

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

Petition of the KENT COUNTY WATER |  
AUTHORITY-Rate Application |

Docket No.: 4611

**MOTION TO INTERVENE**

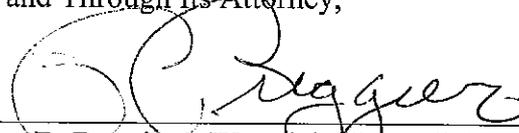
Now comes the City of Warwick (the “City”), by and through its City Solicitor, and hereby moves to intervene in the above-captioned matter. As grounds, the City avers that it has an interest which will be directly affected and which is not represented by any existing party in this proceeding. The issue concerns the Kent County Water Authority’s (the “Authority”) request to seek a rate hike to collect additional revenues of \$3,296,334 during their upcoming budget year. According to the Authority’s notice filed pursuant to this rate request, this rate increase would amount to a \$58.44 increase in the average residential customer’s yearly billing expense. The City purchases water from the Authority and provides that purchased water to its customers. This purchased water is set at the Providence wholesale purchase rate and will not be affected by this rate hike request. However, several thousand customers of the Authority are located within the municipal boundaries of the City. These residents and businesses served by the Authority are located in the Cowesett, Apponaug and Tollgate areas of the City. These customers will have to bear any increase in the rate for water purchased from the Authority.

Based on this situation the City requests intervention status to examine the need and justification for the sought after rate hike approval by the Authority. If the City’s Motion to Intervene is not granted, the City’s residents and businesses served by the Authority will not be represented by an existing party to this proceeding. (R.I. Gen. Laws 45-6-1 (1999 & Supp. 2008)(Rule 1.13 Rules of Practice and Procedure). The City has a direct interest in the resulting

consequences to the Authority's customers located within the City should this rate hike Petition be approved.

For these reasons and pursuant to PUC Rule 1.13, the City hereby requests the PUC to grant its Motion to Intervene.

Respectfully submitted,  
CITY OF WARWICK,  
By and Through Its Attorney,



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Dated: May 5, 2016

**CERTIFICATION**

I, the undersigned, do hereby certify that I did forward a copy of the within Motion to Intervene via e-mail to all on the following service list on the 5<sup>th</sup> day of May, 2016.

**Docket No. 4611- Kent County Water Authority – Multi-Year Rate Plan  
Service List 5/2/16**

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