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JUN 20 2018

June 20, 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ



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JUN 20 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Ira G. Megdal
June 21, 2018

Aida Camacho-Welch
Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

Re: I/M/O the Petition of New Jersey American Water Company, Inc. for Approval of Increased Tariff Rates & Charges for Water & Wastewater Service, Change in Depreciation Rates & Other Tariff Provisions

BPU Docket No. WR17090985; OAL Docket No. PUC 14251-2017S

Dear Secretary Camacho-Welch:

This firm represents Petitioner New Jersey-American Water Company, Inc. ("NJAWC") in the above-captioned matter. On June 15, 2018, Legal Services of New Jersey ("LSNJ") filed a Motion to Intervene for the Limited Purpose of Supporting Rate Counsel's Motion to Issue an Order Rejecting New Jersey-American Water's Proposed Provisional Rate Increase ("Motion") and a letter brief in support.

Enclosed for filing are an original and ten copies of NJAWC's letter in response to the Motion. Please stamp a copy as "filed" and return it to the courier.

NJAWC does not oppose LSNJ's request to intervene for the limited purpose stated in the Motion. NJAWC disagrees, however, with LSNJ's contention that the New Jersey Board of Public Utilities ("BPU") should enjoin NJAWC from implementing provisional rates. The basis for LSNJ's support of Rate Counsel's Motion is the alleged risk to the health and safety of low-income New Jersey residents.

NJAWC recognizes the impact of water rate increases on low-income New Jersey residents. For that reason, NJAWC has offered in the past and will continue to offer assistance to low-income customers under the H2O Help to Others program ("H2O Help"). Eligibility for H2O Help is based on income. The income threshold is 300% of the federal poverty level (\$25,000 for a family of four). Thus, H2O Help provides assistance with water bills to a family of four with a household income of \$75,000.

Further, H2O Help provides ongoing assistance to eligible customers in the form of a 100% discount on NJAWC's monthly fixed service charge. For the average residential customer

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described, the fixed service charge discount represents an over 25% decrease in annual water service bills.

Finally, NJAWC offers a Low Income Payment Program that provides aid to its most economically challenged customers. This aid can reduce a customer's monthly bill by as much as 20%.

LSNJ's claim that NJAWC's "self-designed rate assistance program is tiny and inadequate" is incorrect. The foregoing programs are administered by NJ Shares, along with other utility assistance programs in New Jersey.

For the foregoing reasons, as well as the reasons articulated in NJAWC's Opposition to Rate Counsel's Motion to Issue an Order Rejecting the Company's Proposed Provisional Rates, NJAWC respectfully requests that the BPU grant LSNJ's Motion to Intervene but deny Rate Counsel's Motion.

Respectfully,

COZEN O'CONNOR, PC

By: 
Ira G. Megdal

IGM

cc: Attached Service List (via email)
Honorable Jacob S. Gertsman (via fax)

IN THE MATTER OF THE PETITION OF NEW JERSEY AMERICAN WATER COMPANY, INC.
FOR APPROVAL OF INCREASED TARIFF RATES AND CHARGES FOR WATER AND
WASTEWATER SERVICE, CHANGE IN DEPRECIATION RATES
AND OTHER TARIFF MODIFICATIONS
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OAL DOCKET NO. PUC 14251-2017 S

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