

# 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\***  
**STACIL L. KOLB**

**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  
FAX (508) 822-2832

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

February 1, 2013

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

**Re: *City of Newport, Utilities Department, Water Division***  
***Docket 4355***

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the following documents:

1. Newport Water's Response to the Division of Public Utilities and Carrier's Second Set of Data Requests.

Please be advised that an electronic copy of these documents has been sent to the service list.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough Jr.

JAK/kf  
Enclosure

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4355  
Response Of The City Of Newport,  
Utilities Division, Water Department  
To The Division of Public Utilities  
and Carriers'  
Data Requests  
Set 2

---

Div. 2-1: Reference HJS Schedule D-1 Rebuttal. Please provide the number of accounts by class, connection size and meter read frequency which would have been applicable in Docket No. 4243. That is, provide a breakdown of the accounts as requested for those reflected on RFC Schedule A in Docket No. 4243.

Response: See Attachment A.

Prepared by: Harold J. Smith

Docket 4355  
 Response to Div 2  
 Attachment A

Newport Water Division  
 Response to Div. 2-1 in Docket 4355  
 Water Accounts, by Size and Class

Connection Size	Meter Factors	COMMERCIAL				RESIDENTIAL				WHOLESALE (Monthly)			
		Meter Read Frequency		Equivalent Meters		Meter Read Frequency		Equivalent Meters		Navy		Portsmouth	
		Monthly	Quarterly	Monthly	Quarterly	Monthly	Quarterly	Monthly	Quarterly	Meters	Equivalents	Meters	Equivalents
5/8	1.0	99	583	99	583	6	10,067	6	10,067	0	0	0	0
3/4	1.1	50	173	55	190	5	2,214	6	2,435	1	1	0	0
1	1.4	144	38	202	53	20	343	28	480	0	0	0	0
1.5	1.8	141	28	254	50	21	158	38	284	0	0	0	0
2	2.9	168	19	487	55	33	42	96	122	0	0	0	0
3	11.0	46	8	506	88	10	11	110	121	0	0	0	0
4	14.0	10	3	140	42	1	1	14	14	0	0	1	14
5	18.0	1	0	18	0	0	0	0	0	0	0	0	0
6	21.0	11	1	231	21	1	1	21	21	10	210	0	0
8	29.0	0	0	0	0	1	1	29	29	0	0	0	0
10	43.5	0	0	0	0	0	0	0	0	1	44	0	0
Total	<b>14,472</b>	670	853	1,992	1,083	98	12,838	347	13,574	12	255	1	14

	Equivalent Billing Units	
Billed Monthly	781	9,372
Billed Quarterly	13,691	54,764
Billed Annually	369	369
<b>Total</b>	<b>14,472</b>	<b>64,505</b>

	Equivalent Meter Units	
Billed Monthly	2,607	31,286
Billed Quarterly	14,657	175,882
Billed Annually	N/A	N/A
<b>Total</b>	<b>17,264</b>	<b>207,168</b>

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4355  
Response Of The City Of Newport,  
Utilities Division, Water Department  
To The Division of Public Utilities  
and Carriers'  
Data Requests  
Set 2

---

Div. 2-2: Please provide the quantity of unaccounted-for water in 1,000 gallons used in Docket No. 4243.

Response: See Attached Item 2.9(n)(1) from the Appendix to Newport Water's Application to Increase Rates in Docket 4243. Please note that the unaccounted for water in this attachment was not used to calculate rates in Docket 4243 or in Newport's proposed Cost of Service Study in Docket 4355.

Prepared by: Harold J. Smith

Item 2.9 (n)(1)

Unaccounted for Water  
Newport Water Division

Fiscal year

2006	423,178,000 gallons	16.20%
2007	487,868,400 gallons	19.07%
2008	448,274,164 gallons	17.08%
2009	455,844,576 gallons	18.02%
2010	527,319,275 gallons	21.73%

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4355  
Response Of The City Of Newport,  
Utilities Division, Water Department  
To The Division of Public Utilities  
and Carriers'  
Data Requests  
Set 2

---

Div. 2-3: Reference the fixed asset values for Lawton Valley, Station One and Treatment Both on HJS Schedule B-5 Rebuttal. Identify the fixed asset value amounts associated with design and construction of the new Lawton Valley Water Treatment Plant and the improvements to the Station One Water Treatment Facility for which new debt is being issued (per page 17, lines 14-15 of Mr. Smith's rebuttal testimony).

Response: Please see Attachment B. The assets highlighted in light blue are the assets associated with design and construction of the new Lawton Valley Water Treatment Plant and the improvements to the Station One Water Treatment Facility. The total value of these assets is \$7,800,110.

Prepared by: Harold J. Smith

Newport Water  
Docket 4355  
Response to Div. 2-3

**WATER FUND FIXED ASSETS**

TD	TRANSMISSION/DISTRIBUTION	20,846,330.69	Pumping Highlighted in green
L	LAWTON VALLEY	7,116,281.83	
N	STATION 1	22,516,440.91	
T	TREATMENT BOTH	9,161,055.40	
ST	STORAGE	1,060,548.49	
SS	SOURCE OF SUPPLY	19,453,648.97	
M	METERS	629,135.04	
TDP	T&D PUMPING	907,332.37	
B	BILLING	2,902,066.32	
F	FIRE	351,481.16	
LAB	LABORATORY	80,000.00	
LAND	LAND AND ROW	3,594,491.24	
		88,618,812.42	

ASSET	DESCRIPTION	INSRV-DATE	Total to 5/31/12		7/1/11-5/31/12	(No depr Calculated on 2012 additions yet)
Alloc	ASSET DESCRIPTION	INSRV-DATE	ORIG-COST	A/D to 6/30/11	YTD-DEPR	A/D to 5/31/12
F	2861 Hydrants	6/30/1981	2,818.27	2,818.27	-	2,818.27
F	2862 Hydrants	6/30/1982	48,742.23	47,252.88	1,303.18	48,556.06
F	2863 Hydrants	6/30/1983	513.18	480.40	13.72	494.12
F	2864 Hydrants	6/30/1984	390.89	352.90	10.46	363.36
F	2865 Hydrants	6/30/1985	5,615.80	4,882.62	150.15	5,032.77
F	2866 Hydrants	6/30/1986	11,149.30	9,322.05	298.09	9,620.14
F	2867 Hydrants	6/30/1987	2,130.64	1,710.41	56.98	1,767.39
F	2868 Hydrants	6/30/1988	345.06	265.48	9.24	274.72
F	2869 Hydrants	6/30/1989	13,148.17	9,678.49	351.53	10,030.02
F	2870 Hydrants	1/17/1996	11,796.00	11,796.00	-	11,796.00
F	2871 Hydrants	12/12/1996	10,190.00	10,190.00	-	10,190.00
F	2872 Hydrants	5/21/1998	4,494.00	4,494.00	-	4,494.00
F	2873 Hydrants	3/16/1998	1,577.00	1,577.00	-	1,577.00
F	2874 Hydrants	3/26/1998	1,276.00	1,276.00	-	1,276.00
F	2875 Hydrants	6/4/1999	28,444.02	28,444.02	-	28,444.02
F	2876 Hydrants	3/15/2000	8,372.00	8,372.00	-	8,372.00
F	2877 Hydrants	6/30/2001	15,660.00	15,660.00	-	15,660.00
F	2878 Hydrants	7/1/2002	23,737.00	21,363.30	1,903.92	23,267.22
F	2879 Hydrants	4/16/2004	40,848.00	29,614.80	3,276.35	32,891.15
F	2880 Hydrants	4/14/2005	31,431.00	19,644.38	2,521.04	22,165.42
F	2881 Hydrants	4/5/2006	38,480.00	20,202.00	3,086.44	23,288.44
F	3677 Hydrant Replacements	10/1/2009	6,924.60	1,211.81	555.42	1,767.23
F	3678 Hydrant Replacements	10/20/2009	7,253.00	1,269.28	581.74	1,851.02
F	3807 Hydrant Replacements	1/1/2010	1,872.00	280.80	150.15	430.95
F	4400 Hydrant Replacements	2/28/2011	16,773.00	698.88	1,345.34	2,044.22
F	Hydrant Replacements	FY 2012	17,500.00	-	-	-
L	2722 Filter Building/structure	6/30/1942	340,775.40	340,775.40	-	340,775.40
L	2723 Structure	6/30/1965	1,156,376.62	1,156,376.62	-	1,156,376.62
L	2725 Structure	6/30/1988	2,052.00	1,184.18	41.15	1,225.33
L	2729 Baffle #3 replacement	12/1/1995	65,900.00	25,673.54	1,321.42	26,994.96
L	2730 Elevator replacement	5/7/2004	118,800.00	21,285.00	2,382.19	23,667.19
L	2731 WTP Sediment Basin Repairs	6/30/2005	227,476.00	34,595.31	4,561.38	39,156.69
L	2732 Chlorine System Improvements	3/31/2005	92,250.00	14,606.25	1,849.83	16,456.08
L	2744 LV Chlorine Building (CAF)	1/1/1943	13,399.68	13,399.68	-	13,399.68
L	2745 LV Pump Building (CAG)	1/1/1973	22,818.56	17,570.25	366.04	17,936.29
L	2746 LV Garage	1/1/1982	11,805.27	6,965.12	189.38	7,154.50
L	2750 Newport Sta.#1 improve	5/31/2001	9,686.31	4,923.88	388.47	5,312.35
L	2752 Engineering Study-SCADA	2/6/2004	32,639.11	12,103.68	1,308.97	13,412.65
L	2765 Liquid chemical feed	7/1/2006	144,559.00	36,139.75	5,797.43	41,937.18
L	2939 SCADA-Lawton Valley Imprv	10/17/2007	12,762.50	2,392.97	511.84	2,904.81
L	2940 SCADA-Lawton Valley Imprv	11/5/2007	3,877.50	710.88	155.51	866.39
L	3319 SCADA-Lawton Valley Imprv	6/30/2008	2,690.00	414.71	107.90	522.61
L	3326 CDM Water Age	6/30/2008	9,617.00	1,482.62	385.67	1,868.29
L	3327 CDM Water Age	6/30/2008	12,968.10	1,999.25	520.07	2,519.32
L	3328 Liquid Chemical Feed	6/30/2008	8,439.40	1,301.07	338.46	1,639.53
L	3329 LV Mixing System Design	6/30/2008	2,047.37	315.64	82.10	397.74
L	3330 LV Mixing System Design	6/30/2008	3,162.06	487.48	126.82	614.30
L	3363 LV Backwash Diversion	2/27/2009	67,925.00	8,207.60	2,724.07	10,931.67
L	3364 LV Backwash Diversion	2/27/2009	59,850.00	7,231.88	2,400.24	9,632.12
L	3365 Lawton Valley Mixing System	2/27/2009	705.04	85.19	28.30	113.49
L	3366 Lawton Valley Mixing System	2/27/2009	854.05	103.19	34.27	137.46
L	3367 Lawton Valley Mixing System	2/27/2009	501.35	60.59	20.12	80.71
L	3376 LV Backwash Diversion	2/27/2009	55,062.00	6,653.33	2,208.22	8,861.55
L	4691 SCADA-LV Improvements	6/30/2011	486,091.11	2,025.38	19,494.28	21,519.66
L	3636 LV New Treatmnt Plant	6/30/2009	425,296.14	-	-	-
L	3702 LV New Treatmnt Plant	12/1/2009	142,810.79	-	-	-
L	3703 LV New Treatmnt Plant	12/1/2009	20,316.52	-	-	-
L	3704 LV New Treatmnt Plant	12/1/2009	322,894.99	-	-	-
L	3708 LV New Treatment Plant	12/16/2009	13,312.49	-	-	-
L	2897 LV Treatment Plant (DAX)	1/1/1943	155,575.00	155,575.00	-	155,575.00
L	2898 LV Addition - 1966 (DAY)	1/1/1966	196,360.00	178,687.60	3,149.96	181,837.56
L	2899 Clearwell LV (DAZ)	1/1/1943	6,891.26	6,891.26	-	6,891.26

Docket 4355  
Response to Div 2  
Attachment B

L	2900 LV In-Ground Reservoir (DBA)	1/1/1966	289,649.25	263,580.82	4,646.47	268,227.29
L	2901 LV Generator Housing (DBB)	1/1/1991	6,286.73	2,577.55	100.87	2,678.42
L	2904 LV UndergrPlant Piping (DBG)	1/1/1943	18,882.06	18,882.06	-	18,882.06
L	2905 LV UndergrPlant Piping (DBH)	1/1/1966	8,612.63	7,837.48	138.17	7,975.65
L	2906 LV UndergrPlant Piping (DBI)	1/1/1973	35,831.70	27,590.40	574.81	28,165.21
L	2913 Generator Housing	1/1/1991	6,371.68	2,612.35	102.22	2,714.57
L	4695 Lawton Valley Residuals	6/30/2011	111,530.00	185.88	1,789.12	1,975.00
L	4696 LV Constr Raw Residuals	6/30/2011	79,612.80	132.69	1,277.14	1,409.83
L	4697 LV Sedimentation Basin	6/30/2011	335,813.80	559.69	5,387.02	5,946.71
L	2770 PVC liners for alum tanks	11/1/2000	8,922.00	8,922.00	-	8,922.00
L	2778 Hydr lime volumetric feed	2/6/1998	12,271.00	12,271.00	-	12,271.00
L	2781 SCADA-L V Improvements	6/30/2007	707,526.64	288,906.71	56,749.54	345,656.25
L	4698 PH Chemical Feed	6/30/2011	586,123.68	976.87	9,402.39	10,379.26
L	4699 Pretreat Clar Trng	6/30/2011	660,300.24	1,100.50	10,592.31	11,692.81
LAB	2782 Lab Equipment - Contract 26	3/6/1991	80,000.00	80,000.00	-	80,000.00
LAND	2669 Various Land Purchases	6/9/1936	327,597.32	-	-	-
LAND	2670 4.50 Acres Bliss Mine Neast	5/2/1940	5,000.00	-	-	-
LAND	2671 Green End Avenue parcel	6/30/1941	947.18	-	-	-
LAND	2672 789' x 20' easement	3/31/1942	250.00	-	-	-
LAND	2673 6.80 acres w/ease to Union St	3/31/1942	4,500.00	-	-	-
LAND	2674 496' x 20' easement	3/31/1942	175.00	-	-	-
LAND	2675 Green End Avenue land	10/31/1944	1,890.00	-	-	-
LAND	2676 7.05 acres of Thurston Farm	6/21/1957	10,506.00	-	-	-
LAND	2677 Land & Rights of Way	6/11/1964	217,586.67	-	-	-
LAND	2678 Land & Rights of Way	6/7/1965	1,832.27	-	-	-
LAND	2679 20' easement	6/18/1965	999.86	-	-	-
LAND	2680 600' x 12' easement	10/13/1965	300.00	-	-	-
LAND	2681 Pipeline easement	4/5/1967	1,000.00	-	-	-
LAND	2682 Burchard Avenue	11/18/1967	1,500.00	-	-	-
LAND	2683 Reservoir Rd Sewer Line	9/7/1970	6,800.00	-	-	-
LAND	2684 Land & Rights of Way	6/30/1976	3,750.00	-	-	-
LAND	2685 Land & Rights of Way	11/22/1976	54,201.02	-	-	-
LAND	2686 Gray Craig Estate	1/26/1995	151,268.00	-	-	-
LAND	2687 Land & Rights of Way	12/22/1995	25,600.00	-	-	-
LAND	2688 Land & Rights of Way	6/7/1996	188,000.00	-	-	-
LAND	2689 Land & Rights of Way	12/17/1996	386,120.00	-	-	-
LAND	2690 Land & Rights of Way	12/11/1996	54,846.00	-	-	-
LAND	2691 Land & Rights of Way	12/17/1996	65,390.00	-	-	-
LAND	2692 Land & Rights of Way	7/17/1996	280,000.00	-	-	-
LAND	2693 Land & Rights of Way	12/11/1996	145,000.00	-	-	-
LAND	2694 Land & Rights of Way	11/15/1996	48,695.28	-	-	-
LAND	2695 Land & Rights of Way	4/4/1997	110,364.00	-	-	-
LAND	2696 Land & Rights of Way	4/4/1997	50,000.00	-	-	-
LAND	2697 Land & Rights of Way	2/12/1997	248,675.00	-	-	-
LAND	2698 Land & Rights of Way	6/26/1997	44,334.00	-	-	-
LAND	2699 Land & Rights of Way	4/4/1997	29,916.00	-	-	-
LAND	2700 Land & Rights of Way	3/31/1997	94,503.27	-	-	-
LAND	2701 Land & Rights of Way	6/26/2000	588,500.00	-	-	-
LAND	2702 Cons ease from VanderbiltFarm	6/26/2001	53,444.37	-	-	-
LAND	2703 Cons ease from VanderbiltFarm	12/22/2000	391,000.00	-	-	-
M	4693 FY08 Series 2008 A SRF Loan	6/30/2011	59,000.00	98.33	946.45	1,044.78
M	2855 Meters	6/30/2004	44,956.05	10,614.62	1,201.97	11,816.59
M	2856 Meters	10/22/2004	27,235.60	6,127.99	728.17	6,856.16
M	2857 Meters	6/20/2005	54,080.81	10,966.36	1,445.91	12,412.27
M	2858 Meters	10/18/2006	30,681.66	4,857.92	820.33	5,678.25
M	2934 Meter Replacements	10/19/2007	6,750.00	843.75	180.47	1,024.22
M	2935 Meter Replacements	12/21/2007	6,750.00	806.25	180.47	986.72
M	3312 Meter Replacements	6/30/2008	875.00	89.94	23.39	113.33
M	3313 Meter Replacements	6/30/2008	7,882.20	810.12	210.75	1,020.87
M	3314 Meter Replacements	6/30/2008	8,640.00	888.00	231.00	1,119.00
M	3315 Meter Replacements	6/30/2008	1,470.00	151.08	39.30	190.38
M	3316 Meter Replacements	6/30/2008	4,379.00	450.07	117.08	567.15
M	3317 Meter Replacements	6/30/2008	3,315.00	340.71	88.65	429.36
M	3318 Meter Replacements	6/30/2008	22,595.00	2,322.27	604.11	2,926.38
M	3374 Meter Replacements	2/27/2009	6,400.00	515.55	171.13	686.68
M	3379 Meter Replacements	2/27/2009	3,157.12	254.33	84.41	338.74
M	3380 Meter Replacements	2/27/2009	723.56	58.29	19.35	77.64
M	3542 Meter Replacements	6/25/2009	14,269.80	990.96	381.54	1,372.50
M	3543 Meter Replacements	6/25/2009	3,946.40	274.06	105.50	379.56
M	3544 Meter Replacements	6/25/2009	11,280.00	783.33	301.58	1,084.91
M	3631 Meter Replacements	6/29/2009	20,514.50	1,424.63	548.49	1,973.12
M	3676 Meter Replacements	10/1/2009	13,776.00	803.60	368.34	1,171.94
M	3953 Meter Replacements	6/29/2010	7,780.00	280.94	208.00	488.94
M	3954 Meter Replacements	6/29/2010	21,840.00	788.67	583.94	1,372.61
M	4019 Meter Replacements	6/8/2010	10,860.00	392.17	290.37	682.54
M	4396 Meter Replacements	2/28/2011	9,690.00	134.58	259.09	393.67
M	4397 Meter Replacements	2/28/2011	11,273.31	156.58	301.41	457.99
M	4438 Meter Replacements	5/1/2011	2,892.00	16.07	77.32	93.39
M	4439 Meter Replacements	5/1/2011	145.00	0.81	3.86	4.67
M	4440 Meter Replacements	5/1/2011	13,899.00	77.22	371.62	448.84
M	4518 Meter Replacements	6/1/2011	2,378.18	6.61	63.59	70.20
M	4519 Meter Replacements	6/7/2011	26,000.00	72.22	695.13	767.35
B	4702 SRF Remote Meter Reading	6/30/2011	2,589,948.41	7,194.30	69,245.14	76,439.44
M	Meter Replacements	FY 2012	139,197.85	-	-	-



Docket 4355  
Response to Div 2  
Attachment B

B	SRF Remote Meter Reading	FY 2012	298,997.91		-	-
B	laptop	FY 2012	13,120.00		-	-
M	2889 GCW Pick-up truck	6/30/2001	30,502.00	30,502.00		
N	2719 Water treat plant (BAH-BAI)	1/1/1991	23,123.24	-		30,502.00
N	2724 Structure	6/30/1979	686,914.60	550,962.75	13,774.06	564,736.81
N	2726 Structure - Contract 26	3/6/1991	14,045,392.00	7,139,740.93	281,639.37	7,421,380.30
N	2727 Const supervision settlement	3/6/1991	154,159.00	78,364.16	3,091.21	81,455.37
N	2728 Carbon dioxide feed & control	11/5/1994	60,290.00	27,157.67	1,306.98	28,464.65
N	2742 Station 1 Improvements	4/29/2005	176,474.19	27,574.08	3,538.69	31,112.77
N	2749 Optimization study	5/31/2000	107,929.23	60,260.47	4,328.42	64,588.89
N	2751 Engineering Study-SCADA	6/30/2003	135,969.13	54,954.21	5,452.95	60,407.16
N	2754 Engineering Services-SCADA	6/18/2004	6,992.61	2,476.55	280.45	2,757.00
N	2755 Station 1 WTP & SCADA Improv	6/18/2004	257,830.95	91,315.15	10,340.11	101,655.26
N	2759 Engineering Services-SCADA	6/30/2005	85,909.18	26,130.72	3,445.32	29,576.04
N	2762 SCADA Project 2060032	6/30/2005	23,836.69	7,250.32	955.96	8,206.28
N	2894 S1 (DAU)Clearwell	1/1/1991	220,885.34	90,563.04	3,543.36	94,106.40
N	2895 S1 (DAV) Wash Water Well	1/1/1991	103,646.20	42,494.91	1,662.66	44,157.57
N	2896 S1 Ozone Pump (DAW)	1/1/1978	169,722.66	113,714.15	2,722.62	116,436.77
N	2774 Electric Pumping Equipment	3/6/1991	236,450.00	160,260.57	6,321.77	166,582.34
N	2775 Machinery & Equipment	6/22/1982	537,323.04	537,323.04	-	537,323.04
N	2776 Machinery & Equipment	6/30/1989	29,485.95	29,485.95	-	29,485.95
N	2777 Furnish and Equip - Cont 26	3/6/1991	1,942,631.00	1,942,631.00	-	1,942,631.00
N	2780 Machinery & Equipment	6/30/1999	10,926.00	10,926.00	-	10,926.00
N	2902 S1 Treatment Plant (DBC)	1/1/1991	3,370,200.54	1,381,782.21	54,063.63	1,435,845.84
N	2903 S1Undergr Piping (DBF)	1/1/1991	130,349.36	53,443.30	2,091.03	55,534.33
SS	2721 Pier Wood 3126 Sq. Ft.	6/30/1980	14,042.97	-	-	-
SS	2736 Storm windows	3/2/1989	675.00	376.88	13.54	390.42
SS	2743 Lawton Valley Sluice Gate	3/30/2006	191,630.00	25,550.67	3,842.59	29,393.26
SS	2767 Dam and Moat Study	6/30/2007	40,088.00	8,184.63	1,607.69	9,792.32
SS	2768 Dam and Moat Study	7/20/2007	13,743.50	2,748.70	551.18	3,299.88
SS	2769 Dam and Moat Study	8/20/2007	43,407.50	8,500.64	1,740.82	10,241.46
SS	4690 Paradise Intake Structures	6/30/2011	12,995.00	54.15	521.17	575.32
SS	4692 Source Water Assess Plan	6/30/2011	44,322.65	184.68	1,777.55	1,962.23
SS	3637 E. Pond Dam Repairs	6/30/2009	61,320.95	-	-	-
SS	3679 Easton Pond Dam Repairs	10/1/2009	400.00	-	-	-
SS	3683 E. Pond Dam Repairs	11/1/2009	49,755.80	-	-	-
SS	3684 E. Pond Dam Repairs	11/1/2009	11,719.00	-	-	-
SS	3685 E. Pond Dam Repairs	11/1/2009	17,321.20	-	-	-
SS	3705 E. Pond Dam Repairs	11/1/2009	3,575.00	-	-	-
SS	3706 E. Pond Dam Repairs	11/1/2009	38,434.40	-	-	-
SS	3707 E. Pond Dam Repairs	12/2/2009	10,473.60	-	-	-
SS	3898 E. Pond Dam Repairs	4/28/2010	6,295.75	-	-	-
SS	3899 E. Pond Dam Repairs	4/28/2010	1,727.50	-	-	-
SS	3955 E. Pond Dam Repairs	6/30/2010	3,404.70	-	-	-
SS	3956 E. Pond Dam Repairs	6/30/2010	8,045.40	-	-	-
SS	3957 E. Pond Dam Repairs	6/30/2010	11,010.50	-	-	-
SS	3958 E. Pond Dam Repairs	6/30/2010	13,792.20	-	-	-
SS	4022 E. Pond Dam Repairs	6/30/2010	1,930.70	-	-	-
SS	4096 E. Pond Dam Repairs	6/30/2010	4,446.90	-	-	-
SS	4343 E. Pond Dam Repairs	2/25/2011	9,037.50	-	-	-
SS	4344 E. Pond Dam Repairs	2/25/2011	3,061.10	-	-	-
SS	4345 E. Pond Dam Repairs	2/25/2011	4,422.00	-	-	-
SS	4346 E. Pond Dam Repairs	2/25/2011	6,046.80	-	-	-
SS	4347 E. Pond Dam Repairs	2/25/2011	1,549.40	-	-	-
SS	4487 E. Pond Dam Repairs	5/1/2011	7,219.90	-	-	-
SS	4488 E. Pond Dam Repairs	5/1/2011	4,541.40	-	-	-
SS	4493 E. Pond Dam Repairs SRF	6/1/2011	5,826.75	-	-	-
SS	4494 E. Pond Dam Repairs SRF	6/7/2011	1,942.25	-	-	-
SS	4685 E. Pond Dam Repairs SRF	6/30/2011	931.00	-	-	-
SS	4688 E. Pond Dam Repairs SRF	6/30/2011	8,539.09	-	-	-
SS	E. Pond Dam Repairs SRF	FY 2012	2,349,160.46	-	-	-
SS	4704 St Mary's Raw Water	6/30/2011	2,300,147.51	3,833.58	36,898.21	40,731.79
SS	St Mary's aeration	FY 2012	21,355.91	-	-	-
SS	intake structures	FY 2012	13,402.60	-	-	-
SS	4694 Gardiner Pond Water Tank Imp	6/30/2011	103,052.25	171.75	1,653.14	1,824.89
SS	4700 SRF Issuance Cost	6/30/2011	28,396.63	47.33	455.55	502.88
SS	2704 Lawton Valley	6/9/1936	374,677.00	-	-	-
SS	2705 North & South Easton's	9/30/1940	28,615.66	-	-	-
SS	2706 North & South Easton's	9/30/1940	28,615.67	-	-	-
SS	2707 North & South Easton's	9/30/1940	(8,356.60)	-	-	-
SS	2708 North & South Easton's	9/30/1940	(8,680.78)	-	-	-
SS	2709 Gardiner	3/31/1958	87,543.72	-	-	-
SS	2710 Nonquit	3/31/1958	77,847.03	-	-	-
SS	2711 Easton's Pond	6/30/1995	37,048.02	-	-	-
SS	2712 Lawton Valley Res & Dam	6/30/1985	1,556,751.00	-	-	-
SS	2713 Permit	4/1/1993	600.00	-	-	-
SS	2714 Dam	6/30/1961	271,108.19	271,108.19	-	271,108.19
SS	2715 Reservoir Road Bridge	6/30/1961	4,929.36	4,929.36	-	4,929.36
SS	3360 Safe Yield Study	2/27/2009	75,498.12	9,122.70	3,027.81	12,150.51
SS	3361 Safe Yield Study	2/27/2009	42,681.88	5,157.38	1,711.71	6,869.09
SS	3525 Safe Yield Study	6/12/2009	3,884.66	404.65	155.80	560.45
SS	3540 Safe Yield Study	6/25/2009	1,467.92	152.92	58.89	211.81
SS	Source Water Monitoring	FY 2012	96,549.81	-	-	-
SS	2882 1995 MCI off-road vehicle	6/2/1995	10,995.00	10,995.00	-	10,995.00

Docket 4355  
Response to Div 2  
Attachment B

SS	2886 Deweze Mower 72"	6/30/2001	26,799.00	26,799.00	-	26,799.00
SS	2887 Big Tex Trailer	6/30/2001	3,555.00	3,555.00	-	3,555.00
SS	2888 Mid-size Cab Pick-up	6/30/2001	14,168.00	14,168.00	-	14,168.00
SS	2891 Dew Eze ATM72 Mower	6/30/2004	28,307.56	28,307.56	-	28,307.56
SS	3680 Riding Mowers	10/1/2009	15,321.00	6,702.94	3,072.20	9,775.14
SS	4401 Slope Mower	2/8/2011	53,374.00	3,706.53	7,135.08	10,841.61
SS	2716 5100 ft 24 Pipe Wat Dam Nonq	6/30/1961	93,878.00	93,878.00	-	93,878.00
SS	2717 Replaced 60 ft 16" 60 ft 24"	4/13/1992	16,850.39	6,487.44	270.31	6,757.75
SS	2718 24" x 10400 feet pipeline	2/21/1995	11,046,429.59	3,626,911.02	177,203.15	3,804,114.17
ST	2738 storage reservoir cleaning	6/4/1999	39,537.50	11,943.65	792.81	12,736.46
ST	3322 Lawton Valley Mixing System	6/30/2008	2,670.62	411.72	107.13	518.85
ST	3348 CDM Water Age	6/30/2008	12,968.10	1,999.25	520.07	2,519.32
ST	3528 Lawton Valley Mixing System	6/12/2009	3,468.82	361.33	139.11	500.44
ST	2911 Reservoir Rd Water Tank	1/1/1966	140,318.97	127,690.28	2,250.96	129,941.24
ST	2914 Water Tank	1/1/1970	100,109.25	83,090.68	1,605.93	84,696.61
TDP	2915 St. Mary Pump Station	1/1/1966	25,961.16	23,624.65	416.47	24,041.12
ST	2916 LV Plant Water Tank	1/1/1973	167,197.25	128,741.88	2,682.12	131,424.00
ST	4701 Water Tank Imp - Goulart Ln	6/30/2011	594,277.98	990.46	9,533.21	10,523.67
T	2747 Optimization study	1/1/1997	11,050.00	8,011.25	443.14	8,454.39
T	2753 Compliance Eval Water Trmt	11/7/2003	105,856.03	40,578.13	4,245.29	44,823.42
T	2756 Vulnerability Assessment	6/18/2004	14,172.84	5,019.53	568.38	5,587.91
T	2758 Compliance Eval Water Trmt	11/9/2004	62,943.97	20,981.33	2,524.34	23,505.67
T	2760 Water System Eval	6/30/2005	34,730.65	10,563.89	1,392.83	11,956.72
T	2761 Short Term Improvements	6/30/2005	52,562.00	15,987.61	2,107.97	18,095.58
T	2763 Water System Eval	9/16/2005	137,499.35	40,103.99	5,514.30	45,618.29
T	2764 Eng Short Term Improvements	10/20/2005	114,994.00	33,060.78	4,611.72	37,672.50
T	2936 Short Time Improvements	1/9/2008	14,350.60	2,511.36	575.52	3,086.88
T	3320 Chloramine Conversion	6/30/2008	57,722.00	8,898.81	2,314.91	11,213.72
T	3321 Chloramine Conversion	6/30/2008	30,139.00	4,646.43	1,208.71	5,855.14
T	3323 Chloramine Conversion	6/30/2008	31,149.00	4,802.14	1,249.23	6,051.37
T	3324 Chloramine Conversion	6/30/2008	15,339.00	2,364.76	615.15	2,979.91
T	3325 Chloramine Conversion	6/30/2008	17,626.00	2,717.34	706.86	3,424.20
T	3368 Chloramine Conversion	2/27/2009	29,668.00	3,584.88	1,189.83	4,774.71
T	3369 Chloramine Conversion	2/27/2009	17,626.00	2,129.81	706.86	2,836.67
T	3545 Chloramine Conversion	6/25/2009	4,788.00	492.76	192.31	685.07
T	3546 Chloramine Conversion	6/25/2009	8,342.00	579.31	223.03	802.34
T	3629 Chloramine Conversion	6/30/2009	9,875.00	1,016.31	396.58	1,412.89
T	3811 Chloramine Conversion	1/1/2010	21,797.00	1,089.86	582.79	1,672.65
T	4398 Chloramine Conversion	2/28/2011	30,678.00	426.08	820.23	1,246.31
T	3701 New LV Plant Sta 1 Improvement	12/1/2009	27,915.05	-	-	-
T	3800 New LV Plant Sta 1 Improvement	1/1/2010	737.10	-	-	-
T	3801 New LV Plant Sta 1 Improvement	1/1/2010	10,654.39	-	-	-
T	3802 New LV Plant Sta 1 Improvement	1/29/2010	5,850.00	-	-	-
T	3803 New LV Plant Sta 1 Improvement	1/7/2010	5,767.16	-	-	-
T	3804 New LV Plant Sta 1 Improvement	1/7/2010	65,149.98	-	-	-
T	3895 New LV Plant Sta 1 Improvement	4/28/2010	15,236.84	-	-	-
T	3896 New LV Plant Sta 1 Improvement	4/28/2010	92,466.62	-	-	-
T	3897 New LV Plant Sta 1 Improvement	4/28/2010	2,300.00	-	-	-
T	4023 New LV Plant Sta 1 Improvement	6/30/2010	9,330.00	-	-	-
T	4137 New LV Plant Sta 1 Improvement	6/30/2010	5,000.00	-	-	-
T	4193 New LV Plant Sta 1 Improvement	11/29/2010	5,693.96	-	-	-
T	4194 New LV Plant Sta 1 Improvement	11/29/2010	94,973.14	-	-	-
T	4341 New LV Plant Sta 1 Improvement	2/25/2011	1,446.52	-	-	-
T	4348 New LV Plant Sta 1 Improvement	2/25/2011	20,500.00	-	-	-
T	4349 New LV Plant Sta 1 Improvement	2/25/2011	13,560.00	-	-	-
T	4480 New LV Plant Sta 1 Improvement	5/1/2011	5,420.00	-	-	-
T	4481 New LV Plant Sta 1 Improvement	5/1/2011	220.00	-	-	-
T	4482 New LV Plant Sta 1 Improv SRF	5/1/2011	4,960.00	-	-	-
T	4483 New LV Plant Sta 1 Improvement	5/1/2011	824,980.75	-	-	-
T	4484 New LV Plant Sta 1 Improvement	5/1/2011	89,243.38	-	-	-
T	4485 New LV Plant Sta 1 Improvement	5/1/2011	22,405.03	-	-	-
T	4486 New LV Plant Sta 1 Improvement	5/1/2011	154,964.20	-	-	-
T	4495 New LV Plant Sta 1 Improv SRF	6/1/2011	80.00	-	-	-
T	4496 New LV Plant Sta 1 Improv SRF	6/7/2011	10,154.65	-	-	-
T	4497 New LV Plant Sta 1 Improv SRF	6/7/2011	60,345.00	-	-	-
T	4498 New LV Plant Sta 1 Improv SRF	6/7/2011	1,974.00	-	-	-
T	4626 New LV Plant SRF Req 4	6/30/2011	6,040.00	-	-	-
T	4629 New LV Plant SRF Req 4	6/30/2011	16,025.36	-	-	-
T	4630 New LV Plant SRF Req 4	6/30/2011	53,958.66	-	-	-
T	4684 New LV Plant Sta 1 Improv SRF	6/30/2011	156,504.29	-	-	-
T	4689 New LV Plant Sta 1 Improv SRF	6/30/2011	12,440.00	-	-	-
T	4705 New LV Plant Sta 1 Improvement	6/30/2011	5,128.55	-	-	-
T	4706 New LV Plant Sta 1 Improv SRF	6/30/2011	201,980.97	-	-	-
T	New LV Plant Sta 1 Improv SRF	FY 2012	5,796,703.91	-	-	-
T	2907 Lee's Wharf Pump Station	1/1/1977	11,947.42	8,243.77	191.65	8,435.42
T	2910 Paradise Avenue Pump Station	1/1/1944	10,121.54	10,121.54	-	10,121.54
T	2912 Forest Ave Pump Station	1/1/1966	20,618.74	18,763.05	330.77	19,093.82
T	2917 Paradise Avenue Pump Station	6/10/2005	495,349.75	60,267.55	7,946.24	68,213.79
TD	2720 Group of Chain Link Fencing	1/1/1966	5,088.79	-	-	-
TD	2737 Modifications	6/30/1990	64,650.00	34,075.94	1,296.39	35,372.33
TD	2739 Office & shop	8/22/1967	148,175.48	148,175.48	-	148,175.48
TD	2740 Overhead doors (7)	11/26/1986	14,266.00	8,797.37	286.06	9,083.43
TD	2741 (2) Natural gas unit heater	3/1/1999	2,842.26	876.41	56.98	933.39
TD	2748 Water Mapping Project	6/30/1994	123,095.28	105,143.88	4,936.66	110,080.54

Docket 4355  
Response to Div 2  
Attachment B

TD	2757 Leak detection survey	4/9/2004	5,400.00	1,957.50	216.56	2,174.06	
TD	2766 Sherman St Main Improve	11/15/2006	15,227.33	3,553.06	610.71	4,163.77	
TD	3362 Hydraulic Modeling & GIS	2/27/2009	12,360.78	1,493.60	495.72	1,989.32	
TD	3526 Hydraulic Modeling & GIS	6/12/2009	10,472.31	1,090.87	419.99	1,510.86	
TD	3527 Hydraulic Modeling & GIS	6/12/2009	37,176.70	3,872.57	1,490.94	5,363.51	
TD	3547 Hydraulic Modeling & GIS	6/25/2009	17,297.12	1,801.79	693.67	2,495.46	
TD	3630 Hydraulic Modeling & GIS	6/30/2009	52,432.82	5,461.75	2,102.77	7,564.52	
TD	3675 Hydraulic Modeling & GIS	10/5/2009	48,053.71	4,204.71	1,927.15	6,131.86	
TD	3809 Hydraulic Modeling & GIS	1/1/2010	7,545.65	565.92	302.61	868.53	
TD	3810 Infrastructure Replacement Pla	1/1/2010	35,360.34	2,652.03	1,418.11	4,070.14	
TD	3894 Infrastructure Replacement Pla	4/28/2010	11,133.36	695.84	446.50	1,142.34	
TD	3946 Hydraulic Modeling & GIS	6/29/2010	77,668.01	4,207.02	3,114.83	7,321.85	
TD	4434 Hydraulic Modeling & GIS	5/1/2011	15,999.51	133.33	641.66	774.99	
TD	4668 Hydraulic Modeling & GIS	6/1/2011	5,193.39	21.64	208.29	229.93	
TD	2783 Mains & Gates	6/30/1975	4,871,072.96	3,515,291.02	78,140.14	3,593,431.16	
TD	2784 Mains & Gates	6/30/1980	513,807.23	319,416.82	8,242.34	327,659.16	
TD	2785 Mains & Gates	6/30/1981	191,764.29	115,378.20	3,076.23	118,454.43	
TD	2786 Mains & Gates	6/30/1982	1,218,412.90	708,710.23	19,545.39	728,255.62	
TD	2787 Mains & Gates	6/30/1983	754.04	423.50	12.11	435.61	
TD	2788 Mains & Gates	6/30/1984	3,690.43	1,999.02	59.19	2,058.21	
TD	2789 Mains & Gates	6/30/1985	2,273.74	1,186.13	36.48	1,222.61	
TD	2790 Mains & Gates	6/30/1986	1,837,575.53	921,850.38	29,477.79	951,328.17	
TD	2791 Mains & Gates	6/30/1987	26,510.96	12,769.47	425.29	13,194.76	
TD	2792 Mains & Gates	6/30/1988	12,303.98	5,680.35	197.40	5,877.75	
TD	2793 Mains & Gates	6/30/1989	405,637.92	179,156.78	6,507.11	185,663.89	
TD	2794 Mains & Gates	6/30/1990	318,202.11	134,175.18	5,104.51	139,279.69	
TD	2795 Bellevue Avenue Main	6/30/1991	357,013.46	143,400.42	5,727.08	149,127.50	
TD	2796 Dexter Street Main	3/10/1992	12,441.55	4,810.71	199.60	5,010.31	
TD	2797 12" hydraulic check valve	9/8/1992	18,000.00	6,780.00	288.75	7,068.75	
TD	2798 Water services-dig & backfill	9/4/1998	3,564.50	914.89	57.17	972.06	
TD	2799 Mains & Gates	3/1/2000	40,000.00	9,066.67	641.69	9,708.36	
TD	2800 Water main installation	9/19/2002	234,391.84	41,409.25	3,760.03	45,169.28	
TD	2801 Trench restoration	12/18/2002	48,748.68	8,368.49	782.03	9,150.52	
TD	2802 Piping	11/16/2001	27,713.17	5,357.85	444.58	5,802.43	
TD	2803 Side water tapping machine	6/30/2003	13,200.00	2,134.00	211.75	2,345.75	
TD	2804 L V ResidualsMgt	12/19/2003	348,038.23	52,785.78	5,583.12	58,368.90	
TD	2805 Water trench restoration	12/19/2003	58,145.13	8,818.66	932.76	9,751.42	
TD	2806 Ocean Dr water mains	6/30/2004	131,689.50	18,656.01	2,112.51	20,768.52	
TD	2807 Const Ocean Dr water mains	12/30/2004	1,132,256.82	149,080.51	18,163.30	167,243.81	
TD	2808 Trench/Sidewalk Restoration	6/30/2005	109,605.90	13,335.40	1,758.28	15,093.68	
TD	2809 Engineer-Ocean Dr water mains	6/3/2005	93,371.08	11,360.14	1,497.84	12,857.98	
TD	2810 Reconst of East Main Road	6/30/2005	55,403.47	6,740.76	888.77	7,629.53	
TD	2811 Eng Ocean Dr water mains	8/8/2005	33,755.79	3,994.46	541.50	4,535.96	
TD	2812 Eng Services Ocean Drive #2	7/18/2006	3,960.77	396.10	63.53	459.63	
TD	2813 Trench/Sidewalk Restoration	9/22/2005	49,894.02	5,820.97	800.40	6,621.37	
TD	2814 Ocean Dr water mains Phase 2	10/31/2005	1,128,339.16	129,758.99	18,100.45	147,859.44	
TD	2815 Ocean Dr water mains Phase 3	9/30/2006	1,555,576.15	150,372.35	24,954.05	175,326.40	
TD	2816 Reconst of East Main Road	7/1/2006	71,984.86	7,198.50	1,154.77	8,353.27	
TD	2817 Reconst of East Main Road	9/12/2007	21,268.79	1,630.62	341.21	1,971.83	
TD	2818 Special Detail - Ocean Ave	7/28/2005	108,945.00	13,073.40	1,747.67	14,821.07	
TD	2819 Special Detail - Ocean Ave	10/6/2006	76,157.50	7,234.96	1,221.70	8,456.66	
TD	2820 Special Detail - Ocean Ave	8/28/2007	6,025.00	471.96	96.64	568.60	
TD	2821 Fluid Conservation Systems	6/30/2006	29,900.00	3,039.83	479.64	3,519.47	
TD	2822 Reservoir Tank Improve	5/31/2006	443,675.00	45,846.42	7,117.30	52,963.72	
TD	2823 Trench and Sidewalk Restor	8/17/2006	51,949.00	5,108.32	833.33	5,941.65	
TD	2824 Ocean Dr water mains Phase 3	6/30/2007	76,143.17	6,218.35	1,221.47	7,439.82	
TD	2825 Booster station	1/1/1967	77,956.36	77,956.36	-	77,956.36	
TD	2826 Reservoir Road Standpipe	3/3/1967	185,675.00	185,675.00	-	185,675.00	
TD	2827 Goulart Lane Standpipe	10/28/1967	134,123.00	134,123.00	-	134,123.00	
TDP	2828 Treated water pump	10/4/1973	465,883.33	439,677.39	PUMP	9,341.93	449,019.32
TD	2829 Painting of Water Tank	6/6/1985	106,535.00	69,469.70	2,136.27	71,605.97	
TD	2830 Distribution Standpipes	6/30/1986	80,817.53	50,679.37	1,620.56	52,299.93	
TD	2831 Leak detection survey	6/30/2003	12,070.00	2,439.15	242.04	2,681.19	
TD	2832 Water trench repair	6/30/2003	36,107.20	7,296.66	724.02	8,020.68	
TD	2921 Ocean Dr water mains Phase 3	10/29/2007	64,010.60	4,800.79	1,026.84	5,827.63	
TD	2922 Ocean Dr water mains Phase 3	11/16/2007	129,205.55	9,475.07	2,072.66	11,547.73	
TD	2925 Special Detail - Ocean Ave	10/29/2007	12,950.00	971.25	207.74	1,178.99	
TD	2926 Special Detail - Ocean Ave	11/30/2007	800.00	58.67	12.83	71.50	
TD	2927 Special Detail - Ocean Ave	11/30/2007	3,150.00	231.00	50.53	281.53	
TD	2928 Special Detail - Ocean Ave	11/30/2007	325.00	23.83	5.20	29.03	
TD	2929 Special Detail - Ocean Ave	11/30/2007	1,950.00	143.00	31.28	174.28	
TD	2930 Special Detail - Ocean Ave	12/21/2007	1,700.00	121.83	27.27	149.10	
TD	2931 Trench and Sidewalk Restor	11/16/2007	11,830.92	867.61	189.81	1,057.42	
TD	2932 Trench and Sidewalk Restor	12/21/2007	38,340.10	2,747.70	615.04	3,362.74	
TD	2933 Trench and Sidewalk Restor	12/21/2007	792.00	56.76	12.71	69.47	
TD	3306 Reconst of East Main Road	6/30/2008	1,500.00	92.50	24.06	116.56	
TD	3308 Ocean Dr water mains Phase 3	6/30/2008	7,192.13	443.51	115.39	558.90	
TD	3309 Ocean Dr water mains Phase 3	6/30/2008	79,120.31	4,879.10	1,269.25	6,148.35	
TD	3310 Trench and Sidewalk Restor	6/30/2008	2,640.58	162.83	42.35	205.18	
TD	3311 Trench and Sidewalk Restor	6/30/2008	14,800.00	912.67	237.44	1,150.11	
TD	3370 Trench and Sidewalk Restor	2/27/2009	20,506.18	991.12	328.97	1,320.09	
TD	3371 Trench and Sidewalk Restor	2/27/2009	36,863.42	1,781.74	591.36	2,373.10	
TD	3372 Spec Det Trench Rest	2/27/2009	750.00	36.25	12.03	48.28	
TD	3373 Spec Det Trench Rest	2/27/2009	425.00	20.54	6.83	27.37	



Div. 2-4:

- a. Does Mr. Smith agree that water production less unaccounted-for water is equal to sales? If no, explain why not.
- b. Does Mr. Smith agree that the sales units being used to design rates in this proceeding are those from Docket No. 4243, and that the sales billing units used in Docket No. 4243 reflect an average of FY 2008 – FY2010 sales data? If no, explain why not.
- c. Does Mr. Smith agree that the costs reflected in his cost of service study, with the exception of debt service, are those approved in Docket No. 4243? If no, explain why not.
- d. Does Mr. Smith believe it's reasonable to recover costs on a basis which is consistent how those costs were allocated, for example, to the base, maximum day and maximum hour functions? If no, explain why not.
- e. Does Mr. Smith believe it is a reasonable ratemaking practice to recover costs on a basis which differs from the manner in which they were allocated? If yes, please explain why it is reasonable.

Response:

- a. As shown on HJS Schedule D-4, for the purposes of calculating rates using the COS model in this rate filing, "Unaccounted for Water" is determined by subtracting "Billed Consumption" from "Total Water Produced". As such, the Division's statement that "water production less unaccounted-for water is equal to sales" is correct. It should be noted however, that not all of this "Unaccounted for Water" is truly unaccounted for in that some of it is used for the hydrant flushing program and other uses that do not generate revenue.
- b. Rate Year water sales projections used for the purpose of setting rates in this docket are the same as the water sales projections used in Docket 4243. However, the sales projections used for Docket 4243 do not reflect an average of FY 2008-FY 2010 sales data. As stated on page 20 of the Commission's Order from Docket 4243:

“The wholesale consumption figure is the three year average for the most recent three-year period. The retail consumption figure was based on the average annual change in sales over the most recent ten-year history applied to FY 2011 sales. Therefore, the parties agreed to a 1.7 percent decline in sales applied to the FY 2011 retail sales to arrive at the retail projection for FY 2012.”

- c. I agree that the costs reflected in my cost of service study, with the exception of debt service, are those approved in Docket No. 4243
- d. I do believe it's reasonable to recover costs on a basis which is consistent how those costs were allocated.
- e. I believe there may be circumstances under which recovering costs in a way that differs to some degree from the way in which they are allocated may be reasonable.

Prepared by: Harold J. Smith

**CERTIFICATION**

I hereby certify that on February 1, 2013, 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</b>
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
	<a href="mailto:crussell@cityofnewport.com">crussell@cityofnewport.com</a>	
	<a href="mailto:lsitrin@CityofNewport.com">lsitrin@CityofNewport.com</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>	401-222-2424
	<a href="mailto:sscialabba@ripuc.state.ri.us">sscialabba@ripuc.state.ri.us</a>	
	<a href="mailto:psmith@ripuc.state.ri.us">psmith@ripuc.state.ri.us</a>	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@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
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:aramos@haslaw.com">aramos@haslaw.com</a>	
	<a href="mailto:jmansolf@haslaw.com">jmansolf@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
Ellen M. Evans Senior Trial Attorney Naval Facilities Engineering Command Litigation Office 720 Kennon St., Bldg. 36, Room 233 Washington Navy Yard, DC 20374-5051	<a href="mailto:ellen.evans@navy.mil">ellen.evans@navy.mil</a>	202-685-2235

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4355  
Response Of The City Of Newport,  
Utilities Division, Water Department  
To The Division of Public Utilities  
and Carriers'  
Data Requests  
Set 2

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
	<a href="mailto:Larry.r.allen@navy.mil">Larry.r.allen@navy.mil</a>	
Maurice Brubaker Brubaker and Associates, Inc. PO Box 412000 St.Louis, MO 63141-2000	<a href="mailto:mbrubaker@consultbai.com">mbrubaker@consultbai.com</a>	401-724-3600 401-724-9909
	<a href="mailto:bcollins@consultbai.com">bcollins@consultbai.com</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
	<a href="mailto:jmierzwa@exeterassociates.com">jmierzwa@exeterassociates.com</a>	
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
An original and nine (9) copies w/ 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>	
	<a href="mailto:sccamara@puc.state.ri.us">sccamara@puc.state.ri.us</a>	

  
 \_\_\_\_\_  
 Joseph A. Keough, Jr., Esquire # 4925  
 KEOUGH & SWEENEY, LTD.  
 41 Mendon Avenue  
 Pawtucket, RI 02861  
 (401) 724-3600 (phone)  
 (401) 724-9909 (fax)  
[ikeoughjr@keoughsweeney.com](mailto:ikeoughjr@keoughsweeney.com)