

**DUFFY & SWEENEY, LTD**  
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March 13, 2025

**VIA EMAIL ONLY**

Water Resources Board  
Division of Statewide Planning  
235 Promenade Street, Suite 230  
Providence, RI 02908  
c/o Kathleen Crawley, Acting General Manager  
Meredith Brady, Prehearing Board Chair  
Matthew Smith, Esq., Deputy Chief of Legal Services

**RE: Request for Supplemental Records**

Dear Ms. Crawley, Ms. Brady and Attorney Smith:

As discussed, and requested at the Prehearing Board Meeting yesterday, enclosed please find the full record of the previous four (4) extensions granted by the Jamestown Board of Water & Sewer Commissioners in the rural water district ("RWD") between 2009 and 2021. These records were obtained via a public record request several years ago, related to court proceedings regarding a previous denial of an extension request at 68 East Shore Road, which resulted in a settlement.

In total, as noted in my previous memoranda, there were 16 extension and connection applications granted in the RWD from 2009-2021. Of those 16, four (4) were extension applications. As noted by the parties, there have been connection applications in the RWD granted since 2021.<sup>1</sup>

For ease of reference, I have attached the Table of Contents from the addendum submitted to the Rhode Island Supreme Court which references, by Bates Stamped page number, these application materials and specifically lists which materials are related to which application. *See **Tab 1*** attached, beginning at page 3 "Westcott Application." The materials from the table of contents are enclosed at **Tab 2**.

The first extension was for the Westcott application from 2013 which record contains various materials and forms as well as the meeting minutes approving the application. The next is the Rappaport application for an extension from 2014 which materials include agendas, letters,

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<sup>1</sup> In fact, **Exhibit X** of my October 18, 2024 Memorandum at page 5, shows a connection granted in the RWD for Julie T. Berry at Bayberry Road.

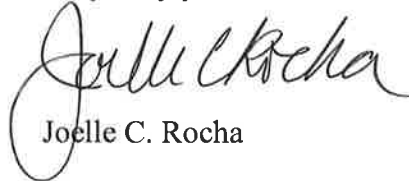
Kathleen Crawley, Acting General Manager  
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Matthew Smith, Esq., Deputy Chief of Legal Services  
March 13, 2025  
Page 2

reports and minutes. Additionally, the Fitzgerald application (which was also granted in 2014) record includes letters, applications and other materials, including the meeting minutes. Lastly, the Reamer application materials include the agenda letters, application memoranda and the meeting minutes.

As noted, the meeting minutes of all these applications (including the connections during this period), are already attached at **Exhibit M** to my memorandum filed with this Board on October 18, 2024.

Should you require any additional information regarding this matter, please do not hesitate to contact me.

Very truly yours,



Joelle C. Rocha

Attachments

cc: Kathleen Daniels, Esq. (via email with attachments)  
Peter Ruggiero, Esq. (via email with attachments)  
Chistian Infantolino, Esq. (via email with attachments)  
Michael Mineau, Esq. (via email with attachments)  
Marisa Desautel, Esq. (via email with attachments)