#### STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

## IN RE: PROVIDENCE WATER SUPPLY BOARD - DOCKET #4994

# THE SMITHFIELD WATER SUPPLY BOARD'S UNOPPPOSED MOTION TO INTERVENE

NOW COMES the Smithfield Water Supply Board ("SWSB"), by and through its undersigned counsel, and hereby moves this Honorable Commission to allow the SWSB to intervene in the above-captioned proceeding, pursuant to Rule 1.14 of the Rhode Island Public Utilities Commission's ("PUC") Rules of Practice and Procedure ("Rules"). In support of its Motion, the SWSB states as follows:

- 1. The SWSB is a public water authority created by the state's Legislature through enabling legislation.
- 2. Rule 1.14(A) of the PUC Rules states that "[p]articipation in a proceeding as an intervenor may be initiated by order of the Commission upon a motion to intervene."
- 3. On December 2, 2019, the Applicant, City of Providence's Department of Utility's Water Division ("Applicant"), filed an Application to Implement a Multi-Year Increased Rate Plan Pursuant to R.I.G.L. §39-15.1-4.
- 4. The SWSB and the SWSB's customers purchase all of their water from the Applicant, as wholesale/retail users, just like the residents of the City of Providence.
- 5. The Applicant provides the SWSB's sole source of water.
- 6. The SWSB will be directly affected by any outcome of this proceeding because it will impact the rates the SWSB pays for the water purchased from the Applicant.

7. The SWSB, therefore, possesses an interest that will be directly affected by the PUC's

actions in this proceeding.

8. Said interests of the SWSB are not adequately represented by existing parties, as the SWSB

and the SWSB's customers are separate and distinct wholesale/retail customers of the

Applicant.

9. The SWSB's intervention in this proceeding is also in the public interest of the customers

of the SWSB, as the outcome of this proceeding will affect the rates that all of the SWSB

customers will pay for water.

10. Additionally, counsel for the SWSB avers that none of the existing parties to this docket

object to the subject motion.

WHEREFORE, based on the above statements, the SWSB respectfully requests that the

PUC grant the SWSB's Motion to Intervene in this matter.

Dated: April 14, 2021

Respectfully submitted,

Smithfield Water Supply Board

By and through its counsel:

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## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that an original and (9) copies of the within was mailed to the Commission Clerk for filing, and a true copy of the within was served via electronic mail upon all parties set forth in the below updated Service List on the 14<sup>th</sup> day of April, 2021.

Clarice Parsons

### **VIA FIRST CLASS MAIL:**

Luly.massaro@puc.ri.gov Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888

#### **VIA ELECTRONIC MAIL:**

Docket No. 4994 - Providence Water Supply Board - General Rate Filing

Service List updated 4/12/2021

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