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September 4, 2013

Via Email and Regular Mail

Kristi Izzo, Secretary
Board of Public Utilities
44 South Clinton Avenue
9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

Re: *In the Matter of the Board's Review of the Applicability and Calculation of a Consolidated Tax Adjustment*
BPU Docket No. EO12121072

Dear Secretary Izzo:

New Jersey American Water Company (“NJAWC” or “the Company”) hereby provides this response to the questions in the “Notice of Opportunity to Provide Additional Information” dated July 25, 2013 in the above referenced docket. An additional ten copies of this letter are enclosed. An electronic copy of these comments has also been provided to rule.comments@bpu.nj.state.us.

As noted in the attached table, much of the information requested in the Notice has been requested by the Division of Rate Counsel in the Company’s most recent base rate proceeding (Docket No. WR11070460) and is already in the possession of BPU Staff and Rate Counsel. For ease of reference, the attached table provides the docket number and the data request answered by the Company, with a notation as to whether or not the Company’s response was confidential. The Company entered into a confidentiality and nondisclosure agreement with Rate Counsel and BPU Staff to protect certain information in that proceeding, and the Company believes that agreement is still in effect. At this time, NJAWC will rely on the responses provided in that prior proceeding. If Staff or Rate Counsel is not able to readily retrieve these responses, the Company will be more than willing to send the appropriate copies.

With respect to Notice questions d, m and n, NJAWC has not previously provided responses to such questions, and the Company believes that its responses would contain highly sensitive, proprietary and confidential information. NJAWC is prepared to provide responses to

New Jersey-American Water Company, Inc.

Docket No. EO12121072

NJAWC Response to Notice of Opportunity to Provide Additional Information – CTA

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those questions once an appropriate confidentiality and nondisclosure agreement is signed by Staff and Rate Counsel in this proceeding.

Respectfully submitted,

New Jersey American Water Company

/s/ Robert J. Brabston

By: _____

Robert J. Brabston
Corporate Counsel

c: (via email only)
Stefanie Brand, Director, Division of Rate Counsel
Babette Tenzer, DAG
Jerome May, Director, Division of Energy
Tricia Caliguire, Chief Counsel
Mark Beyer, Chief Economist
Michael Sgro, Vice President and General Counsel, New Jersey American Water
Frank Simpson, Director of Rates, New Jersey American Water

ATTACHMENT A

CTA Generic Proceeding Docket No. EO12121072

New Jersey American Water Company Response

	Request	BPU Docket No.	Data Request	Confidential
a	Copy of Tax Sharing Agreement	WR11070460	RCR-CIT-2	NO
b	Year 1st included in consolidated return	WR11070460	RCR-CIT-17	NO
c	Total income tax paid to parent since 1991 by NJAWC	WR11070460	RCR-CIT-15	YES
d	Total income tax paid to parent since 1991 by all members of consolidated group	Not previously supplied *		YES
e	Amount paid to each loss company by parent since 1991	WR11070460	RCR-CIT-12	YES
f	Total FIT paid by consolidated entity to IRS	WR11070460	RCR-CIT-14	YES
g	Bonus depreciation taken by each member since 1991	WR11070460	RCR-CIT-47	YES
h	AMT taxes paid by the consolidated group each year since 1991	WR11070460	RCR-CIT-3	YES
i	Amount of tax loss carryforward available to consolidated group	WR11070460	RCR-CIT-42	YES
j	A brief description of each company included in the consolidated group	WR11070460	RCR-CIT-10	NO
k	Reason why company is no longer included in consolidated group	WR11070460	RCR-CIT-13	NO
l	All workpapers and calculations related to CTA calculation as requested in Notice	WR11070460	Andrea Crane Testimony	YES
m	FIT, both current & deferred, reported by parent in their Annual Report since 1991	Not previously supplied *		YES
n	FIT, both current & deferred, reported by NJAWC in its Annual Report since 1991	Not previously supplied *		YES

* Will be supplied under a Confidentiality Agreement to be entered into with Staff and Rate Counsel