

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 (data 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.

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.

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?

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.

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 area part of the record in this docket.

KCWA:DIV1-6. Please provide the backup for Mr. Catlin's revenues at proposed rates on his Schedule TSC-1.

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.

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.

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.

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.

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?

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.

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.

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.

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.

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.

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?

Submitted By:  
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