



NEW YORK STATE LEGISLATURE

July 2, 2020

John B. Rhodes
Chair & CEO of the Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223

Re: Addendum to August 2019 Comments,
Case # 19-W-0168, SUEZ Water New York, Inc., SUEZ Water Westchester, Inc., and SUEZ
Water Oswego-Nichols, Inc., Proposed Rate Increase and Merger

Dear Chairperson Rhodes:

As the State Senator for the 37th District and the State Assemblyman for the 91st District, we represent several municipalities impacted by Suez Water's Joint Proposal for a rate increase, conservation plan, and the merger of Suez Water New York, Inc., SUEZ Water Westchester, Inc. (SWW), and SUEZ Water Oswego-Nichols, Inc.. Our affected municipalities include the City of Rye and the Villages of Rye Brook and Port Chester.

In the midst of a pandemic with unprecedented economic fallout, we express even stronger concern, as originally expressed in our August 2019 letter, about the financial shock SUEZ's proposed rate increases and merger would have on Westchester communities. At this moment of incredible economic stress in the service area it would be inappropriate for the PSC to allow rates to rise. In addition, with this joint proposal, we ask the PSC to press for a more effective conservation program and expedited implementation of a plan to identify and meet the needs of low-income ratepayers.

Independent analysis has raised concerns about the efficacy of SUEZ's existing Conservation Program; yet, this joint proposal includes an expansion of the program into the regions of its proposed merged territory. Among other things, the PSC should require an independent evaluation of the program to ensure it is as efficient and effective as possible, including addressing peak summer demand, inclusive of all ratepayers in the analysis and effectively targeting fixture rebates. Conservation programs use ratepayer dollars to invest in measures to

reduce usage, so it is incumbent on the utility to ensure it is as efficient and effective as possible. SUEZ's program must be independently evaluated and strengthened to ensure it is worth ratepayers' investment.

In 2016 SUEZ was required to identify and address the needs of low-income rate payers, but it has failed to do so. In the midst of severe economic hardship for so many customers in the region, when the needs of low-income customers ought to be prioritized and an affordability plan expedited, this joint proposal provides SUEZ more time to identify the needs of low-income customers and develop a plan to address them. Any application before the PSC should be used as an opportunity to require that needs of low-income customers are addressed.

As noted in our 2019 letter, SUEZ Water's proposals should be approached with an attitude of increased skepticism and an even stronger focus on protecting ratepayers, especially those who are most vulnerable. This skepticism ought to be heightened by the economic crisis and SUEZ's persistent failure to adopt a plan to meet the needs of its most vulnerable customers.

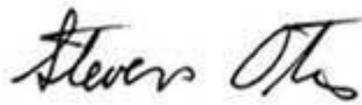
We urge the Public Service Commission to reject SUEZ Water's joint proposal.

Thank you for your consideration of these issues.

Sincerely,



Shelley B, Mayer



Steven Otis