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November 2, 2017

Ms. Luly Massaro, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: *Providence Water Supply Board***  
***Docket 4618***

Dear Ms. Massaro:

Enclosed herewith please find an original and nine copies of the following documents:

1. Bristol County Water Authority's Objection To The Providence Water Supply Board's Request To Transfer Funds.
2. Bristol County Water Authority's First Set of Data Requests to the Providence Water Supply Board.

Please be advised that electronic copies of these documents have been sent to the service list.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf  
Enclosures

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

**IN RE: PROVIDENCE WATER SUPPLY BOARD                   :                   DOCKET No. 4618**

**THE BRISTOL COUNTY WATER AUTHORITY’S OBJECTION TO THE PROVIDENCE WATER SUPPLY  
BOARD’S REQUEST TO TRANSFER FUNDS**

On October 27, 2017 the Providence Water Supply Board (“Providence”) filed a request to transfer funds from its restricted Revenue Reserve Account to its operating fund. The Bristol County Water Authority (“BCWA”) objects to this request to the extent that it is considered a motion pursuant to Rule 1.15 of the Rule of Practice and Procedure for the Rhode Island Public Utilities Commission (“Commission”). The BCWA seeks time to issue data requests and examine Providence’s request beyond the ten days allowed for motions under Rule 1.15. The BCWA asks that the Commission, in consultation with the parties to Docket 4618, establish a procedural schedule that will allow an appropriate amount of time to issue data requests and examine Providence’s request.

WHEREFORE, the Bristol County Water Authority hereby objects to Providence’s requests and prays that the Commission grant the relief sought herein.

BRISTOL COUNTY WATER AUTHORITY  
By its attorney,



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**CERTIFICATION**

I hereby certify that on November 2, 2017, 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.

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

**IN RE: PROVIDENCE WATER SUPPLY BOARD:  
REQUEST TO TRANSFER FUNDS**

**DOCKET No. 4618**

**THE BRISTOL COUNTY WATER AUTHORITY'S FIRST SET OF DATA REQUESTS  
ISSUED TO THE PROVIDENCE WATER SUPPLY BOARD**

**BCWA 1-1:** Providence's exhibit NEP 1 only shows nine months of consumption data for FY 17. Please update this schedule with the full twelve months of consumption for FY 17.

**BCWA 1-2:** Ms. Parrillo's testimony on page 3, lines 5-6 indicates that the balance of the Restricted Revenue Reserve Account is \$4,669,372.94 as of August 31, 2017, and that the account is "fully funded as of August 31, 2017."

- a. Please explain what Ms. Parrillo means when she says the account is "fully funded."
- b. How did Ms. Parrillo arrive at the conclusion that the account was fully funded as of August 31, 2017?
- c. Please provide all calculations and reference all past orders Ms. Parrillo relied on to support her claim that the account was fully funded as of August 31, 2017.
- d. Has Providence continued to fund this account after August 31, 2017?
- e. If Providence has not continued to fund this account after August 31, 2017, what has Providence done with the money provided in rates to fund this account?

**BCWA 1-3:** Please provide schedules in the same format as NEP 12A – 12I as submitted in Providence's original filing in Docket 4618 that show actual numbers for FY17 and FY 18 to date for each of Providence's restricted accounts.

**BCWA 1-4:** On page 2 of her testimony, Ms. Parrillo indicates that the decline in consumption is an ongoing trend.

- a. Does Providence agree that the Commission set rates in Docket 4061 based on consumption figures for calendar year 2009? If not, why not?
- b. Does Providence agree that the total consumption for the calendar year 2009 was 25,760,032 hcf? If not, why not?
- c. Does Providence agree that new rates based on the consumption figures for calendar year 2009 in Docket 4061 became effective on April 27, 2010? If not, why not?
- d. Does Providence agree that the rates set in Docket 4061, based on calendar year 2009 consumption, were in place until the Commission set new rates in Docket 4571? If not, why not?
- e. Does Providence agree that new rates in Docket 4571 became effective on September 1, 2015? If not, why not?

- f. Based on the total consumption figures set forth in Exhibit NEP2, does Providence agree that in Fiscal Years 2011, 2012, 2014 and 2015 that total consumption exceeded the 25,760,032 hcf used to set rates in Docket 4061? If not, why not?
- g. Please explain what Providence did with the extra revenue collected in Fiscal Years 2011, 2012, 2014 and 2015.

**BCWA 1-5:** Please provide Providence's actual revenues and expenses for Fiscal Year 2017 in the same format used in HJS-1 (Cost of Service Summary) submitted with Providence's original rate application in Docket 4618.

**BCWA 1-6:** Please identify any expenditures that Providence was not able to make, or had to defer, in Fiscal Year 2017 as a result of the reduction in consumption identified in Ms. Parrillo's testimony.

THE BRISTOL COUNTY WATER AUTHORITY,  
By its attorney,



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### CERTIFICATION

I hereby certify that on November 2, 2017, 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.

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