



**STATE OF NEW JERSEY**  
**Board of Public Utilities**  
**44 South Clinton Avenue, 9<sup>th</sup> Floor**  
**Post Office Box 350**  
**Trenton, New Jersey 08625-0350**  
[www.nj.gov/bpu/](http://www.nj.gov/bpu/)

CLEAN ENERGY

IN THE MATTER OF THE COMPREHENSIVE )  
ENERGY EFFICIENCY AND RENEWABLE )  
ENERGY RESOURCE ANALYSIS FOR THE )  
2013 – 2016 CLEAN ENERGY PROGRAM )  
)  
) DOCKET NO. EO11050324V

Parties of Record

- Joe Gennello**, Honeywell Utility Solutions
- Diane M. Zukas**, TRC Energy Solutions
- Mike Ambrosio**, Applied Energy Group
- Lawrence Sweeney**, Jersey Central Power & Light
- Timothy White**, Atlantic City Electric
- Holly Thompson**, Orange & Rockland Utilities
- Bruce Grossman**, South Jersey Gas
- Elaine Bryant**, Public Service Electric & Gas Company
- Tracey Thayer**, New Jersey Natural Gas
- Mary Patricia Keefe**, Elizabethtown Gas Company

BY THE BOARD:

On February 9, 1999, the Electric Discount and Energy Competition Act, N.J.S.A. 48:3-49 et seq. (EDECA or the Act) was signed into law. The Act established requirements to advance energy efficiency and renewable energy in New Jersey through the societal benefits charge (SBC), at N.J.S.A. 48:3-60a(3). EDECA further directed the Board of Public Utilities (Board) to initiate a proceeding and cause to be undertaken a comprehensive resource analysis of energy programs currently referred to as the comprehensive energy efficiency and renewable energy resource analysis. After notice, opportunity for public comment, public hearing, and consultation with the New Jersey Department of Environmental Protection (NJDEP), within eight months of initiating the proceeding and every four years thereafter, the Board would determine the appropriate level of funding for energy efficiency and Class I renewable energy programs (now called New Jersey's Clean Energy Program) that provide environmental benefits above and beyond those provided by standard offer or similar programs in effect as of February 9, 1999.

As required by the Act, in 1999 the Board initiated its first comprehensive energy efficiency (EE) and renewable energy (RE) resource analysis proceeding. At the conclusion of this proceeding, the Board issued its initial comprehensive resource analysis order, dated March 9, 2001, Docket

Nos. EX99050347 et al. (hereinafter referred to as the March 9th Order). The March 9<sup>th</sup> Order set funding levels for the years 2001 through 2003, established the programs to be funded and budgets for those programs, and determined that the energy efficiency programs and customer-sited renewable energy programs would initially be administered by the State's utilities and that the grid-connected renewable energy programs would be administered by the Board. Due to the lifting of rate caps scheduled for August 2003, a final decision concerning the funding levels for the fourth year, 2004, was left out of the March 9<sup>th</sup> order. The Board approved funding of \$115 million for 2001, \$119.326 million for 2002, and \$124.126 million for 2003. By Order dated July 27, 2004, Docket Nos. EX03110945 et al., the Board adopted a final 2004 funding level of \$124.126 million.

By Order dated March 4, 2003, Docket No. EO02120955, the Board created the New Jersey Clean Energy Council (CEC) and directed it to make recommendations on the final administrative structure of the New Jersey Clean Energy Program (NJCEP or CEP). The Board further directed that any future reorganization should recognize the distinction between administrative/implementation and planning/design. The CEC released its Report: "New Jersey Clean Energy Program – Recommendation on Administration and Fund Management" (Report) on July 21, 2003. The Report included a paragraph discussing the components of administrative activities. It states as follows:

The Board defines administration as "further developing of program details, contracting for program delivery and managing those contracts." The CEC recommends that other duties of the administrator expressly include managing the budget for the portfolio of Clean Energy Program activities, overseeing and monitoring program management and implementation by third party contractors, and providing the Board, as the policymaking entity, with evaluations and recommendations from which new policy decisions can be made. Outreach and education, and communication and marketing of the overall goals and objectives of the New Jersey Clean Energy Program are also a component of administration. Finally the administrator will oversee the selection of measurement and verification methodologies, as well as the overall evaluation process.

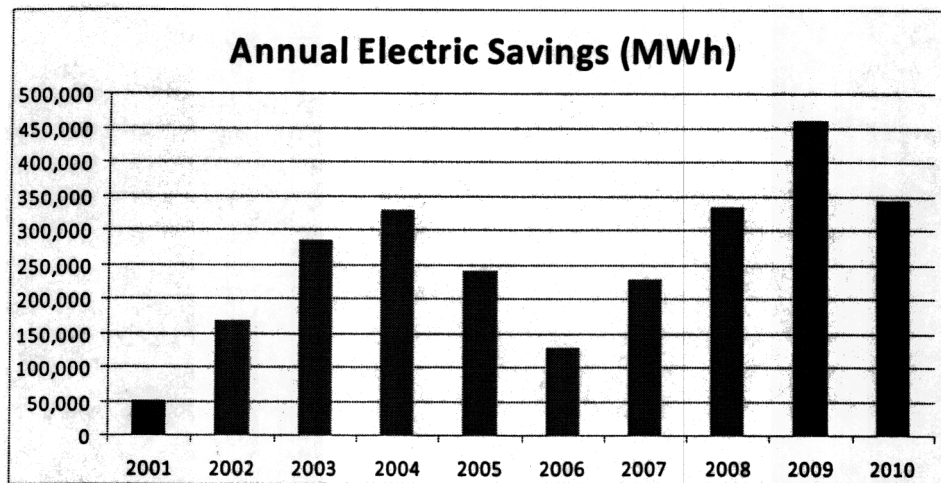
By Order dated September 11, 2003, Docket No. EO02120955, the Board adopted the majority of the recommendations included in the Report, including transitioning the administration of the programs from the utilities to the Board. However, the actual transfer of the programs was delayed until 2007. During this period the utilities lost numerous key personnel that moved on to other positions given the tenuous nature of their jobs supporting the CEP. The utilities also cut back on program marketing to avoid promoting programs they would no longer be managing.

By Order dated May 7, 2004, Docket Nos. EX03110946 and EX04040276, the Board initiated its second comprehensive EE and RE resource analysis proceeding and established a procedural schedule for the determination of the funding levels, allocations and programs for the years 2005 through 2008. In this proceeding the Board directed the Office of Clean Energy (OCE) to review the programs and budgets with advice from the Council. The Board also directed OCE to hold hearings and meetings to discuss programs and budgets. By Order dated December 23, 2004, Docket No. EX04040276, the Board concluded its second CRA proceeding, which set funding levels for the years 2005 through 2008. The Board approved funding levels of \$140 million for 2005, \$165 million for 2006, \$205 million for 2007, and \$235 million for 2008. The Board's December 23, 2004 Order also established goals for the programs based on the funding levels noted above as follows:

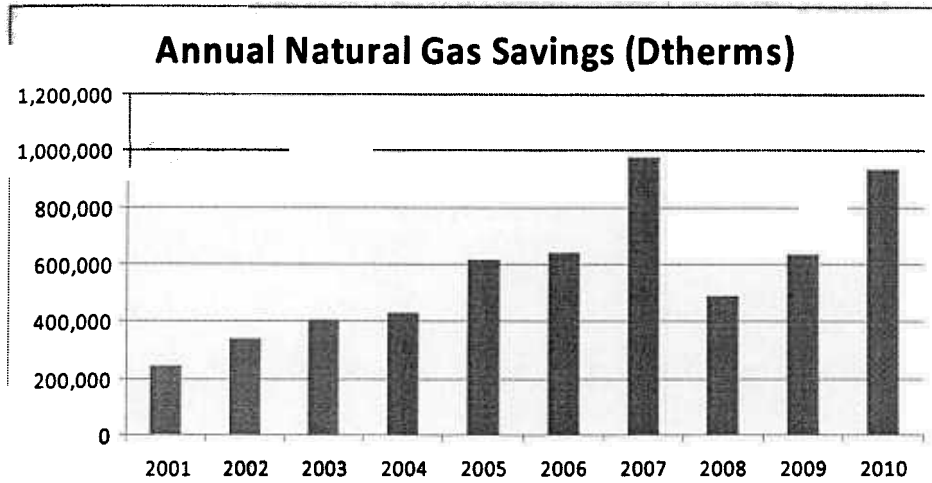
1. With regard to renewable energy, the Board reaffirmed its goal of delivering to the grid 300 MW of Class I renewable electric generation capacity in New Jersey by December 31, 2008, of which a minimum of 90 MW alternating current (AC) will be derived from photovoltaics, and
2. By December 31, 2008, six and one half percent of the electricity used by New Jersey residents and businesses will be provided by Class I and Class II renewable energy resources, of which a minimum of four percent will be from Class I renewable energy resources.
3. With regard to energy efficiency, the Board determined that the goal was to increase energy savings over 2003 levels by the percent increase in funding plus 10%.

Since the establishment of the CEP, and as a means of tracking progress toward the goals established in 2004, a close record of energy savings and renewable energy generation has been kept. The following charts display the results of the Clean Energy Program over the years 2001 through 2010. During 2003-2007 when the CEP administrative functions were transitioning from the utilities to the Board, the number of program participants and related energy savings declined. The decline highlights the importance of effectively manage the transition to any new administrative model to avoid a significant drop off in program results.

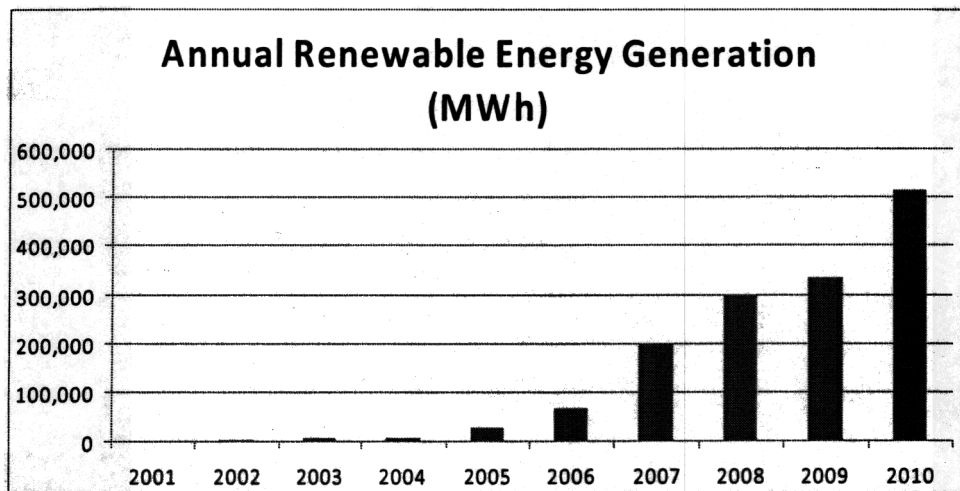
With regard to electricity saved:



With regard to natural gas saved:



With regard to the renewable energy generated



On August 19, 2005, the New Jersey Department of the Treasury, Division of Purchase and Property (Treasury) issued, on behalf of the Board, Request for Proposal 06-X-38052 for New Jersey Clean Energy Program Management Services. After an extensive review of the proposals submitted, including the submission of best and final price offers and negotiation of several price components, the Board selected Honeywell International, Inc. (Honeywell) as the Market Manager for residential EE and RE programs and TRC Energy Services (TRC) as the Market Manager for commercial and industrial energy efficiency programs. On October 19, 2006, Treasury issued a contract to Honeywell and to TRC to provide program management services. Honeywell and TRC commenced management of all of the programs being transitioned by April 1, 2007. Their contracts were extended for six months in January 2011 and June 2011.

On January 17, 2007, the Board approved the release of the Request for Proposal for the New Jersey Clean Energy Program – Program Coordinator – Docket No. EO05070640. Bids were received on March 20, 2007. After an extensive review of the proposals submitted, including the submission of best and final price offers and negotiation of several price components, the Board selected Applied Energy Group (AEG) as the Program Coordinator for the Clean Energy Programs and issued a contract on July 11, 2007. AEG commenced operation on October 15, 2007. A contract extension with AEG was issued on June 15, 2011.

By Order dated April 27, 2007, Docket No. EO07030203, the Board initiated its third comprehensive EE and RE resource analysis proceeding and established a procedural schedule for the determination of the funding levels, allocations and programs for the years 2009 through 2012. By Order dated September 30, 2008, Docket No. EO07030203, the Board concluded its third CRA proceeding and set funding levels for the years 2009 through 2012.

The Board approved funding levels as set out in the table below:

Year	Total (\$ million)	Energy Efficiency	% of Total	Renewable Energy	% of Total
2009	\$245.00	\$176.50	72%	\$68.50	28%
2010	\$269.00	\$208.00	77%	\$61.00	23%
2011	\$319.50	\$260.00	81%	\$59.50	19%
2012	\$379.25	\$325.00	86%	\$54.25	14%
Total	\$1,212.75	\$969.50	80%	\$243.25	20%

The Board engaged Rutgers Center for Energy, Economic, and Environmental Policy (CEEPP) to perform a cost benefit analysis of the Clean Energy Program. Each of these studies were included in the September 30, 2008 proceeding. Summit Blue Consulting (Summit Blue) also issued a draft Energy Efficiency Market Assessment report that included a number of proposed modifications to the existing programs. An assessment of the renewable energy marketplace was also performed by Summit Blue with a final EE report issued in July 2006 and a final RE market assessment issued in March 2008. The RE report was also included as part of the September 30, 2008 proceeding.

Several programs provide incentives to projects with long lead times, such as residential and commercial new construction. Some programs give projects up to two years for completion after issuance of an incentive approval letter. However, given that the Board has yet to consider funding levels beyond 2012, commitments beyond 2012 cannot be made at this time. Therefore, the proceeding to determine funding levels beyond 2012 needs to be initiated as soon as possible.

As a result of the requirements in EDECA and the aforementioned Orders, the Board **HEREBY ORDERS** the OCE to initiate a fourth proceeding and public hearings on program funding and funding allocations for the comprehensive energy efficiency and renewable energy resource analysis programs for years of 2013-2016.

The Board requests comments on a number of issues that may impact CEP funding levels and programs for 2013 through 2016. Interested parties may comment on any issue related to this proceeding, but should also consider the issues noted below in their comments. The Board strongly encourages any party with interest in the issues noted below to provide their input.

The goals of the energy efficiency and renewable energy programs, as set forth in EDECA, are to reduce market barriers and transform the energy market, produce environmental benefits

over and above those of existing standard offer programs, make energy services more affordable for low-income customers, and eliminate subsidies for programs that can be delivered into the market without SBC funding.

In October 2008, the Board enacted a State Energy Master Plan (EMP). The following objectives were established in the 2008 State Energy Master Plan:

1. Reduce projected energy use by 20 percent by 2020;
2. Strive to exceed the current Renewable Portfolio Standard (RPS) and meet 30% of the State's electricity needs from Class I renewable sources by 2020.

In addition, former Governor Corzine's Executive Order 54 called for an aggressive reduction in greenhouse gas emissions in New Jersey through the stabilization of greenhouse gas emissions at 1990 levels by 2020 and the further reduction of emissions by 80 percent below 2006 levels by 2050.

In April 2010, Governor Christie tasked the Board with revisiting the 2008 Energy Master Plan in light of current economic conditions to ensure a balance between increasing challenges in meeting current and future energy demands in New Jersey. A Draft 2011 Energy Master Plan was released in June 2011. The Board held public hearings to receive comments on the Draft 2011 EMP on July 26th, August 3rd, and August 11th.<sup>1</sup> The Draft EMP is available at [www.NJ.gov/EMP](http://www.NJ.gov/EMP). The Draft 2011 EMP overarching goals are as follows:

1. Drive down the cost of energy for all customers;
2. Promote a diverse portfolio of new, clean, in-State generation;
3. Reward energy efficiency and energy conservation and reduce peak demand;
4. Capitalize on emerging technologies for transportation and power production; and
5. Maintain support for the renewable energy portfolio standard of 22.5% of energy from renewable sources by 2021.

The initiatives to achieve these goals as set forth in the 2011 Draft EMP are as follows:

1. Expand In-State Electricity Resources;
  - a. Construct New Generation and Improve PJM Rules and Processes;
  - b. Assess the Implications of Lost Nuclear Capacity;
  - c. Expand Distributed Generation and Combined Heat and Power;
  - d. Support Behind the Meter Renewables;
  - e. Promote Effective Use of Biomass and Waste to Energy;
  - f. Promote the Safe Expansion of the Natural Gas Pipeline System;
2. Cost Effective Renewable Resources;
  - a. Solar Alternate Compliance Payments;
  - b. Cost Benefit Test for Solar Renewable Incentives;
  - c. Promote Solar Installations that Provide Economic and Environmental Benefits;
  - d. Maintain Support for Offshore Wind;

---

<sup>1</sup> The Draft 2011 New Jersey Energy Master Plan had not been adopted at the time of this Order.

3. Promote Cost-Effective Conservation and Energy Efficiency;
  - a. Promote Energy Efficiency and Demand Response in State Government Buildings;
  - b. Incorporate Aggressive Energy Efficiency in Building Codes;
  - c. Redesign the Delivery of the State Energy Efficiency Programs;
  - d. Monitor PJM's Demand Response Initiatives;
  - e. Improve Natural Gas Energy Efficiency;
  - f. Expand Education and Outreach; and
4. Support the Development of Innovative Energy Technologies
  - a. Improve Transportation Efficiency and Emissions Reduction;
  - b. Future Use of Energy Storage;
  - c. Evaluation of Smart Grid Demonstrations; and
  - d. Dynamic Pricing and Smart Metering.

The Board **HEREBY ORDERS** OCE to request public comments on how New Jersey's Clean Energy Program can support the proposed EMP objectives and the changes to programs and funding levels needed to achieve these objectives. Specifically, the following questions should be considered:

1. Given the goals and initiatives of the 2011 Draft EMP (or Amended EMP), how should the current NJCEP goals and objectives, as discussed above, be modified or re-prioritized for the period 2013 to 2016?
2. What revenue generating mechanisms should the Board pursue to achieve the EMP goal to reduce or eliminate the Societal Benefits Charge (SBC)? In your response, consider PJM capacity payments for EE, and Energy Efficiency Portfolio Standard (EEPS).
3. How should the NJCEP goals and objectives be modified or re-prioritized to enable reduction/elimination of the NJCEP portion of the SBC? Responses should take into consideration the development of mechanisms to generate revenues such as, but not limited to, a revolving loan fund.
4. Should the Board replace all rebate programs with financing programs and/or other mechanisms to generate revenues for the NJCEP? If so why? What would be the overall impacts in terms of costs and benefits? If not why not? What would be the overall impacts in terms of costs and benefits?
5. How would this transition of the NJCEP from rebates to financing impact economic development, jobs creation, and energy savings?
6. Can the currently proposed draft 2011 EMP goals be met by totally replacing the current programs with a revolving loan fund? Please explain your response in detail.
7. Would all EE and RE markets respond to financing programs without any rebates? Please identify which markets would respond and the nature of the market's response.
8. How should the current program goals and objectives, as discussed above, be modified or re-prioritized for the period 2013 to 2016, taking into consideration: economic development, cost-effectiveness, market transformation, affordability, resource acquisition, environmental benefits, and other state, regional and federal initiatives?
9. What funding level should be established for the next four years to meet the policy goals with regard to:

Residential Energy Efficiency;  
Commercial and Industrial Energy Efficiency;

Low Income Programs; and  
Class I Renewable Energy Resources

10. How should funding be allocated to Class I renewable energy and energy efficiency programs?
11. Provide suggestions on how additional funding for new programs can be generated outside of electric and gas ratepayer funding mechanisms to meet the policy goals.
12. How should the Board improve existing programs to further support clean energy program goals and the goals of the draft EMP?
13. What is the relationship of the policies being considered in this proceeding relative to the policies that are proposed in the 2011 Draft EMP?
14. What methods or evaluation should the Board undertake to inform the process of program development, funding levels, etc.?
15. Provide suggestions on how NJCEP funding and the specific NJCEP programs might help reduce electric and gas rates.
16. Should the Board continue the Regional Greenhouse Gas Initiative (RGGI) EE and Solar programs managed by the Utilities? Please explain your answer.
17. How should the Board ensure that utility programs funded through RGGI are not duplicative of programs funded through the NJCEP?
18. Should the individually filed utility EE and Solar programs be consolidated in one filing?

The following additional questions should be considered when commenting on the individual Energy Efficiency Programs:

1. What is the best method to use energy efficiency resources to achieve the goals/objectives stated above?
2. What criteria should be established for choosing among competing energy efficiency programs and objectives, given funding constraints for periods 2013 through 2016?
3. How can subsidies be eliminated for new and existing energy efficiency programs, e.g. implement by regulations, other revenue sources such as PJM capacity payments for EE and Energy Efficiency Portfolio Standards ("EEPS")?
4. Is there a role for SBC funds in overcoming barriers, unrelated to installation costs, to more widespread adoption of EE equipment in New Jersey? For instance, should SBC funds be used more extensively for initiatives such as; education and outreach to reduce municipal permitting and code review or technology development.
5. Can and should SBC funding be made available to encourage the manufacturing of EE technologies in New Jersey.
6. What implementation activities should be considered for each program or technology?
7. Should the energy efficiency programs support green buildings, and if so, what would be ~~the incentive structure to promote this?~~
8. What are the costs and benefits of the Combined Heat and Power (CHP) Program and should the CHP program be expanded? What should be included or excluded from this program?
9. Should the NJCEP incentives fund "clean" generation, such as fuel cells without heat recovery as a separate program and not part of the Pay for Performance (PFP) program? Should it continue as part of the Pay For Performance program, or both?
10. Should the NJCEP fund demand response program? What are the costs and benefits?
11. What, if any, demand response programs should be available for residential, small business and large industrial customers?
12. Should there be a separate program developed specifically for multifamily housing of all types as opposed to a residential multi-family category and a Commercial & Industrial (C&I) multi-family category? Is there a distinction/skill set for contractors that should



- provides a rational breakpoint between the certain small multi-family buildings and large multi-family buildings that translates to two separate programs?
13. Are there other areas within the C&I market that the NJCEP should develop specific focused program?
  14. Should the energy efficiency program incentives be targeted to specific locations to address congestion, reliability issues and other factors? What are those other factors? If so, what would the incentive structure be? How should locations be identified and the value of located Distributed Generation facilities be quantified?
  15. Should the State continue to rely on market transformation programs or utilize resource acquisition programs similar to the Standard Offer Program or rebate program?
  16. Should certain market sectors be targeted for higher incentives within a given program?

The following questions should be considered when commenting on the Renewable Energy programs:

1. How can the State's renewable energy incentive programs be structured to ensure a greater percentage of the NJ Renewable Portfolio Standards (RPS) goal of 20% renewables by 2020 is met by projects that also contribute to the New Jersey's energy and capacity needs?
2. How can the funds from the SBC be used to motivate investment in Class I RE technologies to meet the RPS goal of 20 percent renewables by 2020 with expectations for the funds to be repaid to the state for future investments?
3. Is there a role for SBC funds in overcoming barriers, unrelated to installation costs, to more widespread adoption of renewable energy technologies in New Jersey? Should SBC funds be used more extensively for initiatives such as, but not limited to, education and outreach to reduce municipal permitting, zoning, land use barriers, grid interconnection or technology development?
4. Can and should SBC funding be made available to encourage the manufacturing of renewable energy technologies in New Jersey?
5. Should the RE program incentives be targeted to specific locations and/or interconnection assets in order to address distribution congestion, reliability or other factors to the NJCEP fund? What are those other factors? If these incentives benefit the distribution system, how would the incentives be restructured to revolve back for reuse? Do potential constraints from greater integration of renewables into the PJM Grid justify an expenditure of SBC funds on research into this topic? Does the intermittent and variable nature of renewable energy sources justify an expenditure of SBC funds on research and incentives for energy storage technologies?

Anyone wishing to provide comments should submit by e-mail at [oce@bpu.state.nj.us](mailto:oce@bpu.state.nj.us) RE: ~~2013 – 2016 Funding Allocation for CEP~~ or in hard copy to:

Michael Winka Director  
NJBPB - Office of Clean Energy  
P.O. Box 350  
Trenton, NJ 08625-0350  
Subject: 2013 – 2016 Funding Allocation for CEP

Comments may be submitted up through and including the 30 days from the date of this Order. All submitted comments will be posted on the CEP and BPU website. Reply comments can be presented at the hearing or to the same above address prior to the hearing. All written comments should be provided in a Word document format to help facilitate postings to the website.

Based on the comments received to the above questions and the Energy Efficiency and Renewable Energy Market Potential studies, the Board **DIRECTS** Staff to develop a Straw Proposal for the 2013 – 2016 funding level, allocation and rate and bill impacts. This will be posted on the website at least 30 days prior to the first hearing.

In accordance with the foregoing, the Board **HEREBY DESIGNATES** President Solomon as the Hearing Officer to oversee the hearing proceedings on program funding and funding allocation. President Solomon will determine the date, time and location of the Hearing on Funding Levels and Allocation for Clean Energy Programs for the years 2013 – 2016, which will then be posted on the NJBPU website and on the Clean Energy Program website.

The Board **HEREBY AUTHORIZES** Staff to cause a public notice of these hearings to be published in New Jersey Register and in newspapers of wide circulation.

The Board **HEREBY ORDERS** that the seven electric and gas utilities respond to the issues below within thirty (30) days after the Board issues this Order.

1. What is the current amount being collected in rates for each gas and electric utility: for the Clean Energy Program; for legacy programs?
2. How much was collected in rates for each gas and electric utility by rate class for the year 2010?

DATED: 10/7/11

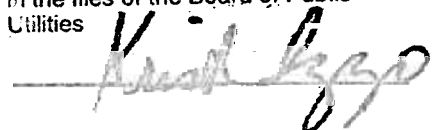
BOARD OF PUBLIC UTILITIES  
BY:



LEE A. SOLOMON  
PRESIDENT

  
JEANNE M. FOX  
COMMISSIONER  
JOSEPH L. FIORDALISO  
COMMISSIONER  
NICHOLAS ASSELTA  
COMMISSIONER

I HEREBY CERTIFY that the within document is a true copy of the original in the files of the Board of Public Utilities



ATTEST:

  
KRISTI IZZO  
SECRETARY

Docket No. EO11050324V – In the Matter of the Comprehensive Energy Efficiency and Renewable Energy Resource Analysis for the 2013-2016 Clean Energy Program.

SERVICE LIST

Joe Gennello  
**Honeywell Utility Solutions**  
5 East Stow Road, Suite E  
Marlton, NJ 08053

Diane M. Zukas  
**TRC Energy Solutions**  
900 Route 9 North, Suite 404  
Woodbridge, NJ 07095

Mike Ambrosio  
**Applied Energy Group**  
317 George Street, Suite 305  
New Brunswick, NJ 08901

Mr. Bruce Grossman  
Program Manager, Residential Energy  
Efficiency  
**South Jersey Gas Company**  
1 South Jersey Plaza  
Folsom, NJ 08037

Mr. Samuel Valora  
Program Manager, Commercial / Industrial  
Energy Efficiency  
**South Jersey Gas Company**  
1 South Jersey Plaza  
Folsom, NJ 08037

Ms. Elaine Bryant  
Manager, Market Strategy & Planning  
**Public Service Electric and Gas  
Company**  
T8C  
PO Box 570  
Newark, NJ 07101

Mr. Alex Stern  
Assistant General Reg. Counsel  
**Public Service Electric and Gas  
Company**  
T5  
PO Box 570  
Newark, NJ 07101

Mr. Steve Swetz  
Director, Corporate Rates & Revenue  
Requirements  
**Public Service Electric and Gas  
Company**  
T5  
PO Box 570  
Newark, NJ 07101

Ms. Mary Patricia Keefe  
**Elizabethtown Gas**  
300 Connell Drive, Suite 3000  
Berkeley Heights, NJ 07922

Mr. Thomas Kaufmann  
**Elizabethtown Gas**  
300 Connell Drive, Suite 3000  
Berkeley Heights, NJ 07922

Mr. Anthony Pugliese  
**Elizabethtown Gas**  
148 Edison Road  
Stewartsville, NJ 08886

Mr. Ken Maloney  
**Elizabethtown Gas**  
300 Connell Drive, Suite 3000  
Berkeley Heights, NJ 07922

Ms. Debbie Franco  
**Elizabethtown Gas**  
300 Connell Drive, Suite 3000  
Berkeley Heights, NJ 07922

Mr. Scott Carter  
**AGL Resources**  
Ten Peachtree Place  
Atlanta, GA 30309

Mr. Lawrence Sweeney  
Rates and Regulatory Affairs  
**Jersey Central Power and Light  
Company**  
300 Madison Avenue  
PO Box 1911  
Morristown, NJ 07962-1911

Ms. Holly Thompson  
Specialist  
**Orange & Rockland Utilities, Inc.**  
Customer Energy Services  
390 West Route 59  
Spring Valley, NY 10977

Mr. Scott Markwood  
Administrator  
**Orange & Rockland Utilities, Inc.**  
Customer Energy Services  
390 West Route 59  
Spring Valley, NY 10977

Ms. Anne Marie Peracchio  
Director, Conservation & Clean Energy  
Policy  
**New Jersey Natural Gas Company**  
1415 Wyckoff Road  
PO Box 1464  
Wall, NJ 07719

Ms. Tracey Thayer  
Director, Regulatory Affairs Counsel  
**New Jersey Natural Gas Company**  
1415 Wyckoff Road  
PO Box 1464  
Wall, NJ 07719

Mr. Wayne Barndt  
Manager Regulatory Strategy & Policy  
**Pepco Holdings**  
New Castle Regional Office  
Mailstop 79NC59  
PO Box 9239  
Newark, DE 19714

Mr. Timothy White  
Manager Policy Coordination  
**Pepco Holdings**  
New Castle Regional Office  
Mailstop 79NC59  
PO Box 9239  
Newark, DE 19714