

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

January 4, 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 Portsmouth Water and Fire District'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

PWFD 2-1: The attachment to Newport Water's response to PWPD 1-7 presents a listing of water assets that are used in HJS Schedule B-5.

- a) Why are no hydrants before 1981 listed?
- b) Does Newport contend there were no public fire hydrants in the system prior to 1981?
- c) If the 1981 listing of hydrants is intended to reflect all hydrants up to 1975, provide the basis for that conclusion and the calculations that support the entry.
- d) Please explain the three listings for the 6/30/2008 CDM water age study (two under Lawton Valley [#3326 and 3327] and one under storage [#3348]).
- e) Does Newport contend that its oldest meters only date back to 2004?
- f) Why are no water mains and gates listed prior to 1975?
- g) Does Newport contend there were no water mains and gates in the system prior to 1975?
- h) If the 1975 listing of water mains and gates is intended to reflect all water mains and gates up to 1975, provide the basis for that conclusion and the calculations that support the entry.
- i) Why do records for some assets go back well before 1975 while there are no records for mains, gates and hydrants prior to that year?

Response:

- a. A review of the asset listing used in the COS model and additional asset records maintained by Newport Water indicate that Newport may have to update and revise the asset listing used in the COS model. Newport Water is performing a reconciliation of its asset records and will supplement this response with the results of that reconciliation as soon as possible. Newport will attempt to address this issue in its rebuttal testimony; however, if the reconciliation is not complete prior to the deadline for Newport's rebuttal testimony, Newport will provide supplemental information before the deadline for surrebuttal testimony deadline for the Division and interveners.

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

- b. See the response to a.
- c. See the response to a.
- d. See the response to a.
- e. See the response to a.
- f. See the response to a.
- g. See the response to a.
- h. See the response to a.
- i. See the response to a.

Prepared by: Harold Smith

CERTIFICATION

I hereby certify that on January 4, 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.

Parties/Address	E-mail Distribution	Phone
Julia Forgue, Director of Public Works Newport Water Department 70 Halsey St. Newport, RI 02840	jforgue@cityofnewport.com	401-845-5601
	crussell@cityofnewport.com	
	lsitrin@CityofNewport.com	
Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	klyons@riag.ri.gov	401-222-2424
	sscialabba@ripuc.state.ri.us	
	psmith@ripuc.state.ri.us	
	dmacrae@riag.ri.gov	
Harold Smith Raftelis Financial Consulting, PA 511 East Blvd. Charlotte, NC 28203	Hsmith@raftelis.com	704-373-1199
Gerald Petros, Esq. Hinckley, Allen & Snyder 1500 Fleet Center Providence, RI 02903	gpetros@haslaw.com	401-274-2000
	aramos@haslaw.com	
	jmansolf@haslaw.com	
William McGlinn Portsmouth Water & Fire District 1944 East Main Rd. PO Box 99 Portsmouth, RI 02871	wmcglinn@portsmouthwater.org	401-683-2090 ext. 224
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	ellen.evans@navy.mil	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 Portsmouth Water and Fire District's
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	Khojasteh.davoodi@navy.mil	202-685-3319
	Larry.r.allen@navy.mil	
Maurice Brubaker Brubaker and Associates, Inc. PO Box 412000 St.Louis, MO 63141-2000	mbrubaker@consultbai.com	401-724-3600 401-724-9909
	bcollins@consultbai.com	
Thomas S. Catlin Exeter Associates, Inc. 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044	tcatlin@exeterassociates.com	410-992-7500
	jmierzwa@exeterassociates.com	
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	Woodcock@w-a.com	508-393-3337
An original and nine (9) copies w/ Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	lmassaro@puc.state.ri.us	401-780-2107
	cwilson@puc.state.ri.us	
	sccamara@puc.state.ri.us	

Joseph A. Keough, Jr., Esquire # 4925
KEOUGH & SWEENEY, LTD.
41 Mendon Avenue
Pawtucket, RI 02861
(401) 724-3600 (phone)
(401) 724-9909 (fax)
jkeoughjr@keoughsweeney.com