

NAIOP

COMMERCIAL REAL ESTATE
DEVELOPMENT ASSOCIATION
NEW JERSEY CHAPTER

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BOARD OF PUBLIC UTILITIES
MAIL ROOM

October 6, 2017

Irene Kim Asbury, Secretary

New Jersey Board of Public Utilities

ATTN: BPU Docket Number: AX1750469

44 S. Clinton Ave., 3rd Floor, Suite 314

PO Box 350

Trenton, NJ 08625-0350

AX17050469

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OCT 13 2017
By CMS
Filed Oct 18, 2017

Dear Secretary Asbury:

On behalf of the 750 members of NAIOP New Jersey, the commercial real estate development association, we appreciate the opportunity to comment on the BPU's Proposed New Rules: N.J.A.C. 14:3-2A, Infrastructure Investment and Recovery.

Improving all of New Jersey's infrastructure systems is a top NAIOP priority, and our aging water infrastructure is in particularly dire need of modernization. Therefore, we support the BPU's proposed new rules for the implementations of Infrastructure Investment Programs (IIP), to allow for accelerated investment in the construction, installation, and rehabilitation of certain non-revenue producing utility plant and facilities to enhance safety, reliability, and/or resiliency. The proposal to increase the approval for Infrastructure Programs from three to five years should add stability and predictability to projects, enabling greater efficiency and cost savings.

Sincerely,

Michael G. McGuinness
Chief Executive Officer

Case Mgmt

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