

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
DOCKET NO. 4025
City Of Newport - Utilities Division - Water Department
Response to
The Division of Public Utilities and Carriers' Data Requests
Set 3

Div. 3-1: Please indicate whether Ms. Forgue agrees that the response to Div. 1-5 and Div. 2-1 together identify four vacant positions. If not, please explain.

Response: Ms. Forgue agrees that the response to Div 1-5 identifies three vacant positions as of December 31, 2008 and the response to Div 2-1 identifies an additional vacant position due to a retirement in January 2009. As of January 2009 there were a total of four vacant positions. One of these positions is the Assistant Water Quality Protection Supervisor. This position is vacant because it is a new position for which we are seeking funding in this Docket.

As set forth in my testimony, actual vacant positions fluctuate through the promotion process. For instance, as of May 6, 2009 there were four vacant positions. However, appointments have been made for two of the positions with start dates of May 11th and May 18th. In addition interviews are scheduled for two positions with promotional appointments expected to be made by the end of May to fill the two remaining two vacancies.

Prepared by: J. Forgue

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Div. 3-2: Please update the response to Div 1-6 to identify the number of employee vacancies in the third quarter of 2009 and the current number of vacancies.

Response: Updated Div. 1-6 is as follows:

		Budgeted	Open
FY06	1st qtr	47	5
	2nd qtr	48	3
	3rd qtr	48	2
	4th qtr	48	1
FY07	1st qtr	48	2
	2nd qtr	48	2
	3rd qtr	48	2
	4th qtr	48	4
FY08	1st qtr	48	2
	2nd qtr	48	2
	3rd qtr	48	4
	4th qtr	48	3
FY09	1st qtr	48	3
	2nd qtr	48	3
	3rd qtr	48	4
	Current (5/6/09)	48	4

Prepared by: K. Garcia

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Div. 3-3: Please state where Mr. Catlin cites the response to Div. 1-6 as identifying four employee vacancies. (Note that Schedule TSC-3 relies on the response to Div.1-6 as support for the normal number of vacancies being two positions).

Response: In further reviewing Mr. Catlin's schedule, it appears there was a misunderstanding on Newport's part. On Page 7, Line 2 Mr. Catlin states that Newport has four vacant positions. It appears that Newport's response to Div. 1-5 and 2-1 was the sole source for this testimony. He then states that Newport has had two unfilled positions for every quarter of FY 2007, 2008 and 2009 to date. It appears that Newport's response to Div. 1-6 was meant to be the source for this testimony. In Mr. Catlin's schedule, Newport's response to Div. 1-6 is the support for "Normal Employee Vacancies." Thus, it appears that Newport's response to Div. 1-6 refers only to the *ongoing* vacancies in 2007, 2008 and 2009 and not the four vacancies Mr. Catlin claim were then "*currently*" vacant.

Prepared by: J. Fogue

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Div. 3-4: Please update the response to Div 1-22 to show the average cost for gasoline and diesel fuel for each month through the most recent month available.

Response: The updated response to Div 1-22 for gasoline and diesel fuel cost by month through the most recent month available is as follows:

	<u>Month</u>	<u>Gasoline Price/Gallon</u>	<u>Diesel Price/Gallon</u>
	January	\$2.40	\$2.82
	February	\$2.40	\$2.82
	March	\$2.50	\$3.31
	April	\$2.72	\$3.31
	May	\$2.96	\$3.86
	June	\$3.09	\$4.04
	July	\$3.48	\$4.31
	August	\$3.31	\$4.01
	September	\$3.06	\$3.73
	October	\$2.53	\$3.22
	November	\$1.74	\$2.52
	December	\$1.55	\$2.12
2009	January	\$1.58	\$2.22
	February	\$1.71	\$2.08
	March	\$1.75	\$2.09
	April	\$1.86	\$2.19

Prepared by: R. Esten

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Div. 3-5: Please identify the actual costs incurred to date for the class cost of service study for which Newport is seeking recovery in the rate year.

Response: Newport has spent \$24,260.00 to date with Raftelis Financial Consultants on the class cost of service study.

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Div. 3-6: Please explain the basis for Ms. Forgue's position that the costs associated with the cost of service study should be recovered over one year while other rate case expense is amortized over two years.

Response: Unlike expenses associated with the current case, which are costs incurred prior to the actual rate year, the costs associated with the cost of service study are costs that will actually be incurred in the rate year and therefore should be included as a rate year expense.

J. Forgue

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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 May 11, 2009, and one original to Luly Massaro, Clerk, Rhode Island Public Utilities Commission.

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