

STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH

Jewel Mullen, M.D., M.P.H., M.P.A.  
Commissioner



Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

**PUBLIC HEALTH HEARING OFFICE**

September 11, 2015

VIA CERTIFIED MAIL

Bruno R. Morasutti, Esq.  
Law Office of Bruno R. Morasutti, LLC  
405 Broad Street  
Meriden, Connecticut 06450

**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**

The Department of Public Health ("the DPH") and the Department of Energy and Environmental Protection's Public Utilities Regulatory Authority ("the PURA") (jointly, "the Departments") hereby **ORDER** the town of Middlefield ("Middlefield") to provide responses to the following interrogatories **on or before September 28, 2015**:

- DPH-30 Describe Middlefield'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 Middlefield and the document that provides such authority.
- DPH-31 Provide a list of the water systems owned or operated, or both, by Middlefield.
- DPH-32 Describe the geographical proximity of Middlefield's water systems to the REJA Acquisition Corp.'s ("REJA") Rainbow Springs water system ("the Rainbow Springs System") in Middlefield, Connecticut.
- DPH-33 Provide any documents Middlefield may have regarding the holder of the exclusive service area for the town of Middlefield.
- DPH-34 Provide a brief description of Middlefield's financial, managerial and technical resources to operate the Rainbow Springs System in a reliable and efficient manner and to provide continuous, adequate service to the persons served by the Rainbow Springs System.
- DPH-35 Provide a copy of Middlefield's current year budget for its water systems.



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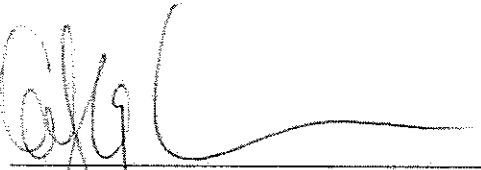
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- DPH-36 Provide a copy of Middlefield's asset management plan for its water systems, if Middlefield has one.
- DPH-37 Provide a summary of Middlefield's experience acquiring and/or operating similar water systems.
- DPH-38 Describe any discussions Middlefield has had with REJA 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 Middlefield discussed such acquisition or acquisitions.
- DPH-39 Describe how Middlefield will provide water service to the customers of the Rainbow Springs System if it is ordered to acquire it.
- DPH-40 Provide Middlefield's current rate structure for its water systems.
- DPH-41 Provide an estimate of the monthly cost to provide water service and operate the Rainbow Springs System as described in interrogatory DPH-39 and the proposed monthly rate that Middlefield would charge the Rainbow Springs System's current customers if Middlefield is ordered to acquire the Rainbow Springs System.

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.

Middlefield's responses to interrogatories shall be submitted in writing as follows:

1. The original and two copies shall be sent to Hearings Liaison, Department of Public Health, MS#13PHO, Box 340308, Hartford, CT 06134-0308;
2. A copy shall be sent to the DPH via email at [DPH.Acquisitions@ct.gov](mailto:DPH.Acquisitions@ct.gov);
3. Four copies shall be sent to Jeffrey R. Gaudiosi, Esq., Executive Secretary, Public Utilities Regulatory Authority, Ten Franklin Square, New Britain, CT 06051; and
4. A copy shall be sent to each of the parties to above-referenced proceeding.



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Kathryn Keenan, Esq.  
Hearing Officer

cc: Via First Class Mail/Email to Service List