



THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

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September 18, 2023

VIA ELECTRONIC MAIL ONLY

William E. Martin, Esq.  
Martin Law Offices  
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RE: Housatonic Water Works Company, D.P.U. 23-65

Dear Attorney Martin:

Enclosed please find the Department of Public Utilities' ("Department") Second Set of Information Requests to Housatonic Water Works Company in the above referenced matter. Please provide responses to the Department before 5:00 p.m. on **October 2, 2023**.

If you have any questions regarding this matter, please contact me at [kevin.crane@mass.gov](mailto:kevin.crane@mass.gov).

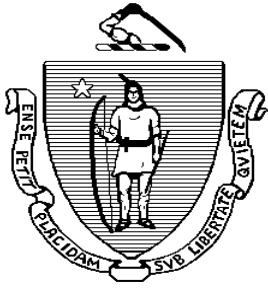
Sincerely,

/s/

Kevin Crane  
Hearing Officer

Enc.

cc: Mark Marini, Department Secretary  
Service List, D.P.U. 23-65



# The Commonwealth of Massachusetts

## DEPARTMENT OF PUBLIC UTILITIES

### SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF PUBLIC UTILITIES TO HOUSATONIC WATER WORKS COMPANY D.P.U. 23-65

Pursuant to 220 CMR 1.06(5)(c), the Department of Public Utilities ("Department") submits to Housatonic Water Works Company ("Company") its Second Set of Information Requests.

#### Requests

- DPU 2-1 Refer to the Company's initial and supplemental responses to information request DPU 1-15. Please:
- (a) reconcile the statement in the supplemental response that all work orders are issued "verbally" with the reference on the attachment summary in the initial response the existence of "multi-page work orders;" and
  - (b) provide copies of all multi-page work orders referenced in the attachment summary.
- DPU 2-2 Refer to the prefiled testimony of James J. Mercer at 9. Please provide copies of all correspondence between the Massachusetts Department of Environmental Protection ("DEP") and the Company relative to the proposed language regarding privately-owned mains.
- DPU 2-3 Refer to Section 8 of the Company's proposed tariff, M.D.P.U. 14 (Rules and Regulations). Please provide the Company's definition of a privately-owned main. As part of this response, provide the street locations for all privately-owned mains connected to the Company's distribution system.
- DPU 2-4 Refer to Section 8 of the Company's proposed tariff M.D.P.U. 14 (Rules and Regulations). Please explain why there are privately-owned mains connected to the Company's distribution system.
- DPU 2-5 Refer to the August 27, 2023 comments of Andrew Berens. Please:
- (a) confirm, or revise accordingly, the Company's use of the term "service hydrant" in describing a particular hydrant involved in a fire on Division Street in or about July 2023; and

- (b) explain the physical and operational distinctions, if any, between service hydrants and other hydrants, as well as what measures are taken to ensure that customers and town officials are aware of the distinctions.

DPU 2-6 Refer to the prefiled testimony of James J. Mercer at 8 and the Company's Filing, Water Rate Study Schedule C-2(w). Please:

- (a) explain whether the Company used a competitive bidding process to engage each outside consultant and legal service for this rate case and, if not, explain why not;
- (b) explain what price and non-price factors were considered by the Company in selecting each outside consultant and legal service provider for this rate case;
- (c) provide a copy of any request for proposals and all responses the Company received for consultant and legal services for this rate case;
- (d) describe why the Company chose each consultant and legal representative for this rate case; and
- (e) describe in detail all steps taken by the Company to contain rate case costs.

DPU 2-7 For all outside rate case service providers, please provide invoices containing a detailed description of all work performed by these providers on this rate case through August 31, 2023. Each invoice must include, at a minimum, the number of hours billed, the billing rate, and the specific nature of services performed.

DPU 2-8 For all outside rate case service providers, please provide a rate case expense summary in a format that identifies, for each service expense category, the following:

- (a) the original estimate of expenses;
- (b) the actual expenses incurred as of August 31, 2023;
- (c) an estimate of remaining expenses; and
- (d) the sum of actual and estimated expenses. To the extent this sum differs from the original estimate identified in subpart (a), explain the difference;

- (e) any discounts applied to any rate case expense category; and
- (f) to the extent that any invoices were challenged by the Company or otherwise adjusted, a full and complete description of why the invoice was challenged or otherwise adjusted.

DPU 2-9 For all outside rate case service providers, please provide through August 31, 2023:

- (a) a schedule totaling the invoices for each consultant and legal service provider; and
- (b) a schedule totaling invoices for miscellaneous rate case expenses (e.g., lodging, transportation, and meals).

DPU 2-10 Refer to the Company's response to information request DPU 1-17. For Supervision/Operator Employee 1, please provide:

- (a) the employee(s) name and base salary for this position for the last five years;
- (b) a complete and detailed description of this employee's job responsibilities during the test year and any known changes that will occur during the rate year;
- (c) copies of any timesheets or other records of the employee's time and work activities performed for the Company during the test year; and
- (d) copies of any documents or other information relied on by the Company to determine how the employee's base salary and benefits compare to similar employees at similarly situated companies that compete for skilled employees.

DPU 2-11 Refer to the Company's response to information request DPU 1-17. For Supervision/Operator Employee 2, please provide:

- (a) the employee(s) name and base salary for this position for the last five years;
- (b) a complete and detailed description of this employee's job responsibilities during the test year and any known changes that will occur during the rate year;

- (c) copies of any timesheets or other records of the employee's time and work activities performed for the Company during the test year; and
  - (d) copies of any documents or other information relied on by the Company to determine how the employee's base salary and benefits compare to similar employees at similarly situated companies that compete for skilled employees.
- DPU 2-12 Refer to the Company's filing, Water Rate Schedule C-1(w) and the Company's response to information request DPU 1-17. Please reconcile the line item in Schedule C-1(w), Salaries of General Officers & Clerks, \$56,571 with the Company's response to information request DPU 1-17.
- DPU 2-13 Refer to the prefiled testimony of James J. Mercer at 5. Please:
  - (a) provide documentation supporting the Company's \$150,000 estimate for the certified Class 2-T operator; and
  - (b) explain whether the current certified operator would continue filling this role in accordance with DEP requirements if the treatment system is upgraded to a 2-T level.
- DPU 2-14 Refer to the Company's response to information request DPU 1-15 and Housatonic Water Works Company, D.P.U. 15-179, Settlement, § 2.4 ("In addition to these actions, the Company agrees to accelerate a planned installation of additional piping on the storage tank which will allow it to reduce the DEP-mandated level of chlorine used in the water treatment process. Such chlorine reduction is expected to improve the aesthetic qualities of the water, prolong the life of customer owned service lines and fixtures, and mitigate the possibility that chlorine used in the treatment process could be a contributing factor in the lead and copper level exceedances"). Please:
  - (a) provide a complete and detailed explanation of the referenced project to install additional piping on the storage tank, including: (1) when the Company started and completed the project; (2) any pre-construction estimate of the project's cost; (3) the actual cost of the project; (4) whether the Company reduced the chlorine in the water treatment process after the project's completion; and (5) the impact of the project on water quality; and
  - (b) explain which, if any, of the capital projects listed in the Company's response to information request DPU 1-15 includes the

additional piping on the storage tank referenced in Settlement, § 2.4.

DPU 2-15 Refer to the prefiled testimony of Gary C. White at 5. Please:

- (a) identify with specificity all system upgrades the Company contends have been mandated by DEP; and
- (b) provide documentation supporting the assertion that DEP has mandated each identified system upgrade.

Dated: September 18, 2023