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Director

May 14, 2015

Via Email & First Class Mail

Stephen Genzer, Esq.
Saul Ewing, LLP
One Riverfront Plaza, Suite 1520
Newark, New Jersey 07102

**Re: I/M/O Middlesex Water Company for Approval of an Increase in its Rates
for Water Service and Other Tariff Changes
RC File No. 15-W-322
BPU Docket No.: WR15030391**

Dear Mr. Genzer:

Enclosed please find the Division of Rate Counsel's discovery requests RCR-RD-1 through RCR-RD-12 in connection with the above referenced matter.

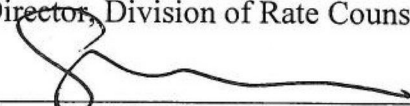
Pursuant to N.J.A.C. 1:1-10.4, please respond to the requests and submit copies of the documents requested herein within fifteen (15) days or submit a schedule of reasonable compliance within fifteen (15) days from receipt of this letter.

Please note that all discovery requests are of a continuing nature and should be updated or corrected, if necessary, over the course of the proceeding as soon as the information becomes available. Also, provide a designation on each response identifying the witness sponsoring the answer. Please provide the responses on three-hole punched paper.

Thank you for your attention to this matter.

Very truly yours,

Stefanie A. Brand, Esq.
Director, Division of Rate Counsel

By: 
Susan E. McClure, Esq.
Assistant Deputy Rate Counsel

SEM/dn
cc: Service list ✓



I/M/O the Petition of Middlesex Water Company for Approval of an
Increase in its Rates for Water Service and Other Tariff Changes
BPU Docket No. WR15030391

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DIVISION OF RATE COUNSEL DISCOVERY REQUESTS

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- RCR-RD-1 Please provide a copy of all workpapers utilized in the preparation of the Company's cost-of-service study (COSS) shown in JFG Exhibit 1, including, but not limited to, all workpapers used to develop the COSS's *external* classification and customer class allocation factors.
- RCR-RD-2 Please provide an electronic copy of JFG Exhibit 1, Schedules 19 and 20, with all formulae intact.
- RCR-RD-3 Please identify any change in the cost-of-service *methodology* employed by the Company in this proceeding compared to the methodology employed in BPU Docket No. WR13111059. State the Company's reason(s) for making any such change.
- RCR-RD-4 Please provide the separate test period billing determinants and derive the corresponding proposed increase for each Public Fire Protection customer served on Rate Schedule No. 3.
- RCR-RD-5 Please confirm that the Company is not proposing any change to its (i) Resumption of Service charges or (ii) Turn on Charge contained in Rate Schedule No. 4.
- RCR-RD-6 With respect to the Wholesale classes that appear in the Company's COSS:
- a. Please provide the relevant portion(s) of the Company's agreements with contract customers that specify the maximum day and maximum hour demand limits applicable to such customers;
 - b. Please provide the amount of any penalty that would apply to a contract customer in the event that a contract level maximum day demand or maximum hour purchase limit was exceeded; and
 - c. Please provide the number of occurrences where contract purchase limits were exceeded, by contract customer, over the period 2010-2014. Include the date, excess demand level and penalty charge(s) associated with each contract violation.
- RCR-RD-7 Please explain in detail how the Company determined the Wholesale class maximum day and maximum hour ratios that appear in Exhibit JFG-1, Schedule 18.
- RCR-RD-8 Reference JFG Exhibit 1, Schedule 1. Please provide a detail breakdown of the total South River Basin net revenue requirement of \$6,546,424 into the following components: a) costs that are applicable to (i.e., should be

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DIVISION OF RATE COUNSEL DISCOVERY REQUESTS

recovered via) the Company's Rate Schedule No. 5; and b) costs that are applicable to the Company's Rate Schedule No. 7. Include a copy of all supporting calculations.

- RCR-RD-9 Please explain in detail how the Company determined its proposed increases to Rate Schedule No. 5 and Rate Schedule No. 7.
- RCR-RD-10 Reference page 2 of the pre-filed testimony of Mr. Richard M. Risoldi.
- a. Please provide a system map that identifies (via highlight) that portion of Middlesex's transmission system that serves South River Basin customers;
 - b. How many retail (i.e., non-South River Basin customers) are served from the transmission mains identified in part (a)?
 - c. Please identify the dollar amount of the \$59.9 million investment included in Plant Account 343 (for Transmission Mains) shown in Exhibit JFG-1, Schedule 4, which is associated with the transmission mains identified in part (a).
- RCR-RD-11 Reference JFG Exhibit 1, Schedule 18, page 5 of 6. Please provide a detailed derivation of the Origination Cost values shown under Allocation Factor 57.
- RCR-RD-12 Reference JFG Exhibit 1, Schedule 18, page 5 of 6. Please provide the source of the Original Cost values for AF 85, and explain why such values are appropriate for allocating labor expense.

**I/M/O Middlesex Water Company
for Approval of an Increase in its
Rates for Water Service and Other
Tariff Changes
BPU Docket No. WR15030391**

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****Receives all correspondence except
discovery.***

*****Receives all documents by
e-mail only.***