

March 4, 2021

VIA EMAIL ONLY

board.secretary@bpu.nj.gov

Hon. Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, NJ 08625-0350

Re: In the Matter of the New Jersey Board of Public Utilities' Response to
the COVID-19 Pandemic
BPU Docket No. AO20060471

Dear Secretary Camacho-Welch:

Please accept these comments on behalf of Aqua New Jersey, Inc. ("Aqua" or the "Company") in the above-referenced proceeding. As an initial matter, Aqua joins in the Supplemental Comments filed by New Jersey American Water Company ("NJAWC") on March 1, 2021 in this docket. NJAWC has appropriately identified the issues raised by the questions posed by the Board of Public Utilities (the "Board"), and provided input with which Aqua agrees. Until now, however, Aqua did not feel the need to provide separate input to the Board.

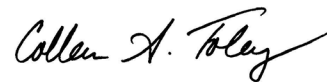
Yesterday, Aqua learned that the current moratorium on service disconnections has been further extended to June 30, 2021 pursuant to Executive Order 229. While Aqua acknowledges the reasons for the continued moratorium, Aqua is also concerned that the further extension will only exacerbate a problem whose scope is truly unknown. Indeed, NJAWC is correct that, absent detailed individual customer financial information, "there is no definitive way to evaluate the impact of the pandemic on our customers' ability to pay outstanding utility bills." Until customers are required to pay for the utility services they have received, and so have an incentive to address arrearages, neither the Board nor individual utilities will have any comprehensive understanding of the true scope of customer arrearages. Such information is vital to devising programs and rate mechanisms to address arrearages in a fair, reasonable and holistic fashion. Further delaying the

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point at which customers must address arrearages isn't a solution to the arrearages problem—it only delays gathering the exact information needed to craft a resolution. In the meantime, continuing to ask utilities to shoulder the burden of customer arrearages risks undercutting the financial health of utilities—an outcome that could have adverse consequences for all customers.

In closing, Aqua urges the Board to use the next few months to move aggressively to develop regulatory solutions to customer arrearages that are fair and reasonable, and recognize that water and wastewater utilities currently do not have access to Federal and State customer assistance programs or comprehensive clause mechanisms to address uncollectible accounts. Aqua stands ready to assist the Board as it works to address this important issue.

Respectfully submitted,

A handwritten signature in black ink that reads "Colleen A. Foley". The signature is written in a cursive, flowing style.

Colleen A. Foley, Esq.
Counsel for Aqua New Jersey, Inc.

cc: Service List (email only)

**IN THE MATTER OF THE NEW JERSEY BOARD OF PUBLIC UTILITIES'
RESPONSE TO THE COVID-19 PANDEMIC
DOCKET NO. AO20060471**

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*The municipals listed are regulated only in terms of the customers served outside of the municipality's limits and only for service issues, if the rates are equalized. Currently, the NJBPU-regulated municipal water systems all have equalized rates.

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