

KEOUGH & SWEENEY, LTD.
ATTORNEYS AND COUNSELORS AT LAW
100 ARMISTICE BOULEVARD
PAWTUCKET, RHODE ISLAND 02860

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

SEAN P. KEOUGH*
MARGARET HOGAN SWEENEY*

JEROME V. SWEENEY II
OF COUNSEL

*ADMITTED TO PRACTICE IN
RHODE ISLAND & MASSACHUSETTS

TELEPHONE
(401) 724-3600

FACSIMILE
(401) 724-9909

www.keoughsweeney.com

BOSTON OFFICE:
171 MILK STREET
SUITE 30
BOSTON, MA 02109
TEL. (617) 574-0054
FAX (617) 451-1914

June 19, 2007

Ms. Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: City of Newport, Utilities Department, Water Department – Docket 3818

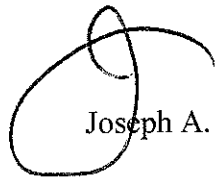
Dear Ms. Massaro:

Enclosed please find a copy of Newport Water's Response to the Division of Public Utilities and Carriers' Data Requests (Set 3).

These Responses were electronically served to the members of the Service List on June 18, 2007.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf
Enclosures

RECEIVED
2007 JUN 21 AM 9:49
PUBLIC UTILITIES COMMISSION

CITY OF NEWPORT - WATER DEPARTMENT
Docket No. 3818
Response to
Division of Public Utilities & Carriers' Data Requests
Set 3

Div. 3-1: Please state whether Newport Water has contacted any other local utilities to inquire about the potential for coordinating meter readings or sharing meter readers. If not, explain why not. If yes, please provide a detailed report on the findings of those efforts.

Response: Newport Water has not contacted any other utilities to assist in meter readings for a non emergency, long term period. Local utilities within the immediate area are smaller and have smaller staffs than Newport, and we believe they would not be able to provide the minimum three meter readers required to staff this additional work. Intermunicipal agreements are normally for assistance during emergency situations. Assistance under these agreements is provided for short term periods. In addition, please see Newport's answer to Div. 3-2.

Prepared by: Ken Mason

CITY OF NEWPORT - WATER DEPARTMENT
Docket No. 3818
Response to
Division of Public Utilities & Carriers' Data Requests
Set 3

Div. 3-2: Please state whether Newport Water has evaluated the potential for utilizing contract meter readers. If not, explain why not. If yes, please provide a detailed report on the findings of those efforts.

Response: Utilizing contract meter readers in the City of Newport would require an agreement be reached with labor union, Rhode Island Council 94 AFSCME Local 911. As part of the collective bargaining agreement, the City has agreed not to subcontract work that has been done exclusively by bargaining unit employees unless a specific agreement is reached with the union. Due to the protracted negotiations that would be required to effect this change, it is unlikely that this would provide a viable solution.

Prepared by: Ken Mason

CITY OF NEWPORT - WATER DEPARTMENT
Docket No. 3818
Response to
Division of Public Utilities & Carriers' Data Requests
Set 3

Div. 3-3: If Newport is allowed to include the full annual amount for the Lawton Valley sewer charges as an annual expense even though the residuals management project will not be in service for the entire rate year, please explain how Newport proposes to treat the amount included in rates, but not required to pay sewer charges during the rate year.

Response: Newport Water would seek the Commission's approval to use any excess revenues generated as a result of this specific issue or other excess revenues to fund an operating reserve that would be used to meet any unexpected expenses during the course of the year or used to meet normal expenses in the event that revenues are down due to decreased demand.

Response prepared by: Harold Smith

CITY OF NEWPORT - WATER DEPARTMENT
Docket No. 3818
Response to
Division of Public Utilities & Carriers' Data Requests
Set 3

Div. 3-4: Please state whether Newport would agree to place the amount included in rates for Lawton Valley sewer charges prior to the time the residuals management project goes in to service in the proposed operating reserve fund.

Response: See response to Div. 3-3.

Response prepared by: Harold Smith

CITY OF NEWPORT - WATER DEPARTMENT
Docket No. 3818
Response to
Division of Public Utilities & Carriers' Data Requests
Set 3

CERTIFICATION

I hereby certify that I sent by electronic mail a copy of the within to all parties set forth on the attached Service List on June 18, 2007.

Parties/Address	E-mail Distribution	Phone/Fax
Joseph A. Keough, Jr., Esq. Keough & Sweeney 100 Armistice Blvd. Pawtucket RI 02860	jkeoughjr@keoughsweeney.com	401-724-3600 401-724-9909
Julia Forgue, Director of Public Works Newport Water Department 70 Halsey St. Newport RI 02840	jforgue@cityofnewport.com	401-845-5601 401-846-0947
	kgarcia@cityofnewport.com	
	lsitrin@CityofNewport.com	
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence RI 02903	lwold@riag.ri.gov	401-222-2424 401-222-3016
	sscialabba@ripuc.state.ri.us	
	pdodd@ripuc.state.ri.us	
	RDIMeglio@riag.ri.gov	
Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte NC 28203	Hsmith@raftelis.com	704-373-1199 704-373-1113
	Hhoover@raftelis.com	
Gerald Petros, Esq. Hinckley, Allen & Snyder 1500 Fleet Center Providence RI 02903	gpetros@haslaw.com	401-274-2000
	bcanning@haslaw.com	
William McGlinn Portsmouth Water & Fire District 1944 East Main Rd. PO Box 99 Portsmouth RI 02871	wmcglinn@portsmouthwater.org	401-683-2090 ext. 224
Audrey VanDyke, Esq. Naval Facilities Engineering Command Litigation Command 1314 Harwood St., SE Washington Navy Yard, DC 20374-5018	Audrey.VanDyke@navy.mil	202-685-1931 202-433-2591
Dr. Kay Davoodi, P.E. Utility Rates and Studies Office NAVFACHQ- Building 33 1322 Patterson Ave SE Washington Navy Yard, D.C. 20374-5065	Khojasteh.davoodi@navy.mil	202-685-3319 202-433-7159

CITY OF NEWPORT - WATER DEPARTMENT
Docket No. 3818
Response to
Division of Public Utilities & Carriers' Data Requests
Set 3

Thomas S. Catlin Exeter Associates, Inc. 5565 Sterrett Place, Suite 310 Columbia, MD 21044	tcatlin@exeterassociates.com	410-992-7500 410-992-3445
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough MA 01532	Woodcock@w-a.com	508-393-3337 508-393-9078
Email copy and one original to: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	lmassaro@puc.state.ri.us	401-941-4500
	PatriciaL@gw.doa.state.ri.us	401-941-8827
	anault@puc.state.ri.us	

/s/

 Joseph A. Keough, Jr., Esquire # 4925
 KEOUGH & SWEENEY, LTD.
 100 Armistice Boulevard
 Pawtucket, RI 02860
 (401) 724-3600