



February 10, 2022

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

The Hon. Jorge O. Elorza
Mayor
Ricky Caruolo
General Manager

RE: Dk 4994; New Cost of Service Study Data Requests

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Legal Advisor

Dear Mrs. Massaro:

Enclosed, please find Providence Water's response to the first (1st) set of data requests from the Public Utilities Commission.

Thank you for your attention to this matter.

Sincerely,

Mary L. Deignan-White

Mary L. Deignan-White
Division Manager-Finance

cc: service list(via email)

MEMBER

Rhode Island Water Works Assn.
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PROVIDENCE WATER SUPPLY BOARD
RIPUC DK. 4994
Public Utilities Commission Set 1
NEW COST OF SERVICE STUDY

(Issued February 10, 2022)

- 1-1. On page 6 of his Rebuttal Testimony, Mr. Smith references an email between Attorneys Keough and McElroy regarding the use of hydraulic modeling. Please provide the complete email chain.

Response: See attached email chain between Attorneys Keough and McElroy.



Mike McElroy <mcelroymik@gmail.com>

Providence Water Docket 4994

1 message

Joseph A. Keough Jr, Esq <jkeoughjr@keoughsweeney.com>

Wed, Sep 23, 2020 at 10:45 AM

To: "Michael@McElroyLawOffice.com" <Michael@mcelroylawoffice.com>

Cc: "Wold, Leo (DPUC)" <Leo.Wold@dpuc.ri.gov>, "marybali@aol.com" <marybali@aol.com>,

"mmarcello@cityofeastprov.com" <mmarcello@cityofeastprov.com>, "tbliss@timblisslaw.com" <tbliss@timblisslaw.com>

Mike

Please see the attached and feel free to contact me if you have any questions. Thanks.

Joseph A. Keough Jr., Esquire

Keough + Sweeney, Ltd.

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 **McElroy 09-23-20 (00278981xBDDFF).pdf**
53K

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September 23, 2020

*Via Email and
First Class Mail*

Michael McElroy, Esq.
McElroy & Donaldson
PO Box 6721
Providence, RI 02940-6721

Re: Providence Water Supply Board – Docket 4994

Dear Attorney McElroy:

I am writing in follow-up to the August 18, 2020 decision by the Rhode Island Public Utilities Commission (“PUC”) in the above captioned matter. As you know, the PUC ordered that the Providence Water Supply Board (“Providence”) submit a new allocated Cost of Service Study by February 18, 2021.

During the hearing, Mr. Smith indicated that a new cost of service study would require cooperation of the parties, and in response to a PUC data request, Providence indicated a new study would require input from all stakeholders. To that end, please let me know if there is any information you need from the Bristol County Water Authority (“BCWA”).

In addition, during the litigation of this Docket, Providence took the position that it needed to study a number of issues to properly calculate individual wholesale rates. One of the issues Providence sought to study was the way each wholesale customer uses individual assets such as reservoirs, pump stations and transmission mains. To that end, if Providence plans to assign usage of transmission facilities to each wholesale customer, the BCWA requests that Providence run a hydraulic model. This hydraulic model could be run for average day and peak day and should be able to determine the percentage capacity of each storage tank, pump station, and section of transmission main attributable to each wholesale customer. Please let me know if Providence will agree to run such a model.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joseph A. Keough, Jr.", written in dark ink.

Joseph A. Keough, Jr.

cc: Leo Wold, Esquire (via email)
Mary B. Shekarchi, Esquire (via email)
Michael J. Marcello, Esquire (via email)
Timothy M. Bliss, Esquire (via email)



Mike McElroy <mcelroymik@gmail.com>

Re: Providence Water Docket 4994

1 message

Michael McElroy <Michael@mcelroylawoffice.com>

Fri, Sep 25, 2020 at 12:58 PM

To: "Joseph A. Keough Jr, Esq" <jkeoughjr@keoughsweeney.com>

Cc: "Wold, Leo (DPUC)" <Leo.Wold@dpuc.ri.gov>, "marybali@aol.com" <marybali@aol.com>,
"mmarcello@cityofeastprov.com" <mmarcello@cityofeastprov.com>, "tbliss@timblisslaw.com" <tbliss@timblisslaw.com>

Bcc: Ricky Caruolo <rcaruolo@provwater.com>, Gregg Giasson <ggiasson@provwater.com>, Leah Donaldson <leah@mcelroylawoffice.com>, Nancy Parrillo <NParrillo@provwater.com>, mary deignan-white <mdeignan-white@provwater.com>, Collin Drat <cdrat@raftelis.com>, harold smith <hsmith@raftelis.com>, Alicia Mignanelli <amignanelli@provwater.com>, Peter Palozzi <PETERP@provwater.com>

Joe:

Providence Water will be seeking input for the wholesale rate study from all stakeholders, including BCWA.

Also, as you requested, this is to confirm that Providence Water will be using its hydraulic model to evaluate wholesale rates. Providence Water is currently in the process of determining the scope.

Have a good weekend.

Michael R. McElroy | Managing Partner | **McElroy & Donaldson**
21 Dryden Lane, P.O. Box 6721, Providence, Rhode Island 02940-6721
o: 401.351.4100 | c: 401.749.2612 | f: 401.421.5696
www.McElroyLawOffice.com

On Wed, Sep 23, 2020 at 10:45 AM Joseph A. Keough Jr, Esq <jkeoughjr@keoughsweeney.com> wrote:

Mike

Please see the attached and feel free to contact me if you have any questions. Thanks.

Joseph A. Keough Jr., Esquire

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41 Mendon Avenue

Pawtucket, Rhode Island 02861

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2/10/22, 11:18 AM

Gmail - Re: Providence Water Docket 4994

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