

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
BEFORE THE PUBLIC UTILITIES COMMISSION

IN RE: THE CITY OF NEWPORT, :  
UTILITIES DEPARTMENT WATER DIVISION : Docket No. 4025  
APPLICATION TO CHANGE RATE SCHEDULES :

**MOTION OF THE PORTSMOUTH WATER  
AND FIRE DISTRICT TO INTERVENE**

The Portsmouth Water and Fire District ("Portsmouth") hereby moves to intervene in this proceeding. In support of this motion, Portsmouth states that:

1. Portsmouth purchases all of the water that it supplies to customers within the Portsmouth Water and Fire District.
2. The City of Newport Utilities Department, Water Division ("Newport"), is the sole supplier of water to Portsmouth.
3. Portsmouth estimates that it will purchase approximately 446,500,000 gallons of water from Newport during Newport's next fiscal year, which runs from July 1, 2009 to June 30, 2010.
4. Portsmouth purchased an average of 441,370,000 gallons of water from Newport during each of Newport's previous five fiscal years, exclusive of water purchased by Portsmouth for sale to the Navy on a temporary, emergency basis from September 29, 2006 through June 30, 2008.

Portsmouth seeks to intervene in this proceeding pursuant to the Rhode Island Public Utility Commission's Rules of Practice and Procedure. Portsmouth possesses an interest that may be directly affected by the Commission's action in the proceeding and is not adequately represented by the existing parties. Portsmouth's participation in this proceeding is also clearly in the public interest.

The City of Newport has no objection to this motion to intervene.

Respectfully submitted,

PORTSMOUTH WATER AND FIRE  
DISTRICT

By its Attorneys,

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Gerald J. Petros (#2931)  
Brent R. Canning (#5546)  
Hinckley, Allen & Snyder LLP  
50 Kennedy Plaza, Suite 1500  
Providence, RI 02903  
401-274-2000  
401-277-9600 (fax)

Dated: January 16, 2009

**CERTIFICATION**

I hereby certify that I mailed a copy of the within Motion to Intervene to all parties set forth on the attached Service List on the 16<sup>th</sup> day of January, 2009.

**Docket No. 4025 - City of Newport Water Division – General Rate Filing  
Dated: January 15, 2009**

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone/Fax</b>
Joseph A. Keough, Jr., Esq. Keough & Sweeney 100 Armistice Blvd. Pawtucket, RI 02860	<a href="mailto:Jkeoughjr@keoughsweeney.com">Jkeoughjr@keoughsweeney.com</a>	401-724-3600 401-724-9909
Julia Forgue, Director of Public Works Newport Water Department 70 Halsey St. Newport, RI 02840	<a href="mailto:jforgue@cityofnewport.com">jforgue@cityofnewport.com</a>	401-845-5601 401-846-0947
	<a href="mailto:resten@cityofnewport.com">resten@cityofnewport.com</a>	
	<a href="mailto:lsitrin@CityofNewport.com">lsitrin@CityofNewport.com</a>	
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:lwold@riag.ri.gov">lwold@riag.ri.gov</a>	401-222-2424 401-222-3016
	<a href="mailto:sscialabba@ripuc.state.ri.us">sscialabba@ripuc.state.ri.us</a>	
	<a href="mailto:pdodd@ripuc.state.ri.us">pdodd@ripuc.state.ri.us</a>	
	<a href="mailto:Mtobin@riag.ri.gov">Mtobin@riag.ri.gov</a>	
Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte, NC 28203	<a href="mailto:Hsmith@raftelis.com">Hsmith@raftelis.com</a>	704-373-1199 704-373-1113
	<a href="mailto:Hhoover@raftelis.com">Hhoover@raftelis.com</a>	
Gerald Petros, Esq. Hinckley, Allen & Snyder 1500 Fleet Center Providence, RI 02903	<a href="mailto:gpetros@haslaw.com">gpetros@haslaw.com</a>	401-274-2000
	<a href="mailto:bcanning@haslaw.com">bcanning@haslaw.com</a>	
William McGlinn Portsmouth Water & Fire District 1944 East Main Rd. PO Box 99 Portsmouth, RI 02871	<a href="mailto:wmcglinn@portsmouthwater.org">wmcglinn@portsmouthwater.org</a>	401-683-2090 ext. 224
Audrey VanDyke, Esq. Naval Facilities Engineering Command Litigation Command 1314 Harwood St., SE Washington Navy Yard, DC 20374-5018	<a href="mailto:Audrey.VanDyke@navy.mil">Audrey.VanDyke@navy.mil</a>	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	<a href="mailto:Khojasteh.davoodi@navy.mil">Khojasteh.davoodi@navy.mil</a>	202-685-3319 202-433-7159
	<a href="mailto:Larry.r.allen@navy.mil">Larry.r.allen@navy.mil</a>	

**Docket No. 4025 - City of Newport Water Division – General Rate Filing  
Dated: January 15, 2009**

Thomas S. Catlin Exeter Associates, Inc. 5565 Sterrett Place, Suite 310 Columbia, MD 21044	<a href="mailto:tcatlin@exeterassociates.com">tcatlin@exeterassociates.com</a>	410-992-7500 410-992-3445
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	<a href="mailto:Woodcock@w-a.com">Woodcock@w-a.com</a>	508-393-3337 508-393-9078
<b>File an original and nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:lmassaro@puc.state.ri.us">lmassaro@puc.state.ri.us</a>	401-780-2107
	<a href="mailto:cwilson@puc.state.ri.us">cwilson@puc.state.ri.us</a>	401-941-1691
	<a href="mailto:anault@puc.state.ri.us">anault@puc.state.ri.us</a>	