STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

IN RE: **Joint Investigation by DPH and PURA of REJA's (Rainbow Springs) Request to Cease Operations as a Water Company**

Docket Number 14-12-21

August 5, 2015

TOWN OF MIDDLEFIELD'S RESPONSE
TO STATE OF CONNECTICUT DEPARTMENT
OF PUBLIC HEALTH'S INTERROGATORIES
DATED AUGUST 4, 2015.

DPH-20 through DPH 29; EN-18 through EN-19; RA-8.

Answer: The town of Middlefield hereby responds to all the above interrogatories and says it has no knowledge whatsoever concerning Aquarion Water Company of Connecticut or the Connecticut Water Company. The town is not privy to the business of these two companies and therefore cannot provide the State with any of the information it is seeking.

Jon A Brayshaw

Jon Brayshaw
First Selectman
Town of Middlefield

Subscribed and sworn to before me, at Middlefield, Connecticut, on August 7, 2015.

Anne L. Wagenmann
Commission Expires 3-30-16

Notary Public

Certification

I hereby certify that a copy of the above was mailed or electronically delivered on the above date to all counsel and pro se parties of record and that written consent for electronic delivery was received from all counsel and pro se parties of record who were electronically served as follows:

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PUBLIC HEALTH HEARING OFFICE

August 4, 2015

VIA CERTIFIED MAIL

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Re: Joint Investigation by DPH and PURA of REJA's (Rainbow Springs) Request to Cease Operations as a Water Company, Docket Number 14-12-21

ORDER RE INTERROGATORIES

Aquarion Water Company of Connecticut, The Connecticut Water Company and the town of Middlefield ("the Water Company") are hereby **ORDERED** to provide responses to interrogatories numbered DPH-20 through DPH-29, EN-18 and EN-19, and RA-8 on or before **August 20, 2015.**

DPH-20 Describe the Water Company's organizational structure. Please also provide the name and title of the person(s) who has the authority to enter into binding agreements on behalf of the Water Company and the document that provides such authority.

DPH-21 Describe the Water Company's geographical proximity to the REJA Acquisition Corp.'s (REJA) Rainbow Springs water system ("System") in Middlefield, Connecticut.

DPH-22 Provide a brief description of the Water Company's financial, managerial and technical resources to operate the System in a reliable and efficient manner and to provide continuous, adequate service to the persons served by the System.

DPH-23 Provide a copy of the Water Company's current year budget.

DPH-24 Provide a copy of the Water Company's asset management plan, if the Water Company has one.

DPH-25 Provide a summary of the Water Company's experience acquiring and/or operating similar systems.

DPH-26 Describe any discussions the Water Company has had with the System regarding a potential acquisition, including the substance of such discussions. Please also provide any documents relating to such discussions, including any correspondence or meeting minutes at which the board of the Water Company discussed such acquisition.

DPH-27 Describe how the Water Company will provide water service to the customers of the System if it was ordered to acquire it.

DPH-28 Provide the Water Company's current rate structure.

DPH-29 Provide an estimate of the monthly cost to provide water service and operate the System as described in interrogatory number DPH-27 and the proposed monthly rate that the Water Company would charge the System's current customers if the Water Company were ordered to acquire the System.

EN-18 Where is the Water Company's nearest water system located from the System?

EN-19 If the Water Company was ordered to own and operate Rainbow Springs:

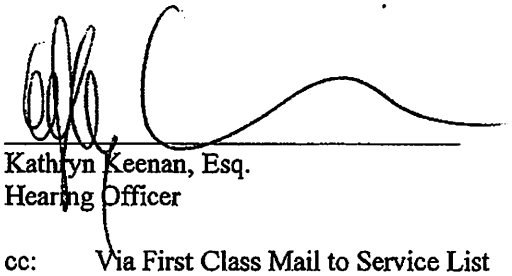
(a) Explain how the Water Company would operate and maintain the System. Specifically, would the Water Company operate the System as a satellite system or as an interconnection to the Water Company's water system?

(b) Identify the capital improvements that the Water Company anticipates to perform on the System within the next three years. Include the estimated date of each improvement and associated cost of these improvements.

RA-8 Once the costs to interconnect or run the System as a satellite are determined, would the Water Company: (a) assess the customers of the System a surcharge to interconnect; (b) run as a satellite; or (c) or make any necessary/required upgrades to the System? If not, explain why not. If yes, provide an estimated surcharge and the associated time period that it would be imposed. Provide all calculations and assumptions.

In making your responses, please restate each question and answer, using a separate sheet for each interrogatory number, and identify the person responsible for the response. To the extent that the information requested above can be provided in a pre-existing form or format, please feel free to do so. However, please indicate to which question or questions such materials are submitted in response. Please note that persons responsible for responses must be available for cross-examination during the hearing and must attest to the truth and accuracy of their responses.

The Departments require an original and two (2) copies of all submissions, including cover letters. All parties are required to serve each other with a copy of all documents submitted to the Departments.



Kathryn Keenan, Esq.
Hearing Officer

cc: Via First Class Mail to Service List