



Joy Tozzi
Business Administrator
2298 Route 33, Robbinsville, New Jersey 08691
(609) 259-3600 ext. 1100
jtozzi@robbinsville.net

October 26, 2022

Honorable Carmen Diaz
New Jersey Board of Public Utilities
44 South Clinton Avenue, Suite 314
Trenton, New Jersey 08625

Re: Aqua New Jersey, Inc. – 2022 Initial DSIC Filing
BPU Docket No. WR22050360

Members of the Board:

On behalf of the residents of the Township of Robbinsville and Township Council, I thank you convening this public hearing and allowing the Township the opportunity to comment on Aqua New Jersey's Foundational Filing ("Filing") to ultimately implement a Distribution System Improvement Charge ("DSIC") upon all classes of its customers.

Robbinsville, New Jersey, is a growing municipality of approximately 20 square miles and 15,500 residents. Traversed by the NJ Turnpike, Route 33, Route 130, and I-195, and home to a thriving warehouse park that includes two Amazon buildings and a leading Fortune 500 pharmaceutical distributor, Robbinsville has sought to balance its commercial, industrial, and residential development with the preservation of thousands of acres of open space and preserved farmland. Despite significant challenges year after year imposed on municipalities throughout New Jersey, Robbinsville continues to be able to balance this growth without placing an undue burden on its residents and taxpayers. However, approving Aqua's Filing to allow it to implement a DSIC on all classes of its customers will prove to be a significant burden that will upset this carefully-constructed balance.

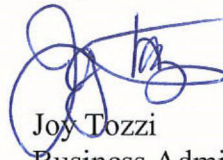
Charging a municipality a DSIC at the same time the DSIC is being assessed to individual residential, commercial, and industrial residents of the municipality is ultimately charging those same residents multiple times over for the provision of water. On a basic level, this makes sense as Aqua is charging for the use of the water it is providing. However, in terms of municipalities, the water provided is not always used.

Municipalities throughout New Jersey, like Robbinsville, are billed every year by Aqua for water that they do not actually use. Primarily water provided to fire hydrants, this water sits idle for most of the time; yet, municipalities are being billed every month for this unused standby water. In 2022, Robbinsville will be billed over \$300,000.00 by Aqua for this standby water. Ultimately, as this payment is made from tax dollars, the taxpayers themselves are paying for unused water. It is incomprehensible to subject individual taxpayers to paying increased charges for water that is going unused.

Certainly, a portion of the water placed on standby for hydrants is used each year. However, for all of the charges collected for the water that remains unused, it begs the question as to where Aqua accounts for this money. Perhaps the fees collected for the unused water can be used for the infrastructure improvements proposed by Aqua, or at least used to offset the increased costs Aqua requests to be assessed to municipalities?

To be clear, Robbinsville Township is not opposed to Aqua's investment in its infrastructure as it recognizes the clear importance of maintaining a functional, clean, and safe water system. What Robbinsville is opposed to, however, is the imposition of yet another increased charge on municipalities for a water system for which money is already being paid for water that goes unused year after year. There is value in the unused water and that value should be offset against any proposed increase assessed against municipalities like Robbinsville.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Joy Tozzi', with a large, stylized flourish extending to the left.

Joy Tozzi
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