VIA EMAIL
Hon. Kathleen H. Burgess
Secretary, Public Service Commission
3 Empire State Plaza
Albany, New York 12223
secretary@dps.ny.gov

Case No.: 13-W-0303
Case Title: Proceeding on Motion of the Commission to Examine United Water New York, Inc.’s Development of a New Long-Term Water Supply Source.

Re: Support of Motions for Prudence Investigation

Honorable Secretary Burgess,

I join in the July 9, 2014 Motions by the Town of Ramapo and the Department of State’s Utility Intervention Unit for a Prudence Investigation in the above-referenced case and respectfully request that the Public Service Commission grant the Motions.

The scope of the Prudence Investigation should also include Equitable Apportionment of Rockland County’s water resources with the State of New Jersey.

The 114-year long non-arms-length relationship between wholly owned subsidiary United Water New York (formerly Spring Valley Water) and parent United Water New Jersey (formerly Hackensack Water) has been to the detriment of the ratepayers and citizens of Rockland County.

Experts in water resource management and planning such as Robert Kecskes, former 25 year Chief of the Water Supply Planning Section at the New Jersey Department of Environmental Protection and Albert F. Appleton, former Commissioner of the New York City Department of Environmental Protection and Director of the New York City Water and Sewer system have commented at length in this case (13-W-0303), and other...
related cases with regard to the inequity in water resource apportionment between Rockland County and New Jersey. I have also commented.

As a “franchisee” of Rockland County’s water resources, United Water New York has a duty to prudently manage this essential resource.

Despite clear evidence that Rockland County is not receiving its equitable apportionment of water resources shared with New Jersey, United Water New York has not petitioned the State of New York for a reduction of passing flows from Lake DeForest, and has not petitioned the State of New York for an equitable apportionment of the safe yield of Lake Tappan.

United Water New York views the management of Rockland County’s water resources through the prism of what is best for parent company United Water New Jersey.

United Water New York would be acting to the detriment of parent United Water New Jersey if it were to advocate for an equitable apportionment of water resources shared between Rockland County and New Jersey.

Clearly the most prudent alternative to develop additional water supply for Rockland County, if needed, has not been given proper consideration.

Sincerely,

Robert Dillon

Intervenor, Case 13-W-0303

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1 Robert Kecskes, 7/9/2014, Kecskes Comments on DeForest Reservoir;

Robert Kecskes, 7/9/2014, Kecskes Comments on DPS Staff Report;

Albert F. Appleton, 11/8/2013, Report of Professor Albert F. Appleton, "A Report on the Proposal to Meet the Future Water Needs of Rockland County by Building 7.5 million gallons a day (mgd) of capacity on Haverstraw Bay to desalinate Hudson River water for drinking water purposes and whether a viable demand side alternative to it exists;"

2 Robert Dillon, 7/9/2014, Comments of Robert Dillon on DPS Staff Need Report