

**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

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

\*ADMITTED TO PRACTICE IN  
RHODE ISLAND & MASSACHUSETTS

July 14, 2011

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

**Re: *United Water Rhode Island, Inc.***  
***Docket No. 4255***

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of United Water Rhode Island, Inc.'s ("United Water") response to the Division of Public Utilities and Carriers' ("Division") First Set of Data Requests.

Please be advised that United Water is seeking protective treatment of a confidential attachment identified as attachment DIV 1-10, as permitted by Commission Rule 1.2(g) and by RIGL §38-2-2(4)(i)(B). Also enclosed, you will find an original and nine (9) copies of United Water's Motion For Protective Treatment Of Confidential Information along with one (1) sealed copy of a confidential attachment to DIV 1-10. A confidential copy of this attachment has been provided to the Division pursuant to a protective agreement between United Water and the Division pending a determination of United Water's motion.

Please note that an electronic version of United Water's response to the Division's First and Second Set of Data Requests has been sent to the service list. However, the electronic version of United Water's response to Div. 1-10 has not been provided pending a decision on the Motion For Protective Treatment Of Confidential Information.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,



Joseph A. Keough, Jr.

Enclosures

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

**IN RE: UNITED WATER  
RHODE ISLAND, INC.**

:  
:  
:  
:  
:

**DOCKET NO. 4255**

**UNITED WATER RHODE ISLAND, INC.'S MOTION FOR PROTECTIVE  
TREATMENT OF CONFIDENTIAL INFORMATION**

**I. INTRODUCTION**

Now comes United Water Rhode Island, Inc. (“United Water”) and hereby requests that the Rhode Island Public Utilities Commission (“Commission”) provide confidential treatment to, and grant protection from public disclosure of, certain confidential and sensitive information. United Water makes this request pursuant to Commission Rule 1.2(g) and RIGL §38-2-2 (4)(i)(B). United Water also requests that the Commission preliminarily grant its request for confidential and protective treatment pursuant to Rule 1.2(g)(2).

**II. FACTS**

On July 14, 2011, United Water filed a response to the Division of Public Utilities and Carriers’ (“Division”) First Set of Data Requests, Request 1-10 (“Request”). This Request seeks “a large scale map of United’s water utility facilities, showing treatment plants, major transmission lines, large customers, sales for resale customers, etc.” United Water seeks confidential treatment of the document responsive to this request.

### **III. LEGAL STANDARD**

Commission Rule 1.2(g) provides that access to a public record shall be granted in accordance with the Access to Public Records Act (“APRA”), RIGL §38-2-1, et seq. Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be a “public record”, unless the information set forth in the documents and materials falls within one of the enumerated exceptions identified in RIGL §38-2-2(4). As such, the Commission has the authority under the APRA to protect such information from public disclosure and deem it to be confidential if it falls within one of the specific exceptions to the APRA. A review of RIGL §38-2-2(4)(i)(B) indicates that the following records are not deemed to be public:

“Trade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature.”

In making a confidentiality determination, the Rhode Island Supreme Court set forth a two-prong test. The first prong assesses whether the information was provided voluntarily to a governmental agency. *Providence Journal Company v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001).*Id.* at 47. If the answer to this first question is in the affirmative, then the next question becomes whether the information “is of a kind that would customarily not be released to the public by the person from whom it was obtained.” *Id.*

Furthermore, the Supreme Court has held that agencies making determinations as to the disclosure of information under the APRA may apply the balancing test established in *Providence Journal v. Cane*, 577 A.2d 661, (RI 1990). Under this test, the

Commission may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure.

#### **IV. BASIS FOR CONFIDENTIALITY**

In the interest of security, United Water seeks confidential treatment of the document sought. United Water does not wish to have a large scale map of its water utility facilities, showing treatment plants and major transmission lines in the public domain. This is not the type of information United Water would ordinarily release to the public. In fact, United Water participates in regulatory proceedings in several other jurisdictions, and it routinely requests confidential treatment of the type of information sought by the Division's Request.

In the post 9/11 era, water professionals have taken steps to further protect water supplies, treatment facilities and distribution systems from natural and man-made disasters.<sup>1</sup> Threats are now targeted at the country's vital institutions and infrastructure, including drinking water and wastewater systems.<sup>2</sup> To combat such threats, it is essential that government agencies, water utilities, state and local water agencies and public health organizations, be ready to protect our water infrastructure.<sup>3</sup> A map of United Water's facilities could potentially provide valuable information, and could lead to vulnerability in the system.

#### **V. CONCLUSION**

For the reasons set forth herein, United Water hereby requests that the Rhode Island Public Utilities Commission grant the relief sought herein and grant protective and

---

<sup>1</sup>See American Water Works Association web site  
(<http://www.awwa.org/drinktap/BlogPost.cfm?ItemNumber=48146&showLogin=N>)

<sup>2</sup> See EPA's Role in Water Security Research  
([http://www.epa.gov/safewater/watersecurity/pubs/water\\_exec\\_summ.pdf](http://www.epa.gov/safewater/watersecurity/pubs/water_exec_summ.pdf))

<sup>3</sup> Id.

confidential treatment to the information produced in response to the Division of Public Utilities and Carriers' Data Request 1-10.

UNITED WATER RHODE ISLAND, INC.  
By its attorney,



---

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

**CERTIFICATION**

I hereby certify that on July 14, 2011, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone/Fax</b>
Timothy J. Michaelson United Water Mgmt. & Services, Inc. 200 Old Hook Road Harrington Park, NJ 07640	<a href="mailto:Tim.Michaelson@UnitedWater.com">Tim.Michaelson@UnitedWater.com</a>	201-750-3406 201-750-5728
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:jbell@ripuc.state.ri.us">jbell@ripuc.state.ri.us</a>	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a>	
	<a href="mailto:Mcorey@riag.ri.gov">Mcorey@riag.ri.gov</a>	
Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:klyons@riag.ri.gov">klyons@riag.ri.gov</a>	
Thomas S. Catlin Exeter Associates, Inc. 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044	<a href="mailto:tcatlin@exeterassociates.com">tcatlin@exeterassociates.com</a>	410-992-7500 410-992-3445
Michael A. Ursillo, Esquire Ursillo, Teitz & Ritch, Ltd. 2 Williams Street Providence, RI 02903	<a href="mailto:mikeursillo@utrllaw.com">mikeursillo@utrllaw.com</a>	401-331-2222 401-751-5257
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
Mark A. McSally, Esq. Kelly, Kelleher, Reilly & Simpson 146 Westminster Street, Suite 500 Providence, RI 02903	<a href="mailto:mmcsally@kkr.com">mmcsally@kkr.com</a>	401-789-7800
<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 401-941-1691
	<a href="mailto:plucarelli@puc.state.ri.us">plucarelli@puc.state.ri.us</a>	
	<a href="mailto:sccamara@puc.state.ri.us">sccamara@puc.state.ri.us</a>	

  
\_\_\_\_\_

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-1: Please provide the Company's current private fire service meter investment amount.

RESPONSE: Private Fire Customers are not metered, therefore there is no meter investment amount. Although the tariff provides the Company the option of metering private fire customers, "where evidence indicates that water is being taken from the line for purposes other than fire protection", this situation has not arisen in the past.

Prepared by: Michaelson

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-2: Please explain the nature of the metering arrangements for private fire services.

RESPONSE: The Company reserves the right to meter any fire line where evidence indicates that water is being taken from the line for purposes other than fire protection, and such metered service shall and then be billed in accordance with the regular schedule of meter rates in addition to the applicable rates based on size of connection, with proper allowance for water consumed in fire fighting. All private fire services are for the sole use of fire protection.

Prepared by: Knox



STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities and Carriers'

Data Requests

Set 1

---

Div. 1-3: Please explain the nature of the billing arrangements for public and private fire.

RESPONSE: Public hydrants are billed at a cost of \$260.00 per year. The Narragansett Fire District is billed semi-annually and the Union Fire District is billed quarterly. Private fire service is billed based on the size of service connection, regardless of the number of sprinklers or fire hydrants. Private fire customers are billed quarterly.

Prepared by: Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-4: Please explain which sized pipe United generally considers to be transmission pipe and which sized pipe is generally considered to be distribution pipe.

RESPONSE:

United does not generally need to classify pipe as transmission vs. distribution. For the purposes of rate design and the allocation of costs between retail and wholesale customers, United considers mains that are 10" and less to be distribution pipes and mains 12" and greater to be transmission pipes.

Prepared by: Woodcock

## STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-5: Please provide a breakdown of meter investment by meter size and, if available, by cost of service study class.

RESPONSE: Please see the table below for the breakdown requested. The amounts are as of 12/31/10. Please note that the Company does not have the details for meter size prior to 1997 so there is an unclassified category included.

<b>Size</b>	<b>\$</b>
5/8 Inch	\$ 1,119,192
3/4 Inch	16,126
1 Inch	107,913
1 1/2 Inch	42,500
2 Inch	44,482
3 Inch	6,337
4 Inch	1,459
6 Inch	132,448
Unclassified	841,840
<b>Total</b>	<b>\$ 2,312,297</b>

Prepared by: Michaelson

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-6: Please provide the current average or typical cost of purchasing and installing each size meter.

RESPONSE: Please see table below:

<b>Meter Size</b>	<b>Cost</b>
5/8"	\$ 212.68
3/4"	\$ 244.47
1"	\$ 304.94
1 1/2"	\$ 563.08
2"	\$ 762.20
3"	\$ 1,216.52
4"	\$ 1,775.37
6"	\$ 2,350.24
8"	\$ 2,771.10

Note – all meter costs include all hardware and all meters include radio transmitter units.

Prepared by: Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-7: Please explain why sales for resale customers are assigned no peak hour extra capacity costs.

RESPONSE:

The wholesale (sales for resale) customers maintain their own storage facilities to meet their internal system peak hour and fire protection needs. Accordingly, no peak hour costs are assigned to the wholesale customers. This is consistent with the assignment of peak hour costs in the Company's last rate filing before the RI PUC (Docket 2873).

Prepared by: Woodcock

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-8: Please explain how the peak day demand of sales for resale customers was determined. If not based on actual meter readings, please provide the actual peak day demand for each customer for the last five years.

RESPONSE:

This is the same value that was used in the Company's last rate filing before the RI PUC (Docket 2873). In response to a data request in that docket regarding the derivation of the maximum day and peak hour factors (Div 1-91) the Company responded:

"For the most part, these estimates were developed using the March 1991 Report on Water Rates prepared for the Company (see attachment to response to Div 1-90). That report said: "The customer group demands for maximum day and maximum hour have been determined on the basis of a review of the system characteristics. The customer demands used in the cost allocation study are based on a non-coincident demand for the various groups of customers. That is, the demands for each class of customers has been estimated, and these demands do not necessarily occur at the same time or on the same day." (page 3-2 of March 1991 Report on Water Rates by John Russell Associates, Inc.)"

Please see Schedule DIV 1-8 Attachment for actual peak day demand as provided by the Company.

Prepared by: Woodcock

**United Water Rhode Island, Inc**

## Peak Usage For Wholesale Customers:

Town of South Kingstown-	Only had last four years available, their SCADA system installed in 1/17/2007
1-Jul-07	955,360 gallons
20-Jul-08	1,159,840 gallosn
16-Aug-09	740,320 gallons
5-Jul-10	1,085,504 gallons

Town of Narragansett-	Only able to get highest week demand
1-Aug thru 8-Aug-06	7,916,000 gallons
3-Juy thru 10-Jul-07	8,650,000 gallons
15-Jul thru 22-Jul-08	9,048,737 gallons
18-Aug thru 25-Au-09	7,314,875 gallons
10-Aug thru 117-Au-10	7,612,919 gallons

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-9: Please provide all studies, documents and analysis examining the causes of UFW on United's system.

RESPONSE: UWRI has not had studies done by outside consultants since the UFW percent has not been high enough to cost-justify. The Company monitors UFW with its own employees and investigates any suspected leaks, changes in pressures or flows, customer calls regarding water showing, etc. In 2008 the Company purchased four loggers which can be placed on hydrants or service connections and they monitor any pressure changes over a preset period of time. Any sudden pressure changes can possibly indicate a leak. The Company also has Hydro Phones which by listening on a valve or connection on a water main can detect through sound any possible water leaks. Due to the type of soil prevalent in the service area, water usually surfaces quickly which is a great aid in keeping UFW percentages to a minimum.

Prepared by: Knox



STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-10: Please provide a large scale map of United's water utility facilities, showing treatment plants, major transmission lines, large customers, sales for resale customers, etc.

RESPONSE:

A document responsive to this request has been provided to the Division pursuant to a Protective Agreement between United Water and the Division, and a confidential copy has been provided to the Commission subject to a Motion For Protective Treatment of Confidential Information as provided for by Rule 1.2(g)(2) of the Commission's Rules of Practice and Procedure and R.I.G.L. § 38-2-2.

Prepared by: Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-11: Does United provide free water service to any customers? If yes, please identify the customers and the annual volumes.

RESPONSE: UWRI does not provide free water to any customer or any charitable organization.

Prepared by: Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-12: Please explain how the maximum day and hour demands for fire service were selected.

RESPONSE:

The maximum day fire demand was based on a maximum 3500 gallons per minute demand lasting for 6 hours (3500 gallons/minute x 60 minutes x 6 hours = 1,260,000 gal in the day). The maximum fire demand of 3500 gallons per minute is the maximum amount a water supplier is required to provide under the ISO's Public Protection Classification grading system. Because the maximum hour demands are expressed in units of gallons per day, the 3500 gallon per minute fire demand was expressed in gallons per day (3500 gal/min x 60 minutes x 24 hours/day).

Prepared by: Woodcock

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-13: Please provide an estimate of the quantity of water used for fire-fighting during each of the last five years.

RESPONSE: UWRI provides public fire protection to two different fire systems; the Narragansett Fire Department in the town of Narragansett and the Union Fire District in the town of South Kingstown. Both departments contact the Company usually after they have used our hydrants for fighting a fire or for training, however, unless the Company has an exact time the hydrants were flowed and the volume flowed, it is not possible to get a somewhat exact amount of water used. The Company has recently used an annual estimate of 2 MG in its UFW calculation.

Prepared by: Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-14: Please provide a copy of all cost of service studies prepared by Mr. Woodcock utilizing a methodology other than that filed in this case, including the methodology used in the cost of service study filed in United's last rate case.

RESPONSE:

A copy of the spreadsheet derived from the 1999 case (Docket No. 2873) has been provided to the Division's expert, Mr. Catlin. Note that it was converted from Lotus 1-2-3 format to Excel, and the formatting of various cells has not been corrected. Further, amounts (dollars and usage) in this file were very preliminary and do not match those that are being requested in this case. In the 1999 case many costs related to peak demands and fire service were allocated directly to fire protection. In the current docket, Mr. Woodcock only assigned costs directly associated with fire service (e.g., hydrant costs) to the fire protection function and then later assigned additional maximum day and peak hour costs to fire protection.

Prepared by: Woodcock

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-15: Reference Ex. 5 (Woodcock) Sch. 1B.

- a. Please identify the nature of the Administrative Expenses Transferred line item.
- b. Please provide a detailed description and breakdown of the costs included in the Outside Services Employed line item.

RESPONSE:

- a. The Administrative Expenses Transferred line item represents fringe benefits that have been allocated to various PSC account numbers that have labor charged to them. Additionally, it includes fringe benefits that have been transferred out to other business units where United Water Rhode Island employees performed a service for another business unit or their labor has been capitalized. Please refer to Exhibit 4 Schedule 3A. As noted \$213,759 of fringe benefits has been allocated to various PSC account numbers and \$79,151 of fringe benefits has been transferred out to other business units and/or capitalized. The total \$292,910 is shown on Exhibit 5 (Woodcock) Schedule 1B.
- b. Please refer to the attached file labeled "Schedule DIV 1-15 Attachment" for the breakdown of costs included in Outside Services Employed. The amount shown on Ex. 5 (Woodcock) Sch. 1B for Outside Services Employed (A/C# 923) of \$258,349 is incorrect. The attachment reflects the correct amount. Total Outside Services Employed consists of a/c # 923 and part of a/c # 903. As can be seen on the attachment, the adjustment to a/c# 903, \$(22,929) was applied to a/c# 923 resulting in the \$258,349 amount shown on Ex. 5 (Woodcock) Sch. 1B. The correct amounts for each account with the applicable adjustments to each category is shown on the attachment under the heading "Correction". The grand total and adjustment amounts remain the same after the correction therefore there is no impact on total O&M expenses.

Prepared by:

Lippai

**United Water Rhode Island, Inc.**  
**Docket No. 4255**

**Fringe Benefits Transferred Allocation**  
**For the Test Year Ended 12/31/2010 and Rate Year**

**Exhibit 4 (Lippai)**  
**Schedule 3A**

Line No.	Acct No.	Account Description	Test Year Per Books	Fringe Benefits Capitalized (14.11%)	Rate Year Amount	Fringe Benefits Capitalized (21.09%)
1	70251	FICA Taxes	\$ 44,704	\$ (6,309)	\$ 51,706	\$ (10,902)
2	70252	Federal Unemployment Taxes	573	(81)	560	(118)
3	70253	State Unemployment Taxes	3,496	(493)	4,180	(881)
4	91460	Worker compensation	12,343	(1,742)	13,900	(2,931)
5	91500	Employee Pension Cost	126,294	(17,824)	99,067	(20,889)
6	91550	Post Retirement Health Care Accrued	60,754	(8,574)	60,881	(12,837)
7	91700	Employee Group Health & Life	88,952	(12,554)	122,599	(25,851)
8	91800	Employee 401K	12,589	(1,777)	13,257	(2,795)
9	91850	Other Employee Benefits	11,778	(1,662)	9,232	(1,947)
10	92056	Amortization of OPEB Costs	17,676	(2,495)	-	(a) -
11		Total Fring Benefit Costs Subject to Allocation	<u>\$ 379,159</u>	<u>\$ (53,510)</u>	<u>\$ 375,382</u>	<u>\$ (79,151)</u>
12						
13		Fringe Benefits transferred to various accounts	\$ 234,987		\$ 213,759	
14		Fringe benefits related to A&G salaries	90,662		82,472	
15		Fringe benefits Capitalized/Transferred Out	<u>53,510</u>		<u>79,151</u>	
16						
17		Total Fringe Benefits Allocated	<u>\$ 379,159</u>		<u>\$ 375,382</u>	

**Reference:**

(a) fully amortized September 2012

**Fringe Benefits Allocated by PSC A/C#**  
**For the Period 1/1/2010 - 12/31/2010**

A/C#	Test Year Per Books	% to Total	Rate Year Amount	Adjustment
25				
26	601	\$ 1,337 0.41%	\$ 1,216	\$ (121)
27	624	21,060 6.47%	19,157	(1,903)
28	633	4,178 1.28%	3,801	(377)
29	642	17,639 5.42%	16,046	(1,593)
30	660	36,023 11.06%	32,769	(3,254)
31	662	17,936 5.51%	16,316	(1,620)
32	663	14,019 4.30%	12,753	(1,266)
33	665	25,160 7.73%	22,887	(2,273)
34	670	918 0.28%	835	(83)
35	671	4,753 1.46%	4,324	(429)
36	673	10,652 3.27%	9,690	(962)
37	677	1,279 0.39%	1,163	(116)
38	902	39,235 12.05%	35,691	(3,544)
39	903	35,118 10.78%	31,946	(3,172)
40	905	2,796 0.86%	2,543	(253)
41	932	2,884 0.89%	2,623	(261)
42				
43		<u>234,987</u>	<u>213,759</u>	<u>(21,228)</u>
44				
45	920	<u>90,662 27.84%</u>	<u>82,472</u>	<u>(8,190)</u>
46				
47	Total Allocated to Expense	325,649	296,231	(29,418)
48				
49	Total Fring Benefit Costs Subject to Allocation	<u>379,159 100.00%</u>	<u>375,382</u>	<u>(3,777)</u>
50				
51	Fringe Benefits Capitalized/Transferred			
52	Out to Other Business Units	<u>\$ (53,510)</u>	<u>\$ (79,151)</u>	<u>\$ (25,641)</u>
53				
54	% Capitalized	<u>-14.11%</u>	<u>-21.09%</u>	

**United Water Rhode Island, Inc.**  
**Docket No. 4255**  
**Outside Services**

Description	Test Year Per Books	Adjustment	Rate Year
<b>A/C# 923</b>			
M & S Fees:	\$ 213,485	\$ 18,980	\$ 232,465
Accounting & Auditing	5,403	180	5,583
Legal	688	1,512	2,200
Information Systems	14,686	489	15,175
Other	5,720	4,403	10,123
Mgmt Fee (R&I Alliance)	15,227	507	15,734
Temporary Help		(22,929)	(22,929)
Total	255,209	3,140	258,349
<b>A/C# 903</b>			
Temporary Help	42,289	\$ -	42,289
Total	\$ 297,498	\$ 3,140	\$ 300,638

**CORRECTION:**

<b>A/C# 923</b>			
M & S Fees:	\$ 213,485	\$ 18,980	\$ 232,465
Accounting & Auditing	5,403	180	5,583
Legal	688	1,512	2,200
Information Systems	14,686	489	15,175
Other	5,720	4,403	10,123
Mgmt Fee (R&I Alliance)	15,227	507	15,734
Temporary Help			-
Total	255,209	26,071	281,280
<b>A/C# 903</b>			
Temporary Help	42,289	(22,929)	19,360
Total	\$ 297,498	\$ 3,140	\$ 300,638



STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode, Island Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-16: Reference Ex. 5 (Woodcock) Sch. 1D. Please explain in detail the type of costs included in the Computer Hardware line item, and identify the services/processes supported.

RESPONSE: The line item includes costs for Computer Hardware, Computer Software and Office Equipment, Furniture and Office Improvements, specifically;

- Desktop and Laptop Computers
- Computer Networks and Equipment (Servers, Routers, Audiovisual, Printers, Monitors)
- PeopleSoft Financial System, Upgrades and Licensing (Financial Transactions and Reporting System)
- KEY System (Maintenance Management System)
- Human Resources Information System
- Compliance System
- Telecommunications Equipment and Networks (SCADA)
- Security Networks and Equipment
- Document Imaging System (Accounts Payable processing and payment)
- Hydraulic Modeling.

Prepared by: Michaelson

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-17:           What is the Company's proposal with respect to the scale back of rates in the event that the Commission authorizes an increase which is less than the requested increase?

RESPONSE:

It is expected that the approved revenue requirements would be entered into the spreadsheet, cost-of-service model. To the extent that certain rates and charges are capped or reduced for a phase-in, it is expected that these would also be continued with the final revenue requirements.

Prepared by:       Michaelson

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-18: Please update the following for the latest month available:

- a. Schedule 2.8h, page 1;
- b. Schedule 2.8h, page 3; and
- c. Schedule 2.8h, page 5.

RESPONSE:

Please see attachment below

Prepared by: Ugboaja





**United Water Rhode Island, Inc.**  
**Billed Consumption by Customer Class (in '000 Gallons)**

		2011												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
1	Residential	28,553	30,192	26,471	22,569	28,345	28,720	-	-	-	-	-	-	164,850
2	Commercial	7,608	13,774	15,861	6,723	13,479	19,662	-	-	-	-	-	-	77,107
3	Industrial	86	91	25	117	115	142	-	-	-	-	-	-	576
4	Public Authority	1,169	1,036	3,772	846	1,111	2,945	-	-	-	-	-	-	10,879
5	Resale	52,899	7,161	6,794	40,664	8,647	35,115	-	-	-	-	-	-	151,280
		2010												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
6	Residential	28,929	29,787	24,862	22,736	29,279	31,787	34,872	43,371	61,779	43,448	37,061	36,065	423,976
7	Commercial	7,531	13,957	15,756	6,482	13,899	20,880	11,006	19,568	27,301	13,331	17,142	21,414	188,267
8	Industrial	80	136	38	135	79	150	340	496	175	134	155	34	1,952
9	Public Authority	1,099	1,124	2,437	940	1,168	2,835	1,919	2,192	4,288	2,829	2,860	2,865	26,556
10	Resale	3,017	8,152	8,554	53,370	9,931	13,273	121,252	27,188	26,217	17,249	118,972	8,619	415,797
		2009												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
11	Residential	22,053	37,798	25,333	18,915	31,560	24,102	27,008	41,796	50,977	40,999	35,835	32,746	389,122
12	Commercial	6,996	14,330	16,236	6,297	13,113	18,490	8,321	15,355	33,252	12,676	13,454	18,429	176,949
13	Industrial	84	303	23	94	264	127	240	504	184	136	375	49	2,383
14	Public Authority	1,243	1,334	2,758	764	1,196	1,926	1,167	1,167	4,776	2,400	2,836	3,577	23,977
15	Resale	55,499	8,419	6,533	52,594	8,299	11,838	83,223	18,233	17,260	95,117	9,927	16,716	383,658
		2008												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
16	Residential	35,036	30,991	23,945	23,950	28,583	28,066	36,310	45,471	62,381	41,731	41,495	33,508	431,467
17	Commercial	18,359	13,745	11,290	10,548	13,869	19,421	11,138	18,400	27,375	14,012	18,431	19,454	196,042
18	Industrial	271	327	120	456	545	336	262	858	138	501	290	26	4,130
19	Public Authority	2,183	1,241	2,682	1,304	1,185	2,578	2,229	2,460	4,604	3,259	2,465	3,024	29,214
20	Resale	64,865	4,726	7,432	51,099	9,281	14,035	98,408	26,771	22,067	88,547	11,459	7,783	406,473
		2007												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
21	Residential	28,975	32,613	22,908	23,351	33,214	26,453	34,118	58,776	61,680	43,286	30,222	53,673	449,269
22	Commercial	8,403	13,808	12,390	11,423	12,644	11,080	17,955	19,082	24,751	13,364	14,682	13,131	172,713
23	Industrial	531	468	379	556	609	361	386	736	309	391	781	229	5,736
24	Public Authority	1,265	1,439	1,633	1,287	1,652	2,634	2,347	4,023	3,781	2,899	1,488	4,856	29,304
25	Resale	52,841	9,354	7,409	50,079	9,255	16,468	102,137	8,149	18,374	110,100	8,155	8,246	400,567
		2006												
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
26	Residential	24,667	28,938	32,585	15,757	45,074	23,817	42,002	27,325	75,028	38,095	34,469	28,063	415,820
27	Commercial	15,764	12,724	9,929	16,550	16,138	7,230	21,130	14,821	25,886	14,041	14,178	16,649	185,040
28	Industrial	449	970	536	898	918	714	964	1,368	593	646	893	434	9,383
29	Public Authority	1,426	1,372	2,781	1,110	2,060	3,302	1,873	6,861	1,113	2,076	1,556	3,134	28,664
30	Resale	61,009	6,367	5,756	62,263	10,144	14,173	80,340	12,168	15,952	109,372	8,090	5,983	391,617

**United Water Rhode Island, Inc.**  
**Billed Consumption by Customer Class (in '000 Gallons)**

		2005												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
31	Residential	25,280	41,742	26,031	26,901	29,977	27,766	30,994	55,905	70,212	44,574	34,386	44,819	458,587
32	Commercial	17,168	15,559	9,348	17,960	12,950	9,890	21,679	20,380	22,324	20,202	15,234	16,315	199,009
33	Industrial	751	1,170	1,025	1,014	1,334	967	817	1,605	767	773	1,039	797	12,059
34	Public Authority	1,333	1,802	2,965	1,363	1,143	2,784	1,797	2,764	6,531	3,550	2,089	4,677	32,798
35	Resale	77,164	1,299	1,270	73,143	1,050	1,503	95,214	2,220	1,863	147,332	8,512	9,831	420,401
		2004												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
36	Residential	30,268	31,323	28,492	25,384	29,852	32,877	37,390	44,510	53,575	43,481	35,631	31,107	423,890
37	Commercial	10,624	14,483	13,556	8,810	13,773	15,935	13,970	16,636	21,522	16,571	15,083	9,599	170,562
38	Industrial	1,082	1,084	650	926	1,179	1,516	1,136	1,593	1,255	1,435	1,130	683	13,669
39	Public Authority	2,482	1,486	2,188	1,891	1,515	1,608	3,665	2,465	5,204	2,630	2,114	2,955	30,203
40	Resale	78,766	1,325	1,018	81,326	1,327	2,336	118,067	1,514	67,664	128,433	842	1,185	483,803
		2003												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
41	Residential	30,581	30,296	29,554	25,783	29,788	29,437	33,679	39,042	49,997	45,164	35,849	33,329	412,499
42	Commercial	10,795	14,122	15,006	9,411	13,669	15,480	12,663	17,230	20,371	16,662	15,907	15,270	176,586
43	Industrial	833	934	744	952	1,043	785	1,098	1,599	1,672	1,593	1,043	727	13,023
44	Public Authority	1,757	1,473	3,101	1,600	1,563	3,081	1,462	3,568	5,106	3,331	4,906	3,911	34,859
45	Resale	53,974	9,234	1,075	78,548	1,221	1,442	96,461	42,062	1,640	134,497	1,036	1,069	422,259
		2002												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
46	Residential	31,139	29,171	26,195	24,699	29,477	30,775	37,578	46,935	59,423	49,185	38,666	32,002	435,245
47	Commercial	10,373	24,456	12,641	8,684	13,042	14,698	21,624	17,234	20,298	15,817	16,275	14,726	189,868
48	Industrial	842	1,262	806	1,035	1,274	1,199	1,229	1,315	1,041	1,247	941	823	13,014
49	Public Authority	1,788	1,501	3,894	1,265	1,876	3,966	1,757	2,069	6,080	4,288	2,632	4,087	35,203
50	Resale	52,596	1,011	926	48,811	1,166	1,391	75,643	2,746	1,640	88,674	1,037	1,070	276,711
		2001												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
51	Residential	27,880	27,880	31,373	23,854	31,633	31,348	38,508	43,874	60,149	46,584	37,247	33,950	434,280
52	Commercial	15,920	12,546	12,386	12,513	13,875	16,585	14,407	18,393	23,940	16,852	18,918	15,350	191,685
53	Industrial	1,677	1,896	1,291	1,173	1,127	903	1,353	1,102	1,682	1,419	1,395	947	15,965
54	Public Authority	1,334	1,569	4,149	1,330	1,268	3,624	1,896	2,006	6,409	3,425	1,916	4,299	33,225
55	Resale	80,650	10,561	1,169	47,468	14,945	18,198	73,849	20,495	16,575	91,779	26,337	13,852	415,878

**United Water Rhode Island, Inc.**  
**Water Use Per Customer by Class**

		2011											
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	Residential	3.89	4.11	3.60	3.07	3.85	3.90	-	-	-	-	-	-
2	Commercial	10.64	19.26	22.18	9.40	18.85	27.50	-	-	-	-	-	-
3	Industrial	8.60	9.10	2.50	11.70	11.50	14.20	-	-	-	-	-	-
4	Public Authority	12.05	10.68	38.89	8.72	11.45	30.36	-	-	-	-	-	-
5	Resale	17,633.00	2,387.00	2,264.67	13,554.67	2,882.33	11,705.00	-	-	-	-	-	-

		2010											
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
6	Residential	3.97	4.09	3.41	3.12	4.01	4.35	4.77	5.93	8.44	5.93	5.06	4.91
7	Commercial	10.58	19.60	22.13	9.10	19.52	29.33	15.46	27.48	38.18	18.64	23.97	29.95
8	Industrial	8.00	13.60	3.80	13.50	7.90	15.00	34.00	49.60	17.50	13.40	15.50	3.40
9	Public Authority	11.33	11.59	25.12	9.69	12.04	29.23	19.78	22.60	44.21	29.16	29.48	29.54
10	Resale	1,005.80	2,717.42	2,851.43	17,790.13	3,310.43	4,424.43	40,417.49	9,062.57	8,739.11	5,749.83	39,657.36	2,872.99

		2009											
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
11	Residential	3.05	5.23	3.50	2.61	4.36	3.32	3.72	5.76	7.02	5.64	4.93	4.50
12	Commercial	9.83	20.13	22.80	8.84	18.42	25.97	11.69	21.57	46.70	17.80	18.90	25.88
13	Industrial	8.40	30.30	2.30	9.40	26.40	12.70	24.00	50.40	18.40	13.60	37.50	4.90
14	Public Authority	12.81	13.75	28.43	7.88	12.33	-	19.86	12.03	49.24	24.74	29.24	36.88
15	Resale	18,499.67	2,806.33	2,177.67	17,531.33	2,766.33	3,946.00	27,741.00	6,077.67	5,753.33	31,705.67	3,309.00	5,572.00

		2008											
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
16	Residential	4.90	4.33	3.33	3.33	3.97	3.90	5.04	6.31	8.65	5.79	5.75	4.64
17	Commercial	26.00	19.47	15.99	14.94	19.64	27.39	15.71	25.95	38.50	19.68	25.89	27.32
18	Industrial	27.10	32.70	12.00	45.60	54.50	33.60	26.20	85.80	13.80	50.10	29.00	2.60
19	Public Authority	22.51	12.79	27.65	13.44	12.22	26.58	22.98	25.36	47.46	33.60	25.41	31.18
20	Resale	21,621.67	1,575.33	2,477.33	17,033.00	3,093.67	4,678.33	32,802.67	8,923.67	7,355.67	29,515.67	3,819.67	2,594.33

		2007											
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
21	Residential	4.06	4.57	3.21	3.27	4.65	3.70	4.77	8.21	8.61	6.04	4.21	7.48
22	Commercial	11.94	19.61	17.60	16.23	17.93	15.69	25.40	26.99	35.01	18.88	20.74	18.60
23	Industrial	53.10	46.80	37.90	55.60	60.90	36.10	38.60	73.60	30.90	39.10	78.10	22.90
24	Public Authority	13.04	14.84	16.84	13.27	17.03	27.15	24.20	41.47	38.98	29.89	15.34	50.06
25	Resale	17,613.67	3,118.00	2,469.67	16,693.00	3,085.00	5,489.33	34,045.67	2,716.33	6,124.67	36,700.00	2,718.33	2,748.67

		2006											
Line #	Customer Class	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
26	Residential	3.53	4.13	4.65	2.24	6.41	3.38	5.96	3.86	10.58	5.37	4.85	3.94
27	Commercial	22.39	18.07	14.10	23.51	22.92	10.27	30.01	21.05	36.77	19.94	20.14	23.65
28	Industrial	44.90	97.00	53.60	89.80	91.80	71.40	96.40	136.80	59.30	64.60	89.30	43.40
29	Public Authority	14.70	14.14	28.67	11.44	21.24	34.04	19.31	11.47	70.73	21.40	16.04	32.31
30	Resale	20,336.33	2,122.33	1,918.67	20,754.33	3,381.33	4,724.33	26,780.00	4,056.00	5,317.33	36,457.33	2,696.67	1,994.33



**United Water Rhode Island, Inc.**  
**Water Use Per Customer by Class**

		2005											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
31	Residential	3.62	5.98	3.73	3.85	4.28	3.96	4.41	7.96	9.98	6.33	4.88	6.34
32	Commercial	24.39	22.10	13.28	25.51	18.39	14.05	30.79	28.95	31.71	28.70	21.64	23.17
33	Industrial	75.10	117.00	102.50	101.40	133.40	96.70	81.70	160.50	76.70	77.30	103.90	79.70
34	Public Authority	13.74	18.58	30.57	14.05	11.78	28.70	18.53	28.49	67.33	36.60	21.54	48.22
35	Resale	25,721.33	433.00	423.33	24,381.00	350.00	501.00	31,738.00	740.00	621.00	49,110.67	2,837.33	3,277.00
		2004											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
36	Residential	4.40	4.55	4.14	3.68	4.32	4.75	5.40	6.41	7.72	6.25	5.11	4.46
37	Commercial	15.20	20.72	19.34	12.51	19.56	22.63	19.84	23.63	30.57	23.54	21.42	13.63
38	Industrial	108.20	108.40	65.00	92.60	117.90	151.60	113.60	159.30	125.50	143.50	113.00	68.30
39	Public Authority	25.59	15.32	22.56	19.49	15.62	16.58	37.78	25.41	53.65	27.11	21.79	30.46
40	Resale	26,255.33	441.67	339.33	27,108.67	442.33	778.67	39,355.67	504.67	22,554.67	42,811.00	280.67	395.00
		2003											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
41	Residential	4.50	4.45	4.34	3.79	4.37	4.31	4.93	5.71	7.30	6.59	5.23	4.86
42	Commercial	15.49	20.26	21.53	13.46	19.56	22.15	18.12	24.65	29.14	23.84	22.76	21.85
43	Industrial	83.30	93.40	74.40	95.20	104.30	78.50	109.80	159.90	167.20	159.30	104.30	72.70
44	Public Authority	18.30	15.34	32.30	16.67	16.11	31.76	15.07	36.78	52.64	34.34	50.58	40.32
45	Resale	17,991.33	3,078.00	358.33	26,182.67	407.00	480.67	32,153.67	14,020.67	546.67	44,832.33	345.33	356.33
		2002											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
46	Residential	4.65	4.36	3.90	3.67	4.37	4.56	5.56	6.94	8.77	7.25	5.70	4.71
47	Commercial	15.06	35.49	18.37	12.57	18.82	21.18	31.02	24.73	29.12	22.69	23.35	21.13
48	Industrial	84.20	126.20	80.60	103.50	127.40	119.90	122.90	131.50	104.10	124.70	94.10	82.30
49	Public Authority	18.63	15.64	40.99	13.32	19.54	41.31	18.30	21.55	63.33	44.67	27.42	42.57
50	Resale	8,766.00	168.50	154.33	8,135.17	194.33	231.83	12,607.17	457.67	546.67	29,558.00	345.67	178.33
		2001											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
51	Residential	4.24	4.23	4.76	3.62	4.78	4.74	5.81	6.60	9.05	6.99	5.58	5.08
52	Commercial	23.34	18.40	18.13	18.32	20.31	24.21	21.03	26.85	34.95	24.93	27.54	22.34
53	Industrial	167.70	189.60	129.10	117.30	112.70	90.30	135.30	110.20	168.20	141.90	139.50	94.70
54	Public Authority	14.19	16.69	43.22	13.85	13.21	37.75	19.75	20.90	66.76	35.68	19.96	44.78
55	Resale	13,441.67	1,760.17	194.83	7,911.33	2,490.83	3,033.00	12,308.17	3,415.83	2,762.50	15,296.50	4,389.50	2,308.67

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-19: Please provide the monthly number of Normal and All Other Hour Turn on/off occurrences by month for 2011 to date.

RESPONSE: Please see table below. Please note that all Turn On / Turn Off occurrences year to date are "normal".

<b>Month</b>	<b>Occurrences</b>
Jan	14
Feb	5
Mar	40
Apr	41
May	26
Jun	24

Prepared by: Knox

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-20: For each month during the period 2006 through present, please provide:

- a. actual cooling degree days;
- b. NOAA normal cooling degree days;
- c. actual rainfall; and
- d. NOAA normal rainfall.

RESPONSE:

Please see attachment below

Prepared by: Knox

**United Water Rhode Island, Inc.**  
**Response to DIV -1-20**

**Response to Part A: Actual cooling degree days:**

	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	DEC	
2006	0	0	0	0	0	28.5	138.4	334.8	223.4	98.1	0	0	0
2007	0	0	0	0	0	45.7	132	257.4	229.9	67.7	26.6	0	0
2008	0	0	0	0	0	1.3	197.4	332.9	159.1	767	0.4	0	0
2009	0	0	0	0	7.5	10.4	75.6	197.2	301.8	38.8	0	0	0
2010	0	0	0	0	1.4	53.8	196.8	375.9	248.2	96.2	2.3	0	0
2011	0	0	0	0	0	38.3							

**Response to Part B: NOAA Cooling degree days 30 year average:**

	0	0	0	3	25	122	265	223	71	5	0	0
--	---	---	---	---	----	-----	-----	-----	----	---	---	---

**Response to Part C: Actual Rainfall:**

2006	6.35	2	0.4	3.11	6.78	8.9	4.79	4.22	3.89	5.64	3.88	2.43	52.39
2007	4.68	2.6	4.1	7.6	1.95	1.91	3.06	2.21	2.25	2.27	3.36	4.27	40.26
2008	2.2	5.11	5.39	3.45	2.57	2.59	3.97	2.61	1.33	2.14	3.55	5.95	40.86
2009	3.79	1.75	2.34	5.67	3.26	4.63	11.7	1.99	1.82	5.83	2.58	5.01	50.37
2010	2.89	4.67	16.13	2.01	2.18	1.59	0.64	2.25	0.2	3.71	4.09	3.44	43.8
2011	2.97	5.36	2.48	5.98	3.17	5.21							

**Response to Part D: NOAA 30 year average rainfall:**

	4.37	3.45	4.43	4.16	3.16	3.38	3.17	3.9	3.7	3.69	4.4	4.14	45.95
--	------	------	------	------	------	------	------	-----	-----	------	-----	------	-------

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4255

Response of United Water Rhode Island, Inc.

To The Division of Public Utilities And Carriers'

Data Requests

Set 1

---

Div. 1-21:            Please provide monthly pool fill sales volumes and revenues for the period 2010 to present.

RESPONSE:

Please see attachment below

Prepared by:        Ugboaja


United Water Rhode Island, Inc.  
 Pool Fills  
 January, 2010 through July, 2011

January-10		May-10		June-10		July-10		August-10		September-10		October-10		November-10	
Gallons	Amount	Gallons	Amount	Gallons	Amount	Gallons	Amount	Gallons	Amount	Gallons	Amount	Gallons	Amount	Gallons	Amount
12,400	\$32.12	278,500	\$853.01	8,270,000	\$3,197.82	259,400	\$776.45	2,663,200	\$8,110.19	15,000	\$48.14	7,350	\$22.52	926,000	\$2,837.00
June-11															
Gallons	Amount														
25,000	\$771.95														

**CERTIFICATION**

I hereby certify that on July 14, 2011, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone/Fax</b>
Timothy J. Michaelson United Water Mgmt. & Services, Inc. 200 Old Hook Road Harrington Park, NJ 07640	<a href="mailto:Tim.Michaelson@UnitedWater.com">Tim.Michaelson@UnitedWater.com</a>	201-750-3406 201-750-5728
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:jbell@ripuc.state.ri.us">jbell@ripuc.state.ri.us</a>	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a>	
	<a href="mailto:Mcorey@riag.ri.gov">Mcorey@riag.ri.gov</a>	
Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:klyons@riag.ri.gov">klyons@riag.ri.gov</a>	
Thomas S. Catlin Exeter Associates, Inc. 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044	<a href="mailto:tcatlin@exeterassociates.com">tcatlin@exeterassociates.com</a>	410-992-7500 410-992-3445
Michael A. Ursillo, Esquire Ursillo, Teitz & Ritch, Ltd. 2 Williams Street Providence, RI 02903	<a href="mailto:mikeursillo@utrllaw.com">mikeursillo@utrllaw.com</a>	401-331-2222 401-751-5257
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
Mark A. McSally, Esq. Kelly, Kelleher, Reilly & Simpson 146 Westminster Street, Suite 500 Providence, RI 02903	<a href="mailto:mmcsally@kkr.com">mmcsally@kkr.com</a>	401-789-7800
<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 401-941-1691
	<a href="mailto:plucarelli@puc.state.ri.us">plucarelli@puc.state.ri.us</a>	
	<a href="mailto:sccamara@puc.state.ri.us">sccamara@puc.state.ri.us</a>	

  
\_\_\_\_\_