

Final Oct 5, 2017
OCT 04 2017
By CMS

FERREIRA

Via E-Mail (rule.comments@bpu.nj.gov) & First-Class Mail

Hon. Irene Asbury
Secretary, New Jersey Board of Public Utilities
44 South Clinton Avenue, Suite 314
P.O. Box 350
Trenton, New Jersey 08625-0350

BOARD OF PUBLIC UTILITIES

OCT 04 2017

MAIL RECEIVED

Re: In the Matter of the Board's Proposed New Rules: N.J.A.C. 14:3-2A
BPU Docket Number: AX1750469 *AX 17050469*

Dear Secretary Asbury:

Please accept these comments on behalf of Ferreira Construction concerning the above referenced docket. As president of a multi-state organization that employs about 1,000 people, I'm proud that my employees have helped build much of the utility infrastructure in our state during the past 30 years.

We are among the contractors replacing aging cast iron gas mains for PSE&G in a number of communities under the current three-year program. We also have a role in supporting the electrical upgrades necessary to keep the integrity of the system statewide working with many of the utilities in the State. We look forward to doing more of this important work should these programs be extended beyond their current timelines.

I am pleased to say that our firm has a proven track record of safely implementing projects through effective planning. The proposal the BPU is considering would extend critical utility infrastructure programs beyond a few years and provide much-needed certainty in how contractors like us plan the work, hire the employees we will need, and procure materials. Extending the length of programs from 3 to 5 years allows for improved and more efficient planning. It would allow utilities to retain contractors for longer periods and to procure goods at more reasonable costs.

On behalf of Ferreira Construction, I would like to acknowledge the BPU's leadership in approving the many electric and gas infrastructure investments programs to date and hope that more can be done. We at Ferreira Construction fully support longer-term projects to maintain and improve the reliability of our state's energy infrastructure, and support the economy of our state.

Nelson Ferreira

President, CEO and Founder
Ferreira Construction Co., Inc.

*CMS
Legal
A. Moray
J. Walker*