



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

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CASE MANAGEMENT

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TRENTON, NJ

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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Co-Chairman

Aida Camacho-Welch, Secretary of the Board
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

AX1750469

Re: BPU Docket Number: AX1750469 - Proposal Number: PRN 2018-018
Proposed Amendment: N.J.A.C. 14:1-5.12

Laborers' Trustees:

TOM RAMSAY
ANTHONY CAPACCIO
JERRY ISABELLA

Dear Secretary Camacho-Welch:

Employers' Trustees:

ROBERT EPIFANO
JACK KOCSIS
JOSEPH WALSH

I am writing to submit comments on behalf of the New Jersey Laborers'- Employers' Cooperation and Education Trust (NJLECET). 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

We support this Rule Proposal which would promulgate regulations to "adjust the scope of a CTA analysis by: 1) requiring that it shall be for five consecutive tax years including the complete tax year within the utility's proposed test year; (2) the calculated CTA shall be allocated so that the rate base may be reduced by up to 25 percent of the full CTA; and (3) the transmission portion of an electric distribution company's income shall not be included in the calculation of CTA."

While we urge the elimination of the CTA, we support this proposal which would significantly reduce the impact of the previous application which curtailed investment in utility infrastructure. It is critical, now more than ever, that we remove barriers to investment in all sectors of utility infrastructure - our electric grid, our water and wastewater systems, and our natural gas systems.

The 25,000 workers we represent live and work throughout the Garden State and so we have a vested interest in supporting programs and initiatives that make our economy strong and ensure the high quality of life we enjoy in New Jersey. We believe that reducing the impact of the CTA will lead to more investment in infrastructure which is an investment in all of the people who live and work in our state. Thank you.

Sincerely,


Steven Gardner
Director

CMS
Energy
Legal
DAG