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State of New Jersey
DIVISION OF RATE COUNSEL
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KIM GUADAGNO
Lt. Governor

STEFANIE A. BRAND
Director

January 9, 2014

Via E-Mail & Hand Delivery

Kristi Izzo, Secretary
Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, New Jersey 08625

**Re: In the Matter of the Joint Petition of United Water West
Milford Inc. and United Water Arlington Sewerage Inc. for
Approval to Modify Their Respective Tariffs to Provide for
Monthly Customer Billing
BPU Docket No. WT13111037**

Dear Secretary Izzo:

The Division of Rate Counsel (the "Division") is in receipt of the above captioned matter. The Division has carefully reviewed the petition. Based on this review, the Division is not opposed to the Board's approval of the Joint Petitioners' request for authorization to revise its existing tariff to provide for monthly billing of customers.

Consistent with the Board's Order approving monthly billing for Gordon's Corner Water Company, BPU Docket No. WT08070493, Rate Counsel recommends that any Board Order approving the Joint Petition contain the following language:

1. This Order shall not affect nor in any way limit the exercise of authority of this Board, or this State, in any future petition or in any proceeding with respect to rates, franchises, services, financing, capitalization, depreciation, or any other matters affecting the Petitioner.
2. Approval of the switch from quarterly to monthly billing does not constitute Board approval of any costs or expenses associated with this petition or the change in billing frequency. Any determination as to the appropriateness or reasonableness of the costs and expenses related to the switch from quarterly to monthly billing shall be made in the next base rate cases of United Water West Milford and United Water Arlington Hills Sewerage. The Joint Petitioners shall

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maintain records in such a manner that costs related to the switch from quarterly to monthly billing can be determined.

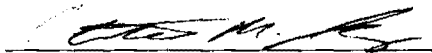
3. The Joint Petitioners shall provide individual notice by first class mail to all customers in advance of the effective date of the Board Order, and proof of such mailings to the Board within ten days.
4. Petitioner shall submit revised tariff pages reflecting the change from quarterly to monthly billing within ten days of this Order.

With these caveats, Rate Counsel is not opposed to the Board's approval of the above-referenced petition.

Respectfully submitted,

STEFANIE A. BRAND
Director, Division of Rate Counsel

By:


Christine M. Juarez
Assistant Deputy Rate Counsel

In the Matter of United Water West
Milford and United Water Arlington
Hills Approval to Modify Their
Respective Tariffs to Provide for
Monthly Customer Billing

BPU Docket No.: WT13111037

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