Schacht & McElroy

Michael R. McElroy Leah J. Donaldson

Members of the Rhode Island and Massachusetts Bars

Attorneys at Law

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> (401) 351-4100 fax (401) 421-5696

August 3, 2016

Luly E. Massaro Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888

Re:

Block Island Power Company

Petition for Expedited/Emergency Rate Relief for Recovery of Engine Rental Costs

Docket No. 4635

Dear Luly:

As you know, this office represents Block Island Power Company (BIPCo).

Enclosed are an original and nine copies of BIPCo's Responses to the Commission's 1st Set of Data Requests.

Please note that due to the voluminous amount of pages attached to Response 1-2, each copy will only contain a summary of insurance. The full policy will be sent electronically.

However, at the request of Cynthia Wilson Frias, we have enclosed two complete copies of the insurance policy for the Clerk and for Commissioner DeSimone.

If you need any further information, please contact me.

Very truly yours

Michael R. McElroy

MRMc:tmg

cc:

Block Island Power Company

Service List

Docket No. 4635 – Block Island Power Co. – Request for Emergency Relief Service List as of 8/2/16

| Name/Address | Email | Phone |
|---|--|---------------------------|
| Michael McElroy, Esq. Schacht & McElroy PO Box 6721 | Michael@McElroyLawOffice.com; | 401-351-4100 |
| Providence RI 02940-6721 | | |
| David Bebyn B&E Consulting | dbebyn@beconsulting.biz; | 401-785-0800 |
| Christy Hetherington, Esq. Dept. of Attorney General | CHetherington@riag.ri.gov; | 401-274-4400 Ext. 2425 |
| 150 South Main St. Providence, RI 02903 | Jmunoz@riag.ri.gov; dmacrae@riag.ri.gov; | |
| Steve Scialabba Division of Public Utilities and Carriers | Steve.scialabba@dpuc.ri.gov; John.bell@dpuc.ri.gov; Al.contente@dpuc.ri.gov; | |
| Kathleen Merolla, Esq. | Pat.smith@dpuc.ri.gov; KAMLAW2344@aol.com; | |
| Nancy Dodge, Town Manager Town of New Shoreham | townmanager@new-shoreham.com; | 401-466-3219 |
| File an original & nine (9) copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888 | Luly.massaro@puc.ri.gov; Cynthia.WilsonFrias@puc.ri.gov; Alan.nault@puc.ri.gov; Todd.bianco@puc.ri.gov; | 401-780-2107 |
| Interested Persons | Toud.oraneo@puc.rr.gov, | |
| Huma McGhee | Huma.mcghee@biaero.com; | 908-626-0500 |
| Mike Delia & Maggie Delia | mikdelia@biaero.com; maggie@biaero.com; | 908-268-8116 |
| Nick Ucci, OER | Nicholas.Ucci@energy.ri.gov; | 401-574-9104 |
| Andrew Marcaccio, Esq., OER | Andrew.Marcaccio@doa.ri.gov; | 401-222-8880 |

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

IN RE: BLOCK ISLAND POWER COMPANY

PETITION FOR EXPEDITED/EMERGENCY : DOCKET No. 4635

RATE RELIEF :

BLOCK ISLAND POWER COMPANY'S RESPONSES TO THE COMMISSION'S FIRST SET OF DATA REQUESTS

1-1. Please provide calculations supporting the various per kWh charges presented on page 7 of Mr. Bebyn's testimony.

RESPONSE:

Please see the attached Schedule.

Prepared by: David G. Bebyn, CPA

| | Α | В | С | |
|--------------------|-------------|----------------------|-------------------|------------------|
| | | (A / .96) | | (B / C) |
| | Rental Cost | Rental cost with GRT | Prior year Useage | Surcharge |
| July | 33,145.71 | 34,526.79 | 1,774,745 | 0.0195 |
| August | 103,120.00 | 107,416.67 | 1,983,286 | 0.0542 |
| July & August | | 141,943.45 | 1,983,286 | 0.0716 |
| September | 103,120.00 | 107,416.67 | 1,223,161 | 0.0878 |
| July, Aug., & Sept | | 249,360.12 | 1,223,161 | 0.2039 0.1160 |
| Oct | 51,560.00 | 53,708.33 | 738,000 | 0.0728 |
| Nov | 51,560.00 | 53,708.33 | 606,000 | 0.0886 |
| Dec | 51,560.00 | 53,708.33 | 594,000 | 0.0904 |
| Jan | 51,560.00 | 53,708.33 | 615,000 | 0.0873 |
| Feb | 51,560.00 | 53,708.33 | 538,000 | 0.0998 |
| March | 51,560.00 | 53,708.33 | 594,003 | 0.0904 |

| 1-2. | Please provide trucks. | а сору | of the | insurance | policies | covering | the | engines, | transformer, | and |
|---------|------------------------|-----------|---------|-----------|----------|----------|-----|----------|--------------|-----|
| RESPO | ONSE: | | | | | | | | | |
| See att | ached. | | | | | | | | | |
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| Prepar | ed by: Albert Ca | asazza, I | Preside | nt | | | | | | |

For **Block Island Power Company** David Milner c/o B&E Consult 21 Dryden Lane Providence, RI 02904 401-466-5851 Commercial Application Travelers Indemnity Co of CT P6300696L335TCT14 08/01/16 08/01/17 Dan prosty Travelers Indomnily Co of CT DESCRIPCIÓN SECUCIÓN DESCRIPCIÓN DESCRIPCIÓN DE SECUCIÓN DE SECUCI 00304340 00/04/47 Policy Level Information Premise 1 Building 1 Ocean Avenue Block Island, RI 02807 BUILDING -300,000 Coins % 90 Valuation RC Cause of Loss **SPECIAL** Deductible 5000 BUS PERS PROP -75,000 Coins % 90 Valuation RC Cause of Loss **SPECIAL** Deductible 5000 WINDSTRM/HAIL -Forms # 2% OR \$50K Additional Coverages, Options, Restrictions, Endorsements, and Rating Information Bldg & BPP limits are specific. Wind/Hall Ded 2% subject to a min of %50K at each premise; Deluxe Prop Covg Form. Electronic Vandalism Limitation ENdt \$10K; Premise 1 Building 2 Ocean Avenue Block Island, RI 02807 BUILDING -200,000 Coins % 90 Valuation RC Cause of Loss SPECIAL Deductible 5000 BUS PERS PROP -2,000,000 Coins % 90 Valuation RC Cause of Loss **SPECIAL** Deductible 5000

For **Block Island Power Company David Milner** c/o B&E Consult 21 Dryden Lane Providence, RI 02904 401-466-5851 Property (Continued) WINDSTRM/HAIL -Forms # 2% OR \$50K Premise 1 Building 3 Ocean Avenue Block Island, RI 02807 BUILDING -275,000 Coins % 90 Valuation RC Cause of Loss SPECIAL Deductible 5000 BUS PERS PROP -2,600,000 Coins % 90 Valuation RC Cause of Loss SPECIAL Deductible 5000 WINDSTRM/HAIL -Forms # 2% OR \$50K Premise 1 Building 4 Ocean Avenue Block Island, RI 02807 BUILDING -180,000 Coins % 90 Valuation Cause of Loss **SPECIAL** Deductible 5000 BUS PERS PROP -10,000 Coins % 90 Valuation RC Cause of Loss **SPECIAL** Deductible 5000 WINDSTRM/HAIL -Forms # 2% OR \$50K

Block Island Power Company David Milner c/o B&E Consult 21 Dryden Lane Providence, RI 02904 401-466-5851 Egyérage Amount Carrigany 1991 Property (Continued) Premise 1 Building 5 Ocean Avenue Block Island, RI 02807 BUILDING -500,000 Coins % 90 Valuation RC Cause of Loss **SPECIAL** Deductible 5000 BUS PERS PROP -50,000 Coins % 90 Valuation RC Cause of Loss SPECIAL Deductible 5000 WINDSTRM/HAIL -Forms # 2% OR \$50K Premise 1 Building 6 Ocean Avenue Block Island, RI 02807 BUILDING -1,000,000 Coins % Valuation RC Cause of Loss SPECIAL Deductible 5000 WINDSTRM/HAIL -Forms # 2% OR \$50K Premise 1 Building 7 Ocean Avenue Block Island, RI 02807 TOWER -525,000 Valuation RC Deductible 5000 WINDSTRM/HAIL -Forms # 2% OR \$50K

Block Island Power Company David Milner c/o B&E Consult 21 Dryden Lane Providence, RI 02904 401-466-5851 Property (Continued) Additional Coverages, Options, Restrictions, Endorsements, and Rating Information 250 Feet Communications Tower that is fonced & locked General Liability Travelers Indemnity Co of CT P6300696L335TCT14 08/01/16 08/01/17 Occurrence General Aggregate 2,000,000 Products/Completed Oper. Aggr. 2,000,000 Personal & Advertising Injury 1,000,000 Each Occurrence 1,000,000 Damage to Rented Premises 100,000 Medical Expense (Any One Person) 5,888 Other Coverages, Restrictions, And/Or Endorsements Bikt Addi Ins(CG D2 48)Contractors; Manufacturers & Wholsalers Xtend Endt(CG D1 87) Includes form DXT3421009 (EDP coverage) **Equipment Floater** Travelers Indemnity Co of CT P6300696L335TCT14 08/01/16 08/01/17 Coverage/Deductible Scheduled Equipment=\$15K Plus Tower at \$525,000 \$1K, except \$5k for Tower, except 2% Wind at Tower or \$50k min. **Electronic Data Processing** Travelers Indemnity Co of CT P6300696L335TCT14 08/01/16 08/01/17 Location 1 Building 1 Equipment (HDW) Owned 50,000 Deductible 1000 Media/Data 50,000 Deductible 1000 Additional Coverages **Business Auto** Arbella Protection InsuranceCo 1020057494 08/01/16 08/01/17 Liability

| SUNIVIARY OF INSURANCE Prepared 8/2/2016 For Block Island Power Company David Milner c/o B&E Consult 21 Dryden Lane Providence, RI 02904 401-466-5851 | | | | | | |
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| Business Auto (Continued) | | | | | | |
| CSL Medical Payments Ea Per Uninsured Motorists CSL Underinsured Motorists CSL Endorsements, Forms, Conditions. UMBI \$1mm w/\$25L UMPD; Auto Ext | 1,000,000 5,000 1,000,000 1,000,000 | | | | | |
| * See Attached Vehicle Schedule | | | | | | |
| Umbrella | | Travelers Property Casualty Co | PSM-CUP-5335L659-TIL- | 08/01/16 | 08/01/17 | |
| Liability Limit Each Occurrence Aggregate Retained Limit | 5,000,000 5,000,000 10,000 | | | | | |
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From:Lori Lyle FaxID:Carey Richmond Vikin Date:8/2/2016 02:30 PM Page: 7 of 7

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| 3 | 1995 | Ford | 800 | 11FDNF80C05VA35586 | Block Island, RI 02807 | 21499 | 31,000 29,000 | X X | | × | Х | | | |
| | 1994 | Altec | Digger | 1FDXK74CRVA38512 | Block Island, RI 02807 | 31499 | 70,500 | X | | X | X | | | |
| 5 | 2008 | Ford | F550 | 1FDAF57R68EB07682 | Block Island Power, RI 02807 | 21499 | 83,781 | X | | X | X | | | |
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| 6 | 1978 | Frushauf | Tanker 10K | UNZ594503 | Block Island Power, RI 02807 | 68499 | 20,000 | x | | x | x | Specified | 500 | |
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1-3. Please provide the make, model, and age of each generating unit that was damaged. Is there any remaining warranty on either unit?

RESPONSE:

All Caterpillar engines:

| Engine # | Serial # | | |
|----------|----------|---------|---------------|
| #22 | 8RM00379 | 1340 KW | 18 years old* |
| #23 | INW00134 | 1180 KW | 16 years old |
| #26 | SCJ00113 | 1850 KW | 5 years old |

^{*} but generator is less than 1 year old.

There was no remaining warranty on any of the damaged engines.

Prepared by: Albert Casazza, President

1-4. Please indicate when each damaged generating unit was put into rate base and the remaining number of years of depreciation.

RESPONSE:

Below is the book value on the engines.

| Engine #22 | \$ 62,000 |
|------------|-----------|
| Engine #23 | \$ 94,000 |
| Engine #24 | \$ 91,000 |
| Engine #25 | \$203,000 |
| Engine #26 | \$481,440 |

Prepared by: David G. Bebyn, CPA

1-5. Please indicate how the generating units are financed, the number of years remaining and the annual payment.

RESPONSE:

Engine #22, #23, and #24 were part of the main 2000 RUS \$3,420,000 loan (Draws 1 through 6), which was taken out over several years. The loan matures on December 31, 2024. That 2000 RUS loan covered about 65% for engines and SCRs and the remaining 35% was for substation work. The current debt payment for Draws 1 through 6 is about \$63,000 per quarter, so the engine portion of that would be about \$41,000 per quarter.

Engine #25 was purchased with a separate RUS \$600,000 loan (Draw 7). The loan matures on December 31, 2031. The debt payment for this is about \$11,000 per quarter.

Engine #26 was purchased with a \$566,400 note from Caterpillar, Inc. The terms should be \$20,000 per month for June, July, August, and September, then it drops to \$4,000 per month for the remaining months. However, they have only had us pay \$4,000 per month for the past year. There are about 6 ½ years remaining on the loan.

Prepared by: David G. Bebyn, CPA and Albert Casazza, President

1-6. When was the last time the generating unit that threw a piston inspected and/or repaired?

RESPONSE:

Engine #22 was serviced about 1 month prior to the failure (a 500 hour service – oil change and filters). When running, every engine is inspected and logged every day, every hour, from 7 a.m. to 1 a.m. by BIPCo personnel.

Prepared by: Albert Casazza, President

Respectfully submitted,

BLOCK ISLAND POWER COMPANY

By its attorney

Dated: August 3, 2016

Michael R. McElroy, Esq. #2627

Leah J. Donaldson, Esq. #77

Schacht & McElroy

21 Dryden Lane P.O. Box 6721

Providence, RI 02940-6721

Tel: (401) 351-4100 Fax: (401) 421-5696

<u>Michael@McElroyLawOffice.com</u> <u>Leah@McElroyLawOffice.com</u>

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of August, 2016, I sent a copy of the foregoing to the following to the attached service list from Docket No. 4606.

Theresa Gallo