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VIA EMAIL and FEDERAL EXPRESS

Honorable Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Ave., Suite 314
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Re: In the Matter of the Petition of Suez Water New Jersey Inc. for Approval of a Pilot Program to Facilitate the Replacement of Lead Service Lines and a Related Cost Recovery Mechanism
BPU Docket No. WO19030381
OAL Docket No. PUC 07138-19

Dear Secretary Camacho-Welch:

This firm represents SUEZ Water New Jersey ("SWNJ" or the "Company") in the above-referenced matter. Rate Counsel filed a Motion for Reconsideration of the Board's September 9, 2020 Order in this matter on September 18, 2020. Please accept this letter-brief in lieu of a more formal opposition to Rate Counsel's Motion. As set forth more fully herein, the Company respectfully requests that Rate Counsel's Motion should be denied.

LEGAL ARGUMENT

I. THE LEGAL STANDARD GOVERNING MOTIONS FOR RECONSIDERATION.

Motions for reconsideration are governed by N.J.A.C. 14:1-8.6, which requires the petitioner to "state in separately numbered paragraphs the alleged errors of law or fact relied upon and shall specify whether reconsideration, reargument, rehearing or further hearing is requested

and whether the ultimate relief sought is reversal, modification, vacation or suspension of the action taken by the Board or other relief."

This standard is analogous to the civil standard governing motions for reconsideration, Rule 4:49-2. See R. 4:49-2 (a motion for reconsideration must "state with specificity the basis on which it is made, including a statement of the matters or controlling decisions which counsel believes it has overlooked or as to which it has erred [.]"); see In the Matter of the Provision of Basic Generation Serv. (Bgs) for the Period Beginning June 1, 2019 in the Matter of the Allocation of Renewable Portfolio Standards for Basic Generation Serv. Beginning June 1, 2019, No. EO18111250, 2019 WL 2656036, at *4 (May 28, 2019) (citing civil cases interpreting R. 4:49-1 reconsideration standard). Thus, in light of the express requirements of Rule 4:49-2, the courts have admonished that "[r]econsideration should only be used in a 'narrow corridor' of cases:

1. where 'the Court has expressed its decision based upon a palpably incorrect or irrational basis,' or

2. where 'it is obvious that the Court either did not consider, or failed to appreciate the significance of probative, competent evidence[.]'"

Palombi v. Palombi, 414 N.J. Super. 274, 288 (App. Div. 2010); see also Cummings v. Bahr, 295 N.J. Super. 374, 384 (App. Div. 1996) (citing D'Atria v. D'Atria, 242 N.J. Super. 392, 401 (Ch. Div. 1990)).

In other words, "the magnitude of the error cited must be a game-changer for reconsideration to be appropriate." Palombi, 414 N.J. Super. at 289. Thus, "a litigant must initially demonstrate that the Court acted in an arbitrary, capricious, or unreasonable manner, before the Court should engage in the actual reconsideration process." D'Atria, 242 N.J. Super. at 401. To be clear: "[f]iling a motion for reconsideration does not provide the litigant with an opportunity to

raise new legal issues that were not presented to the court in the underlying motion." Medina v. Pitta, 442 N.J. Super. 1, 18 (App. Div. 2015).

Reconsideration cannot and should not be used as a tool to "expand the record and reargue a motion." Capital Fin. Co. of Delaware Valley, Inc. v. Asterbadi, 398 N.J. Super. 299, 310 (App. Div. 2008). Motions for reconsideration have therefore been roundly criticized as "a mechanism by which unhappy litigants attempt once more to air their positions and relitigate issues already decided." Michel v. Michel, 210 N.J. Super. 218, 224 (Ch. Div. 1985). Further, the Appellate Division has analogized motions for reconsideration to a second bite of the apple, and explained that "if repetitive bites at the apple are allowed, the core will swiftly sour." Cummings, 295 N.J. Super, at 384. Thus, courts must be "sensitive and scrupulous" when analyzing motions for reconsideration. D'Atria, 242 N.J. Super. at 402. Since neither of the above criteria are applicable to the Board's decision in this case, in spite of Rate Counsel's arguments to the contrary, the Motion for Reconsideration must be denied.

II. RATE COUNSEL'S MOTION FAILS TO SATISFY THE STANDARD FOR RECONSIDERATION. EVEN IF RATE COUNSEL WERE TO ARGUE THAT IT SOMEHOW SATISFIED THE STANDARD FOR RECONSIDERATION, THIS MOTION MUST STILL BE DENIED SINCE THE NOW DENIED RATE COUNSEL MOTION WAS PREDICATED ON ITS INTERPRETATION OF LAW WHICH THE BOARD HAS NOW REJECTED.

A. Rate Counsel's Motion Fails to Demonstrate that the Board Acted in an Arbitrary and Capricious Manner.

Rate Counsel purports to set forth eight (8) separate reasons why the Board acted in an arbitrary or capricious manner. Each of these reasons, however, only serves to demonstrate Rate Counsel's disagreement with the Board's decision:

1. Rate Counsel contends that the Board "erred by misconstruing the arguments of the parties" because, according to Rate Counsel, the Board did not understand the argument that while

expenses incurred between rate cases may be deferred as regulatory assets, "such treatment may not be afforded to property that is not owned by the utility or used and useful in the provision of utility service." See Rate Counsel Motion for Reconsideration ("RCM") at pg. 4;

2. Rate Counsel argues that the Board failed to address "the issue of whether property owned by others may be deferred by the utility as a regulatory asset for recovery at a later date[.]" See RCM at pg. 4;

3. Rate Counsel next complains that the Board failed cite any authority in support of its statement that "[t]he Board is vested with the discretion to determine whether or not a utility may be compensated for expenditures made on non-company owned assets and to carry them on its books as a deferred expense." See RCM at pg. 4;

4. Thereafter, Rate Counsel asserts that the Board's reliance on certain matters cited in its order was misplaced, resulting in a "clear error" in the Board's reasoning. See RCM at pgs. 5-6;

5. Next, Rate Counsel posits that the Board's reliance on and citation to the Electric Distribution and Energy Competition Act warrants reconsideration because EDECA is inapplicable to lead service line replacement. RCM at pg. 6;

6. Rate Counsel then claims that the Board's concern over the serious problem of lead in water must be tempered by In re Centex Homes, 411 N.J. Super. 244 (App. Div. 2009) because the Board cannot regulate public health or environmental matters. As such, Rate Counsel attempts to wield Centex as a sword to compel the Board to accept its arguments. RCM at pgs. 6-7;

7. Moving on, Rate Counsel takes issue with the fact that the matters cited by the Board in support of its statement that "[t]he Board has used the discretionary authority under N.J.S.A. 48:2-21 to defer accounting on a number of occasions where the health of the public, or the ability of the utility to continue to provide service, were in peril[,]" are – according to Rate Counsel – distinguishable because "none of the cases cited by the Board involved property that was not owned by the utility or used by it to provide utility service." RCM at pgs. 7-8;

8. Finally, Rate Counsel contends that the Board's reference to and reliance upon its recent COVID-19 orders was "misplaced" because these orders did not address "property not owned by the utility or expensed incurred on other people's property." RCM at pg. 8.[1]

Rate Counsel then collectively refers to these eight items as "eight errors of law" committed by the Board. RCM at pg. 8. Rate Counsel's disagreements with the Board's reasoning, as expressed above, are insufficient, as a matter of law, to warrant reconsideration. D'Atria, 242 N.J. Super. at 401. Simply stated, in addition to being incorrect, the eight alleged "errors" identified by Rate Counsel are not "game changers" sufficient to warrant reconsideration. Palombi, 414 N.J. Super. at 289.

Rate Counsel has failed to demonstrate that the Board rendered its order in an arbitrary, capricious, or unreasonable manner. Indeed, Board has not permitted *anything* at this point. Instead, the Board's Order mandates only that the matter is to be remanded for a more complete record on the specifics of the proposed Pilot Program and other options it may have, and that the Board is not barred, as a matter of law, from establishing a pilot program to replace non-company side Lead Service Lines in order to reduce lead levels in drinking water of its customers, and directly impact the utility's expenses, *e.g.*, in water treatment to better deal with that lead issue. The Board stated it instructed the ALJ to hear and:

[1] Arguments, 1, 2 and 4, were clearly specifically understood and considered by the Board when it rejected Rate Counsel's bright line approach banning recovery of expenditures on non-company owned property. The Board's specific rejection of this theory in the Rockland AMI case, see, e.g., Board's Order at pg. 9, essentially discounts Rate Counsel's complaints. Arguments 3 and 6 are belied by even a brief reading of N.J.S.A. 48:2-23 and arguments 5, 7, and 8 must be rejected as they are arguments which undercut the Board's general statutory authority to insure safe, adequate and proper service and the power to deal with public health and public policy concerns between and during full base rate cases and other proceedings. Rate Counsel seems to aver that if the Board consciously and specifically disagrees with Rate Counsel's legal interpretation on any public policy, public health, or other legitimate concern, then this must mean that the Board has failed to consider or misconstrued their argument. However, the plain language of the Board's Order demonstrates that Rate Counsel's arguments were specifically considered by the Board but found to be substantively incorrect and, therefore were rejected.

> to establish a factual record to determine the issues set forth in Stipulated Fact No. 24, including whether the proposed Pilot Program would result in just and reasonable rates to SUEZ's customers and whether special circumstances exist that warrant consideration of the merits of the petition, as well as other relevant factual issues and options for the Board to consider in making its determination whether as a matter of policy SUEZ can be permitted to incur the expenses associated with the replacement of non-company owned LSLs.

See Board's Order at pg. 19.

More extensively addressing each "error of law" that Rate Counsel claims the Board made is unnecessary. This is so because the Board clearly acknowledges in its Order that the Legislature has vested the Board with broad authority to accomplish its statutory objectives. See Board's Order at pg. 15. This is undisputedly true. "The New Jersey Legislature has vested the BPU with 'general supervision and regulation of and jurisdiction and control over all public utilities ... so far as may be necessary for the purpose of carrying out the provisions of [Title 48] of the New Jersey Statutes.'" Matter of Valley Rd. Sewerage Co., 154 N.J. 224, 235 (1998) (quoting N.J.S.A. 48:2-13) (alteration in original).

"This sweeping grant of power is 'intended to delegate the widest range of regulatory powers over utilities to the [BPU].'" Valley Rd. Sewerage Co., 154 N.J. at 235 (internal citation and quotation omitted).[2] Indeed, New Jersey's courts have "always construed these legislative grants to the **fullest and broadest extent.**" In re Pub. Serv. Elec. & Gas Co., 35 N.J. 358, 371 (1961) (internal citations omitted) (emphasis supplied). "Furthermore, the BPU's authority over

[2] See also N.J.S.A. 48:2-23 (the Board has authority to "require any public utility to furnish safe, adequate and proper service, including furnishing and performance of service in a manner that tends to conserve and preserve the quality of the environment[.]"); N.J.S.A. 48:2-25(a) (the Board may "[f]ix just and reasonable standards, classifications, regulations, practices, measurements or service to be furnished, imposed or observed and followed thereafter by any public utility[.]"); N.J.S.A. 48:2-21(b), (c), (d) (providing broad ratemaking authority to the Board).

utilities, like that of regulatory agencies generally, extends beyond powers expressly granted by the statute to include incidental powers that the agency needs to fulfill its statutory mandate." Id. (internal citations omitted).

Further, as the Board is well aware, Rate Counsel's primary argument supporting its Motion for summary disposition was that the "used and useful" principle "cannot be overridden by . . . legislation." See Rate Counsel's Motion for Summary Disposition at pg. 11. In other words, Rate Counsel made a constitutional argument that it now seems to have abandoned in the face of numerous examples of the Board exercising its authority as cited in the Board's Order.

Now, however, Rate Counsel at least tacitly concedes the reality that legislation *can* override the "used and useful principle," but Rate Counsel argues that is not true in this situation. See, e.g., RCM at pg. 6. This is a *new* argument and, therefore, inappropriate for a motion for reconsideration. Asterbadi, 398 N.J. Super. at 310 (reconsideration should not be used to "expand the record and reargue a motion.").

Finally, Rate Counsel cites Centex in an attempt to coerce the Board into changing its mind with respect to this decision. Indeed, Rate Counsel now argues without basis that Centex stands for the proposition that the Board's "power has never been cast in environmental terms." RCM at pg. 7. Centex, however, has no applicability to this proceeding because it addressed a situation where the Board was found to have exceeded its authority where a statute *circumscribed* that authority and there was no other grant of authority that justified the Board's actions. 411 N.J. Super. at 260-61 ("BPU's power to act in the area of extensions of service is circumscribed by the language of [statute][.]"). In short, Rate Counsel's strained interpretation of Centex seeks to accomplish the same goal as Rate Counsel's Motion for summary disposition: to tie the Board's hands and limit its broad authority.

B. Assuming, for the sake of Argument only, that Rate Counsel's Motion Satisfies the preliminary Standard for Reconsideration, its motion must still be Denied because Rate Counsel's motion was itself predicated on the lack of a need to have a more extensive Factual Record, since its motion indicated that any program dealing with recovery of utility expenditures on non-company owned property was, per se, contrary to law.

At bottom, Rate Counsel's arguments miss the forest for the trees because they fail to recognize that the Board's decision was predicated upon Rate Counsel's assertion that its Motion for summary disposition was filed as a matter of law and not otherwise impacted by the extent of a factual record. In short, "[t]he standard governing agency determinations under N.J.A.C. 1:1-12.5 is substantially the same as that governing a motion under Rule 4:46-2 for summary judgment in civil litigation." L.A. v. Bd. of Educ. of City of Trenton, Mercer County, 221 N.J. 192, 203-04 (2015) (internal citation and quotations omitted). Thus, the factfinder must view the evidentiary materials in the light most favorable to the *non-moving* party (in this case, SWNJ) and draw all reasonable inferences from the evidence in favor thereof. L.A., 221 N.J. at 204 (citing Brill v. Guardian Life Ins. Co. of Am., 142 N.J. 520, 523 (1995)).

Just like the comparable civil litigation standard, a motion for summary decision should be denied when the factfinder would be required to decide the motion on a less fulsome record – especially when the ruling sought on the motion would have a far-reaching social and legal effect. See Jackson v. Muhlenberg Hosp., 53 N.J. 138, 141-42 (1969); Wilson v. Amerada Hess Corp., 168 N.J. 236, 253-254 (2001) (motion should be denied where discovery on material issues is incomplete). Here, the lack of an extensive factual record resolving all the details of a Pilot Program was short circuited by Rate Counsel's Motion, which should have rendered a summary decision premature. This is *precisely* why the Board stated it reversed that portion of the Initial Decision.

Indeed, the Board's reasoning is crystal clear:

> However, the entry of summary disposition is not appropriate in a case where material facts remain unresolved. In re Robros Recycling Corp., 226 N.J. Super 343 (App. Div. 1988), certif. denied, 113 N.J. 638 (1988). Here, while the record reflects that it is undisputed as to what type of program SUEZ has proposed, SUEZ has specifically indicated that it is not seeking rate-base treatment for the proposed regulatory asset, while Rate Counsel appears to assert that SUEZ's request is to treat it as a rate-based asset. **The Board is vested with the discretion to determine whether or not a utility may be compensated for expenditures made on non-company owned assets and to carry them on its books as a deferred expense.** The BPU has exercised this discretion by permitting deferred accounting treatment on a case-by-case basis. Then, at a later date, the Board can make a determination about that asset, including the appropriate accounting treatment to be afforded to the regulatory asset.

See Board's Order, at pg. 16 (emphasis supplied).

The lack of a factual record dealing with all issues should have precluded summary disposition in this matter, in addition to the Board's clear repudiation of Rate Counsel's contention that monies may not be recovered if they were for non-utility owned property. No longer distracted by Rate Counsel's bright line legal argument , the parties should now be able to provide the Board with the factual record it wishes. If this was not already clear from the rest of the order, the above-cited quotation leaves no room for doubt.

In other words, a genuine dispute as to material facts remains. It is beyond cavil that all reasonable inferences must be drawn in favor of the *non*-moving party (in this case, SWNJ), and that the existence of genuine issues of fact—not to mention the lack of a more extensive factual record—precludes summary disposition/judgment. L.A., 221 N.J. at 204.

In short, the Board was clear in its Order. As a matter of law, there are no bright lines barring recovery of utility expenditures on non-company owned property such as the kind Rate

Counsel advocated. Instead, each situation must be addressed based on the particular facts and circumstances of each case to ensure that the outcome results in just and reasonable rates as well as the Board exercising its jurisdiction to deal with specific public health or public policy issues within that jurisdiction. This is exactly what the Board consistently recognized in its Order by ordering the hearings to further explore options in the context of a more complete factual record.

It is this record – and this record alone – that will ultimately allow the Board an opportunity to determine whether it has the desire to permit the Company to deal with the public health concern of lead service lines by implementing an authorized Pilot Program, with its cost amortized over a number of years, with an appropriate return. However, what is clear from the Order is the Board's finding that Rate Counsel's bright line barring recovery of monies spent on non-utility property is incorrect as a matter of law. All the examples cited in the order confirm that holding. That holding need not be reconsidered. Instead, it should be affirmed.

CONCLUSION

The Company respectfully requests that the Board DENY the Division of Rate Counsel's Motion for Reconsideration.

Respectfully submitted,

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cc: Attached Service List (via email only)

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OAL Docket No. PUC07138-2019S
BPU Docket No. WO19030381

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