

# ROTHFELDER STERN, L.L.C.

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Please reply to Trenton

July 27, 2023

**Via Electronic Filing**

Sherrri Golden, Secretary  
Board of Public Utilities  
44 South Clinton Avenue, 1st Floor  
P.O. Box 350  
Trenton, New Jersey 08625-0350

**Re: I/M/O Petition of New Jersey-American Water Company, Inc. for Recovery of  
Regulatory Asset Established for Incremental Covid-19 Related Expenses, and for  
Establishment of an Uncollectible Adjustment Clause  
Docket No. WR23050275**

Dear Secretary Golden:

Enclosed on behalf of Princeton University, please find enclosed its motion to intervene in this matter. A certificate of service is also enclosed.

Sincerely,



Bradford M. Stern

enclosure

cc: Service List (via email)

Rothfelder Stern, L.L.C.  
407 Greenwood Ave., #301  
Trenton, NJ 08609  
(609) 394-1000

**STATE OF NEW JERSEY  
BEFORE THE  
BOARD OF PUBLIC UTILITIES**

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<b>In The Matter of the Petition of</b>	)	<b>BPU DOCKET NO. WR23050275</b>
<b>New Jersey-American Water Company, Inc.</b>	)	
<b>for Recovery of Regulatory Asset</b>	)	<b>MOTION TO INTERVENE</b>
<b>Established for Incremental Covid-19</b>	)	<b>OF</b>
<b>Related Expenses, and for Establishment</b>	)	<b>PRINCETON UNIVERSITY</b>
<b>of an Uncollectible Adjustment Clause</b>	)	
	)	

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Princeton hereby moves for an Order granting it intervention in the above referenced matter. This Motion is filed pursuant to N.J.A.C. 1:1-16.1. In support of this motion, Princeton University states:

1. Princeton University maintains its campus in Princeton, New Jersey.
2. Princeton University’s campus is within the service territory of New Jersey American Water Company (“NJAW”) and the former service territory of Elizabethtown Water Company. Princeton University purchases water from NJAW pursuant to Rate Schedule F, Optional Industrial Wholesale (“OIW”) NJAW tariff (“OIW Tariff”). Princeton University’s recent annual billings from NJAW for water supply are more than \$1 million annually, making Princeton University among NJAW’s largest institutional customers.
3. NJAW is requesting a substantial increase in its rates in this proceeding. Princeton University will therefore be directly and specifically affected by NJAW’s requested rate relief. Princeton University’s interests are clearly distinct from other

customers of NJAW and no other party to this proceeding can adequately represent Princeton University's interest.

4. Princeton University anticipates coordinating its representation and presentation of witnesses to the extent possible in this proceeding with other customers in the same rate class and will in that regard act in concert as the "OIW Customer Coalition."

5. Granting Princeton University intervention at this stage of the proceeding will not cause undue delay or confusion, nor impose an undue burden on any party to this proceeding.

6. The verification of Thomas Nyquist is annexed hereto stating that the facts stated herein are true and accurate to the best of his knowledge and belief.

7. Correspondence concerning this Motion and this proceeding should be sent to

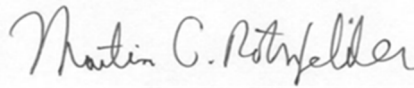
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8. A Certificate of Service and proposed form of order granting intervention are annexed hereto.

**WHEREFORE**, Princeton University respectfully requests the OAL to (1) grant it full rights as an intervenor in this matter pursuant to N.J.A.C. 1:1-16.1, and (2) order such further relief in connection therewith as the OAL deems reasonable and just.

Respectfully Submitted,

Rothfelder Stern, LLC

A handwritten signature in cursive script that reads "Martin C. Rothfelder". The signature is written in black ink on a light-colored background.

Date: July 27, 2023

By: Martin C. Rothfelder

**STATE OF NEW JERSEY  
BEFORE THE  
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**In The Matter of the Petition of )  
New Jersey-American Water Company, Inc. )  
for Recovery of Regulatory Asset )  
Established for Incremental Covid-19 )  
Related Expenses, and for Establishment )  
of an Uncollectible Adjustment Clause )**

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**BPU DOCKET NO. WR23050275  
MOTION TO INTERVENE  
OF  
PRINCETON UNIVERSITY**

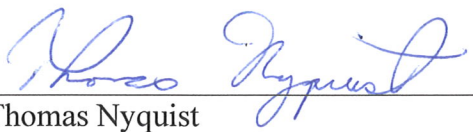
**VERIFICATION OF THOMAS NYQUIST**

I, Thomas Nyquist, of full age and upon my oath, depose and say:

1. I am the Executive Director, Campus Energy and Engineering, Facilities Department, at Princeton University, and I am authorized to make this statement on behalf of the Princeton University.

2. I have reviewed the attached Motion to Intervene and certify that the facts set forth therein regarding Princeton University are true and accurate to the best of my knowledge and belief.

Date: July 14, 2023

  
\_\_\_\_\_  
Thomas Nyquist

**STATE OF NEW JERSEY  
BEFORE THE  
BOARD OF PUBLIC UTILITIES**

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**In The Matter of the Petition of )  
New Jersey-American Water Company, Inc. )  
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**BPU DOCKET NO. WR23050275  
MOTION TO INTERVENE  
OF  
PRINCETON UNIVERSITY**

**ORDER**

On July 27, 2023, Princeton University filed a Motion to Intervene in this matter. Princeton University maintains its campus in Princeton, New Jersey that receive water from New Jersey American Water Company (“NJAW”) under Rate Schedule F, Optional Industrial Wholesale. Princeton University represents that, to the best of its knowledge, it is among the largest retail customers of NJAW.

I FIND that Princeton University will be directly and substantially affected by the outcome of this proceeding and that no other party to this proceeding can adequately represent Princeton University’s interests. Granting intervention to Princeton University will not cause undue confusion or delay, nor impose an undue burden on any party to this proceeding. I therefore GRANT Princeton University intervention in this proceeding pursuant to N.J.A.C. 1:1-16.1 and 1:1-16.3.

Date: \_\_\_\_\_

\_\_\_\_\_  
[Presiding Hearing Officer]

**STATE OF NEW JERSEY  
BEFORE THE  
BOARD OF PUBLIC UTILITIES**

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**In The Matter of the Petition of )  
New Jersey-American Water Company, Inc. )  
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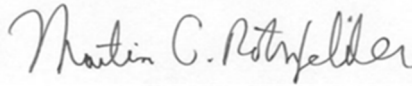
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**BPU DOCKET NO. WR23050275  
MOTION TO INTERVENE  
OF  
PRINCETON UNIVERSITY**

**CERTIFICATE OF SERVICE**

I, Martin C. Rothfelder upon my oath, duly state that I have sent or caused to be sent by electronic mail, unless otherwise noted, the attached Motion to Intervene and supporting Verification by Princeton University to the persons set forth on the attached service list.

Date: July 27, 2023

  
\_\_\_\_\_

**SERVICE LIST**

**BPU DOCKET NO. WR23050275**

**I/M/O Petition of New Jersey-American Water Company, Inc. for Recovery of Regulatory Asset Established for Incremental Covid-19 Related Expenses, and for Establishment of an Uncollectible Adjustment Clause**

**NEW JERSEY AMERICAN WATER**

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Donna Carney - [Donna.Carney@amwater.com](mailto:Donna.Carney@amwater.com)

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**BOARD OF PUBLIC UTILITIES**

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