



State of New Jersey  
DIVISION OF RATE COUNSEL  
140 EAST FRONT STREET, 4<sup>TH</sup> FL  
P.O. Box 003  
TRENTON, NEW JERSEY 08625

PHIL MURPHY  
Governor

SHEILA OLIVER  
Lt. Governor

STEFANIE A. BRAND  
Director

August 4, 2021

**Via Electronic Mail**

Hon. Aida Camacho-Welch, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9th floor  
P.O. Box 350  
Trenton, New Jersey 08625-0350  
[Board.Secretary@bpu.nj.gov](mailto:Board.Secretary@bpu.nj.gov)  
[Aida.Camacho@bpu.nj.gov](mailto:Aida.Camacho@bpu.nj.gov)

**Re: I/M/O the New Jersey Board of Public Utilities' Response to the  
COVID-19 Pandemic  
BPU Docket No. AO20060471**

Dear Secretary Camacho-Welch:

Please accept for filing in the above-referenced matter Rate Counsel's response to a motion filed by Public Service Electric & Gas Company, South Jersey Gas Company and Elizabethtown Gas Company (collectively, "Companies") requesting that the Board of Public Utilities amend its July 2, 2020 Order Authorizing the Establishment of a Regulatory Asset for Incremental COVID-19 Related Expenses ("COVID-19 Regulatory Asset Order") to extend the end of the regulatory asset deferral period from September 30, 2021, as approved in the Order, to the end of 2023.

Consistent with the March 19, 2020 Order of the New Jersey Board of Public Utilities ("BPU" or the "Board") in *I/M/O the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential*

Tel: (609) 984-1460 • Fax: (609) 292-2923 • Fax: (609) 292-4991  
<http://www.nj.gov/rpa> E-Mail: [njratepayer@rpa.nj.gov](mailto:njratepayer@rpa.nj.gov)

Hon. Aida Camacho-Welch, Secretary

August 4, 2021

Page 2

*Obligations*, BPU Docket No. EO20030254, copies of this comment letter are being provided to each person on the service list by electronic mail only. No paper copies will follow. **Please acknowledge receipt of this comment letter.** Thank you.

Very truly yours,

STEFANIE A. BRAND  
DIRECTOR, DIVISION OF RATE COUNSEL

By: /s/ Bethany Rocque-Romaine  
Bethany Rocque-Romaine, Esq.  
Assistant Deputy Rate Counsel

c. Service List (via electronic mail only)

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

**Comments of the New Jersey Division of Rate Counsel**

**August 4, 2021**

**Background**

On March 9, 2020 Governor Murphy signed an Executive Order No. 103 (“EO 103”) declaring a State of Emergency and a Public Health Emergency in response to the COVID-19 pandemic and authorizing the heads of state agencies to “...promulgate rules to waive, suspend or modify any existing rule, where the enforcement of which would be detrimental to the public welfare during this emergency.”<sup>1</sup>

On March 13, 2020, the Board of Public Utilities (“BPU” or “Board”) announced that the State’s public electric and gas utilities agreed to suspend service shutoffs due to the public health emergency and the state-wide effort to respond to the COVID-19 pandemic. The moratorium was later voluntarily extended by the utilities until October 15, 2020. On October 15, 2020, the moratorium was extended by Governor Murphy through Executive Order 190 (“EO 190”) to March 15, 2021. On March 3, 2021 Governor Murphy further extended the moratorium from March 15, 2021 to June 30, 2021 through Executive Order 229 (“EO 229”). On June 4, 2021, through Executive Order 244 (“EO 244”) Governor Murphy terminated the Public Health Emergency put into effect through EO 103, but continued the State of Emergency established in

---

<sup>1</sup> EO 103, p. 6.

EO 103.<sup>2</sup> EO 244 also directed that EO 229 would remain in effect until January 1, 2022, with the option of the Governor modifying EO 229 prior to January 1, 2022.

Executive Order 246, issued by Governor Murphy on June 14, 2021 and effective July 1, 2021, ended the utility shutoff moratorium and provided a grace period through December 31, 2021 to customers protected by the moratorium against termination for non-payment of gas, electric, water, or internet service. The grace period was intended to allow customers to apply for available assistance programs, make payment arrangements with utilities to address overdue balances, and provide time for the State to decide the process for distribution of American Rescue Plan of 2021 funds to customers in arrears. In addition, when linked with the established Winter Moratorium period, electric and gas utility customers are protected from the termination of utility service for non-payment until March 15, 2022.

On July 2, 2020 the BPU issued an order in I/M/O Board of Public Utilities' Response to the Covid-19 Pandemic (Docket No. AO20060471) authorizing the establishment of a Regulatory Asset for Incremental Covid-19 Related Expenses (“COVID-19 Regulatory Asset Order”) to defer the utilities’ incremental costs associated with COVID-19 and the state-wide moratorium on utility service shutoffs. The Board established a timetable for the deferral of these costs on the utilities’ books and records starting March 9, 2020 and ending on September 30, 2021, or 60 days after Governor Murphy issues an order, declaration, proclamation or similar announcement that the Public Health Emergency is no longer in effect, or in the absence of such an order, 60 days from the time the Public Health Emergency automatically terminates pursuant to N.J.S.A 26:13-3(b).<sup>3</sup>

---

<sup>2</sup> See also Assembly Bill No. 5820 as L. 2021, c. 103 signed on June 4, 2021.

<sup>3</sup> COVID-19 Regulatory Asset Order, p. 4.

## Summary of the Companies' Motions

On July 6, 2021, Public Service Electric & Gas Company (“PSE&G”), South Jersey Gas Company (“SJG”) and Elizabethtown Gas Company (“ETG”) (collectively the “Companies”) filed a motion requesting the Board extend the regulatory asset deferral period for their incremental COVID-19-related costs, from September 30, 2021 to the end of 2023; and to extend the date for filing a COVID-19 cost recovery petition to a date 60 days past the close of the extended regulatory asset deferral period requested.

On July 19, SUEZ Water New Jersey, Inc. (“SUEZ”) filed a letter in support of the Companies’ motion. On July 21, New Jersey American Water Company (“NJAWC”) also expressed its support for the Companies’ motion. On July 21, Atlantic City Electric Company stated that it did not oppose the Companies’ motion but requested that the Board consider shortening the requested extension of the regulatory asset deferral period to allow cost recovery to begin in mid-2022.

Aqua New Jersey, Inc. (“Aqua”) filed a letter motion on the afternoon of July 23, after the close of the period set by Board Staff. Aqua cited an increase in its total accounts receivable (“AR”), from \$561,000 in June 2019 to over \$1.3 million in June 2021 (including an increase from \$37,000 to \$521,000 in AR over 6 months old), and concern that it is less likely to collect its longer-term AR. Aqua expressed support for the Companies’ motion, and for an extension of the regulatory asset deferral period until at least mid-2022.<sup>4</sup>

The Companies argue that the incremental costs, particularly those related to bad debt and carrying costs on the Companies’ incremental AR, are mounting and will continue to mount

---

<sup>4</sup> July 23, 2021 Certification of Lawrence R. Carson, President of Aqua, in support of motion to extend regulatory asset deferral period, ¶¶ 6, 10 & 13.

past the September 30, 2021 end date.<sup>5</sup> PSE&G claims that the payments it receives from the Low Income Home Energy Assistance Program (“LIHEAP”) have decreased by 24% from the January to May 2019 time period to the January to May 2020 time period. SJG claims that the payments it receives from LIHEAP have decreased by 20.3% and ETG claims that the payments it receives from LIHEAP have decreased by 25% over the same time period. The Companies state their concern that customers who do not pay or set up a payment arrangement by the January 2022 end of the service shutoff grace period (and the March 15, 2022 end of the Winter Termination Program) will not have paid their bills in over two years and will be too far behind to be able to catch up with their payments, may move to a different residence or may no longer be their customers. The Companies anticipate that customers in any of these circumstances likely will not completely pay their outstanding bills. The Companies also state that their customers are currently not motivated to engage with them to address their arrearages.

PSE&G states that its overdue AR (greater than 30 days) on June 30, 2021 was \$264 million higher than on June 30, 2019, a 126% increase. The number of PSE&G customers with bills overdue over six months has almost doubled from 95,000 to 186,000 since before the COVID-19 pandemic.

SJG states that its overdue AR in May 2021 was \$14 million higher than in May 2019, a 33.8% increase from before the pandemic. The number of SJG customers with bills overdue for six months and longer is also higher, 23,500 now vs. 14,800 pre-pandemic.

ETG states that its overdue AR in May 2021 was \$15.5 million higher than in May 2019, an 85% increase, and the number of ETG customers with debts overdue six months or longer has increased to 17,500 from 12,100 pre-pandemic.

---

<sup>5</sup> Affidavit of Jane Bergen in Support of Public Service Electric and Gas Company’s motion to extend the close of the COVID-19 regulatory asset period, and Affidavit of Deborah Franco in support of motion to extend the close of the Covid-19 Regulatory Asset Period, filed with the motion.

NJAWC stated that its customers' arrearages rose from \$14.5 million in June 2019 to \$29.7 million in June 2021, a 104% increase, and that the number of its customers with bills that are five months or more overdue rose from 5,688 in June 2018 to 20,912 in June 2021.<sup>6</sup>

NJAWC does not request an extension to a specific date, but its argument suggests an extension at least through March 15, 2022. NJAWC anticipates that its AR will continue to increase at least through December 31, 2021, due to the grace period on utility shutoffs.

SUEZ stated that its AR more than 30 days overdue rose from \$5 million on March 31, 2020 to \$11 million on June 30, 2021.

The Companies acknowledge that the Board's two-year expansion of Universal Service Fund ("USF") and Fresh Start programs<sup>7</sup> may help electric and gas utility customers pay down their arrearages; however, each company states it will not know for some time the number of its customers who are eligible and the number of customers for whom they will actually receive payments, preventing the Companies from knowing the full extent of write off exposure until the conclusion of the USF and Fresh Start program expansions in late 2023. Therefore, the Companies argue that the end date for the regulatory asset deferral period should be extended until three months after the September 30, 2023 end of the USF and Fresh Start program expansions, or well beyond the September 30, 2021 date set in the COVID-19 Regulatory Asset Order.

---

<sup>6</sup> July 21, 2021 Affidavit of John S. Tomac in support of NJAWC motion to extend the close of the COVID-19 regulatory asset period, ¶¶ 7 & 8.

<sup>7</sup> By Order dated June 24, 2021, the Board directed an expansion of the USF and Fresh Start programs on a temporary basis for a two-year period beginning on October 1, 2021 and expiring on September 30, 2023, unless further extended by future Board Order. BPU Docket No. AO20060471.

NJAWC and SUEZ point out that, as water utilities, their customers cannot receive any benefits from USF, Fresh Start or LIHEAP, and a Low Income Household Water Assistance Program has been proposed but not yet established in New Jersey.

SUEZ also states that it anticipates incurring potentially significant costs to set up a program and process to administer federal funds, from the Consolidated Appropriations Act of 2021 and the American Rescue Plan Act of 2021, intended to reduce ratepayer arrearages.<sup>8</sup>

The Companies also argue that, considering the large increase in customers falling behind in making payments and needing assistance, they anticipate increased costs to hire additional employees for field collection and call center work, and eventual shut offs. The Companies expect these expenses will not begin to accrue until 2022 and will extend well beyond the September 30, 2021 close of the current COVID-19 Regulatory Asset period.

### **Rate Counsel Response**

As a preliminary matter, Rate Counsel notes that the Companies' filing requests relief by way of motion. It is unclear that this is the proper procedure to amend the COVID-19 Regulatory Asset Order, or whether it should have been filed as a petition so as to allow all interested parties an opportunity to be heard.<sup>9</sup> Ensuring the due process rights of all interested parties is paramount and as demonstrated by the Board Staff's procedural determination, will not prejudice the rights of the Companies. Rate Counsel thanks Board Staff for granting all interested parties additional time to respond. Rate Counsel provides this substantive response

---

<sup>8</sup> July 19, 2021 letter from Gary S. Prettyman, Senior Director – Regulatory Business for SUEZ, to Board Secretary Aida Camacho-Welch in support of the Companies' motion, p. 1.

<sup>9</sup> See N.J.A.C. 14:1-10.3.



while reserving all rights to further contest the procedural or substantive issues relating to this filing.<sup>10</sup>

Rate Counsel does not disagree that extension of the regulatory asset deferral period beyond September 30, 2021 may be a reasonable solution to the issues raised by the Companies; however, as discussed below, Rate Counsel respectfully recommends inclusion of certain conditions to ensure appropriate implementation of the COVID-19 Regulatory Asset.

Additionally, Rate Counsel considers an extension through the end of calendar year 2023 at this time to be excessive and unnecessary. While it is unclear from the Companies' filings what exactly these costs will be or whether they are reasonable, prudent and subject to recovery, it is reasonable to anticipate that the Companies, ACE, NJAWC, SUEZ and Aqua may continue to have additional expenses due to the pandemic. Based on these facts, Rate Counsel is not sure that an extension of the regulatory asset deferral period until December 2023 is appropriate.

Rate Counsel recommends the Board derive a reasonable extension of the regulatory asset deferral period based on when the Board expects: (a) federal funds to be received and processed; (b) the enhanced relief programs will be fully operational; and (c) customers have had an opportunity to earn arrearage forgiveness through the USF Fresh Start program. Rate Counsel further recommends that the Board impose reasonable conditions regarding clear accountability for the deferred costs.

Rate Counsel recommends that the Board impose reasonable conditions on any extension, particularly requiring each utility in this proceeding to file a plan setting forth how it will use the additional time to obtain appropriate federal funds and work with customers to reduce arrearages and avoid disconnections, as well as, requiring the utilities to keep transparent record of actions

---

<sup>10</sup> Board Staff advised all parties to the COVID-19 Regulatory Asset Order that any motions for extension to the regulatory asset period, or comments in support thereof, should be filed by July 21, 2021. Staff also provided that responses to the motion should be filed by August 4, 2021, with replies due by August 11, 2021.

taken and costs incurred. In addition to the information the utilities are required to file, this recordkeeping should include periodic filings setting forth new hires and their roles; numerical goals and achievements such as arrearages collected; numbers of disconnections and re-connections by zip code; Deferred Payment Arrangements (“DPAs”) entered into; funds received by each utility from programs such as USF, Fresh Start, LIHEAP, PAGE and Lifeline; detailed accounting of each regulatory asset cost claimed by each utility; amounts of arrearages recovered through any mechanism including the Societal Benefits Charge (electric), base rates (gas) and from federal funds (e.g. American Rescue Plan Act of 2021 and Consolidated Appropriations Act of 2021) and other relevant information. This additional information is necessary to evaluate the prudence or recoverability of each utility’s regulatory asset, and to compare the utilities’ claims. While Board Staff have required each utility to submit quarterly reports under the COVID-19 Regulatory Asset Order, the data reported varies widely by utility and does not include all the parameters listed above. In addition, those reports should be in a consistent format using Excel, to enable accurate evaluation and comparison.

Rate Counsel notes the claim that SUEZ anticipates incurring potentially significant costs to set up a program to administer federal funds toward their customers’ arrearage balances.<sup>11</sup> Rate Counsel respectfully requests that the Board ensure an efficient process by the utilities for distributing federal assistance funds to each utility’s customers, so that funds intended to reduce ratepayer debts are not diverted into IT or other administrative costs. Rate Counsel requests that any further evaluation of the COVID–related costs and expenses of all the utilities, not just those appearing in this action, be addressed in separate and full proceedings for each utility.

---

<sup>11</sup> The July 19 letter from SUEZ indicates that they are working with Board Staff and the State Department of Community Affairs to develop a program and process through which customers can receive federal assistance funds from the Consolidated Appropriations Act of 2021 and the American Rescue Plan Act of 2021. While Rate Counsel continues to meet with all parties in the generic COVID Proceeding, under BPU Docket No. AO20060471, it is not involved in those discussions referenced by SUEZ.

While Rate Counsel does not oppose the extension of time under the conditions described above, we take no position in this motion on the prudence or recoverability of any element of any utility's claimed regulatory asset. Further, Rate Counsel requests that any additional requests for extension by the Companies, be appropriately filed sufficiently ahead of the expiration of any extension given here so as to allow for proper review and consideration of the claims made therein.

### Conclusion

As set forth above, Rate Counsel does not object to extension of the regulatory asset deferral period in the COVID-19 Regulatory Asset Order beyond September 30, 2021. Based on the information provided, Rate Counsel is unable to determine whether the date requested is reasonable and believes an extension of the regulatory asset deferral period should be set to a time when the Board expects: (a) federal funds to be received and processed; (b) the enhanced relief programs will be fully operational; and (c) customers have had an opportunity to earn arrearage forgiveness through the USF Fresh Start program. Extending the deferral period based on these necessary actions is reasonable and warranted, and will ensure a fair and orderly process. Additionally, Rate Counsel recommends the inclusion of certain conditions to help track the utilization of the additional time and money by all of the utilities. Rate Counsel recommends the extension of the regulatory asset deferral period only be approved by the Board based on the conditions recommended above.

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

**SERVICE LIST**

Aida Camacho-Welch, Secretary  
Board of Public Utilities  
44 South Clinton Ave., 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350x

Robert Brabston, Esq.  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625-0350x

Abraham Silverman, Esq.  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625x

Ben Witherell, PhD  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625x

Stacy Peterson  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625x

Carol Artale, Esq.  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625x

Jamie Saunders  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625x

Michael Kammer  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625x

Julie Ford-Williams  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625x

Megan Lupo, Esq.  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Lanhi Saldana, Esq.  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625x

Crystal Pruitt  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Kofi Ocansey  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

ONeil Hamilton  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Richard Lambert  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Raymond Matos  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Peter Peretzman  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Hannah Thonet  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Charles Gurkas  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Taryn Boland  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Maureen Clerc  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Tony Iskander  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Lawanda Gilbert  
Board of Public Utilities  
44 South Clinton Ave., 9th Floor  
P.O. Box 350  
Trenton, NJ 08625

Pamela Owen, DAG  
Dept. of Law and Public Safety  
Division of Law  
R.J. Hughes Justice Complex  
25 Market Street, P.O. Box 112  
Trenton, NJ 08625

Darren Eppley, DAG  
Dept. of Law and Public Safety  
Division of Law  
R.J. Hughes Justice Complex  
25 Market Street, P.O. Box 112  
Trenton, NJ 08625

Tanya Lloyd-Samuel  
Dept of Law and Public Safety  
Division of Law  
R.J. Hughes Justice Complex  
25 Market Street, P.O. Box 112  
Trenton, NJ 08625

Janel Winter  
Department of Community Affairs  
Division of Housing and Community  
Resources  
101 South Broad Street  
P.O. Box 811  
Trenton, NJ 08624

Fidel Ekhelar  
Department of Community Affairs  
Division of Housing and Community  
Resources  
101 South Broad Street  
P.O. Box 811  
Trenton, NJ 08624

Stefanie A. Brand, Director  
Division of Rate Counsel  
140 East Front Street, 4th Fl.  
P.O. Box 003  
Trenton, NJ 08625

Brian O. Lipman, Esq.  
Division of Rate Counsel  
140 East Front Street, 4th Fl.  
P.O. Box 003  
Trenton, NJ 08625

T. David Wand, Esq.  
Division of Rate Counsel  
140 East Front Street, 4th Fl.  
P.O. Box 003  
Trenton, NJ 08625

Susan McClure, Esq.  
Division of Rate Counsel  
140 East Front Street, 4th Fl.  
P.O. Box 003  
Trenton, NJ 08625

Brian Weeks, Esq.  
Division of Rate Counsel  
140 East Front Street, 4th Fl.  
P.O. Box 003  
Trenton, NJ 08625

Maria Novas-Ruiz, Esq.  
Division of Rate Counsel  
140 East Front Street, 4th Fl.  
P.O. Box 003  
Trenton, NJ 08625

Bethany Rocque-Romaine, Esq.  
Division of Rate Counsel  
140 East Front Street, 4th Fl.  
P.O. Box 003  
Trenton, NJ 08625

Robert Glover, Esq.  
Division of Rate Counsel  
140 East Front Street, 4th Fl.  
P.O. Box 003  
Trenton, NJ 08625

Debora Layugan  
Division of Rate Counsel  
140 East Front Street, 4th Fl.  
P.O. Box 003  
Trenton, NJ 08625

Susan Baldwin  
SMBaldwinConsulting  
13 Church Hill Street  
Watertown, MA 02472

Matthew Weissman, Esq.  
PSEG Services Corporation  
80 Park Plaza, T5G  
PO Box 570  
Newark, NJ 07102

Danielle Lopez, Esq.  
PSEG Services Corporation  
80 Park Plaza, T5G  
PO Box 570  
Newark, NJ 07102

Katherine Smith, Esq.  
PSEG Services Corporation  
80 Park Plaza, T5G  
PO Box 570  
Newark, NJ 07102

Michelle Falcao  
PSEG Services Corporation  
80 Park Plaza, T5G  
PO Box 570  
Newark, NJ 07102

Bernard Smalls  
PSEG Services Corporation  
80 Park Plaza, T5G  
PO Box 570  
Newark, NJ 07102

Caitlyn White  
PSEG Services Corporation  
80 Park Plaza, T5G  
PO Box 570  
Newark, NJ 07102

Claire Bartolomeo  
PSEG Services Corporation  
80 Park Plaza, T5G  
PO Box 570  
Newark, NJ 07102

Rosa Pagnillo-Lopez  
PSEG Services Corporation  
80 Park Plaza, T5G  
PO Box 570  
Newark, NJ 07102

Philip J. Passanante, Esq.  
Atlantic City Electric Company  
500 N. Wakefield Dr.  
P.O. Box 6066  
Newark, DE 19714

Evalene Wright  
Atlantic City Electric Company  
500 N. Wakefield Dr.  
P O Box 6066  
Newark, DE 19714

Alita Corbett  
Atlantic City Electric Company  
500 N. Wakefield Dr.  
P O Box 6066  
Newark, DE 19714

Joshua Eckert, Esq.  
Jersey Central Power & Light Co.  
300 Madison Avenue  
P.O. Box 1911  
Morristown, NJ 07962

Michael J. Connolly, Esq.  
Cozen O'Connor  
One Gateway Center  
Suite 910  
Newark, NJ 07102

Leonard Howell  
Jersey Central Power & Light Co.  
300 Madison Avenue  
P.O. Box 1911  
Morristown, NJ 07962

John Carley, Esq.  
Rockland Electric Company  
4 Irving Place  
New York, NY 10003

Margaret Comes, Esq.  
Rockland Electric Company  
4 Irving Place  
New York, NY 10003

David Braunfotel  
Rockland Electric Company  
4 Irving Place  
New York, NY 10003

Jade Fell  
Rockland Electric Company  
4 Irving Place  
New York, NY 10003

Andrew K. Dembia, Esq.  
New Jersey Natural Gas Company  
1415 Wycoff Road  
P.O. Box 1464  
Wall, NJ 07719

Mark Kahrer  
New Jersey Natural Gas Company  
1415 Wycoff Road  
P.O. Box 1464  
Wall, NJ 07719

Tina Trebino  
New Jersey Natural Gas Company  
1415 Wycoff Road  
P.O. Box 1464  
Wall, NJ 07719

Susan Fastuca  
New Jersey Natural Gas Company  
1415 Wycoff Road  
P.O. Box 1464  
Wall, NJ 07719

Maria Delaplain  
New Jersey Natural Gas Company  
1415 Wycoff Road  
P.O. Box 1464  
Wall, NJ 07719

Suzanne Bostwick  
New Jersey Natural Gas Company  
1415 Wycoff Road  
P.O. Box 1464  
Wall, NJ 07719

Deborah Franco, Esq.  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Diana Donnelly  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Marissa Travaline  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Gina O'Donnell  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Brian Jacobs  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Dominick DiRocco  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Andrew McNally  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Carolyn Jacobs  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Jim Fredricks  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Susan Potanovich  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

Tom Kaufmann  
South Jersey Gas Company and  
Elizabethtown Gas Company  
520 Green Lane  
Union, NJ 07083

James Lampmann  
Borough of Butler  
1 Ace Road  
Butler, NJ 07405

Robert Oostdyk, Jr., Esq.  
Murphy McKeon P.C.  
51 Route 23 South  
P.O. Box 70  
Riverdale, NJ 07456

Lawrence Carson  
Aqua NJ, Inc.  
10 Black Forest Road  
Hamilton, NJ 086

Adam Burger  
Aqua NJ, Inc.  
10 Black Forest Road  
Hamilton, NJ 08691

Kimberly Joyce  
Aqua NJ, Inc.  
10 Black Forest Road  
Hamilton, NJ 08691

Bill Packer  
Aqua NJ, Inc.  
10 Black Forest Road  
Hamilton, NJ 08691

Wendy Stewart  
Atlantic City Sewer Company  
1200 Atlantic Avenue, Suite 300  
Atlantic City, NJ 08401

Carl Cordek  
Atlantic City Sewer Company  
1200 Atlantic Avenue, Suite 300  
Atlantic City, NJ 08401

Tom Kavanaugh  
Atlantic City Sewer Company  
1200 Atlantic Avenue, Suite 300  
Atlantic City, NJ 08401

Dennis Doll  
Middlesex Water Company  
481 C Route 1 South, Suite 400  
Iselin, NJ 08830

Jay Kooper  
Middlesex Water Company  
481 C Route 1 South, Suite 400  
Iselin, NJ 08830

Cheryl Norton  
NJ American Water Company  
One Water Street  
Camden, NJ 08102

Debbie Albrecht, Esq.  
NJ American Water Company  
One Water Street  
Camden, NJ 08102

Christopher Arfaa, Esq.  
NJ American Water Company  
One Water Street  
Camden, NJ 08102

Alan Weland  
Suez Water NJ, Inc.  
461 From Road, Suite 400  
Paramus, NJ 07652

Jim Cagle  
Suez Water NJ, Inc.  
461 From Road, Suite 400  
Paramus, NJ 07652

Rodolphe Bouichou  
Suez Water NJ, Inc.  
461 From Road, Suite 400  
Paramus, NJ 07652

Gary Prettyman  
Suez Water NJ, Inc.  
461 From Road, Suite 400  
Paramus, NJ 07652

David B. Simmons, Jr.  
Simmons Water Company  
P.O. Box 900  
Branchville, NJ 07826

John Cannie  
Fayson Lakes Water Company  
160 Boonton Avenue  
Kinnelon, NJ 07405

Steve Lubertozi, President  
Montague Water Company  
2335 Sanders Road  
Northbrook, IL 60062

Jeffrey Fuller, President  
Lake Lenape Water Company  
83 Eagle Chase  
Woodbury, NY 11797

William Iannacone  
Midtown Water Company  
1655 US Highway 9  
Old Bridge, NJ 08857

Jennifer Zappola  
Midtown Water Company  
1655 US Highway 9  
Old Bridge, NJ 08857

Samuel Faiell  
Shore Water Company  
105-23rd Avenue  
South Seaside Park, NJ 08752

Gloria Stuart  
Shore Water Company  
105-23rd Avenue  
South Seaside Park, NJ 08752

David Ern  
Gordon's Corner Water Company  
27 Vanderburg Road  
P.O. Box 145  
Marlboro, NJ 07746

Eric Olsen  
Gordon's Corner Water Company  
27 Vanderburg Road  
P.O. Box 145  
Marlboro, NJ 07746

Henry Schwarz  
Mt. Olive Villages Water Company  
200 Central Avenue  
Mountainside, NJ 07902



Evelyn Liebman  
AARP NJ State Office  
303 George St., Suite 505  
New Brunswick, NJ 08901

Janine Bauer, Esq.  
101 Grovers Mill Road  
Suite 200  
Lawrenceville, NK 08648

Randi Moore  
Affordable Housing Alliance  
3535 Route 66, Parkway 100  
Building 4  
Neptune Township, NJ 07753

Donna Blaze  
Affordable Housing Alliance  
3535 Route 66, Parkway 100  
Building 4  
Neptune Township, NJ 07753

Kathy Kerr  
Affordable Housing Alliance  
3535 Route 66, Parkway 100  
Building 4  
Neptune Township, NJ 07753

Renee Koubiadis  
Anti-Poverty Network of NJ  
272 Dunns Mill Road, #327  
Acme Commons Center  
Bordentown, NJ 08505

Beverly Brown Ruggia  
NJ Citizen Action  
The Hahne's Building  
625 Broad Street, Suite 270  
Newark, NJ 07102

Tom Churchelow, Esq.  
NJ Utilities Association  
154 West State Street, 1<sup>st</sup> Floor  
Trenton, NJ 08608

Lawrence Levine, Esq.  
Natural Resources Defense Council  
Urban Water Infrastructure  
40 West 20<sup>th</sup> Street  
New York, NY 10011

Eric Miller  
Natural Resources Defense Council  
NJ Energy Policy  
40 West 20<sup>th</sup> Street  
New York, NY 10011

David McMillan, Esq.  
Legal Services of New Jersey  
100 Metroplex Drive, Suite 402  
Edison, NJ 08818

Louise Rush  
Division Director Division of Aging  
Services  
P.O. Box 715  
Trenton, NJ 08625-0715

Matthew Smith  
Food and Water Watch NJ  
100 Bayard Street  
New Brunswick, NJ 08901

Gina Sullivan  
Engineers Labor-Employer  
Cooperative  
65 Springfield Avenue, 2<sup>nd</sup> Floor  
Springfield, NJ 07081

Evan Piscitelli  
National Utilities Contractors  
Association  
3925 Chain Bridge Road, Suite 300  
Fairfax, VA 22030

Bruce Miller, Esq.  
Cullen and Dykman, LLP  
One Riverfront Plaza  
Newark, NJ 07102

Cheryl Stowell  
New Jersey Shares, Inc.  
4 Walter E. Foran Boulevard  
Suite 105  
Flemington, NJ 08822

Dan Kennedy  
Utility & Transportation Contractors  
Association on NJ  
P.O. Box 728  
Allenwood, NJ 08720

Heather Mailander,  
Village of Ridgewood  
131 N. Maple Ave #5  
Ridgewood, NJ 07450

Sarmili Saha, Esq.  
Cullen and Dykman, LLP  
80 State Street, Suite 900  
Albany, NY 12207

Richard Calbi, Director  
Village of Ridgewood  
131 N. Maple Ave #5  
Ridgewood, NJ 07450

Richard Phelan  
Public Works/Business  
Administrator  
Clinton Municipal Building  
43 Leigh Street  
Clinton, NJ 08809

Chris O'Leary  
Borough of Park Ridge Water  
53 Park Avenue  
Park Ridge, NJ 07656

Art Dysart  
Clinton Water and Sewer Utility  
43 Leigh Street  
Clinton, NJ 08809

John Allsebrook  
Borough of Berlin Water  
Department  
59 South White Horse Pike  
Berlin, NJ 08009

Andrew-Dujack  
Town of Dover Water  
Commissioners  
100 Princeton Ave  
Dover, New Jersey 07801

John Gross  
Town of Dover  
37 North Sussex Street  
Dover, NJ 07081

Kristin Epstein  
Trenton Water Works  
333 Cortland Street  
Post Office Box 528  
Trenton, NJ 08604

Stacey DiVello  
Borough of Berlin  
59 South White Horse Pike  
Berlin, NJ 08009

Debra DiMattia,  
Borough of Berlin  
59 South White Horse Pike  
Berlin, NJ 08009

Rafael Valentin  
Trenton Water Works  
333 Cortland Street  
Trenton, NJ 08638

Maria Kelly  
Assistant Municipal Attorney  
City of Trenton  
333 Cortland Street  
Trenton, NJ 08638

Mark Lavenberg  
Trenton Water Works  
333 Cortland Street  
Trenton, NJ 08638

Kathy McCarthy  
Borough of Collingswood  
678 Haddon Ave  
Collingswood, NJ 08108

Robert Kinsey  
Town of Dover Water  
37 North Sussex Street  
Dover, NJ 07081

Steve DiOrio  
Collingswood Water Department  
215 Hillcrest Ave  
Collingswood, NJ 08108

Mike McIntyre,  
Wildwood Water Utility  
3416 Park Boulevard  
Wildwood, NJ 08260

Patricia McGowan  
City of Bordentown Water  
Department  
324 Farnsworth Avenue  
Bordentown, NJ 08505

John J. Walls  
Water Treatment Facility Operator  
City of Bordentown  
324 Farnsworth Avenue  
Bordentown, NJ 08505

Marilyn D. Davis,  
Altice USA  
494 Broad Street, 9th Floor  
Newark, NJ 07102

Michael A. Chowanec  
Charter Communications  
400 Atlantic Street  
Stamford, CT 06901

Elizabeth Murray  
Comcast  
50 Randolph Road  
Somerset, NJ 08873

Stephanie Kosta  
Comcast  
3800 Horizon Boulevard, Suite 300  
Trevose, PA 19053

John Capparell  
Service Electric Cable TV  
2260 Avenue A, LVIP#1  
Bethlehem, PA 18017

Jennifer Brown  
Service Electric Cable TV  
2260 Avenue A, LVIP#1  
Bethlehem, PA 18017

Ava-Marie Madeam, Esq.  
Verizon New Jersey, Inc.  
999 West Main Street, 3rd Floor  
Freehold, NJ 07728

Sylvia Del Vecchio  
Verizon New Jersey, Inc.  
9 Gates Avenue, 2nd Floor  
Montclair, NJ 07042-3399

Richard C. Fipphen, Esq.  
Verizon New Jersey, Inc.  
140 West Street, 6th Floor  
New York, NY 10007

Josh Motzer  
Century Link  
37 W. Broad Street, Suite 470  
Columbus, OH 43215

Virginia O'Hanlon  
Momentum Telecom  
47 Main Street  
Warwick, NY 10990

Charlene Brown  
AT&T  
192 West State Street  
Trenton, NJ 08873

Robert H. Williams, Esq.  
Service Electric of Cable TV New  
Jersey, Inc  
320 Sparta Avenue  
Sparta, NJ 07871

Robbin Blessing  
Service Electric of Cable TV New  
Jersey, Inc  
320 Sparta Avenue  
Sparta, NJ 07871