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January 8, 2020

Via UPS Overnight Delivery and Electronic Mail
Honorable Jacob S. Gertsman, ALJ
Office of Administrative Law
Quakerbridge Plaza, Bldg. 9
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Mercerville, New Jersey 08619

Re: In the Matter of the Petition of New Jersey-American Water Company Inc. for Approval of Increased Tariff Rates and Charges for Water and Wastewater Service, Changes in Depreciation Rates and Other Tariff Modifications
BPU Docket No.: WR17090985
OAL Docket No.: PUC 16279-2018S

Dear Judge Gertsman:

On behalf of the Division of Rate Counsel ("Rate Counsel"), please accept this letter brief in lieu of a more formal brief on the limited issue of acquisition adjustments proposed by New Jersey American Water Company ("NJAWC" or "Company") in connection with the base rate case referenced above.

PROCEDURAL HISTORY AND BACKGROUND

On September 14, 2017, NJAWC filed with the New Jersey Board of Public Utilities ("Board") a petition, testimony and exhibits (collectively, "Petition") requesting an increase in operating revenues of $129.3 million, or approximately 17.54% over projected pro-forma

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rate revenues.

NJAWC serves approximately 631,000 water and fire service customers and approximately 41,000 sewer service customers. The Company proposed that the increase become effective on October 15, 2017.[1] In the Petition, NJAWC proposed a test-year ending March 31, 2018. The Petition as originally filed was based upon five months of actual and seven months of estimated data. On January 15, 2018, NJAWC filed an update based on nine months actual and three months estimated data. NJAWC filed an additional update on April 23, 2018 based on 12 months actual data. Both updates included supplemental testimony.

On September 27, 2017, the Board transmitted this matter to the Office of Administrative Law ("OAL") as a contested case and on October 20, 2017, the Board issued an Order suspending NJAWC's proposed rate increase until February 15, 2018. By a second suspension order dated January 31, 2018, the proposed rate increase was suspended until June 15, 2018. This matter was assigned to Administrative Law Judge ("ALJ") Jacob S. Gertsman, who issued a Prehearing Order on December 18, 2017, establishing procedures and hearing dates for the conduct of this case. ALJ Gertsman issued an Order Establishing Revised Prehearing Submission Deadlines on May 23, 2018.

Motions to intervene were filed by the following parties (collectively, "Intervenors") and were unopposed: Rutgers, the State University ("Rutgers"), Princeton University, Phillips 66 Company, Johanna Foods, Inc., and Cogen Technologies Linden Venture, L.P. (collectively, "OIW"); Middlesex Water Company ("Middlesex"); Mount Laurel Township Municipal Utilities

[1] On September 22, 2018, the Company filed a letter with the Board via electronic mail stating that it would not implement rates on an interim basis prior to the effective date of the Board's suspension Order resulting from the Board's October 20, 2017 agenda meeting. However, the Company stated that it did not waive its "right to implement the proposed rates at the conclusion of the eight month suspension period on June 15, 2018 should the Board not issue a final Decision and Order by that date."

Authority ("Mount Laurel"); Aqua New Jersey, Inc. ("Aqua"); and City of Elizabeth. The motions to intervene filed by the OIW, with the exception of Rutgers, Middlesex, Aqua, and the City of Elizabeth, were granted by Orders dated December 18, 2017, which were subsequently amended on January 16, 2018. Rutgers and Mount Laurel were granted intervenor status by Orders dated January 16, 2018 and February 28, 2018, respectively. On May 31, 2018, AARP filed a motion to participate, which was unopposed. ALJ Gertsman granted AARP leave to participate on June 8, 2018. On July 2, 2018, the New Jersey Utility Shareholders Association ("NJUSA") filed a motion to participate. On August 1, 2018, ALJ Gertsman entered an Order granting NJUSA's motion to participate, which Order was amended on August 3, 2018 to correct a typographical error.

After proper notice to the general public and affected municipalities and counties within NJAWC's service area, four public hearings were held. One public hearing was held on January 8, 2018 in Westfield, New Jersey; two public hearings were held on January 10, 2018 at 1:00 p.m. in Ocean City, New Jersey and at 6:00 p.m. in Howell Township, New Jersey; and one public hearing was held on January 16, 2018 in Haddonfield, New Jersey. A representative of NJUSA attended the hearing in Haddonfield and entered a statement on the record that requested that the process for granting NJAWC new rates be fair and balanced, taking into account the interests of New Jersey utility shareholders and ratepayers. Members of the public also attended and spoke at the Howell Township hearing in general opposition to the proposed rate increase. No members of the public attended the Westfield or Ocean City hearings. In addition, the Board received over 100 written comments in opposition to the Petition.

On February 8, 2018, NJAWC filed supplemental direct testimony related to the Tax Cuts and Jobs Act of 2017. On April 13, 2018, Rate Counsel and certain Intervenors filed direct

testimony and on May 11, 2018, NJAWC filed rebuttal testimony. Evidentiary hearings took place on June 11, 13, 14, 18 and 25, 2018. Prior to the June 15, 2018 expiration of the second suspension period, NJAWC provided notice that it would implement interim rates. On May 18, 2018, Rate Counsel filed a motion requesting the Board issue an Order rejecting the Company's proposed provisional Rates. The motion was opposed by the Company. The Board issued an Order denying Rate Counsel's request on June 22, 2018. The Company implemented interim rates that included a $75 million increase, effective June 15, 2018, in accordance with N.J.A.C. 14:1-5.12(f). This resulted in a 12.323% increase applied equally to all rate classes using the existing rate design for the utility approved by the Board, pursuant to N.J.A.C. 14:1-5.12(e)(2).

On July 3, 2018, Rate Counsel submitted a letter to ALJ Gertsman alerting him of a report that the Staff of the New York Public Service Commission ("PSC"), Department of Public Service ("DPS") had issued ("Staff Report") regarding certain oral testimony and discovery responses that employees of American Water Works Service Company, Inc. ("Service Company") submitted to the PSC in connection with the base rate case of New York-American Water Company, Inc. ("NYAWC"). One implicated Service Company employee had submitted pre-filed testimony, answered discovery, and testified at the evidentiary hearings in this case. Another had submitted pre-filed testimony and answered discovery, and his pre-filed testimony was adopted by a different witness in this case. Both such employees separated from the Service Company before the conclusion of the evidentiary hearings here. In its letter, Rate Counsel requested that, as a result of the Staff Report, ALJ Gertsman order NJAWC to review the testimonies of the two witnesses and provide a certification that their testimonies were complete and free of errors or omissions. Board Staff sent a separate letter on July 10, 2018 requesting that ALJ Gertsman order NJAWC to verify all testimony and discovery responses submitted in

evidence in this case (collectively, Board Staff and Rate Counsel letters are referenced as "Letters").

On July 25, 2018, the Board held its regularly scheduled Board meeting at which time it ordered NJAWC to conduct an independent certification of the numbers that NJAWC had submitted in support of its Petition.

ALJ Gertsman held a limited-purpose hearing on August 1, 2018 regarding the issues raised by Rate Counsel and Board Staff in the Letters. At the August 1, 2018 hearing, NJAWC moved additional exhibits into evidence, including a certification of the accuracy of the record by NJAWC President Deborah A. Degillio, which appended supporting certifications. Ms. Degillio also provided direct testimony and was cross-examined. Thereafter, NJAWC retained its auditor, PriceWaterhouse Coopers ("PwC"), to perform an Agreed Upon Procedures Engagement regarding the Schedules, applicable SIRs, and utility plant asset records in Power Plant for the Haddonfield and Shorelands acquisitions for which NJAWC requested recognition in connection with the Petition. PwC subsequently agreed to include in its engagement those discovery responses received in evidence in this proceeding. PwC agreed to reconcile all of these items to NJAWC's general ledger to the extent applicable. It also determined the extent to which NJAWC's proposed post-test year plant additions were recorded on NJAWC's books and records. As to Haddonfield and Shorelands, PwC agreed to verify that correct amounts were transferred when entered into NJAWC's books and records. On August 31, 2018, PwC issued a Report of Independent Accountants, which was subsequently admitted into the record.

After discovery and comprehensive settlement discussions, on October 16, 2018, the Company, Board Staff, Rate Counsel, and OIW (collectively, "Parties") reached a stipulation of settlement with regard to all issues in the base rate case except the issue of plant acquisition adjustments ("Partial Stipulation"). On October 18, 2018, ALJ Gertsman issued an Order to Bifurcate Partial Initial Decision Settlement ("Initial Decision") in this matter, recommending adoption of the Partial Stipulation executed by the Parties, finding that the Parties had voluntarily agreed to the Partial Stipulation and that the Partial Stipulation fully disposed of all issues, except for the acquisition adjustment. On October 29, 2018 the Board issued an Order adopting the Order to Bifurcate Partial Initial Decision Settlement and Remand the Proposed Plant Acquisition Adjustment Issues ("Order"). On November 8, 2018, the Board transmitted the previously bifurcated issue of plant acquisition adjustments back to the OAL, over which ALJ Gertsman was again assigned to preside.

ALJ Gertsman established a briefing schedule for the acquisition adjustment issue. Rate Counsel, Board Staff, the Company, and Middlesex submitted initial briefs on the limited issue of acquisition adjustments on January 18, 2019, with reply briefs being filed on February 25, 2019. On May 6, 2019, the Company filed a Motion to Admit Supplemental Testimony and Schedule of John S. Tomac Into Evidence. The Motion pertained to previously filed testimony and briefing on the issue of whether the acquisition adjustments for Shorelands and Haddonfield can be paid for solely by rates collected from those customers, or whether other Company ratepayers would be subsidizing the adjustments. Rate Counsel filed a reply to this motion accompanied by supplemental testimony of Howard Woods on May 31, 2019. Oral argument on the acquisition adjustment issue was held before ALJ Gertsman on November 21, 2019.

Rate Counsel submits this summary brief in accordance with the procedural schedule in this matter.

ARGUMENT

The Requested Adjustments For the Shorelands Water and Haddonfield Acquisitions Should Be Denied As the Company Has Failed to Demonstrate Net Benefits to Ratepayers From the Acquisitions.

1. Board Policy Confines Acquisition Adjustments to the Limited Circumstances Where A Utility Has Shown Tangible Benefits to Existing Ratepayers or Has Acquired a Distressed System That Cannot Provide Safe, Adequate & Proper Service to Ratepayers.

Normally, when a utility acquires another system, it receives a return in rates based on the acquired system's book value, which represents the original cost of the system's assets less accumulated depreciation. Acquisition adjustments, if permitted, allow for rate recovery of the full amount that a utility chose to pay to acquire a system, which is almost always in excess of that system's current book value.

The Board's policy regarding acquisition adjustments was set forth in I/M/O Petition of Elizabethtown Water Co. For an Increase in Rates, BPU Docket No. 8312-1072, 62 P.U.R. 4th 613 (N.J.B.P.U. 1984) ("Elizabethtown Acquisition Order"). In that case, the Board found that an acquisition adjustment is appropriate only when a utility can demonstrate specific benefits to existing customers, finding that "[w]e will continue to recognize the appropriateness of acquisition adjustments where a specific benefit can be shown, such as the acquiring of needed facilities which benefit the entire system." Id. at 614. In denying the acquisition of the Peapack and Gladstone Water System in that case, the Board accepted the analysis of the ALJ, whose Initial Decision found that "existing customers received no benefit from the Peapack-Gladstone acquisition...petitioner offered no evidence as to why existing ratepayers should bear the cost associated with a purchase that may be in the public interest, but does not particularly aid

existing customers of the system." 11 N.J.A.R. 303, 313-14. The Board also noted an additional circumstance where acquisition adjustments may be appropriate, which was a utility's acquisition of a troubled small water company. The Board made it clear that its policy was limited to distressed systems that are "hard-pressed to provide safe, adequate and proper service" consistent with "the intent of the Small Water Company Takeover Act, N.J.S.A. 58:11-59 et seq."

The Board affirmed its policy on acquisition adjustments in I/M/O Petition of South Jersey Gas Co. For Approval of Increased Base Tariff Rates & Charges, BPU Docket No. 843-184, Order dated 12/30/85 ("South Jersey Gas Order"). In that matter, South Jersey Gas Company sought an acquisition adjustment for its purchase of the Cape May portion of its system from New Jersey Natural Gas Company. Noting that "[t]he Board's policy on this issue was clearly set forth in [the Elizabethtown Acquisition Order]," the Board reiterated that acquisition adjustments would be recognized "only where it was proven that a specific and tangible benefit inured to ratepayers from the acquisition." South Jersey Gas Order at 4. The Board made it clear that benefits must inure to ratepayers of the existing system, noting that "[i]n his Initial Decision, Judge Sullivan properly recognized the Board's policy in this area and correctly rejected the Company's position that the Board should look to both utilities and their ratepayers in determining if any benefits were created by the transaction." Id. In denying the requested acquisition adjustment, the Board found that "the Company bears the burden of proof with regard to any benefits from its acquisition" and "the Company failed to carry its burden of proof as to whether any specific and tangible benefits resulted from its acquisition from New Jersey Natural." Id.

Good public policy dictates that acquisition adjustments be limited to the narrow circumstances outlined in the Board's policy. Allowing the Company to receive acquisition adjustments in this matter above the system's current book value would send a signal to both sellers and purchasers regarding future acquisitions. Acquisition adjustments are an exception to the rule that utilities can only recover a rate of return on the book value of their assets. Without any tie to the book value of the system, water utilities could purchase systems at any inflated price, knowing that they will recover any excess costs from ratepayers. This will almost certainly raise the future purchase price of acquisitions, as the seller will know there is little to no ceiling on cost and the purchaser can increase their earnings by overpaying for a system. For this reason, acquisition adjustments must only be granted in very limited circumstances, such as those outlined in the Board's acquisition adjustment policy.

2. The Company Does Not Claim That Either Haddonfield or Shorelands Was a Troubled Utility When Acquired.

The Company has never asserted that Shorelands was a troubled utility when acquired by the Company. Furthermore, during oral argument on November 21, 2019, the Company clarified its position regarding the issue of whether Haddonfield was a troubled utility at the time of its acquisition. Specifically, the Company no longer asserts that Haddonfield was troubled at the time of its acquisition, nor is it seeking rate recognition of the proposed acquisition adjustment on these grounds ("New Jersey American is not claiming that the acquisition adjustment should be recognized because the entities were either small or troubled.") 33T:L11-14 (11/21/19) .

3. The Company Has Failed to Demonstrate Net Benefits to Existing Ratepayers From the Shorelands Acquisition.

The Company is seeking an acquisition adjustment for the approximately $26.9 million over book value it paid to acquire the Shorelands Water Company. *RC-30.* As explained below,

the Company has failed to carry its burden of proving that its existing ratepayers should pay for the Company's decision to pay such a substantial sum for Shorelands. First, it is important to note that the decision to acquire Shorelands was made purely by the Company and its Board of Directors. Ratepayers had no say in whether to acquire Shorelands, or in the Company's decision to pay $26.9 million in excess of book value for the system. The Company has a heavy burden to prove that its ratepayers should now pay a return on and a return of this $26.9 million premium, and it is a burden that the Company has failed to meet.

The Company offered an analysis attempting to show that the alleged benefits of the acquisition outweigh the cost of the acquisition adjustment. The Company claims that it will avoid $29 million of planned capital costs and defer an additional $18.9 million of capital costs for a period of 5-10 years. *P-8* at 38. The Company asserts a net present value benefit of $6.6 million as a result of the acquisition. Id. at 39.

There are a number of reasons why the Company failed to meet its burden of proving net benefits to existing ratepayers. First, the alleged benefits of the acquisition are based solely on the Company's claims that it will avoid spending on certain capital projects. *RC-1* at 31. Although the Company claims that it will avoid certain capital costs, it has never committed to doing so. Absent a commitment, there is no guarantee that these capital costs will actually be avoided, or result in lower rates for ratepayers.

Secondly, the net benefits analysis is speculative and cannot meet the Company's burden of proof. For example, the Company claims that due to its acquisition of Shorelands, it can avoid the cost of rebuilding the Englishtown Wells and delay the construction of the ASR Wells for five years. These wells are designed to help alleviate capacity issues in the Coastal North System. The flaw in this claim is that the Company admits in its testimony that the Company

has capacity issues in its Coastal North System that encompasses Shorelands. P-5 at 14. Company witness Donald Shields testified that "[t]he Coastal North System has a reliable maximum day supply deficit." Id. This means that the Company struggles to meet water demand in this area on its maximum demand days. Furthermore, the Coastal North System is and will continue to be a high growth area. All of these factors add up to speculation when the Company claims that it can avoid and/or defer well construction. Speculation cannot satisfy the Company's burden of proof here.

Furthermore, as Mr. Woods testified, the Company's net benefits analysis contains certain assumptions that may not be realistic, and absent such assumptions, the Shorelands acquisition ends up as a net liability to existing ratepayers. One example of a flawed assumption in the Company's analysis relates to its Navy Tank. *RC-1* at 32-35. The Navy Tank is a 1.2 million gallon standpipe with operating range between 240 feet and 278 feet. Id. at 32. Replacement of the Navy Tank is one of the avoided projects under the Company's analysis, with an avoided cost of $3,700,000. *P-8*, Schedule FXS-1. The Company's analysis assumes that the Navy tank will remain in service for the next forty years, without needing replacement during that time. *RC-1* at 33. The flaw in the Company's analysis is that the Navy Tank was built in 1951, and is already 67 years old. Id. at 34. In other words, the Company's analysis assumes the Navy Tank will continue in service until it is 107 years old, despite its current depreciation rate of only 72 years. Id. Mr. Woods' testimony illustrates the sensitivity of the analysis offered by the Company simply by examining its assumption about the Navy Tank. As Mr. Woods demonstrated, if the Navy Tank needs to be replaced in 2023 – the end of its 72 year depreciation life – then the Shorelands acquisition transforms from an acquisition with a $6.6 million net benefit to ratepayers under the Company's analysis, to a $197,000 net cost to

ratepayers. *RC-1* at 35. Simply with one reasonable change to the Company's analysis, Mr. Woods demonstrated that the Company's claim of net benefits from the Shorelands acquisition does not stand scrutiny.[2] The Company's analysis is based upon hopeful, speculative assumptions. If any of those assumptions prove inaccurate, the result of the cost benefit analysis changes dramatically. An analysis built on such speculative assumptions cannot sustain the Company's burden of proof.

Furthermore, as Mr. Woods testified, unless the Company's overall capital spending is somehow capped, there is no guarantee that ratepayers will actually experience lower rates, even if the capital projects contained in the analysis remain avoided. *RC-1* at 37. Indeed, the Company has never claimed that its capital spending will be reduced as a result of acquiring Shorelands. The Company has aggressively invested in new plant in its service territory, in the amount of $868 million since its last rate case only three years ago. Id. As Mr. Woods testified, absent a cap it is likely that any avoided costs will simply shift dollars elsewhere, with ratepayers being asked to pay for both the acquisition premium and the new investment. Id. Without seeing any relief in rates, customers will hardly experience a benefit from these alleged avoided projects.

Finally, the Company's analysis ignores certain costs related to the Shorelands acquisition. The analysis does not consider the cost of any internal improvements that will need to be made to the Shorelands system over time, nor does it consider any of the capital integration costs necessary to integrate Shorelands with the existing New Jersey American system. Id.

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[2] Mr. Woods also examined other projects that the Company claimed could be avoided or deferred, such as the storm protection project for the Newman Springs Clearwell. *RC-1* at 35. Mr. Woods testified that if the Company finds the Newman Springs Clearwell and the Englishtown Wells must be built as planned, and not delayed, then together with the Navy Tank construction the Shorelands acquisition would result in a net present cost to ratepayers of approximately $25.5 million. Id. at 36.

Since these are costs that never would have been incurred absent the Company's acquisition of Shorelands, the Company should have included them in its analysis of whether the acquisition produced net benefits to existing ratepayers. The Company did not, and for this and all the other reasons noted above, failed to meet its burden of proving that it should receive an acquisition adjustment for the Shorelands system. Accordingly, the Company's request for an acquisition premium in excess of Shorelands' book value should be denied.

4. Haddonfield Was Not a Troubled Utility, Nor Did Its Acquisition Benefit Existing New Jersey American Ratepayers. Accordingly, Per Board Policy the Proposed Acquisition Adjustment for Haddonfield Should Be Denied.

The Company is seeking an acquisition adjustment of $1,588,911 for the Haddonfield system.[3] *RC-1*, Schedule HJW-10. The Board's policy, as set forth in the Elizabethtown Acquisition Order, requires that a utility demonstrate a specific benefit to existing customers from an acquisition in order for an acquired system to be eligible for an acquisition adjustment. The Company has failed to meet its burden in this case of showing that the Haddonfield acquisition benefited existing customers. The Company asserts various benefits such as the decommissioning of Haddonfield's Centre Street water treatment plant and Haddonfield's Cottage Avenue Standpipe. *P-24* at 4-5. However, as Mr. Woods testified, these asserted benefits inure only to Haddonfield customers, not other New Jersey American ratepayers as is a pre-requisite to receiving an acquisition adjustment under the Elizabethtown Acquisition Order. *RC-1* at 23.

The Company does assert one benefit to existing ratepayers from the Haddonfield acquisition, the Haddonfield water allocation permit. Id. at 6. Through the testimony of Mr.

[3] This amount reflects the difference in the purchase price of $28.5 Million and the value of the Haddonfield system of $26,911,089 contained in the testimony of Stephanie Cuthbert, *P-36* at 10.

Shields, the Company claims that this allocation will be useful in addressing water quality requirements associated with perfluorinated compounds (PFCs). *P-7* at 18. However, Mr. Woods successfully rebutted Mr. Shields' testimony. As Mr. Woods testified, "three years after the acquisition of the Haddonfield system, [the Company] still cannot quantify the impact of these groundwater quality issues or the impact that the Haddonfield acquisition may or may not have on the solution to these problems." *RC-84* at 3. When asked in discovery to quantify the impact of the Haddonfield acquisition on the Company's ability to address the new PFC standards, the Company could not answer, instead stating that it "is still evaluating the overall impact of the new PFC standards on the company wells and does not have an overall impact developed at this time." *RC-18, RC-19.* The Company bears the burden of proving any alleged benefits to existing ratepayers from the Haddonfield acquisition. Since the Company could not quantify the impact that the Haddonfield acquisition had on its ability to address PFCs, the Company failed to meet this burden of proof, and per Board policy its request for an acquisition adjustment for Haddonfield should be denied.

Additionally, while the Board has occasionally granted acquisition adjustments for acquisitions of utilities that cannot provide safe, adequate and proper utility service to customers, the Company no longer asserts that Haddonfield was troubled at the time of its acquisition, nor is it seeking rate recognition on the grounds that Haddonfield is a troubled system. 33T:L10-14 (11/21/19).

CONCLUSION

For the reasons stated above, Rate Counsel respectfully requests Your Honor issue an Initial Decision recommending that the Board deny the acquisition adjustments proposed by the Company.

Respectfully submitted,

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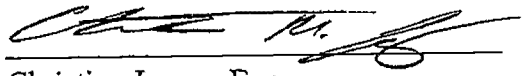
By: 
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