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May 22, 2015

Ms. Luly Massaro, Clerk  
Division of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: *Pawtucket Water Supply Board, General Rate Filing***  
***Docket No. 4550***

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the Pawtucket Water Supply Board's Objection to Cumberland Data Request 3-10.

Please note that an electronic copy of this document has been provided to the service list.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough Jr.

JAK/kf  
Enclosures  
cc: Karen Lyons, Esquire

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4550

Response Of The Pawtucket Water Supply Board

To The Town of Cumberland's

Data Requests

Set 2

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**Cumb. 3-10:** [Ref. – PWSB response to Cumb. 1-11 and Schedule DGB-2] Please provide your best estimates of the line item amounts shown in DGB-2 corresponding to FY2015 based on 10 months of actual data and 2 months of estimated data. As early as possible in June revise these amounts based on 11 months of actual data and 1 month of estimated data (June 2015). Lastly, as soon as possible provide an update to that schedule based entirely of 12 months of actual data.

**Objection:** Objection, this request is unreasonable and burdensome. Rule 1.18 (c) of the Commission's Rules of Practice and Procedure allows a party to issue data requests for "data, studies, workpapers, reports and information reasonably relevant to the proceeding..." This request essentially calls for the PWSB to recreate its test year in same form as Schedule DGB-2 using *estimated* figures for FY15. This would require the PWSB and Mr. Bebyn to evaluate ten months of financial information that is currently available for FY15. This information would then have to be examined and properly adjusted. The PWSB and Mr. Bebyn would then have to completely estimate financial information for the remaining two months of FY15. The PWSB believes this task would require Mr. Benson and Mr. Bebyn to expend approximately two to three full days. The actual FY15 information can be provided after the close of the fiscal year and after accruals post and audit adjustments are made.

**Prepared by:** Joseph A. Keough Jr., Esquire

## STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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**CERTIFICATION**

I hereby certify that on May 22, 2015, 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>
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