

# Del Sesto + Read

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August 15, 2016

Ms. Luly E. Massaro, Commission Clerk  
Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

RE: Kent County Water Authority  
Docket No. 4611

Dear Ms. Massaro:

Please find enclosed find an original and nine copies of the following:

- 1) Coventry Fire District's Motion To Compel Kent County Water Authority To Provide More Responsive Answers To Coventry Fire District's Data Requests, dated August 15, 2016, and
- 2) Coventry Fire District's Memorandum In Support Of Its Motion To Compel Kent County Water Authority To Provide More Responsive, dated August 15, 2016

These are to be distinguished from a similarly Motion and supporting Memorandum, dated August 13, 2016 which the enclosed replace.

Yours truly,



Arthur M. Read, II

AMR/lmh  
Enclosures (2)  
Cc: Docket 4611 Service List (via electronic mail)

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

Docket No.:4611

Petition of the KENT COUNTY WATER AUTHORITY  
Rate Application

COVENTRY FIRE DISTRICT'S MOTION TO COMPEL  
KENT COUNTY WATER AUTHORITY TO PROVIDE MORE RESPONSIVE ANSWERS  
TO CFD'S DATA REQUESTS

Respectfully represents Intervenor Coventry Fire District ("CFD") as follows:

1. It propounded Data Requests to Petitioner on June 20th and 28<sup>th</sup> respectively.
2. Petitioner filed blanket objections to those Requests.
3. CFD subsequently filed a request on June 30<sup>th</sup> asking that Petitioner be compelled to respond to CFD's Data Requests.
4. The Commission ruled by its July 22<sup>nd</sup> Memorandum.
5. Petitioner then filed purported response to those Requests which are, in the main, unresponsive.

Wherefore, CFD respectfully prays as follows:

- 1) That KCWA's responses to CFD's Data Requests may be found to be non-responsive;
- 2) That KCWA be ordered to file responsive answers and information as to the Data Requests and

- 3) That the Commission may grant such other and further relief as it may deem meet in the circumstances.

/s/ Arthur M. Read, II  
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August 15, 2016

**Certification**

I certify that I forward a copy of the foregoing Motion and a Memorandum in support thereof via e-mail to all on the following service list on August 15, 2016.

/s/ Arthur M. Read, II

**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan  
Service List 7/13/16**

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

Docket No.:4611

Petition of the KENT COUNTY WATER AUTHORITY  
Rate Application

COVENTRY FIRE DISTRICT'S MEMORANDUM IN SUPPORT OF ITS MOTION TO  
COMPEL KENT COUNTY WATER AUTHORITY TO PROVIDE MORE RESPONSIVE  
ANSWERS TO CFD'S DATA REQUESTS<sup>1</sup>

Petitioner Kent County Water Authority ("KCWA") has filed a request with the PUC for a multi-year rate change.

It seeks to increase its rates for a number of services and products among which is an increase in the charges which is levies for public fire hydrants.

Coventry Fire District ("CFD") is a purported customer of KCWA in that KCWA charges it an annual fee for public fire hydrants which are within CFD's service area.

Prior to filing of the instant Data Requests, CFD had inquired of KCWA by what authority it was levying its charges for public fire hydrants. CFD's governing Board's interest was piqued in this regard because the charge had become a significant portion of CFD's annual budget, because there had been such a large percentage increase in the fee in recent years, because it could not find any authority within its records to explain why CFD was being billed and because a title examination in the Land Evidence Records did not establish who owned the public fire hydrants.

KCWA's response to CFD's request was perfunctory and unresponsive.

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<sup>1</sup> This is the second such motion directed to KCWA's responses to CFD's Data Requests. The earlier motion was dated August 13<sup>th</sup>. Subsequent to filing that motion, CFD first became aware that KCWA had filed two responses to its Data Requests. Not realizing that, CFD filed a similar motion and memorandum to the present ones. Realizing its error, it withdrew those by email and is, with this submission, starting over. This motion and memorandum are only directed to a KCWA's responses to CFD 1-6. It may be that CFD will submit a third motion and memorandum directed to KCWA's responses to CFD's other Data Requests and CFD reserves the right to do so as soon as it has had an opportunity to fully review them. CFD apologizes for any confusion or inconvenience which it may have caused the Commission, its staff or counsel.

Shortly thereafter, KCWA filed the instant petition.

Believing that this proceeding would give it a forum within which to have its questions regarding the hydrant rental fees answered, CFD intervened.

It then propounded Data Requests which were limited in number, were as discrete and pointed as CFD could make them and were all directed to the threshold issues of KCWA's ownership of public fire hydrants and the monies spent on them for maintenance and other costs attributable to them. As of them were directed to gathering information which would, hopefully, enable CFD to understand, in plain, shirtsleeve arithmetic, exactly 1) what title KCWA had to the hydrants and 2) how they calculated the hydrant fee so as to recover installation and maintenance costs and to yield a fair and equitable profit, taking their position as a monopoly into account.

CFD wanted to know what had happened or what expenses KCWA had incurred that necessitated such a dramatic percentage increase in the hydrant fees over those charged in prior years.

It wanted to understand KCWA's position; something it had been unable to do in normal civil discourse.

KCWA's response to CFD was basically a blanket assertion that CFD's requests were irrelevant and immaterial.

CFD asked this Commission to compel KCWA to respond.

This Commission did so, for the most part, via its July 22<sup>nd</sup> Memorandum.

KCWA promptly filed its responses which, to CFD's eye are either cleverly unresponsive or obfuscacious.

CFD now asks this Commission to compel KCWA to not only provide responses to CFD's data requests but to provide full and complete responses and, until it does, that this matter may be held in abeyance. This Memorandum is submitted in support of that request.

The Data Requests, the Commission's ruling, KCWA's response and CFD's discussion follow:

1) **CFD-1, CFD-2, CFD-3, CFD-4 and CFD-5**

**OWNERSHIP**

- 1) List each public fire hydrant for which you seek to charge each Intervenor a rental fee by street and other identifying data in such manner that a layman can locate and identify the fire hydrant.
- 2) As to each such public fire hydrant, set forth all facts, documents, deeds, grants, easements, licenses, bills of sale or other indicia upon which you rely in asserting by implication, or otherwise, that you own such fire hydrant and attach copies of the same.
- 3) As to each such public fire hydrant, identify those which you contend were built, constructed or installed by any person, firm or entity other than you, set forth all facts, documents, deeds, grants, easements, licenses, bills of sale or other indicia upon which you rely in asserting by implication, or otherwise, that such fire hydrant was sold, conveyed or demised to you by any means whatsoever, including any consideration therefore, and attach copies of the same.
- 4) As to each such public fire hydrant, which you contend was built, constructed or installed by any person, firm or entity other than you; identify the name and last known address of such person, firm or entity.
- 5) Except as provided in response to a previous data request, as to each such public fire hydrant, which you contend was built, constructed or installed by any person, firm or entity other than you and which was conveyed to you, set forth the consideration for such conveyance.

**The Commission's Ruling:**

KCWA's objections were overruled to the extent that CFD was seeking any information KCWA had regarding ownership of the public fire hydrants within each municipality or fire district to which public fire protection bills are sent. KCWA was ordered to provide any and all records relating to ownership of fire hydrants.



### **KCWA's Response**

RESPONSE: Ownership is clearly defined. Please see attached copies of the 1st KCWA regulations issued and current regulations.

### **CFD's Discussion:**

Attached to KCWA's response was a photocopy of Sections 7 and 8 of KCWA's Rule and Regulations, effective July 1, 1953, and pp 2-24 and 2-25 of KCWA's Rule and Regulations, effective May 21, 2009.

Section 7 speaks to installation and ownership of hydrants. Public fire hydrants are installed "...at the *written request* from the ... Fire District..." and provides that all public fire hydrants and their connections *are* installed and maintained by...[KCWA] and remain a part of ...[its] system. [Emphasis added]

So, there is no question that if KCWA installs a public fire hydrant upon a written request that it retains ownership of it, if it was installed after the adoption of the Rules and Regulations on July 1, 1953.

However, that response begs the question.

CFD argues that a proper response would have been for KCWA to provide whatever deeds, easements, records of written requests and its installation of hydrants in response to such written requests.<sup>2</sup>

According to its Rules and Regulations, KCWA had to prove that CFD had made written requests for the hydrants which it was paying for (as opposed to the Town of Coventry or some other entity).

CFD asserts that it has been unable to find any records of ever having made such written requests.

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<sup>2</sup> As part of its due diligence, CFD hired a title examiner to search the Coventry Land Evidence Records to determine if there were any recorded instruments which bore on this issue. None were found. Not that it bears on the present issue, but CFD couldn't find any instruments which conveyed an easement or other right to KCWA to run its water lines in public or private ways or property, either.

CFD concedes that it has responded to KCWA's requests for its advice as to the *placement* of public fire hydrants; but that is a far different thing than requesting the *installation* of a public fire hydrant in the first instance.

Sec 2.6.3 of the 2009 Rules and Regulations appears to be indistinguishable in substance to Section 7 of the 1953 Rules and Regulation.

KCWA's response, however, begs the question and is non-responsive to the underlying issue: who owns the hydrants and who authorized their installation, in writing?

KCWA did not assert that it installed any of the hundreds of hydrants listed; not one.

KCWA did not assert that CFD requested the installation of any of the hundreds of hydrants listed; not one.

That is the kernel of the matter.

CFD should be able to get a simple declarative response that supports KCWA's apparent position that it owns the hydrants because it installed them at CFD's written request.

The next issue, assuming that KCWA did install the hydrants at CFD's written request, is: What were the applicable rules and regulations at the time of installation?

This is important because KCWA's Rules and Regulations did not impose a duty on the requesting authority to pay quarterly fees until 1953, at the earliest. KCWA's responses indicate that a number of hydrants were installed prior to 1953. Arguably, KCWA could not impose hydrant fees for hydrants installed prior to the adoption of its Rules and Regulations on July 1, 1953.

This is no more than a threshold question but, until it is answered, KCWA is stuck at the threshold.

Until then, CFD takes the position that it is not under any obligation to pay quarterly fees and, although this Commission can authorize KCWA to charge such fees, they can only be charged to the responsible party.

To CFD's plain reading, KCWA's responses to these data requests do not address its ownership of the public fire hydrants in CFD's service area.

CFD, respectfully requests that KCWA be compelled to provide a more responsive answer to its Data Requests 1-5.

2) **CFD-6**

6) *As to each such public fire hydrant, which you contend you built, constructed or installed, advise of the date of construction, date the hydrant was placed in service (if different), set forth all costs of construction, set forth all costs of maintenance since construction (itemized by year), set forth the hydrant's life expectancy and attach records of all maintenance performed on said hydrants [Emphasis added]*

**The Commission's Ruling:**

KCWA's objections were overruled and it was ordered to provide, in the aggregate, by year for each year since 2000, the total amount of maintenance or replacement costs related to fire hydrants, such information was to be broken out by municipality or fire district where possible. The remainder of the question relation to installation was to be responded to in full and KCWA was to provide all records relation to the installation of hydrants.

**KCWA's Response**

*CFD-6}: As to each such public fire hydrant, which you contend you built, constructed or installed, advise of the date of construction, date the hydrant was placed in service (if different), set forth all costs of construction, set forth all costs of maintenance since construction (itemized by year), set forth the hydrant's life expectancy and attach records of all maintenance performed on said hydrants.*

Response:

Hydrant maintenance costs in the aggregate by year since 2000 as follows:

<b>FY</b>	<b>AMOUNT</b>	<b>FY</b>	<b>AMOUNT</b>
06/2000	\$106,088.65	06/2009	\$ 97,044.51
06/2001	\$ 46,789.06	06/2010	\$ 76,727.35
06/2002	\$ 96,083.32	06/2011	\$ 101,666.21
06/2003	\$ 96,988.44	06/2012	\$ 98,534.01
06/2004	\$ 84,619.78	06/2013	\$ 101,568.13

06/2005	\$ 94,181.14	06/2014	\$ 78,443.60
06/2006	\$ 88,307.42	06/2015	\$ 79,531.29
06/2007	\$ 84,307.34	06/2016	\$ 84,993.00
06/2008	\$101,097.11	<b>TOTAL:</b>	<b>\$ 1,516,970.36</b>

Listing of all public hydrants attached.

Total cost of construction: \$1,362,339

This response was followed by some ten pages listing public fire hydrants located in CFD's district as well as those in Cranston, East Greenwich and Central Coventry Fire District with location information, the year of construction and other information which was **not responsive to the request.**

**CFD's Discussion:**

KCWA's attached list enumerates hydrants in four fire districts or municipalities. It lists \$1,362,339 as the cost of construction without breaking it out for each entity or, as requested, each fire hydrant, thus making it impossible to know how much is allocable to CFD, how much to Cranston and so on.

KCWA makes the same error with regard to maintenance. It gives gross figures for all four entities.

All CFD wants to know is what did it cost to build the hydrants in its district and what did KCWA pay to maintain them by year and by hydrant, if possible. In that way we can look at a particular fire hydrant, can understand what it cost to build it, can determine its life expectancy and can determine what KCWA spent on it for maintenance.

In this way one can determine the costs attributable to a particular hydrant and, then, for all of the hydrants for which CFD is being charged. This is the sort of information which CFD would anticipate a business would keep for its own benefit and so that it could accurately track whether or not it is earning or losing money on its hydrant business.<sup>3</sup>

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<sup>3</sup> CFD recognizes that, in light of the number of hydrants, that KCWA might track these expenses system-wide or customer-wide rather than by each hydrant. If that is the case then so be it. Regardless of how KCWA tracks these expenses, so long as it does track them and so long as KCWA can present its accounting to CFD and the Commission, then CFD and the Commission will be able to analyze whether or not the proposed hydrant fees are fair and

CFD sought the following information as to each such public fire hydrant, which CFD contended it built:

- date of construction,
- date the hydrant was placed in service (if different),
- all costs of construction,
- all costs of maintenance since construction (itemized by year),
- the hydrant’s life expectancy and
- to attach records of all maintenance performed on said hydrants

Here was the information, which KCWA provided:

- date of construction, *Provided [at least as to year of construction]*
- date the hydrant was placed in service (if different), *Not Provided*
- all costs of construction, *Not Provided*
- all costs of maintenance since construction (itemized by year), *This is difficult to analyze as the costs of maintenance was provided but appears to have been provided in the aggregate (i.e. for all customers) by year rather than broken down to the maintenance performed in CFD’s service area.*
- the hydrant’s life expectancy and to attach records of all maintenance performed on said hydrants *Not Provided*

The purpose of this set of data requests is to try to get data which would enable CFD to determine what the hydrants cost KCWA to install and to maintain. With this information, it should have been possible to determine whether the cost of installation had been recovered, whether the operating costs (principally maintenance) were such that they would justify KCWA’s requested increase, or not.

It is right and proper for KCWA to recover its costs, to recover a reasonable profit and to escrow monies for anticipated replacement of hydrants that are past their shelf date and for reasonable capital expansion.

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reasonable. Otherwise, one must assume that KCWA just charges a hydrant fee which it “pulls out of the air” but which is sufficient for it to balance its budget. That, CFD would argue, is unfair and unreasonable and should not be countenanced by the Commission.

It is wrong and improper for KCWA to set up public fire hydrants as an excessive profit center.

Determining which of these is the case (or neither) is a function of this set of Requests.

KCWA has provided an answer but its answer is deficient in that it is not broken out as CFD requested.

For instance, CFD does not have a clue as to the life expectancy of a fire hydrant. Is it fifty years, one hundred years or two hundred years? The answer is important as it the fire hydrant must generate enough income through fees or otherwise over that life expectancy to pay for its installation, maintenance and to provide a reasonable profit to KCWA. Life expectancy is part of that calculus.

KCWA either does not know the life expectancy of each hydrant (in which case its calculations as to the fee to charge are suspect) or knows and will not share it with this Commission or CFD (in which case, CFD respectfully suggests its rate request should be denied).

### **SUMMARY**

CFD is not trying to be unnecessarily contentious.

It has, for some time, had substantive questions (which it believes are basic questions) about the fire hydrant charges which KCWA has been charging it. Especially, so, since the charges have grown, like Topsy, to the point where, next to labor costs, they constitute one of the largest single expenditures in CFD's budget.

CFD's governing Board has a fiduciary duty to its taxpayers to fully understand KCWA's hydrant charges.

Perhaps the explanation as to why KCWA charges CFD for hydrants is lost in the mists of Time. That, however, does not excuse CFD from making every effort to dispel those mists, to develop a full appreciation of why it is paying so much money to KCWA and to satisfy itself that the fees it is being charged are fair and reasonable.

This, ultimately, is all that CFD is seeking:

Does KCWA own the hydrants?

Are the hydrant charges fair and reasonable?

How does KCWA calculate the hydrant charges?

Are its calculations commercially reasonable or are they a function of guesswork?

KCWA's objections, obfuscations, half answers and failure to answer these questions and only serve to suggest to CFD that full and complete responses would not support KCWA's petition to increase hydrant charges.

CFD respectfully requests that the Commission compel KCWA to promptly provide full, complete, responsive answers to its data requests and, until it does so, that any and all existing due dates for discovery, evidentiary hearings and the like may be suspended and reset after KCWA has fully responded to the data requests.

In so doing, CFD does not claim any pride of authorship. If the Commission believes that CFD's Data Requests are inartfully drawn, will unnecessarily inconvenience KCWA or will fail to elicit the ultimate responses which will answer CFD's basic questions, then CFD encourages, ever solicits, the Commission to recouch its Data Requests in such a manner as to accomplish the desired result in the most expedient manner.<sup>4</sup>

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August 15, 2016

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<sup>4</sup> Mindful as CFD is that it began its discovery on June 3<sup>rd</sup> and time is slipping by.

**Certification**

I certify that I forward a copy of the foregoing Motion via e-mail to all on the following service list on August 15, 2016.

/s/ Arthur M. Read, II



**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan  
Service List 7/13/16**

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