





AUG 1 0 2016

BOARD OF PUBLIC UTILITIES MAIL ROOM

STEFANIE A. BRAND Director

Governor By Control KIM GUADAGNO

CHRIS CHRISTIE

Lt. Governor

August 8, 2016

Via Email & First Class Mail

Stephen B. Genzer, Esq.
Saul Ewing
One Riverfront Plaza
Newark, New Jersey 07102

Re:

I/M/O The New Foundational Filing for SUEZ Water Toms River (Formerly United Water Toms River), Inc.'s Distribution System Improvement Charge Pursuant to

N.J.A.C. 14:9-10.4

BPU Docket No.: WR15091103

Dear Mr. Genzer:

Enclosed please find the Division of Rate Counsel's discovery requests RCR-1 through RCR-3 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

Bv.

Christine M. Juarez, Esq.

Assistant Deputy Rate Counsel

CMJ/ddg

cc: Service list

## I/M/O The New Foundational Filing for SUEZ Water Toms River (Formerly United Water Toms River), Inc.'s Distribution System Improvement Charge Pursuant to N.J.A.C. 14:9-10.4

## **BPU DOCKET NO. WR15091103**

## Division of Rate Counsel Discovery Request

- RCR-1. Was any portion of the "Main Street and Route 37" Project shown on Page 7 of 8 reimbursed by NJDOT or any other government entity?
- RCR-2. Please provide a schedule supporting the Long-Term Debt cost rate of 5.27% shown on Page 3 of 8.
- RCR-3. Please provide a schedule showing the calculation of the composite depreciation rate (1.59%) used on Page 2 of 8.

I/M/O The New Foundational Filing for SUEZ Water Toms River (Formerly United Water Toms River), Inc.'s Distribution System Improvement Charge Pursuant to N.J.A.C. 14:9-10.4 BPU Docket No.: WR15091103

Irene Asbury, Secretary Board of Public Utilities 44 South Clinton Avenue, 9th Floor P.O. Box 350 Trenton, NJ 08625

Stefanie A. Brand, Director Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 \*Debra R. Robinson, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625

Brian Lipman, Esq.
Division of Rate Counsel
140 East Front Street, 4<sup>th</sup> Floor
P.O. Box 003
Trenton, NJ 08625

Christine M. Juarez, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 Darlene Duque-Garcia, Paralegal Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625

Maria L. Moran, Director Division of Water Board of Public Utilities 44 South Clinton Avenue, 9th Floor P.O. Box 350 Trenton, NJ 08625-0350 Jim Kane
Division of Water & Wastewater
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Mike Kammer
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625

Matthew Koczur
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625

Mona Mosser Board of Public Utilities 44 South Clinton Avenue, 9th Floor P.O. Box 350 Trenton, NJ 08625 Alex Moreau, DAG Division of Law Dept. of Law & Public Safety 124 Halsey Street, 5th Floor P.O. Box 45029 Newark, NJ 07101

Veronica Beke, DAG Dept. of Law & Public Safety Division of Law 124 Halsey Street, 5th Floor P.O. Box 45029 Newark, NJ 07101 Christopher Psihoules, DAG Division of Law Dept. of Law & Public Safety 124 Halsey Street, 5th Floor P.O. Box 45029 Newark, NJ 07101 James Mastrokalos United Water Toms River 1451 Route 37 West Toms River, NJ 08755 Jane Kunka United Water Toms River 1451 Route 37 West Toms River, NJ 08755 Gary Prettyman Senior Director-Regulatory Business United Water Toms River 1451 Route 37 West Toms River, NJ 08755 Stephen B. Genzer, Esq. Saul Ewing, LLC One Riverfront Plaza, Suite 1520 Newark, NJ 07102

Colleen Foley, Esq. Saul Ewing, LLC One Riverfront Plaza, Suite 1520 Newark, NJ 07102 Howard J. Woods, Jr., Consultant Howard J. Woods, Jr., & Assoc., LLC 138 Liberty Drive Newtown, Pa 18940

- \*Receives all correspondence except discovery.
- \*\*Receives all documents by e-mail only