

May 13, 2019

Via E-mail/Federal Express Delivery

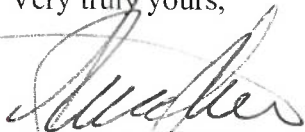
Ms. Luly Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

In re: Woonsocket Water Division – Docket No. 4879 – Rate Filing

Dear Luly:

On behalf of the Woonsocket Water Division (“WWD”), enclosed please find an original and nine (9) copies of WWD’s Response to the Public Utilities Commission’s Second Set of Data Requests.

Very truly yours,



ALAN M. SHOER
ashoer@apslaw.com

Enclosure

cc: Service List

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

**In re: City of Woonsocket Water Division
- Application to Implement Multi-
Year Rate Plan**

Docket No. 4879

**CITY OF WOONSOCKET WATER DIVISION'S ("WWD")
RESPONSE TO THE COMMISSION'S SECOND SET OF DATA REQUESTS
(Issued May 9, 2019)**

2-1:	Please resubmit Joint Settlement Schedule 1.0. The resubmission should break the "Summary of Adjustments Column" into two (2) columns. The first column should be adjustments resulting from the transfer of treatment plant operations to Suez. The second column should be adjustments relating to items/expenses remaining with Woonsocket Water.
WWD Response 2-1:	Please see Exhibit 2-1 .
Respondent:	David Bebyn, CPA
Date:	May 13, 2019

CITY OF WOONSOCKET, WATER DIVISION
By its Attorneys,

/s/ Alan M. Shoer
Alan M. Shoer, Esq. (#3248)
Nicole M. Verdi, Esq. (#9370)
Adler Pollock & Sheehan, P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903-1345
Tel: 401-274-7200
Fax: 401-351-4607
Dated: May 13, 2019

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2019 I delivered a true copy of the foregoing response to the **Commission's SECOND Set of Data Requests** via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

EXHIBIT 2-1

ACCT. #	BUDGET ACCOUNT DESCRIPTION	ADJUSTED TEST YEAR	Adjustments Related to DBO Contract	Remaining Adjustments	RATE YEAR 12/31/19	Adjustment as percent of Test Year	Adjustment Supporting Schedule
EXPENSES							
<i>Personnel Expense</i>							
51110	Permanent Services	\$ 1,388,854	\$ (482,713)	\$ 36,454	\$ 942,595	-32%	DGB-RY-3
51122	Temporary Labor	20,173			20,173		
51141	Overtime Pay	200,286	(125,179)	-	75,107	-63%	DGB-RY-3
51144	Out of Class	367			367		
51145	Longevity Pay	53,989	(16,959)	(287)	36,743	-32%	DGB-RY-3
51146	Medical Buy Back	15,756	(6,756)		9,000	-43%	DGB-RY-3
51147	Sick Leave Reimbursement	1,920			1,920		
51149	Shift Differential	9,262	(4,631)		4,631	-50%	DGB-RY-3
51153	Non-sick/Injury Bonus	1,080			1,080		
51155	Bonus for Course	17,439	(7,124)		10,315	-41%	DGB-RY-3
51160	Retirement	535			535		
<i>Total Personnel Expenses</i>		1,709,661	(643,362)	36,167	1,102,465		
<i>Maintenance & Servicing Expenses</i>							
52211	Postage	16,135			16,135		
52212	Telephone	30,734			30,734		
52213	Dues & Subscriptions	2,726			2,726		
52214	Advertising	3,631			3,631		
52216	Travel Out of City	184			184		
52219	Educational Training	8,585	(4,292)		4,292	-50%	DGB-RY-3
52221	Printing & Reproducing	20,937			20,937		
52231	General Maint. & Upkeep	40,496	(40,496)		(0)	-100%	DGB-RY-3
52234	Vehicle & Outside Equip. Upkeep	34,489			34,489		
52236	Maintenance - Office Equipment	116			116		
52238	Maintenance - Roads & Walks	42,982			42,982		
52239	Computer Software	4,653			4,653		
52244	Land Rental Charges	2,862			2,862		
52249	Other Rentals	17,926			17,926		
52251	Heating	7,061			7,061		
52252	Light & Power	374,530		(39,261)	335,269	-10%	Joint Settlement Schedule-1.1
52255	Property & Fire Taxes	169,237		5,614	174,851	3%	LKM-3
52256	Sewer Assessment	83,899		(83,899)	0	-100%	DGB-RY-3
52258	State Pollution Monitoring Program	21,477			21,477		
52260	Regulatory Assessments	59,724		5,526	65,250	9%	DGB-RY-3
52261	Conservation Services	-			-		
52266	Police Details	1,263			1,263		
52281	Other Independent Service	51,656			51,656		
52282	Audit Service	3,750			3,750		
52283	Legal Service	6,148			6,148		
52289	Medical Examinations	-			-		
52290	Engineering Service	825			825		
<i>Total Maintenance & Servicing Expenses</i>		1,006,026	(44,788)	(112,020)	849,218		
<i>Operating Supplies & Expenses</i>							
53311	Office Supplies	2,699			2,699		
53321	Gas & Diesel	22,611			22,611		
53322	Tires & Batteries	2,506			2,506		
53336	Chemicals - Water Supply	-			-		
	Plant Operating Contract existing		1,941,000		1,941,000	100%	DGB-RY-3
	Plant Operating Contract (Chem Crdt)		(145,717)		(145,717)	100%	DGB-RY-3
53344	Tools & Implements	2,484			2,484		
53346	Cleaning & Housekeeping Supplies	1,563			1,563		
53349	Other Supplies	39,261	(19,631)		19,631	-50%	DGB-RY-3
53351	Lab Supplies	30,129	(30,129)		(0)	-100%	DGB-RY-3
53363	Clothing & Footware	6,082	(3,041)		3,041	-50%	DGB-RY-3
53366	Drug & Medical Supplies	402			402		
53369	Clothing Allowance	4,091	(2,046)		2,046	-50%	DGB-RY-3
<i>Total Operating Supplies & Expenses</i>		111,828	1,740,436	-	1,852,265		
<i>General Expenses</i>							
54413	Fiscal Certification	7,750			7,750		
54433	Pensions	178,142	(53,815)	(18,853)	105,474	-41%	LKM-3
54434	FICA Employer Cost	130,789	(49,144)	2,694	84,339	-36%	DGB-RY-3
54446	City Service Charges	372,060		(49,291)	322,769	-13%	Joint Settlement Schedule-1.1
54451	Insurance - Vehicles & Equipment	75,501			75,501		

ACCT. #	BUDGET ACCOUNT DESCRIPTION	ADJUSTED TEST YEAR	Adjustments Related to DBO Contract	Remaining Adjustments	RATE YEAR 12/31/19	Adjustment as percent of Test Year	Adjustment Supporting Schedule
54452	Insurance - Workmen's Comp	131,800	(50,084)		81,716	-38%	DGB-RY-3
54453	Insurance - Liability	122,819		(998)	121,821	-1%	DGB-RY-3
54456	Insurance - Group Life	13,787		549	14,336	4%	DGB-RY-3
54471	Health Insurance	533,637	(126,755)	34,829	441,711	-17%	LKM-3
54472	Dental Insurance	27,860	(9,554)	1,057	19,363	-30%	LKM-3
54493	Bad Debt Exp	-			-		
<i>Total General Expenses</i>		1,594,145	(289,352)	(30,013)	1,274,780		
<i>Restricted Account Expenses</i>							
53336	Chemicals - Water Supply	396,000	(396,000)		-	-100%	DGB-RY-3
54417	Operating Reserve	63,180		17,100	80,280	27%	DGB-RY-3
54463	Infrastructure Replacement	1,700,000		(365,000)	1,335,000	-21%	DGB-RY-3
54464	Rate Case Expense (Unrestricted)	65,864		(35,864)	30,000	-54%	LKM-3
54467	Debt Service Reimbursement	1,600,000		365,000	1,965,000	23%	DGB-RY-3
54473	Renewal & Replace Fund	120,000			120,000		DGB-RY-3
<i>Total Other Miscellaneous Expenses</i>		3,945,044	(396,000)	(18,764)	3,530,280		
TOTAL EXPENSES		\$ 8,366,703	\$ 366,934	\$ (124,630)	\$ 8,609,008		
<i>Miscellaneous Revenue</i>							
41030	Service & Extensions	121,513		1,610	123,123	1%	LKM-3
41035	Repairs	-			-		
41040	Miscellaneous Income	34,625		4,031	38,656	12%	LKM-3
41070	Water Surcharge	21,170			21,170		
42310	Interest on Bills	106,652		3,421	110,073	3%	LKM-3
42320	Interest on Investments	28,830			28,830		
	Interest on Restricted Accounts	-			-		
		312,790	-	9,062	321,852		
Revenue Requirement		\$ 8,053,913	\$ 366,934	\$ (133,692)	\$ 8,287,155		