

United Water New Rochelle Inc. and United Water Westchester  
Cases 13-W-0539, 13-W-0564 and 14-W-0006

**Exhibit 156**

**STAFF OF THE DEPARTMENT OF PUBLIC SERVICE**  
**INTERROGATORY/DOCUMENT REQUEST**

United Water New Rochelle/United Water Westchester

Request No.: STAFF-134 GRL-1  
Requested By: Gregory R. Luthringer  
Date of Request: February 3, 2014  
Response Due: February 13, 2014 **Updated 3/24/14**  
Witness: Gary Anolik/Kevin Doherty  
Subject: Special Ad Valorem taxes

---

There have been recent tax refund cases involving Long Island Water Corporation d/b/a Long Island Water<sup>1</sup> and New York Water Service Corporation<sup>2</sup> where substantial tax refunds were granted for special ad valorem levies for garbage services upon each company's 'mass property' assets. Mass property includes transmission and distribution facilities including mains, services, hydrants and related fixtures located upon and under public and private property used by others.

1. Does the company pay any special ad valorem levies (ie. garbage, sewer)? If yes, please identify each special ad valorem levy, by month, from January 2012 through the forecasted rate year.
2. If yes to Question 1, then state the amount of such tax on mass asset property and explain why the company considers this a legitimate tax liability.
3. Provide any analysis or reports performed by the company, or any other consultant for the company, regarding special ad valorem tax on the company's mass assets and its determination whether or not to proceed with legal action for refund of such tax. If such analysis was not performed please so state.
4. If the ad valorem levies are not applied against mass asset property, then explain the basis of such levies.
5. Has the company paid any tax bills "Under Protest"?

---

<sup>1</sup> Case 12-W-0051, Long Island Water Corporation d/b/a Long Island Water, Order Allocating Property Tax Refund (issued February 15, 2013).

<sup>2</sup> Case 11-W-0695, New York Water Service Corporation, Order Requiring Refunds and Adopting Terms of Joint Proposal (issued October 19, 2012).

**Updated Response**

1. Yes. Please refer to Staff-134 GRL-1 Attachment 1 for the break out of UWNR's special ad valorem levies and Attachment 2 for UWWC. **Please refer to Staff-134 GRL-1 Updated Attachment 1 for UWNR and Updated Attachment 2 for UWWC.**

2. Please refer to Attachments 1 and 2. The Company considers these to be legitimate tax liabilities as they are billed with and part of the real estate tax bills.

3. No such analysis was performed.

4. The ad valorem levies are applied against mass asset property.

5. The Company has not paid any tax bills under protest.