



NEW JERSEY STATE LABORERS' -EMPLOYERS' COOPERATION AND EDUCATION TRUST

Final Oct 29, 2017

RAYMOND M. POCINO
Co-Chairman

September 29, 2017

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By *CMS*

BOARD OF PUBLIC UTILITIES

OCT 02 2017

JEFFREY WATERS
Co-Chairman

Board of Public Utilities
Irene Asbury, Secretary
ATTN: BPU Docket Number: AX1750469
44 South Clinton Avenue, Suite 314
P.O. Box 350
Trenton, New Jersey 08625-0350

AX17050469

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Laborers' Trustees:

TOM RAMSAY
ANTHONY CAPACCIO
CARL STYLES

Re: In the Matter of the Board's Proposed New Rules: N.J.A.C. 14:3-2A - BPU
Docket Number: AX1750469

In the Matter of the Board's proposed amendments to N.J.A.C.14:1-5.12 (e)-(k)
BPU Docket Number: AX17050468

Employers' Trustees:

ROBERT EPIFANO
JACK KOCSIS
JOSEPH WALSH

Dear Secretary Asbury:

I write in support of both of the above proposals contained in the respective dockets and ask that the Board approve them. The New Jersey Laborers'-Employers' Cooperation and Education Trust (NJ LECET) is a labor management fund representing over 25,000 laborers in NJ and their signatory contractors. We work statewide with numerous stakeholders to promote investment in economic development, transportation and utility infrastructure.

STEVEN GARDNER
Director

NJ LECET believes that the problems facing New Jersey's aging utility infrastructure are serious and long-term. It was for this reason that we have been a "participant" in two BPU cases in the energy area. These were special filings by PSE&G for Energy Strong and a Gas System Modernization Program. Both of these cases documented, through extensive filings, needs that go well beyond the 3-year programs granted. Board and Ratepayer review of all aspects of these filings were also extensive and thorough.

It must be recognized that allowing for timely recovery of investments provides an incentive to utilities to authorize continued investment without delay and provides cost efficiencies in planning and program implementation. We support allowing up to five (5) years after approval of an infrastructure program before requiring a utility to file a base rate case. We also support codification of current BPU statutory authority to grant provisional rates.

I urge you to support these proposals.

Sincerely,

[Signature]
Steven Gardner
Director

CMS
Legal
A. Moreau
T. Walker

SG/cas