

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

**In Re: SUEZ Water Rhode Island, Inc.
Application to Change Rates**

Docket No. 4800

**Motion to Intervene by The Town of Narragansett, Rhode Island
RULE 1.13**

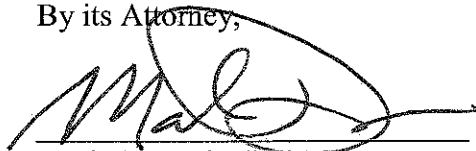
Now comes the Town of Narragansett ("Narragansett"), a Rhode Island Municipal Corporation, pursuant to Rule 1.13 of the Public Utilities Commission Rules of Practice and Procedure and hereby files its request to intervene in the above-captioned matter. In support, Narragansett states as follows:

1. Applicant SUEZ Water Rhode Island, Inc. (applicant) is a public utility corporation providing utility service to the residents and taxpayers of Narragansett as well as ratepayers located elsewhere in the State of Rhode Island.
2. Narragansett purchases 70% of the water used in the North End Water system and 100% of the water used in the Point Judith Water system wholesale from applicant.
3. Applicant directly bills Narragansett for over 300 fire hydrants within the Town that are owned and operated by the Applicant.
4. Applicant's proposed rate increases would have a detrimental effect on Narragansett as well as the town's taxpayers. As the purchaser of water from applicant in the area where the proposed rate increases will occur, Narragansett has "an interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding." (Rule 1.13(b)(2)) Narragansett is also concerned with the necessary increase in rates that would need to be charged to its citizens and the potential deficit in the town budget that would be caused by the proposed rate increases. Accordingly, Narragansett has "[an]other interest of such a nature that [its] participation" in

the proceedings before the Commission are “in the public interest.” (Rule 1.13(b)(3))

5. Therefore, Narragansett would be directly harmed by the proposed rate increases and the citizens of Narragansett would be burdened by the increased price of water and the potential deficit that would be created in Narragansett’s budget.
6. In conclusion, Narragansett believes that its intervention is both as of right and in the public interest, as protective of the interests of the Town, its taxpayers, and its residents.

Respectfully submitted,
The Town of Narragansett,
By its Attorney,



Mark A. Davis, # 5016
Town Solicitor
Martineau Davis & Associates, PC
2639 South County Trail
East Greenwich, RI 02818
T – (401) 398-8333
F – (401) 398-8334
E - mdavis@mdalegal.com

Dated: 3-8-18

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the within was emailed to the following on this 8th day of March, 2018.

Luly Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888
Email: luly.massaro@puc.ri.gov

Gary S. Prettyman
SUEZ Water Management & Services Inc.
461 From Road – Suite 400
Paramus, NJ 07652
Email: gary.prettyman@suez-na.com

Christy L. Hetherington, Esq.
Office of the Attorney General
150 South Main Street
Providence, RI 02903
Email: chetherington@riag.ri.gov

Brain T. Fitzgerald, Esq.
Cullen and Dykman, LLP
99 Washington Avenue – Suite 2020
Albany, NY 12210
Email: bfitzgerald@cullenanddykman.com