

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 FURTHER SUPPORT OF ITS  
MOTION TO COMPEL KENT COUNTY WATER AUTHORITY TO PROVIDE MORE  
RESPONSIVE ANSWERS TO CFD'S DATA REQUESTS

There is such a thing as gilding a lily and CFD does not have any desire to do that in this proceeding.

CFD has received KENT COUNTY WATER AUTHORITY'S OBJECTION/RESPONSE TO THE COVENTRY FIRE DISTRICT'S MEMORANDUM IN SUPPORT OF IT [sic] MOTION 0 [sic] COMPEL MORE RESPONSIVE ANSWERS TO ITS DATA REQUESTS.

As CFD grasps it, KCWA is continuing to object to CFD's efforts (as minimal as they have been) to garner at least *some* information so that CFD can better understand KCWA's argument.... because CFD is unable to divine KCWA's rationale from the submitted material (which, the Commission may be assured, has been carefully reviewed prior to CFD making its data request).<sup>1</sup>

Nevertheless, CFD finds KCWA's most recent submission somewhat breathtaking. As CFD understands it, KCWA's objection to responding<sup>2</sup> is based upon its position that "KCWA was compliant with the Commission's July 22, 2016 Order". Phrased differently, KCWA's position is that they did it correctly the first time.

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<sup>1</sup> CFD is not alone in having difficulty grasping KCWA's rationale behind increasing public hydrant fees. See Direct Testimony of Jerome D. Mierzwa at pp. 10-11.

<sup>2</sup> No expert in these matters, CFD notes that KCWA has not objected to any other party's request as vigorously as it has to CFD's. Either CFD is so off the mark that its requests should be struck or CFD is dead on the mark and KCWA wishes to avoid responding, Hilary Clinton-like. In any event, to paraphrase, KCWA "... doth protest too much, methinks."

That, of course, begs the question as that is the very point that CFD is raising for the Commission to address i.e. that KCWA did not respond correctly the first time.

CFD hopes that no disrespect is taken from its expectation that the answer to that question may come from the Commission and not the Petitioner.

To the extent necessary, CFD restates and republishes its request that KCWA be forced to fully and accurately respond to its data request.

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September 11, 2016

**Certification**

I certify that I forwarded a copy of the foregoing via e-mail to all on the following service list on September 11, 2016.

/s/ Arthur M. Read, II

**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan  
Service List 8/12/16**

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