

SUEZ WATER RHODE ISLAND, INC.
Docket No. 4800
First Set of Data Requests of the
Division of Public Utilities and Carriers
February 9, 2018

1-1
(Jacobs)

1-1 Please provide the average daily, maximum day, and maximum hour demands of the wholesale class and each wholesale customer for the last three years.

Response: Max Day and hourly consumption data is not available. Provided monthly as alternative

Total

-Maximum Month consumption last 3 years.

2015 MMD = 49,429,311 gals

2016 MMD = 54,963,247 gals

2017 MMD = 49,910,887 gals

-Average day consumption last 3 years

2015 ADD = 944,373 gals

2016 ADD = 970,183 gals

2017 ADD = 885,970 gals

South Kingstown

-Maximum daily consumption last 3 years.

2015 MMD = 22413920 gals

2016 MMD = 23675096 gals

2017 MMD = 22413920 gals

-Average day consumption last 3 years

2015 ADD = 381557 gals

2016 ADD = 394148 gals

2017 ADD = 381557 gals

Narragansett

-Maximum daily consumption last 3 years.

2015 MMD = 30123247 gals

2016 MMD = 32353951 gals

2017 MDD = 27496967 gals

-Average day consumption last 3 years

2015 AMD = 562815 gals

2016 AMD = 576034 gals

2017 AMD = 504412 gals

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1-2
(Jacobs)

1-2 Please provide the average daily, maximum day, and maximum hour system-wide demands in each of the last three years.

Response:

-Maximum daily consumption that has occurred within the last 3 years.

2015 MDD = 5.90 MGD

2016 MDD = 5.52 MGD

2017 MDD = 5.57 MGD

-Average day consumption last year

2015 ADD = 2.83 MGD

2016 ADD = 2.86 MGD

2017 ADD = 2.60 MGD

- Maximum Hour consumption last year

2015 MH = 4,400gpm

2016 MH = 4,670gpm

2017 MH = 4,450gpm

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1-3
(Jacobs)

1-3 For each wholesale customer, explain whether Suez is the sole source of supply or whether the customer uses other sources of supply.

Response: SUEZ Water Rhode Island is the sole source supplier for our two wholesale customers, South Kingstown and Narragansett.

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1-4
(Gil)

1-4 Please provide the monthly sales of each retail customer class and wholesale customer for the last three years in Excel format.

Response: Please refer to the response to DIV 2-1, Exh 2 SWRI 2018 Revenues, tab MFR 2h Consumption and Meters pages 10-12

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1-5
(Fox)

1-5 Please identify what Mr. Fox would consider to be reasonable weekly adjustment factors for the residential and non-residential customer classes served by SUEZ (per Appendix A, page 326 of the AWWA Manual M1).

Response: To the extent the question is referring to the term “weekly usage adjustment” as used on page 377 of the 7th and most current edition of the M-1 Manual, we did not perform the calculations described in that section of the manual and are therefore not in a position to suggest an appropriate “weekly adjustment factor”. It should also be noted that the methodology described in Appendix A of the M-1 Manual is dependent upon the availability of monthly billing data and is therefore not relevant in this situation since SUEZ does not yet bill monthly and does not have monthly billing data.

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1-6
(Fox)

1-6 Please provide a copy of Mr. Fox's cost of service study and rate design proposals in Excel format with all formulas intact.

Response: Please see Excel attachment 'Raftelis SUEZ Rate Filing 2018_FILED'.

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1-7
(Fox)

1-7 Reference DMF (Raftelis) Sch. 2A. Please identify the basis for selecting the fire protection maximum day and maximum hour factors identified in footnote [2].

Response: The maximum required fire demand according to ISO is 3500 gallons. A six hour fire at this rate was assumed to be reasonable. At the time of our filing and my cost of service study, the Company did not have a recent ISO report for its service area, and such this estimate was assumed. This methodology was also used and agreed to in the Company's settlement of Docket 4255. For purposes of recreating this calculation, the maximum day demands were calculated by multiplying 3,500 gallons by 60 minutes by 6 hours, while the peak hour demands were calculated by multiplying 3,500 gallons by 60 minutes by 24 hours.

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1-8
(Gil)

1-8 Please provide unbilled water for FY 2017.

Response: Per income statement for the 12 months ended 12/31/2017 the unbilled water is
\$61,511.00

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1-9
(Fox)

1-9 Reference DMF (Raftelis) Sch. 3B. Please explain why Uncollectible Accounts are allocated entirely to Customer Service.

Response: In my opinion, this is a reasonable way to allocate Customer Service costs, in order to ensure that the costs associated with Uncollectible Accounts are distributed amongst all customer classes, rather than allocating solely based on flows which would limit the allocation of these costs to certain classes. Also, Uncollectible Accounts were allocated entirely to Customer Service in the Company's most recent prior filing that included a cost of service analysis (Docket 4255), so this approach was continued in order to maintain consistency.

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1-10
(Jacobs)

1-10 Please identify the capacity of the Company's water storage facilities (distribution reservoirs and standpipes).

Response:

Distribution System Tanks

Boston Neck Tank – 300,000 gals

Tower Hill Tank -1,000,000 gals

Sherman Tank – 500,000 gals (soon to be 1,000,000 gals when new tank is completed, approximately June 2018)

Clear Well Storage Tanks

Howland Tank – 250,000 gals

Tuckertown – 1,000,000 gals

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1-11
(Fox)

1-11 Reference DMF (Raftelis) Sch. 11:

- (a) Please demonstrate that residential usage of over 8 Ccf/month reflects usage during peak hours; and
- (b) Please explain why a peak hour second block is not appropriate for non-residential and sales for resale customers.

Response:

- (a) DMF (Raftelis) Sch.11 neither states nor implies that 8 Ccf per month reflects usage during peak hours and we are not able to demonstrate that it does.
- (b) The Non-Residential class of customers is such a non-homogenous group with regard to volumes of water consumption it would be impossible to determine an appropriate tier cutoff which would apply universally to all customers with any sense of fairness.

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1-12
(Jacobs)

1-12 Please explain the nature of the metering arrangements for private fire services.

Response: Fire services are not metered. Private fire services are billed either quarterly or semiannually in accordance with the rate schedule found on sheet 22 of our current tariff.

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1-13
(Jacobs)

1-13 Please explain the nature of the billing arrangements for public and private fire.

Response: Billing for all public and private fire is on a quarterly basis in accordance with the rate schedule found on page 22 of the Company's current tariff. One exception to this is the Town of Narragansett who the Company bills semiannually. Please note however that the Company is proposing in this case to go to monthly billing for all customers.

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1-14
(Fox)

1-14 Please provide a breakdown of meter investment by meter size and, if available, by cost of service study class.

Response: It is my understanding that the information necessary to provide the requested breakdown of meter investment is not available.

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1-15
(Jacobs)

1-15 Please provide the current average or typical cost of purchasing and installing each size meter.

Response:

Meter size	Meter Cost	Labor and Transport	Total cost per meter installed
5/8"	\$ 59.54	\$ 53.05	\$ 112.59
1 1/2"	\$ 254.84	\$ 53.05	\$ 307.89
2"	\$ 335.59	\$ 53.05	\$ 388.64

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1-16
(Fox)

1-16 Please explain why sales for resale customers are not assigned peak hour extra capacity costs.

Response: The Towns do not peak hourly off of the Company's system, but rather have their own storage to handle these peak hourly demands, therefore no peak hour costs should be allocated to Resale customers.

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1-17
(Jacobs)

1-17 Please provide all studies, documents, and analysis examining the causes of UFW on SUEZ's system.

Response: Please see MFR Item 2.8 (v) for the Company's unaccounted for water levels for the last five years. Given the low amount of UFW, the Company does not feel it is necessary to perform a special study or analysis.

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CONFIDENTIAL

1-18
(Jacobs)

1-18 Please provide a large-scale map of SUEZ's water utility facilities showing treatment plants, major transmission lines, large customers, sales for resale customers, etc.

Response: The Company considers system distribution maps to be confidential for security reasons. As such, based upon signed Non-Disclosure Agreement, one large scale map is being sent to Division consultant, Jerry Mierzwa, and one to the Commission Clerk.

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1-19
(Gil)

1-19 Does SUEZ provide free water service to any customer class? If yes, please identify the customer classes and the annual volumes.

Response: The Company does not provide free water service to any customer class.

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1-20
(Prettyman)

1-20 What is the Company's proposal with respect to the scale back of rates in the event that the Commission authorizes an increase which is less than the requested increase?

Response: During the course of a rate case there are many factors that may change how the Company and the Parties may ultimately design rates and therefore it is premature to suggest exactly how the Company would propose rates if the Commission were to grant a less than requested rate increase. However, generally the Company would most likely propose that the fixed service charges remain as-filed while consumption charges would change to reflect the overall difference in keeping with cost of service.