

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE WATER SUPPLY BOARD :
GENERAL RATE FILING : DOCKET NO. 4406

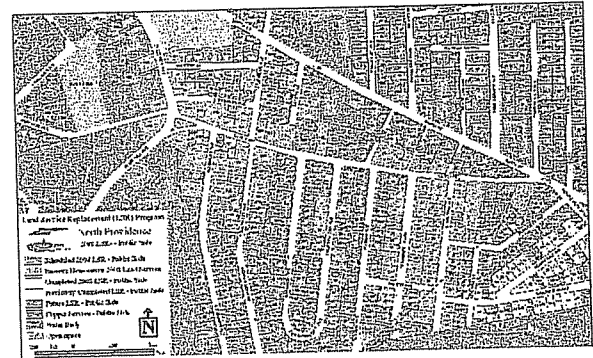
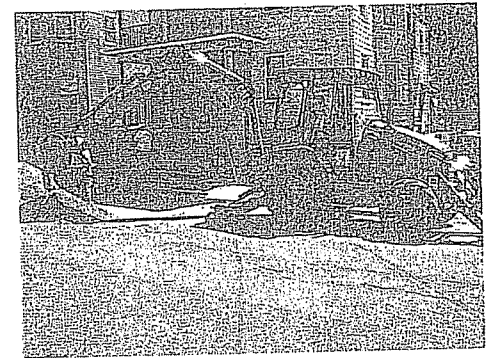
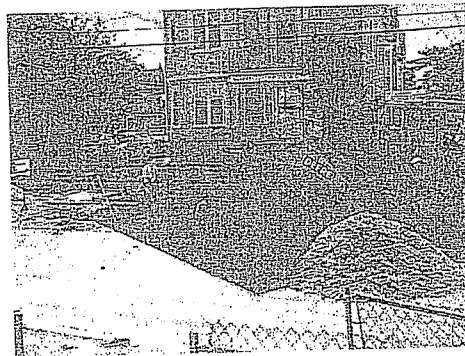
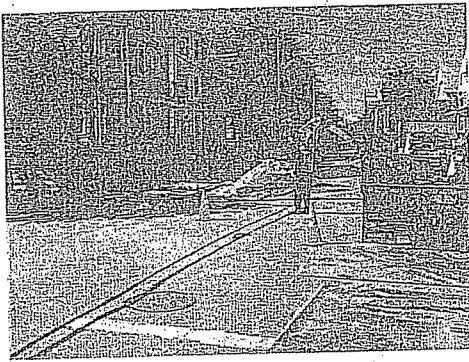
KENT COUNTY WATER AUTHORITY'S FIRST SET OF DATA REQUESTS
DIRECTED TO DIVISION OF PUBLIC UTILITIES & CARRIERS
(Issued August 28, 2013)

KCWA:DIV1-1. Aside from the filings in this docket and the data responses, please list every document reviewed by the Division prior to August 23, 2013 (date of filing of direct testimony) regarding Providence's proposed new Central Operations Facility presented in Mr. Gadoury's Ex. PG5. Provide the date when such documents were presented to the Division's witness(s). Provide a copy of each such document.

RESPONSE: Other than the information filed in this docket, the Division reviewed Providence Water's semi-annual Infrastructure/Capital Program Reports for the period September 2008 through March 2013. The September 2008 report was the first report that included information related to the Central Operations Facility. The March 2011 and the March 2013 report included updated narratives related to the project. Attached are the applicable sections of those 3 reports which show the discussion related to the Central Operations Facility.



Infrastructure/Capital Program Report 1996 – 2008



Pamela M. Marchand, P.E.
Chief Engineer & General Manager
Program Management

Paul J. Gadoury, P.E.
Director of Engineering

Steven D. Santaniello
Manager Capital Improvement

Publication Development
Christopher R. Labossiere

September 2008

Transmission System

Neutaconkanut Conduit Redundancy - Design

An evaluation is being conducted of strategies to be employed for ensuring an adequate supply of water to all areas of the system should the 60" Neutaconkanut conduit pipe ever need to be temporarily placed out of service. These would include the development of operational restrictions and controls to piping and / or pumping reinforcements.

Western Cranston - Water System Improvements

This is a general planning category for improvements in the Western Cranston area of the system. This section of the system was acquired from Cranston in 1996. Various improvements are needed to bring this area of the system up to system standards. The improvements will consist of increased pumping and transmission capacity, expanded storage, and improvements in the transmission and distribution system. The improvements will be more specifically identified in this report as they take place.

Scituate Avenue Transmission Main (Western Cranston)

The installation of approximately 3500 feet of 16-inch water main along Scituate Avenue will close a major transmission loop in the system and will provide a secondary feed route to a large area of the system presently dependent on a single feed main. Plans are to go forward with the transmission main installation in accordance with the overall improvement plan for the Western Cranston area of the system. Plans are also to go forward with the installation of approximately 1000 feet of 20-inch transmission main to provide another needed interconnection between a 24-inch section of transmission main in Scituate Avenue and our 20-inch main in Plainfield Pike.

Support System Facilities

Organizational and Facility Assessment

A study is in progress to evaluate the physical condition and space adequacy of our current office and maintenance facilities to assess their continuing suitability for PW operations.

CIP PROJECT STATUS REPORT

COST AND SCHEDULE DETAILS

CIP STATUS REPORT

PROJECT DESCRIPTION

CONSTRUCTION

Distribution System

AMR system

Support System Facilities

GIS System and base mapping conversion system

PLANNING

Transmission System

Neutaconkanut Conduit Redundancy Main - Design

Western Cranston - water system improvements

Scituate Ave. Transmission Main (W. Cranston)

Support System Facilities

Organization and Facility Assessment

PENDING

Pumping and Storage

Construct Wilbur Avenue Pump Station (W. Cranston)

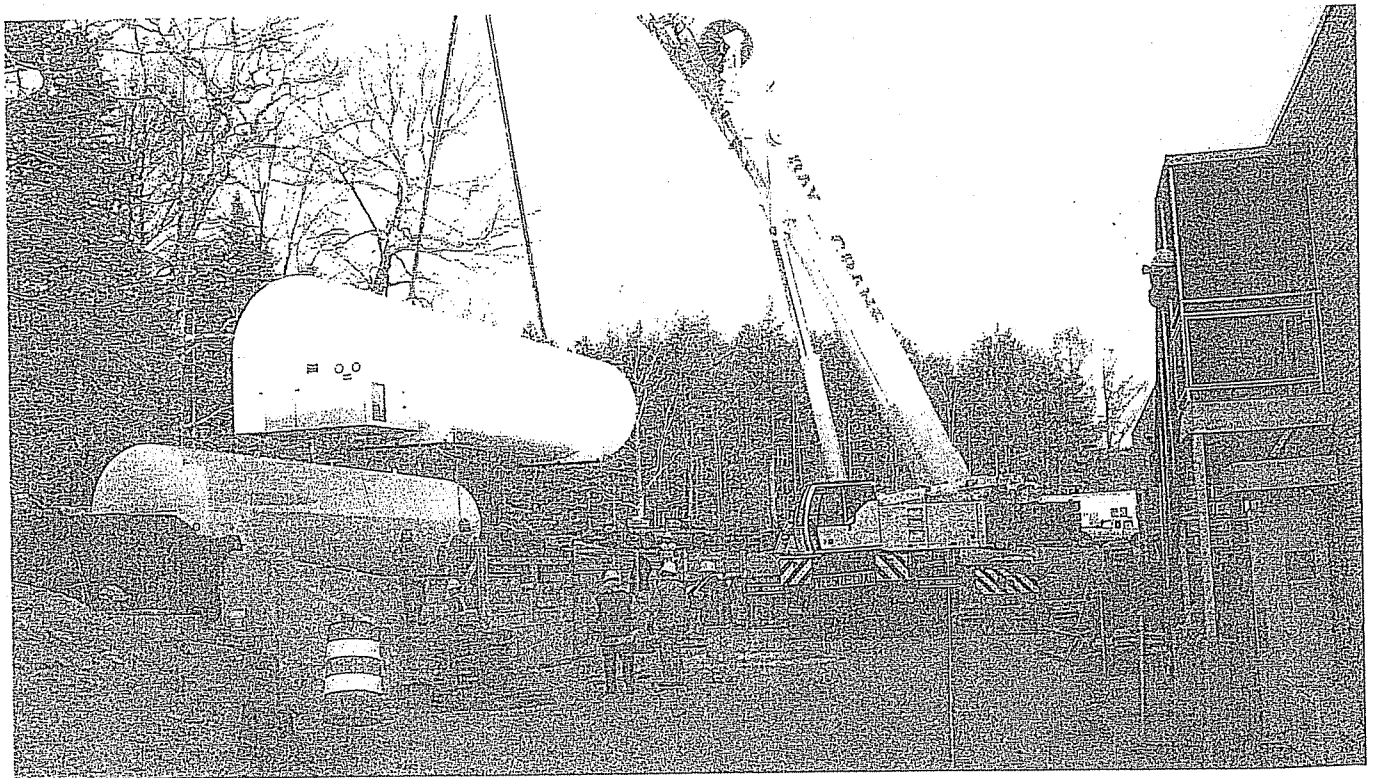
Total CIP Expenditures

\$18,945,464

CIP STATUS REPORT		SCHEDULE				COST	
Project Stage	RFP's Issued	Start Date / or (Projected Date)	Percent of Project Complete	Completion Date / or (Projected Date)	Latest Cost Estimate	Expenditures to 06/30/08	Funds Needed to Complete
CONSTRUCTION							
Distribution System							
Planning	In House	July 94	100%	July 96	\$6,600,000	\$6,699,271	(\$99,271)
Design	In House	Apr 98	100%	Dec 98			
Construction	In House	Aug 99	99%	-----			
Support System Facilities							
Planning	Jan 02	Feb 02	100%	Jun 03	\$4,000,000	\$2,499,899	\$1,500,101
Design	Jan 04	Apr 04	100%	Dec 06			
Construction	Apr 05	Nov 05	75%	(Jun 09)			
PLANNING							
Transmission System							
Planning	In House	Jun 00	10%	-----	\$300,000	\$18,523	\$281,477
Design	-----	-----	-----	-----			
Construction	-----	-----	-----	-----	NA	\$200,456	NA
Support System Facilities							
Planning	various projects						
Design	various projects						
Construction	various projects				\$600,000	\$3,311	\$596,689
Planning	In House	Oct 01	50%	-----			
Design	-----	-----	-----	-----			
Construction	-----	-----	-----	-----			
Support System Facilities							
Planning	Project is a study				NA	\$6,753	NA
Design	Project is a study						
Construction	Project is a study						
PENDING							
Pumping and Storage							
Planning	In House	Jul 02	100%	Dec 03	\$2,000,000	\$74,014	\$1,925,986
Design	In House	Dec 03	90%	-----			
Construction	-----	-----	-----	-----			



Infrastructure/Capital Program Report 1996 - 2011



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Chief Engineer & General Manager

Program Management

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Director of Engineering

Steven D. Santaniello
Manager Capital Improvements

Publication Development
Christopher R. Labossiere

MARCH 2011

Transmission System

Western Cranston - Water System Improvements

This is a general planning category for improvements in the Western Cranston area of the system. This section of the system was acquired from Cranston in 1996. Various improvements are needed to bring this area of the system up to system standards. The improvements will consist of increased pumping and transmission capacity, expanded storage, and improvements in the transmission and distribution system. The improvements will be more specifically identified in this report as they take place.

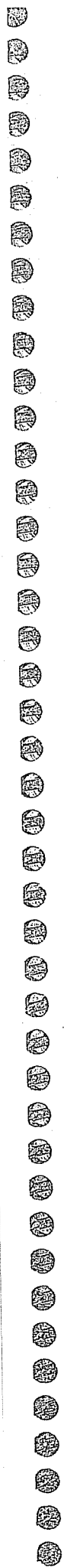
Support System Facilities

Organizational and Facility Assessment

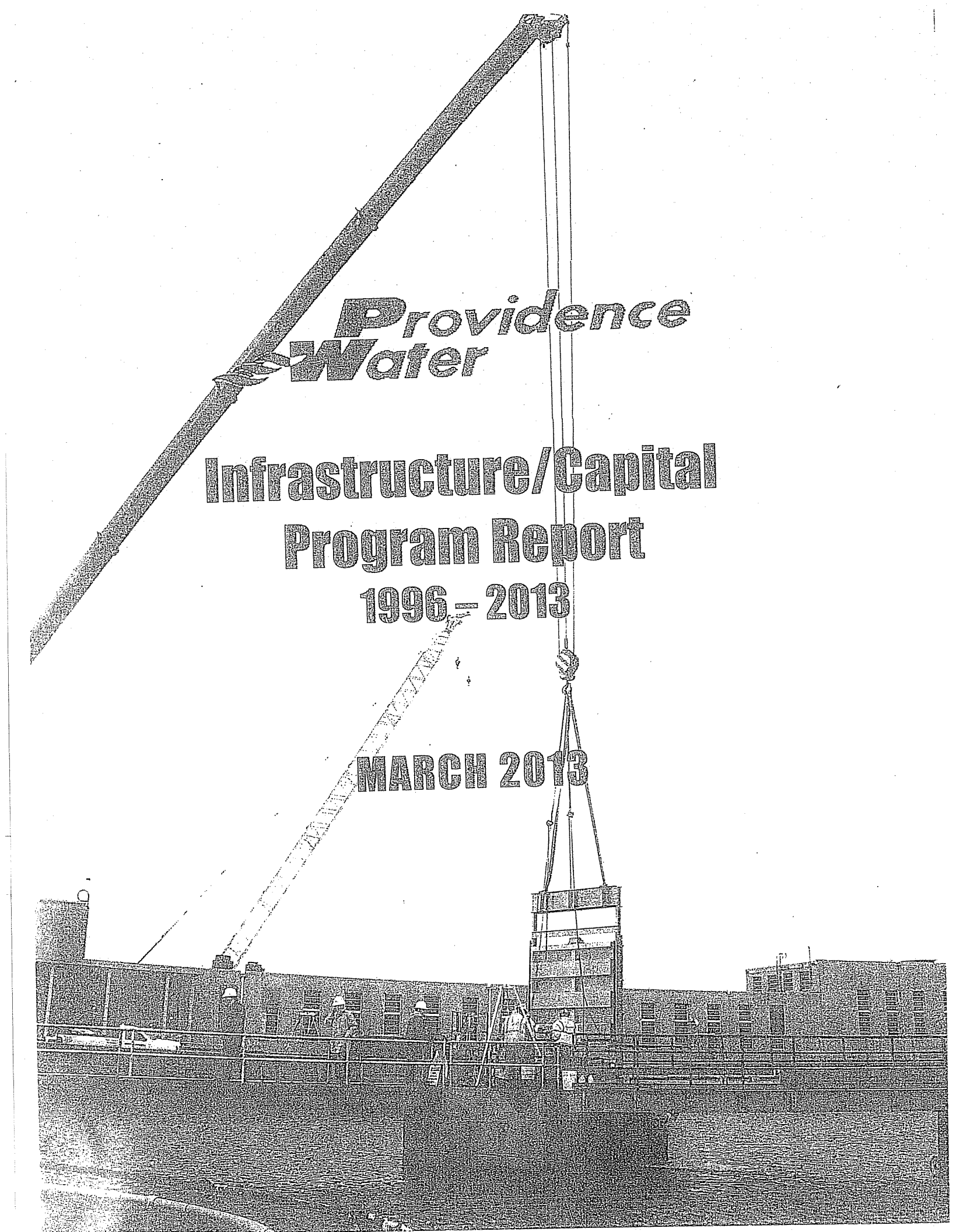
A study was completed that evaluated the physical condition and space adequacy of our current office and maintenance facilities to assess their continuing suitability for PW operations. A commercial real estate company has been contracted to search for suitable site options for the relocation of our facilities.

CIP PROJECT STATUS REPORT

COST AND SCHEDULE DETAILS



CIP STATUS REPORT		SCHEDULE				COST	
PROJECT DESCRIPTION	PROJECT STAGE	RFP's Issued	Start Date / or (Projected Date)	Percent of Project Complete	Completion Date / or (Projected Date)	Latest Cost Estimate	Funds Needed to Complete
PROJECTS COMPLETED (cont)							
Support System Facilities (cont)							
Various Capital Projects	Planning Design Construction		see narrative			NA	NA
CONSTRUCTION							
Treatment Plant Facilities							
Install New CO2 System	Planning Design Construction	In House Mar 10	Oct 01 Apr 10 Sep 10	100% 100% 90%	Jan 10 Sep 10 (Mar 11)	\$3,000,000	\$1,039,458
Distribution System							
MLOG Leak Detection	Planning Design Construction	In House Dec 09	Jun 09 Dec 09 Mar 10	100% 100% 75%	Dec 09 Mar 10 (Jun 12)	\$1,000,000	\$302,585
Hydrant Locks	Planning Design Construction	NA NA In House	NA NA Mar 10	NA NA 25%	NA NA (Aug 11)	\$360,000	\$124,448
Support System Facilities							
GIS System and base mapping conversion system	Planning Design Construction	Jan 02 Jan 04 Apr 05	Feb 02 Apr 04 Nov 05	100% 100% 90%	Jun 03 Dec 06 (Dec 12)	\$5,000,000	\$3,291,759
DESIGN							
Transmission System							
Sollvate Ave. Transmission Main (W. Cranston)	Planning Design Construction	In House In House	Oct 01 Jan 10	100% 50%	Jan 10 (Jan 11)	\$600,000	\$34,344
PLANNING							
Transmission System							
Western Cranston - water system improvements	Planning Design Construction		various projects			NA	\$219,529
Support System Facilities							
Organization and Facility Assessment	Planning Design Construction		Project is a study			NA	\$123,017
Total CIP Expenditures							\$22,513,897

A black and white photograph of a construction site. A large crane is lifting a heavy rectangular object, possibly a piece of machinery or a large pipe, from a deep excavation. The crane's boom extends from the top left towards the center. The object is suspended by several cables. In the background, there are several multi-story buildings and a fence. The scene is filled with construction equipment and materials.

**Providence
Water**

**Infrastructure/Capital
Program Report
1996 - 2013**

MARCH 2013

Transmission System

Western Cranston - Water System Improvements

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Distribution System

Unidirectional Flushing (UDF) Program Development

Providence Water is planning to utilize the new "all pipes" water model developed under the GIS project to develop a UDF program for the entire system. A UDF program is an advanced preventive maintenance program to systematically flush the system to improve water quality in specific areas of the system. The program utilizes hydraulic modeling software and mapping sequences to select the valves and hydrants to be operated in order to attain required flushing velocities.

Providence Water is developing a program first consisting of an initial pilot project that will help determine and establish best UDF practices for a future flushing program. The pilot project will acquire the proper materials and equipment, development of a data tracking program, and the development of the associated sequences and procedures to effectively flush the entire distribution system.

Support System Facilities

Organizational and Facility Assessment

A study was completed that evaluated the physical condition and space adequacy of our current office and maintenance facilities to assess their continuing suitability for PW operations. Suitable site options for the relocation of our facilities and several potential sites are being evaluated.

CIP PROJECT STATUS REPORT

COST AND SCHEDULE DETAILS

CIP STATUS REPORT		SCHEDULE				COST	
PROJECT DESCRIPTION	PROJECT STAGE	RFP'S ISSUED	START DATE / OR (PROJECTED DATE)	PERCENT OF PROJECT COMPLETE	COMPLETION DATE / OR (PROJECTED DATE)	EXPENDITURES TO 12/31/12	FUNDS NEEDED TO COMPLETE
PROJECTS COMPLETED (cont)							
Distribution System (cont)							
Hydrant Locks	Construction	In House	Mar 10	100%	Jun 12	\$382,118	NA
Support System Facilities							
Forestry Building - Office Construction	Construction	In House	Apr 97	100%	Mar 97	\$18,325	NA
New fencing and roads - PW property	Design	In House	Jun 97	100%	Aug 97	\$97,468	NA
Security upgrade at treatment plant and facilities	Construction	Oct 97	Mar 99	100%	Apr 98	\$4,271,728	NA
Various Capital Projects	Design	May 97	Dec 97	100%	Nov 99		
	Construction	Jul 01	Dec 01	100%	Aug 02		
	Construction	Mar 02	Mar 02	100%	Jun-08	\$207,611	NA
	Planning						
	Design						
	Construction						
CONSTRUCTION							
Support System Facilities							
GIS System and base mapping conversion system	Planning	Jan 02	Feb 02	100%	Jun 03	\$3,558,467	\$1,441,533
	Design	Jan 04	Apr 04	100%	Dec 06		
	Construction	Apr 05	Nov 05	90%	(Jun 14)		
PLANNING							
Transmission System							
Western Cranston - water system improvements	Planning						
	Design						
	Construction					\$219,529	NA
Distribution System							
Unidirectional Flushing (UDF) Program Development	Planning	In House	Aug 12	100%	Feb 13	\$0	\$500,000
	Design	In House	Feb 13	10%	(Dec 13)		
	Construction	In House	(May 13)	0%	(Dec 13)		
Support System Facilities							
Organization and Facility Assessment	Planning						
	Design						
	Construction					\$159,005	NA

Total CIP Expenditures \$25,386,657

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE WATER SUPPLY BOARD :
GENERAL RATE FILING : DOCKET NO. 4406

KENT COUNTY WATER AUTHORITY'S FIRST SET OF DATA REQUESTS
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(Issued August 28, 2013)

KCWA:DIV1-2. Please confirm that the Division of Public Utilities & Carriers has accepted in full, Providence's request to fully fund a new Central Operations Facility from cash rate funded (pay-as-you-go) revenues. If not, please explain what adjustments are proposed.

RESPONSE:

The Division has not accepted or agreed that a new Central Operation Facility should or will be fully funded from rate revenues nor does the Division understand that is Providence Water's proposal based on the response to KCWA 2-5. The Division anticipates that the rates in this case will be in effect for approximately two years based on Providence Water's response to KCWA 2-8. Amounts collected during that time could be used for site assessment and acquisition and possible site preparation. Depending on the total cost, the amounts being collected in rates could also reduce the amount that must be financed and/or ultimately used to pay for debt service used to finance the total cost of a new Central Operations Facility. Since the funds are set aside in a restricted account, to the extent that they are not needed, they can be used in Providence Water's next case to offset other capital needs.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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KCWA:DIV1-3. Regarding Schedule TSC-13. Please explain what item in the filing that the proposed \$9,033 reduction on regulatory expenses labeled "Field Operations-Revised Estimate" is for. Is this the same as the "Hydrant Fees" claimed in the filing by Providence Water?

RESPONSE:

Refer to Mr. Catlin's testimony at page 22, line 4. Yes, The Field Operations-Revised Estimate was inadvertently carried over from Schedule TSC-12 when creating Schedule TSC-13.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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KCWA:DIV1-4. Regarding Mr. Catlin's schedule TSC-13, please explain why Mr. Catlin believes the claim by Providence Water for Bond Filing/Bond Refunding should be included if these costs are recovered as part of a bond issuance expense.

RESPONSE:

If those costs are included as bond issuance expense, then they should not also be recovered as regulatory commission expense. However, there are costs associated with bond filings that may not be included in bond issuance expense. Typically, only the direct costs of issuing bonds are paid for from bond proceeds.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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KCWA:DIV1-5. Regarding Mr. Catlin's schedule TSC-13, please explain what docket (Division or Commission) or what support the Division reviewed prior to the submission of its direct testimony in this matter that supported the claims for the exact amounts of (a) \$2,171 for New Headquarters and (b) \$9,609 for Regional Water District. Please provide copies of any documents or workpapers that are not part of the record on this docket. Aside from the Division filings provided in response to Div 1-24, please identify any documents or workpapers that support these claims that are part of the record in this docket.

RESPONSE:

Mr. Catlin did not rely on any documents for the exact amounts of the expenses cited in the question. With the exception of the amounts for other rate proceedings (Conservation Rates and Hydrant Fees), Mr. Catlin accepted the overall level of regulatory expenses as representative of ongoing expenses without assuming they had to be for the same specific projects as in the FY 2012 test year.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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KCWA:DIV1-6. Please provide the backup for Mr. Catlin's revenues at proposed rates on his Schedule TSC-1.

RESPONSE:

The amounts at proposed rates on Schedule TSC-1 for the individual rate classes have not been adjusted for the proposed rate increase. Only the total has been adjusted for the overall increase needed to meet the Division's recommended revenue requirements. For comparative purposes, Mr. Mierzwa has presented a cost study based on the same revenue requirements that Providence's Witness Smith utilized in his revised study provided in response to DIV 3-1. Mr. Mierzwa will provide a cost study that incorporates Mr. Catlin's final revenue requirement adjustments in his surrebuttal testimony.

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KCWA:DIV1-7. With two minor exceptions, the revenue requirements presented in Mr. Smith's supplemental filing dated April 17, 2013 seem to match those presented in Mr. Mierzwa's Schedule JDM-11. Please provide a schedule that shows where each of Mr. Catlin's proposed adjustments appear on Mr. Mierzwa's Schedule JDM-11.

RESPONSE:

See the response to KCWA: DIV1-8.

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KCWA:DIV1-8. Mr. Mierzwa's schedule JDM-22 (Revenue Proof) appears to show total expenses or "net revenues requirements" of \$74,668,471. Mr. Catlin's Schedule TSC-1 appears to show a proposed total cost of service of \$69,646,380. In addition, the revenues on these two schedules do not seem to match. Please explain the apparent discrepancy between Mr. Catlin's and Mr. Mierzwa's schedules.

RESPONSE:

Schedule JDM-22 does not include Mr. Catlin's revenue requirement adjustments. This is a common practice as it allows the cost of service and rate design recommendations of different parties to be compared on a comparable basis. There are exceptions to this practice. For example, in United Water Rhode Island, Inc. Docket No. 4255, Mr. Mierzwa proposed no changes to the various allocation factors used in the Company's cost of service study and, therefore, reflected the Division's revenue requirement recommendations in his study.

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- KCWA:DIV1-9. Regarding page 8, line 8 of Mr. Mierzwa's pre-filed testimony related to customer service pipes:
- a) Does Mr. Mierzwa agree that the length of service pipe from the curb stop to the customer's building may also have leaks?
 - b) Does Mr. Mierzwa believe that the service pipe between the curb stop and the customer's building will have approximately the same volume of leakage *per foot* as the service pipe between the main and the curb stop? If not, please explain why not and quantify the difference.
 - c) Mr. Woodcock's estimate of the total length of service pipe from the main to the customer's building was 350.59 miles (see CW-23A). This includes an additional 95.6 miles from the curb stop to the building. Does Mr. Mierzwa believe that Mr. Woodcock's estimate is reasonable given Providence Water's lack of response on this question? If not, what additional length does Mr. Mierzwa believe is more reasonable? Provide the basis for any such amount.

RESPONSE:

- a) Yes.
- b) Mr. Mierzwa has no reason to believe the average leakage volume per foot would be different.
- c) Mr. Woodcock has presented no evidence or analysis supporting his estimate. Therefore, Mr. Mierzwa has no basis to evaluate Mr. Woodcock's estimate.

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- KCWA:DIV1-10. Regarding Mr. Mierzwa's claim that "PWSB's capital costs ... can be expected to be used to purchase land related assets in the future" (page 11, lines 10-11):
- a) Please identify all land items that are proposed to be replaced in Providence Water's proposed Infrastructure Replacement Plan.
 - b) Please identify all land items proposed for funding in Providence Water's Equipment Replacement Plan.

RESPONSE:

- a) Mr. Mierzwa's review of PWSB's IFR revealed no expenditures associated with the purchase of land. PWSB's Capital Fund includes costs to purchase land.
- b) Mr. Mierzwa's review of PWSB's Equipment Replacement Plan revealed no expenditures associated with the purchase of land. See the response to part (a).

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- KCWA:DIV1-11. Regarding Mr. Mierzwa's testimony on page 11 regarding investor owned water utilities:
- a) Please confirm that Mr. Mierzwa provided testimony in RI PUC Docket 4255 regarding United Water Rhode Island, Inc.
 - b) Did United Water Rhode Island, Inc. have an Infrastructure Replacement Component to its revenue requirements?
 - c) Is Mr. Mierzwa aware of any other investor owned water company in Rhode Island that includes an Infrastructure Replacement component in its revenue requirements?

RESPONSE:

- a) Confirmed.
- b) Yes. Per the testimony of Stanley J. Knox in Docket No. 4255, the requested "increase was necessary for the Company to continue to be in compliance with water quality requirements, provide quality service to customers and improve reliability of service by replacing aging infrastructure." (Page 7, lines 8-11).
- c) Mr. Mierzwa is not familiar with other Rhode Island investor-owned utilities and does not believe that there are other investor-owned utilities in Rhode Island regulated by the Commission. In other jurisdictions it is common for investor-owned water utilities to have infrastructure replacement costs included in their revenue requirement.

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KCWA:DIV1-12. Regarding Mr. Mierzwa's recommendations regarding the allocation of T&D Engineering expenses: Please list the amount of this line item for the proposed rate year and for the prior years that Mr. Mierzwa has readily available.

RESPONSE:

The amount of this line item for the proposed rate year is \$418,423. For FY 2011, the amount of this line item was \$20,043, and for FY 2012, the amount was \$36,120.

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KCWA:DIV1-13. Given Providence Water's response to BCWA 1-11 and KCWA 5-1, please explain why Mr. Mierzwa believes that 12" pipe should be allocated (in part) to the wholesale customers.

RESPONSE:

The response to KCWA 5-1 shows several wholesale accounts being served by mains sized 12-inches or less. Therefore, Mr. Mierzwa accepted PWSB allocation of mains sized 12-inches and greater to wholesale customers. The response to BCWA 1-11 itself does not identify deliveries by main size. Mr. Mierzwa will reevaluate PWSB's position after review of PWSB's rebuttal testimony.

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KCWA:DIV1-14. Regarding Schedule JDM-23, please explain why Mr. Mierzwa believes that the FY 2009 sales should be *excluded* for the retail customers but the FY 2009 sales should be *included* for the wholesale customers and *included* for the calculation of unaccounted for water.

RESPONSE:

Mr. Mierzwa accepted the PWSB's retail and wholesale sales volumes and calculation of unaccounted for water ("LUFW"). For retail customers, FY 2009 sales were 6.8 percent above the four-year average, and for FY 2010 – FY 2012 sales were within 1 percent of the three-year average. Therefore, FY 2009 appeared to be an outlier and its exclusion appropriate. For wholesale customers, FY 2009 was within 1 percent of the four-year average and, therefore, was not considered an outlier which should be excluded. For wholesale sales, FY 2010 appears to be an outlier which could justifiably be excluded in the development of *Pro Forma* Rate Year sales volumes. The FY 2009 LUFW amount deviates significantly from that experienced during FY 2010 – FY 2012 and could justifiably be excluded as an outlier.

Mr. Mierzwa may reevaluate PWSB's retail and wholesale sales and LUFW projections upon review of PWSB's rebuttal testimony.

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KCWA:DIV1-15. Regarding Mr. Mierzwa's schedule JDM-14, please explain why no pumping costs (symbols N, NO, and NP) are allocated to fire protection.

RESPONSE:

Mr. Mierzwa accepted PWSB allocation factors N, NO and P. Upon review of Mr. Woodcock's testimony, Mr. Mierzwa would accept Mr. Woodcock's allocation to fire protection.

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KCWA:DIV1-16. Was Mr. Mierzwa aware of the amendment to Chapter 46-15.6.6 (IFR) generally discussed on page 24 of Mr. Woodcock's testimony? If so, why does he believe that no costs should be allocated to meters or fire protection under symbol K1? If he was not aware of the amendments, does he still believe that no IFR costs should be allocated to meters or fire protection? If he still believes that no IFR costs should be allocated to meters or fire protection, please explain.

RESPONSE:

Mr. Mierzwa was aware of the amendment to Chapter 46-15-6-6 (IFR). Mr. Mierzwa accepted PWSB's allocation to meters and fire protection under symbol K1 in his direct testimony. Mr. Mierzwa will reevaluate PWSB's position after review of PWSB's rebuttal testimony.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE WATER SUPPLY BOARD :
GENERAL RATE FILING : DOCKET NO. 4406

KENT COUNTY WATER AUTHORITY'S FIRST SET OF DATA REQUESTS
DIRECTED TO DIVISION OF PUBLIC UTILITIES & CARRIERS
(Issued August 28, 2013)

KCWA:DIV1-17. Schedule JDM-19 does not appear to include updated meters or fire services. Does Mr. Mierzwa contend that these should not be updated?

RESPONSE:

No. Mr. Mierzwa will update meters and fire services in his surrebuttal testimony.