV 2-11 Please explain whether private fire services are normally serviced by service lines similar to water services. If no, please explain the service connection arrangements.

RESPONSE:

Private fire services are generally larger diameter service lines as opposed to domestic water services. They typically range from 4-8" in diameter, and unlike domestic service lines, their sole use is fire protection. Similar to water services, private fire services are required to be a separate connection from the main than any other service line (i.e. no shared services).

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DIV 2-12 Please explain whether service line investment has been allocated to private fire protection service. If no, why not?

RESPONSE:

Yes, service line investment has been allocated to private fire protection service in the cost of service study based on Factor 9, which is the allocation of costs associated with services.

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DIV 2-13 Please identify each water quality test performed by the Company's laboratory facilities and explain how frequently each test is performed (daily, weekly, based on usage, etc.).

RESPONSE:

The Company does not have an in-house laboratory and relies on third party laboratories to perform all compliance samples. Please refer to the Excel Spreadsheet titled "DIV 2-13 Attachment" for all required sample lists and frequency.

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DIV 2-14 Please explain whether there are any procedural or cost differences in meter reading for the various water customer classes.

RESPONSE:

The procedure and cost for reading all customers meters aside from wholesale interconnects is the same. Wholesale interconnects require labor hours because we physically read the meters at each interconnect with personnel from the town. Then the manual readings are input into a bill. Between travel to and from the sites, and the manual reading of these interconnect meters, our service person is required for 4 hours at a rate of \$27.00/hr. Manual bills need to be generated from these readings by a customer service representative, which takes two hours at an average rate of \$28.84/hr. of a customer service representative's time including sending readings to the towns for approval before finally processing the invoices through our customer care and billing system.

Sponsored by: Christopher Jacobs

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DIV 2-15 Reference Exhibit No. 7, Schedule E, page 20. Please explain why the unrecovered Public Fire cost of service is allocated to customer classes based on 5/8" equivalent meters rather than the overall cost of service for each class.

RESPONSE:

Nearly all public fire protection costs are fixed costs, and the size of the customer's meter is generally a direct relationship to the customer's maximum demand for water, which would indicate that larger meter size customers would require greater demand for fire protection. Therefore, the unrecovered Public Fire cost of service is based on the 5/8" equivalent meters rather than the overall cost of service for each class. Additionally, the overall cost of service allocations for each class includes variable costs which are not associated with fire protection.

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CERTIFICATION

I hereby certify that on September 2, 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 hand delivery.

Parties	E-mail	Phone
Veolia North America, Inc. 461 From Road Suite 400 Paramus, NJ 07652	timothy.michaelson@veolia.com ;	201-784-7083
	phoebe.youhanna@veolia.com ;	
	bryant.gonzalez@veolia.com ;	
	christopher.jacobs@veolia.com ;	
	david.njuguna@veolia.com ;	
	Debra.visconti@veolia.com ; maryanne.hatch@veolia.com	
Keough & Sweeney Joseph A. Keough, Jr., Esq. 41 Mendon Ave. Pawtucket, RI 02861	jkeoughjr@keoughsweeney.com ;	
RI Attorney General Office 150 South Main St. Providence, RI 02903	nvaz@riag.ri.gov ;	401-274-4400
Division of Public Utilities & Carriers John Bell	john.bell@dpuc.ri.gov ;	401-780-2144
	Margaret.L.Hogan@dpuc.ri.gov ;	
	Leo.wold@dpuc.ri.gov ;	
	mark.a.simpkins@dpuc.ri.gov ;	
	kyle.j.lynch@dpuc.ri.gov ;	
	gregory.schultz@dpuc.ri.gov ;	
	john.r.harrington@dpuc.ri.gov ;	
	nicole.m.corbin@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	Pat.smith@dpuc.ri.gov ;	
	Donna.Daigle@dpuc.ri.gov ;	
	Joseph.Drane@dpuc.ri.gov ;	
	Ellen.golde@dpuc.ri.gov ;	
	Steven.Parrillo@dpuc.ri.gov ;	

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	Christy.hetherington@dpuc.ri.gov ;	
Division Consultants Jennifer Rogers Jerry Mierzwa Maureen Reno Roxie McCullar	irogers@exeterassociates.com ;	
	jmierzwa@exeterassociates.com ;	
	mreno@reno-energy.com ;	
	RoxieMcCullar@consultant.com ;	
Town of South Kingstown Michael A. Ursillo, Esq. Ursillo, Teitz & Ritch, Ltd. 2 Williams Street Providence, RI 02903	mikeursillo@utrlaw.com ;	
Town of Narragansett James Callaghan, Town Solicitor Callaghan & Callaghan Attorneys at Law 3 Brown St. North Kingstown, RI 02852	james@callaghanlawri.com ;	
Union Fire District of South Kingstown Mary B. Shekarchi, Esq. 33 College hill Rd., Suite 15-E Warwick, RI 02886	marybali@aol.com ;	401-828-5030
	mary@mbsesq.com ;	
Original & 9 copies file w/ PUC: Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Stephanie.DeLaRosa@puc.ri.gov ;	401-780-2107
	jordan.sasa@puc.ri.gov ;	
	Christopher.Caramello@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Cynthia.wilsonfrias@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Kristen.L.Masse@puc.ri.gov ;	

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/s/ Joseph A. Keough Jr.

Joseph A. Keough, Jr., Esquire # 4925

KEOUGH + SWEENEY, LTD.

41 Mendon Avenue

Pawtucket, RI 02861

(401) 724-3600 (phone)

jkeoughjr@keoughsweeney.com