

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**  
**PUBLIC UTILITIES COMMISSION**  
**IN RE: PROVIDENCE WATER SUPPLY BOARD:**  
**DOCKET NO. 4406**  
**THE BRISTOL COUNTY WATER AUTHORITY'S FIRST SET OF DATA REQUESTS**  
**DIRECTED TO PROVIDENCE WATER SUPPLY BOARD**  
**(Issued June 28, 2013)**

BCWA 1-1. Refer to the testimony of Boyce Spinelli, page 2, lines 17 to 19. The proposed increases to retail classes (23.0%) are very close (1.8% less) to the increase in total rate revenues (24.8%), and that the increase to the wholesale class (32.8%) is about 32% greater than the average increase.

- a. Does Mr. Spinelli agree that such an increase would result in very significant impacts to wholesale customers and the retail customers they serve?
- b. Did Providence Water consider phasing in the increase to wholesale customers or any other measures to mitigate the impact to wholesale customers?
- c. If Providence did consider phasing in the increase to wholesale customers or any other measures to mitigate the impact to wholesale customers, what measures did Providence consider, and why didn't it adopt any?

BCWA 1-2. Refer to the testimony of Boyce Spinelli, page 4, lines 6 to 25. Mr. Spinelli indicated that nearly 80% of the proposed increase is due to 3 programs that address water quality issues. Please explain the following in detail:

- a. What part of that 80% is associated with the Infrastructure Replacement (IFR) program and the Unidirectional Flushing (UDF) program?
- b. What portion of the IFR program relates solely to distribution facilities (pipes sizes 12 inches in diameter and smaller), as opposed to transmission facilities (pipe sizes greater than 12 inches in diameter)?
- c. What portion of the UDF program, if any, has significant benefits to wholesale customers?
- d. For any system mains that have diameters greater than 12 inches, but are solely used by and only have benefits for the distribution network, please identify these mains (size, length and location) and include them in the distribution category.]

BCWA 1-3. Refer to the testimony of Boyce Spinelli, page 4, line 27 to 32. What is the current billing frequency for each of the wholesale customers?

BCWA 1-4: Refer to the testimony of Boyce Spinelli, page 4, lines 27-28. Mr. Spinelli testified that the conversion to monthly billing will cost \$400,000.

- a. If wholesale customers are already billed on a monthly basis, should any portion of that cost be allocated to wholesale customers?
- b. If any of these costs have been allocated to wholesale customers, what amount was so allocated, and please explain in detail Providence's rationale for doing so.

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BCWA 1-5. Refer to the testimony of Boyce Spinelli, Table A page 6, lines 1 through 25.

- a. In this portion of Mr. Spinelli's testimony is he specifically requesting that the Commission not approve conservation rates as part of this case for either retail or wholesale customers?
- b. If you are not specifically requesting that the Commission not approve conservation rates as part of this case for either retail or wholesale customers, please explain your response in detail.

BCWA 1-6. Refer to the testimony of Boyce Spinelli, Table A. In this table the total length of transmission and distribution mains is listed as being in excess of 950 miles.

- a. Is this the total currently in service?
- b. If not, what is the total currently in service?
- c. For the total currently in service, please list in feet the total lengths for each of the various size (by diameter) pipes.
- d. For the total currently in service, please break down each size total into feet of unlined iron pipe and the remaining total which will include lined iron pipe and all other types (various materials) of pipe.

BCWA 1-7. Refer to the testimony of Boyce Spinelli, Table A :

- a. Are any of the four listed enclosed distribution reservoirs either not needed (or used) at all to serve wholesale customers, or just marginally, under severe conditions?
- b. Are any of the listed booster pumping stations either not needed (or used) at all to serve wholesale customers, or just marginally, under severe conditions?
- c. Are any of the listed emergency power systems either not needed (or used) at all to serve wholesale customers, or just marginally, under severe conditions?
- d. List any of the facilities identified in BCWA 1-7 a-c that are not used to any significant degree to serve wholesale customers.

BCWA 1-8. Refer to the testimony of Boyce Spinelli, Table B.

- a. For the length in Feet of each annual total, please provide the breakdown between the length of pipe that was replaced and the length of pipe that was first added to, or extended, the piping system.
- b. Also provide a further breakdown of annual lengths into unlined iron pipe and all others.

BCWA 1-9. Refer to the testimony of Boyce Spinelli, Table D. Please provide a detailed breakdown of the \$21,000,000 that Providence Water invested in infrastructure replacements and capital improvements to the system during fiscal year 2012. For each separate project

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indicate the type of facility by functional categories, such as source of supply, pumping, treatment, storage, T&D, services, valves, meters, hydrants, general plant, etc.

BCWA 1-10. Refer to the testimony of Boyce Spinelli, Table E.

- a. Does Providence Water separate in any way the portion of its "Non-accounted for Water" between the level that retail customers are responsible for and the level that wholesale customer are responsible for.
- b. If the answer is in the affirmative, please provide all assumptions, calculations and work-papers that were used in deriving those responsibilities.

BCWA 1-11. Refer to the testimony of Boyce Spinelli, Table E.

- a. How are the amounts shown as "Sales for Resale" listed on Table E determined?
- b. In answering this request, please provide the source of all data utilized and all assumptions, calculations and work-papers that Providence used to derive the total annual amounts.
- c. Please provide an example using FYE 2012 to demonstrate the entire process from meter readings to the final determination of value listed (13,213,689 HCF).

BCWA 1-12. Refer to testimony of Boyce Spinelli, Table E.

- a. How are the amounts shown as "Sales to Ultimate Consumers" listed on Table E determined?
- b. In answering this request, please provide the source of all data utilized and all assumptions, calculations and work-papers that Providence used to derive the total annual amounts.
- c. Please provide an example using FYE 2012 to demonstrate the entire process from meter readings to the final determination of the value listed (13,081,259 HCF).

BCWA 1-13. Refer to the testimony of Paul Gadoury, pages 6 through 9.

- a. Does the UDF program affect both distribution mains (pipes 12 inches in diameter or smaller) and transmission mains or just predominantly distribution mains?
- b. If it affects/impacts pipe sizes greater than 12 inches in diameter, is there a size of transmission main where it has little to no effect/impact? For example, will 36 inch or 48 inch pipes benefit from or have improved flow due to the UDF program?

BCWA 1-14. Refer to the testimony of Paul Gadoury, pages 9 through 12.

- a. For wholesale customers how many service interconnections do each have with the PWSB system and what is the diameter of the pipe supplying each connection?

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- b. Which, if any, of the wholesale customers are served directly or nearly directly from the outlet side of the treatment plant?

BCWA 1-15. Refer to the testimony of Paul Gadoury, page 10, lines 2 through 6.

- a. Please verify that Providence Water currently has 220 miles of unlined cast iron pipe in service that is at least 113 years old, and an even larger portion that is significantly older.
- b. What are the lengths of such mains installed prior to 1900 aggregated by diameter size?

BCWA 1-16. Refer to the testimony of Paul Gadoury, page 12.

- a. Should the 7% figure on line 18 be 9%, or should the 9% figure (blue area of the upper pie chart) on Exhibit PG-3 be 7%?
- b. Should the 40% figure on line 19 be 42%, or should the 42% figure (blue area on the bottom pie chart) on Exhibit PG-3 be 40%?

BCWA 1-17. Refer to the testimony of Paul Gadoury, Exhibits PG-3 and PG-4. Please provide a detailed breakdown of the sources of funds totaling \$50 million for the currently approved 5 year Rehabilitation Plan and the \$77 million for the proposed expanded 5 year Rehabilitation Plan.

BCWA 1-18. Refer to the testimony of Paul Gadoury, Exhibits PG-3 and PG-4.

- a. Of the 48 miles of unlined iron pipe to be replaced/relined under the currently approved plan, what is the split between pipe greater than 12 inches in diameter and all pipe equal to or less than 12 inches in diameter?
- b. Also, what are the total costs associated with each size group?
- c. Of the 73 miles of unlined iron pipe to be replaced/relined under the proposed expanded plan, what is the split between pipe greater than 12 inches in diameter and all pipe equal to or less than 12 inches in diameter?
- d. Also, what are the total costs associated with each size group?

BCWA 1-19. Refer to testimony of Harold Smith, page 7, lines 27 – 31.

- a. If Mr. Smith used a four year average for retail, what would the total retail use be in the pro-forma rate year, and how would the ratio of wholesale consumption to total consumption change?
- b. How would the allocator A change?

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BCWA 1-20. Refer to testimony of Harold Smith, page 8, lines 12 – 17.

- a. Does Mr. Smith agree that by using a three year average for retail consumption, rather than a four year average, that Providence has skewed consumption in the direction of wholesale consumption (causing wholesale consumption to be a greater percentage of the total)?
- b. If Mr. Smith does not agree, please explain in detail.
- c. Would Providence Water consider using the three year retail average for estimating pro-forma revenues, but use the four year average for purposes of calculating allocation factors?
- d. If Providence Water is unwilling to do this, please explain why the four year average for retail consumption should not be used for allocation purposes?

BCWA 1- 21. Refer to the testimony of Harold Smith, page 9, lines 16 – 18.

- a. Please provide the dates of filing of Providence Water's last three full rate filings.
- b. Please explain in detail why Providence used a two year period to amortize the rate case expenses?
- c. If Providence's last full rate filing was four years ago. Why wouldn't four years be a more appropriate amortization period?

BCWA 1-22. Refer to the testimony of Harold Smith, page 9, lines 22 – 24. If \$2 million was already built into the rates, why wasn't this adjustment limited to \$6 million instead of \$8 million?

BCWA 1-23. Refer to the testimony of Harold Smith, page 9, lines 26 – 28.

- a. Please provide all source data, assumptions, calculations and work papers used to derive the 2.5% inflation adjustment factor?
- b. Also, explain in detail why a percentage much closer to historic levels (for instance, the last 3 to 5 years) of general inflation should not be used in this case?

BCWA 1-24. Refer to the testimony of Harold Smith, page 13, line 28 to page 14, line 1.

- a. What portion, if any, of the \$507,545 adjustment associated with the UDF is allocated to the wholesale customer class?
- b. Was any portion of this cost attributed solely to distribution mains (pipe sizes with diameters of 12 inches or smaller) and allocated to the wholesale customer class?
- c. If some portion was so allocated, please explain in detail your rationale/justification for doing so.

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BCWA 1-25. Refer to the testimony of Harold Smith, page 14, lines 1 – 5.

- a. Which, if any, of the wholesale customers are not currently billed on a monthly basis?
- b. What portion, if any, of the \$431,493 adjustment associated with the transition the monthly billing is allocated to the wholesale customer class?
- c. If some portion was so allocated, please explain in detail your rationale/justification for doing so.

BCWA 1-26. Refer to the testimony of Harold Smith, page 14, lines 24 – 29.

- a. Does PWSB have the data needed to allocate extra capacity costs to wholesale customers based on their relative contributions to peak demands?
- b. If affirmative, why wasn't it used?
- c. If Providence doesn't have the data, how long would it take and what would it cost to obtain the necessary data?

BCWA 1-27. Refer to testimony of Harold Smith, page 15, lines 1 – 5.

- a. What is the basis for your assumption that the demand characteristics for all wholesale customers are equal, and that their demands for service are essentially the same as the demands placed on the system by the entire retail class?
- b. Please provide any supporting analysis or studies that you relied on in making those assumptions.
- c. If one or more wholesale customers had demand characteristics that put significantly more costly demands (on a unit basis) on the system than other wholesale customers, wouldn't your proposed allocations result in lower charges to those wholesale customers that put more costly demands on the system, and lead to lower cost wholesale customers subsidizing higher cost wholesale customers?
- d. Similarly, If all retail customers had demand characteristics that put significantly more costly demands on the system (on a unit basis) than wholesale customer, wouldn't your proposed allocations result in lower charges to retail customers, and lead to lower cost wholesale customer subsidizing higher cost retail customers?

BCWA 1-28. Refer to testimony of Harold Smith, page 15, lines 23 – 28, and Schedule HJS-16.

- a. Please provide all source data, assumptions, calculations and work papers used to derive the 8 "Demand Factors" listed on Schedule HJS-16.
- b. Are any (list each) of these Factors based on industry data that is not specific to PWSB's system and its somewhat unique system characteristics?
- c. If so, what industry data was used, what geographic area did it apply to, and during what timeframe?

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BCWA 1-29. Refer to testimony of Harold Smith, page 15, line 23 through page 16, line 21.

- a. How are each of the wholesale customers metered for their usage. For example, are continuous recording meters used or are they basic meters simply providing accrued use by subtracting a reading at one point in time minus a reading at a prior point in time.
- b. Provide examples for each wholesale customer that is metered differently.

BCWA 1-30. Refer to testimony of Harold Smith, page 16, lines 4 – 5.

- a. Please identify all locations on Schedules in the filing where adjustments are made to account for the wholesale share of lost water.
- b. Similarly, identify all locations on Schedules in the filing where adjustments are made to account for the retail share of lost water.
- c. Also provide all source data, assumptions, calculations and work papers used to derive the share of lost water attributable to Wholesale customers, and separately the share of lost water attributable to retail customers.
- d. If these two “shares” do not total 1 or 100%, explain why they do not.

BCWA 1-31. Refer to testimony of Harold Smith, page 17, lines 23 – 29.

- a. What was the percentage of total costs allocated to the Wholesale customer class in “Providence Water’s last full rate filing,” and what is the percentage of total costs you propose to allocate to the wholesale customer class in this case?
- b. What was the percentage of total costs allocated to the Wholesale customer class in “Providence Water’s recent abbreviated filings?”
- c. Explain in some detail why or how the percentage of total costs allocated to the Wholesale customer class in “Providence Water’s recent abbreviated filings” were much different from comparable levels used in the last full rate case or proposed in this case?
- d. Regardless of the reason(s) for the disparity between the rate increases to retail and wholesale customers proposed in this case, wouldn’t you agree that the increase to wholesale customers and in turn to their retail customers is a very large increase, and could be characterized as resulting in “rate shock”?
- e. What measures did you consider or recommend to mitigate some of this impact, for example, a phase in approach.

BCWA 1-32. Refer to testimony of Harold Smith, page 5, lines 9 – 11, and Schedule HJS-11. For each of the following accounts, please provide a detailed description of the types of expenses that are normally included, and list all expenses incurred in the test year exceeding \$10,000.

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- a) Account 63510
- b) Account 67510
- c) Account 63530
- d) Account 63540
- e) Account 67530
- f) Account 62050
- g) Account 63550
- h) Account 63580
- i) Account 66780
- j) Account 67580
- k) Account 65980
- l) Account 65880

BCWA 1-33: Refer to page 4 of 4 (Schedule HJS-11). Please provide the same information requested for the listed accounts in BCWA 1-32 for the following two line items:

- a) City Services Cost
- b) State 1 Surcharge

BCWA 1-34. Refer to testimony of Harold Smith relative to Conservation Rates starting on page 18.

- a. Even though you present conservation rates in your testimony, are you recommending that the Commission not approve conservation rates as part of the case for either retail or wholesale customers?
- b. If your response is not affirmative, please explain your response in detail.

BCWA 1-35. Refer to testimony of Harold Smith, page 5, lines 18 – 20, and Schedule HJS-14. For each listed allocation factor describe the basis and rationale for development of the factor, and provide detailed descriptions of how each allocation percentage was computed including specific ratios or formulas used.

- i. NP
- ii. AA
- iii. P
- iv. HM
- v. HMY
- vi. HOC
- vii. Y



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- viii. Z
- ix. ComZ
- x. X4
- xi. YY
- xii. K1
- xiii. K2

BCWA 1-36: Was factor NP computed correctly? Shouldn't it be: 60.06% to Base, 39.94% to Wholesale?

BCWA 1-37: Was factor P computed correctly? Shouldn't it be: 47.31% to Base, 10% to Max Day, 0.90% to Fire, 41.79% to Wholesale?

BCWA 1-38. Refer to the testimony of Harold Smith, page 5, lines 12 – 14, and Schedule HJS-12. For each of the capital funds listed below please provide a detailed breakdown of the specific projects/Equipment that comprise the Pro-Forma Rate Year Amounts along with a description of the need/purpose of each project or equipment purchase:

- a) Capital Fund
- b) Infrastructure Replacement Fund
- c) Equipment Replacement

BCWA 1-39. Refer to the testimony of Harold Smith, page 5, lines 15 – 17, and Schedule HJS-13. For each of the 11 Communities/Districts listed on this Schedule please provide a list of the assets (aggregated by function) that are either not used in providing service to wholesale customers and/or do not provide any benefit to wholesale customers along with their associated property taxes. For example, include all distribution mains (pipes with diameters equal to or less than 12 inches) and distribution valves, services, retail meters, hydrants, pump stations and storage tanks that only serve retail customers, etc.

BCWA 1-40. Refer to the testimony of Harold Smith, page 5, lines 9 – 11, and Schedule HJS-11. Please provide a breakdown of the amounts in the following Accounts for the test year and the two prior years by separating each annual total between expenses related solely to distribution facilities, expenses related solely to transmission facilities, and those expenses partially related to both types of facilities:

- a) Account 60150 Salaries + Wages - Emp
- b) Account 60160 Salaries + Wages - Emp

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- c) Account 63150 Contractual Services - Engineer
- d) Account 63350 Contractual Services – Legal T&D
- e) Account 63460 Contractual Services – Mgt Fees
- f) Account 63550 Contractual Services - Other
- g) Account 63560 Contractual Services - Other

BCWA 1-41. Refer to the testimony of Harold Smith, page 5, lines 9 – 11, and Schedule HJS-11. What portion (amount and percentage) of the following Accounts during the rate year and the two prior years are for expenses related primarily to transmission facilities:

- a) Account 60130 Salaries + Wages - Emp
- b) Account 60140 Salaries + Wages – Emp
- c) Account 62030 Materials + Supplies
- d) Account 62040 Materials + Supplies
- e) Account 63130 Contractual Services – Engineer
- f) Account 63240 Contract Services- Acctg
- g) Account 63430 Contractual Services – Mgt Fees
- h) Account 63530 Contractual Services - Other
- i) Account 63540 Contractual Services - Other

BCWA 1-42. Refer to the testimony of Harold Smith relative to salary and labor costs, and the response to Division 1-1. It appears that personnel costs will increase significantly between the unadjusted test year and the rate year. Presumably a large portion, if not most, is related to several new/additional employees being hired. For each new/additional employee provide the following:

- a. a description of their position; the group they report to (e.g., Administration, an Operations function, Customer service, etc.);
- b. why they are needed (justification for their hiring); and
- c. their known or estimated salaries.

BCWA 1-43. Refer to the testimony of Paul Gadoury, Section 3, Water Main Replacement/Relining pages 9 through 13, and Exhibit PG-4. Over the next 20 years this Exhibit indicates that the PWSB plans to invest approximately \$362 million in replacing or relining system transmission and distribution mains.

- a. What portion (\$ amount) of that investment is expected to be used to replace/reline distribution mains, and what amount of that investment is expected to be used to replace/reline transmission mains?

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- b. To the extent some of Providence's "distribution mains" may be larger than 12 inches in diameter, identify them separately.
- c. Also, to the extent some of Providence's "transmission mains" may be 12 inches in diameter, identify them separately.

BCWA 1-44. Refer to the testimony of Harold Smith in general.

- a. When (date of the final report) and by whom was the last Cost of Service Study (COSS) performed for PWSB's system?
- b. What was the period of time covered in that study (usually at least several months prior to the date of the final report)?
- c. Assuming there have been significant variations between the economic conditions, customer demographics and system facilities since the most recent COSS and the test year for a pending rate case, is Mr. Smith comfortable using many or most of the allocators and system characteristics that are now several years old as a basis for allocating costs to various customer classes in the pending rate case?
- d. If affirmative, please explain your answer in detail.
- e. Without the benefit of basing all allocations on current data and system characteristics wouldn't it be more appropriate (acceptable industry practice) to apply the increase on an A-T-B basis rather than using many or most of the allocators and system parameters that have likely changed significantly since the last COSS?

BCWA 1-45. Refer to testimony of Harold Smith relative to "conservation" rates for wholesale customers.

- a. If the demand management rate ("conservation" rate) for wholesale customers is approved and one or more of PWSB's wholesale customers passes along the increase to its retail customers on an A-T-B basis, what conservation effect would that result in to those wholesale customers other than the price elasticity effect of the average increase to the retail customers of those wholesale customers?
- b. If your response is other than it will have no additional conservation effect, please explain in detail.
- c. Similarly, if the conservation rate for wholesale customers is not approved and one or more of PWSB's wholesale customers passes along the increase to its retail customers through an increasing block rate structure, would that result in conservation effects to those wholesale customers beyond the price elasticity effect of the average increase to the retail customers of those wholesale customers?
- d. If your response is negative, please explain in detail.

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- e. Given these two scenarios would Providence not agree that the demand management rate proposed for wholesale customers will not by itself have any significant conservation effects on wholesale usage?

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**CERTIFICATION**

I hereby certify that on June 28, 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, Robert A. Watson, Esquire and Peter D. Ruggiero by electronic mail and regular mail.


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(Issued June 28, 2013)**

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION  
IN RE: PROVIDENCE WATER SUPPLY BOARD:  
DOCKET NO. 4406  
THE BRISTOL COUNTY WATER AUTHORITY'S FIRST SET OF DATA REQUESTS  
DIRECTED TO PROVIDENCE WATER SUPPLY BOARD  
(Issued June 28, 2013)**

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