

# ***Mary B. Shekarchi***

**Attorney at Law**

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November 18, 2016

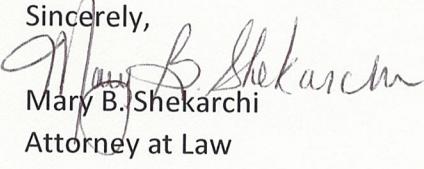
Ms. Luly Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

RE: Kent County Water Authority – Docket No. 4611

Dear Ms. Massaro:

Please find enclosed herewith an original and nine (9) copies of the Kent County Water Authority's Supplemental Response to the Division of Public Utilities and Carriers Data Request Set 7. An electronic copy has been provided to the service list. Should you have any questions, please contact me. Thank you.

Sincerely,

  
Mary B. Shekarchi

Attorney at Law

MBS/mdc  
Enclosure

Cc: Docket 4611 Service List (via electronic mail)

**KENT COUNTY WATER AUTHORITY**

**Docket No. 4611**

**Responses to**

**Seventh Set of Data Requests**

**Division of Public Utilities and Carriers**

1. Please provide the basis for the statement at page 6, lines 2 to 5 of Mr. Woodcock's rebuttal testimony, that water and sewer utilities "throughout the country" use the water and sewer maintenance portion of the CPI as the appropriate inflation rate to adjust their cost of service for ratemaking purposes. If possible, for those utilities, please provide a docket number or case number in which this methodology was used, if available. Also, identify each of those proceedings where Mr. Woodcock was the witness supporting the use of the water and sewer portion of the CPI.

Response:

The full testimony that is referenced in the question stated: "I would also note that the water and sewer portion of the CPI is now used by water and sewer utilities throughout the country to adjust their overall water and sewer rates, not just the "maintenance" portion of their rates." My testimony did not suggest that other utilities "use the water and sewer maintenance portion of the CPI as the appropriate inflation rate" as the question states.

Water and sewer rate adjustments based on general inflation indices are not uncommon. The American Water Works Association's M1 Manual on water rates includes an entire chapter on this subject and specifically discusses the use of the CPI as an index. A quick search indicates the following utilities across the country have or do use the change in the CPI to make annual adjustments to their rates: Bradenton and Lady Lake, Florida; Placer County, Lake County, Napa, San Simeon, Torrance, McFarland and Hughson, California; Hartford County, MD; Poulsbo and Fife, WA; Chicago and Huntley, IL; Longs Peak, CO; and Lansing, MI. This is by no means a full list, but demonstrates that "the CPI is now used by water and sewer utilities throughout the country to adjust their overall water and sewer rates."

I have not conducted a search of cases where a state or provincial regulatory body has used the CPI as the basis for annual rate adjustments.

I have not provided testimony in any docket where I have advocated the use of the CPI as a basis for annual rate adjustments. That includes the current Docket 4611. I am not proposing that the Authority's rates and charges be adjusted to match a change in the CPI or a variant of the CPI; rather, I am proposing that the adjustments for some operating costs be based on a change in the CPI as adjusted for the more applicable water and sewer maintenance portion of the CPI. As explain, this adjustment is based on the Commission's Rules.

Witness Responsible: C. Woodcock

2. Reference page 6, lines 9 to 14 of Mr. Woodcock's rebuttal testimony, please provide listing of water and sewer utilities before the Rhode Island Public Utilities Commission that have used CPI in concert with the water and sewer maintenance CPI index as described by Mr. Woodcock. For each of those utilities, please provide docket number in which this methodology was used. Also, please indicate those proceedings where Mr. Woodcock was the witness supporting the use of this methodology.

Response: I am unaware of any such cases before the RI PUC.

Witness Responsible: C. Woodcock

3. Please provide a listing of Orders by the Rhode Island Public Utilities Commission where the Commission found the inflation rate to be used for ratemaking is the CPI in concert with the water and sewer maintenance index as described by Mr. Woodcock on page 6, lines 9 to 14 of his rebuttal testimony. For each of those utilities, please indicate those where Mr. Woodcock was the witness supporting the use of this methodology.

Response: I am unaware of any such cases before the RI PUC.

Witness Responsible: C. Woodcock

4. Reference page 10, line 21 through page 11, line 3 of Mr. Woodcock's testimony.
  - a. Please provide the dates on which the auditors made the adjustments to transfer the amounts from Miscellaneous Non-Operating Revenue to Transmission and Distribution Plant.
  - b. Please provide illustrative journal entries showing how the amounts were transferred from Miscellaneous Non-Operating Revenue to Transmission and Distribution Plant. In your response, include an explanation of the nature initial transaction and the reason for the auditors' adjustment.
  - c. Please show how those adjustments were reflected in the FY 18 and FY 19 step increases.

Response:

The adjustment for \$652,280.00 was made on June 30, 2013 and the adjustment for \$855,837.00 was made on June 30, 2014.

See attached for illustrative journal entries (General Ledger). It was determined that extensions to the system that were installed by outside contractors (not hired by KCWA) should be posted to Transmission and Distribution Plant and were approved by our auditors Marcum Accountants & Advisors. The adjustments were made to correct the FY2013 and FY 2014 journal entries made to Miscellaneous Non-Operating Revenue.

The adjustments were not reflected in the FY18 and FY19 step increases.

Witness Responsible: C. Heard

REPORT DATE 11/16/2016  
SYSTEM DATE 11/16/2016  
FILES ID Z

Kent County Water Authority  
General REVENUE LEDGER

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ACCOUNT NUMBER/DESCRIPTION	POST DATE	JRNL. NO.	TRANS DATE	REF. NUMBER	VENDOR NUMBER	CHECK NUMBER	TRANSACTION DESCRIPTION	DEBIT	CREDIT	BALANCE
<b>-- TRANSACTION --</b>										
1 - 4210 MISC. NON-OPER. INCOME							* BEGINNING BALANCE			.00
CR 04302014-024 04/2014	04/2014	03197	04/30/2014				COLLECTIONS-FRONT DRAWER			24.90
CR 04302014-026 04/2014	04/2014	03197	04/30/2014				COLLECTIONS-FRONT DRAWER			257.93
CR 20141231-016 12/2014	12/2014	03380	12/08/2014				DEPOSIT SLIP			258.08
CR 20141231-020 12/2014	12/2014	03380	12/09/2014				DEPOSIT SLIP			823.82
CR 20141231-065 12/2014	12/2014	03380	12/31/2014				DEPOSIT SLIP			3072.70
CR 20150109-013 01/2015	01/2015	03376	01/09/2015				MISC			1206.08
CR 20150122-039 01/2015	01/2015	03376	01/22/2015				MISC			1101.72
CR 20150210-008 02/2015	02/2015	03409	02/06/2015				MISC			7935.00
CR 20150217-002 02/2015	02/2015	03422	02/17/2015				MISC			1160.00
CR 20150622-049 06/2015	06/2015	03567	06/22/2015				MISC			302.01
CR 20150629-064 06/2015	06/2015	03567	06/29/2015				MISC			470.00
CR 20150706-009 07/2015	07/2015	03589	07/01/2015				MISC			509.03
CR 20150710-022 07/2015	07/2015	03589	07/01/2015				MISC			40.00
CR 20150807-015 08/2015	08/2015	03626	08/07/2015				MISC			490.00
CR 20150814-027 08/2015	08/2015	03626	08/14/2015				MISC			116.12
CR 20150911-022 09/2015	09/2015	03648	09/11/2015				MISC			245.00
CR 20150922-045 09/2015	09/2015	03648	09/22/2015				MISC			2857.56
CR 20151006-008 10/2015	10/2015	03662	10/06/2015				MISC			156.34
CR 20151019-038 10/2015	10/2015	03662	10/19/2015				MISC EXP			4159.63
CR 20151203-011 12/2015	12/2015	03716	12/03/2015				MISC EXP			320.00
CR 20151208-021 12/2015	12/2015	03716	12/08/2015				MISC EXP			1305.47
CR 20151215-036 12/2015	12/2015	03716	12/15/2015				MISC EXP			416.70
CR 20151221-049 12/2015	12/2015	03716	12/21/2015				MISC			91.25
CR 20160106-008 01/2016	01/2016	03744	01/06/2016				MISC			554.31
<hr/>										<hr/>
TOTAL CASH RECEIPTS								.00		26873.65
JV 022282013-457 02/2013	02/2013	02819	03/19/2013				CASH - FRONT DRAWER			7146.00
JV 022282014-453 02/2014	02/2014	03151	03/21/2014				CASH - FRONT DRAWER			3053.47
JV 04302013-454 04/2013	04/2013	02890	05/16/2013				CASH - FRONT DRAWER			307.59
JV 04302015-302 04/2015	04/2015	03526	04/30/2015				SUSPENSE SVC AND INSP FEE			2204.50
JV 05312013-511 05/2013	05/2013	02917	06/27/2013				CASH - FRONT DRAWER			2870.00
JV 05312014-570 05/2014	05/2014	03224	07/01/2014				FRONT DESK - CASH			544.00
JV 06302013-531 06/2013	06/2013	03064	06/30/2013				AUDITOR ADJUSTMENTS			652280.00
JV 06302014-560 06/2014	06/2014	03351	06/30/2014				AUDITOR YEAR END ENTRY			87254.00
JV 06302014-892 06/2014	06/2014	03268	06/30/2014				JUNE JOURNAL ENTRIES			8555837.00
JV 06302014-958 06/2014	06/2014	03233	06/30/2014				AUDIT YEAR END JE			
JV 06302015-227 06/2015	06/2015	03611	06/30/2015				JUNE JOURNAL ENTRY			173373.90
JV 12312015-201 06/2016	06/2016	03956	06/30/2016				Inspection Fees			66775.00
JV 12312015-202 06/2016	06/2016	03956	06/30/2016				Correct Posting Suspense			6000.00
JV 20120731-546 07/2012	07/2012	02628	08/15/2012				DRAWER - CASH ADJ			40.00
JV 20120930-412 09/2012	09/2012	02687	10/04/2012				CASH FRONT DRAWER			11.00
JV 20121130-452 11/2012	11/2012	02754	12/28/2012				CASH - FRONT DRAWER			518.27
JV 20130630-453 06/2013	06/2013	02927	07/10/2013				CASH - FRONT DRAWER			232.88
JV 20131231-419 12/2013	12/2013	03090	01/30/2014				CASH - FRONT DRAWER			6668.57
JV 20140131-417 01/2014	01/2014	03130	02/26/2014				CASH - FRONT DRAWER			1385.47
JV 20140211-007 10/2013	10/2013	03113	02/11/2014				FRONT DRAWER MARCH 2014			7413.54
JV 20140331-004 03/2014	03/2014	03193	05/15/2014				FRONT DRAWER MARCH 2014			27.75
JV 20140930-513 09/2014	09/2014	03318	11/07/2014				CASH - OVER THE COUNTER			235.59
JV 20141031-643 10/2014	10/2014	03321	11/17/2014				CASH - FRONT DRAWER			3054.39
JV 20141130-468 11/2014	11/2014	03338	12/16/2014				CASH - FRONT COUNTER			1467.58
JV 20151113-002 11/2015	11/2015	03672	11/13/2015				Unclaimed Prop J/E			235.96

REPORT DATE 11/16/2016  
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Kent County Water Authority  
general REVENUE LEDGER

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ACCOUNT NUMBER/DESCRIPTION	POST	JRNL.	TRANS	REF. NO.	DATE	NUMBER	VENDOR NUMBER	CHECK NUMBER	TRANSACTION DESCRIPTION	DEBIT	CREDIT	BALANCE
- - TRANSACTION - -												
JV 20151119-001	11/2015	03676	11/19/2015	02/2016	03769	02/29/2016			Correct Unclaimed Property GRAPHIC IMAGE INSPECTION 2 FORGE RD	3.9 .02		20.00
JV 20160229-003	02/2016	03769	02/29/2016	02/2016	03769	02/29/2016			SAMPLES CEDAR RIDGE CONDO		120.00	
JV 20160229-004	02/2016	03769	02/29/2016	02/2016	03769	02/29/2016			SAMPLES CEDAR RIDGE CONDO		300.00	
JV 20160229-005	02/2016	03769	02/29/2016	02/2016	03769	02/29/2016			RI INTERLOCAL DUMP TRUCK		965.20	
JV 20160229-006	02/2016	03769	02/29/2016	02/2016	03769	02/29/2016			SAMPLES 3323 SO COUNTY TR		150.00	
JV 20160229-007	02/2016	03769	02/29/2016	02/2016	03769	02/29/2016			BLUE CROSS - SILVA		194.44	
JV 20160229-008	02/2016	03769	02/29/2016	02/2016	03769	02/29/2016			WORKERS COMP DIVIDEND		8658.00	
JV 20160229-009	02/2016	03769	02/29/2016	02/2016	03769	02/29/2016			SAMPLES CEDAR RIDGE CONDO		300.00	
JV 20160229-010	02/2016	03769	02/29/2016	02/2016	03769	02/29/2016			SCRAP METAL		78.75	
JV 20160229-011	02/2016	03769	02/29/2016	02/2016	03769	02/29/2016			ACCT# 104297		50.00	
JV 20160229-012	02/2016	03769	02/29/2016	03/2016	03809	03/01/2016			INSPECTION FEE CORRECTION		4333.86	
JV 20160301-009	03/2016	03809	03/01/2016	03/2016	03809	03/01/2016			OTHER INC MARCH 2016		5539.62	
JV 20160301-012	03/2016	03809	03/01/2016	03/2016	03813	03/31/2016			OTHER INC PYMTS		1653.85	
JV 20160331-002	03/2016	03813	03/31/2016	04/2016	03837	04/30/2016			OTHER INC		1872.50	
JV 20160430-002	04/2016	03837	04/30/2016	05/2016	03872	05/31/2016			OTHER INC		8408.63	
JV 20160531-011	05/2016	03872	05/31/2016	06/2016	03898	06/30/2016			OTHER INC		12595.91	
JV 20160630-002	06/2016	03898	06/30/2016	07/2016	03927	07/31/2016			OTHER INCOME		3697.39	
JV 20160731-002	07/2016	03927	07/31/2016	08/2016	03983	09/01/2016			TOTAL JOURNAL VOUCHERS		1973844.61	
JV 20160831-021	08/2016	03983	09/01/2016	09/2016	04009	09/30/2016					9604.90	
JV 20160930-002												

TOTAL MISC. NON-OPER. INCOME

\* \* ACCOUNT TOTALS

9604.90

20000718.26

- - - - -

- 1991113.36

.00

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- 1991113.36

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TOTAL LEDGER BEGINNING BALANCE

TOTAL PERIOD TRANSACTIONS & ENDING BALANCE

9604.90

20000718.26

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- 1991113.36

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SUMMARY PAGE INFORMATION

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SUMMARY PAGE INFORMATION

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5. In Docket 4142, the Commission authorized a debt service funding level of \$3,932,319. In calendar year 2015, KCWA funded its debt service related accounts to a level of \$3,839,844 as follows:

Debt Service Savings 2004	\$1,116,000
Debt Service Savings 2012	544,344
Refunding Revenue Bonds 2012	<u>2,179,500</u>
Total	\$3,839,844

Please explain why there is a difference between the debt service allowance and the actual amount funded for calendar year 2015.

Response: Docket 4142 involved a quite narrow issue. With one exception, the authorized revenue requirements in that docket were based on Docket No. 3942, including the debt service authorized in Docket 4142 which was simply derived from the amount allowed in Docket 3942. In Docket 3942, the rate year debt service was based on Woodcock Sch. 1D which showed:

Sch. 1D  
Pg 2 of 4

#### EXPLANATION OF ADJUSTMENTS TO TEST YEAR COSTS

##### **Debt Service**

<u>2004 Series A (Refunded 1994 bonds)</u>	FY 2007	FY 2008	CY 2009 *
Principal	\$950,000	980,000	1,030,000
Interest	<u>\$303,500</u>	<u>274,700</u>	234,900
Total	\$1,253,500	\$1,254,700	\$1,264,900
<u>2001 Bonds (\$10 million)</u>			
Principal	\$380,000	\$395,000	\$430,000
Interest	<u>\$398,861</u>	<u>\$383,836</u>	<u>\$359,536</u>
Total	\$778,861	\$778,836	\$789,536
<u>2002 Bonds (\$24.39 million)</u>			
Principal	\$870,000	\$895,000	\$955,000
Interest	<u>\$999,583</u>	<u>\$973,108</u>	<u>\$922,883</u>
Total	<u>\$1,869,583</u>	<u>\$1,868,108</u>	<u>\$1,877,883</u>
Total Existing	\$3,901,944	\$3,901,644	\$3,932,319

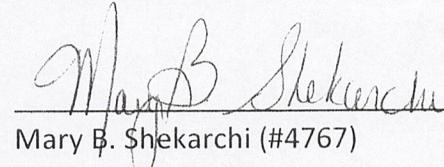
\* CY 2009 used for Rate Year

All of the bonds shown above in Docket 3942 have been refunded. As shown on Rebut.  
Sch. 1D in this docket (4611), the only bonds outstanding are the 2012 Series A bonds.

Witness Responsible: C. Woodcock

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4611

Respectfully submitted,

  
Mary B. Shekarchi

Mary B. Shekarchi (#4767)  
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Dated: November 18, 2016

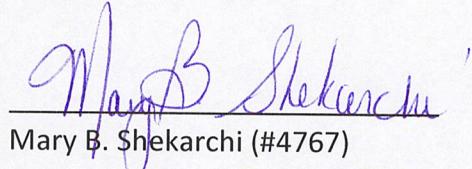
CERTIFICATION OF SERVICE

I hereby certify that on this 18<sup>th</sup> day of November, 2016, I sent a copy of within to the Parties listed on the attached service list.

  
MBS

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. 4611

Respectfully submitted,



Mary B. Shekarchi (#4767)  
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Dated: November 18, 2016

CERTIFICATION OF SERVICE

I hereby certify that on this 18<sup>th</sup> day of November, 2016, I sent a copy of within to the Parties listed on the attached service list.



**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan  
Service List 10/27/16**

Name/Address	E-mail Address	Phone
<b>Kent County Water Authority (KCWA)</b> Mary B. Shekarchi, Esq. 33 College hill Rd., Suite 15-E Warwick, RI 02886	<a href="mailto:marybali@aol.com">marybali@aol.com</a> ;	401-828-5030
Timothy Brown, P.E. General Manager Chief Engineer Kent County Water Authority PO Box 192 West Warwick, RI 02893-0192	<a href="mailto:tbrown@kentcountywater.org">tbrown@kentcountywater.org</a> ;	401-821-9300
Christopher Woodcock Woodcock & Associates, Inc. 18 Increase Ward Drive Northborough, MA 01532	<a href="mailto:chris@w-a.com">chris@w-a.com</a> ;	508-393-3337
<b>Division of Public Utilities &amp; Carriers (Division)</b> Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Lwold@riag.ri.gov">Lwold@riag.ri.gov</a> ; <a href="mailto:john.bell@dpuc.ri.gov">john.bell@dpuc.ri.gov</a> ; <a href="mailto:steve.scialabba@dpuc.ri.gov">steve.scialabba@dpuc.ri.gov</a> ; <a href="mailto:al.mancini@dpuc.ri.gov">al.mancini@dpuc.ri.gov</a> ; <a href="mailto:Sam.lapatin@dpuc.ri.gov">Sam.lapatin@dpuc.ri.gov</a> ; <a href="mailto:jmunoz@riag.ri.gov">jmunoz@riag.ri.gov</a> ; <a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a> ;	401-274-4400 Ext. 2218
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<b>City of Warwick</b> Peter D. Ruggiero, City Solicitor Ruggiero, Brochu & Petrarca 20 Centerville Road Warwick, RI 02886	<a href="mailto:peter@rubroc.com">peter@rubroc.com</a> ; <a href="mailto:maryann@rubroc.com">maryann@rubroc.com</a> ;	401-737-8700
<b>Coventry Fire District (CFD)</b> Arthur M. Read, Esq. Del Sesto & Read, Inc. 612 Greenwich Avenue Warwick, RI 02886	<a href="mailto:art@delamrlaw.com">art@delamrlaw.com</a> ;	401-340-1019
<b>Central Coventry Fire District (CCFD)</b> David M. D'Agostino, Esq. Nicholas Gorham, Esq. Gorham & Gorham, Inc. P.O. Box 46 25 Danielson Pike, Scituate, RI 02857	<a href="mailto:daviddagostino@gorhamlaw.com">daviddagostino@gorhamlaw.com</a> ;	401-647-1400

<b>Town of Coventry</b> Nicholas Gorham, Esq. Gorham & Gorham, Inc. P.O. Box 46 25 Danielson Pike, Scituate, RI 02857	<a href="mailto:nickgorham@gorhamlaw.com">nickgorham@gorhamlaw.com</a> ;	401-647-1400
<b>Original &amp; nine (9) copies file w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ; <a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ; <a href="mailto:Sharon.ColbyCamara@puc.ri.gov">Sharon.ColbyCamara@puc.ri.gov</a> ;	401-780-2107
Kathleen Crawley Water Resources Board	<a href="mailto:Kathleen.crawley@wrb.ri.gov">Kathleen.crawley@wrb.ri.gov</a> ;	401-222-6696