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August 27, 2018

**Environmental Information Disclosure (“EID”) Label
Staff Straw Proposal and Requests for Comments
BPU Docket No. QO18070800**

VIA ELECTRONIC DELIVERY & OVERNIGHT MAIL

Mr. Ronald K. Jackson
Research Scientist
Board of Public Utilities
44 So. Clinton Avenue, 7th Flr.
P.O. Box 350
Trenton, NJ 08625-0350

Dear Mr. Jackson:

Public Service Electric and Gas Company (“PSE&G” or the “Company”) appreciates the opportunity to provide input on the environmental disclosure process. We believe that the process can be improved to provide more accurate information and better inform NJ consumers about the environmental attributes of the electricity delivered. Current instructions seem to guide suppliers/providers to report generic PJM system-wide averages and emissions benchmarks which are not truly reflective of the energy consumed in NJ.

1. Does your company develop and use an environmental disclosure label that is different than the default label provided by the Board?

PSE&G uses the default label template provided by the Board. The template is populated with data calculated from (a) PJM EIS-GATS, (b) RECs and SRECs retired pursuant to NJ Renewable Portfolio Standards (“RPS”) compliance requirements and (c) information provided by BGS suppliers.

a. What claims does your company make about the environmental aspects of the electricity product(s) sold?

PSE&G makes no claims.

b. What information do you use to develop your label and where do you get this information?

The information used to develop this label is from PJM EIS-GATS, RECs and SRECs retired pursuant to NJ RPS compliance requirements and information provided by BGS suppliers.

c. In reporting your product's fuel mix, i.e. "Energy Source", are Renewable Energy Certificates (RECs) used in the calculation of the fuel mix?

Yes, RECs (including SRECs that have been retired on behalf of our BGS suppliers in accordance with RPS compliance requirements) are represented in the fuel mix (Energy Source) as they are part of the supply obligation to customers.

If so, how are the RECs incorporated into the fuel mix reported and how is this information disclosed to the public?

We account for the MWh from the RECs that have been retired for RPS compliance. The balance of load served is from PJM GATS. This data is entered into the template provided by the BPU and reported through bill inserts and/or the Company website.

d. In reporting your product's Air Emissions, are Renewable Energy Certificates (RECs) used in the calculation?

Yes. The air emissions of all energy sources are used in the calculation.

If so, how are the reported emissions calculated?

The reported emissions and percentage of fuel mix are calculated based on the emissions attributes of the generation sources provided by BGS Suppliers.

e. Please provide a sample of the label provided to customers.

Please see attached.

2. What method(s) do you use to distribute the label?

The Company distributes the label in bill inserts and/or the PSE&G Website.

3. Do you have an alternative method you believe would make developing and distributing this label easier? Please explain.

The existing method is not clear. The BPU should clearly state that suppliers should account (in its fuel mix and emissions disclosure) for the energy and emissions attributes associated with its RPS compliance and from other generation sources relied upon to serve its load obligations. Where information is not available, the BPU should require suppliers to report based on the PJM Residual Mix to reflect the generation sources for which environmental attributes have otherwise not been claimed.

4. Are the compliance instructions in the Secretary's Letter clear and understandable? How can they be improved?

PSE&G has the following suggestions and comments:

- It is unclear whether the BPU template must be used in its exact form or whether it can be modified by the user.
- We suggest that the benchmarks should be updated to use the PJM System Mix. In addition, there should be one uniform benchmark for the entire State.
- The Board should clarify that RECs for RPS compliance should be represented in the fuel mix as they are a generation source relied upon by BGS suppliers in NJ.
- The instructions should indicate that suppliers may account for the specific sources they rely upon to meet their load obligations. Otherwise, the instructions should indicate that suppliers should use the PJM Residual Mix to reflect the generation sources for which environmental attributes that have not otherwise been claimed.
- The instructions should indicate what programs and information are applicable for inclusion in the Energy Conservation section of the label.
- The Benchmarks should be updated and the BPU should clearly state that suppliers should account in its fuel mix and emissions disclosure for the energy and emissions attributes associated with its RPS compliance and from other generation sources relied upon to serve its load obligations. Where information is not available, the BPU should require suppliers to report based on the PJM Residual Mix to reflect the generation sources for which environmental attributes have otherwise not been claimed.

Once again, PSE&G appreciates the opportunity to participate in this stakeholder process and to provide these comments. We thank Staff for its consideration of our submission.

Respectfully submitted,



Joseph A. Shea, Jr.
PSEG Services Corporation
80 Park Plaza, T-5
Newark, NJ 07102

ATTACHMENT - 1E

Environmental Information for Basic Generation Service, PSE&G Electricity supplied from June 1, 2016 – May 31, 2017

Electricity can be generated in a number of ways with different impacts on the environment. The standardized environmental information shown below allows you to compare this electricity product with electricity products offered by other electric suppliers.

Energy Source

PSE&G relied on these energy resources to provide this electricity product.

Coal	21.84%
Gas	22.47%
Hydroelectric (large)	0.04%
Nuclear	39.53%
Oil	0.12%

Renewable energy

Captured Methane Gas	1.98%
Fuel Cells	0.02%
Geothermal	0%
Hydroelectric (small)	0.05%
Solar	2.99%
Solid Waste	2.41%
Wind	8.51%
Wood or other biomass	0.04%

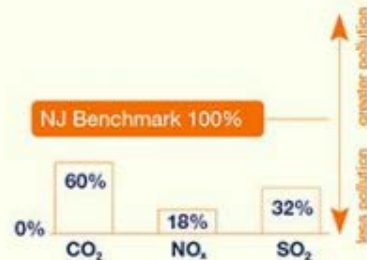
Renewable energy sources subtotal: 16%

Total 100%

Air Emissions

The amount of air pollution associated with the generation of the electricity product is shown. This amount is compared to a New Jersey benchmark*. The benchmark approximates the average emission rate for all electricity generation in New Jersey.

CO₂ is a "greenhouse gas" which may contribute to global climate change. SO₂ and NO_x react to form acids found in acid rain. NO_x also reacts to form ground level ozone, an unhealthy component of "smog."



Energy Conservation

Electricity generation and associated air emissions avoided through PSE&G's investments in conservation measures. Energy conservation measures mean less electricity needs to be generated and pollution is avoided.

Avoided Generation	Avoided Air Emissions
195,180,000 KWh	108,500 tons CO ₂
	93 tons NO _x
	216 tons SO ₂

* Benchmarks are based on data from the U.S. Department of Energy's ("DOE") Energy Information Administration publication EIA-0629, "State Electricity Profiles", 1996 Summary Statistics, February 1999. Regarding the NO_x benchmark, the average value derived from the 1996 DOE data was adjusted to take into account the NJ Department of Environmental Protection ozone season standards for NO_x emissions applied in 1999.

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August 27, 2018

VIA ELECTRONIC MAIL
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Aida Camacho-Welch
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
P.O. Box 350
Trenton, New Jersey 08625-0350

RE: Environmental Information Disclosure (“EID”) Label
Staff Straw Proposal and Requests for Comments
BPU Docket No. QO18070800

Dear Secretary Camacho-Welch:

The undersigned is Assistant General Counsel to Atlantic City Electric Company (“ACE” or the “Company”) in connection with the above referenced matter. In response to the New Jersey Board of Public Utilities (“BPU” or the “Board”) Environmental Information Disclosure (“EID”) Label Staff Straw Proposal and Request for Comments, BPU Docket No. QO18070800, the Company provides the following responses and comments.

1. *Does your company develop and use an environmental disclosure label that is different than the default label provided by the Board?*

Response: ACE uses an EID that is based on, and similar to, the default label provided by the Board but differs in the values reported.

If you answered yes to question 1:

- a. *What claims does your company make about the environmental aspects of the electricity product(s) sold?*

Response: ACE makes claims that energy resources illustrated in the EID were used to provide customers with electricity product. Further, the emission data presented represents the average amount of air pollution associated with the generation of electricity in the PJM Interconnection region.

- b. *What information do you use to develop your label and where do you get this information?*

Response: Emission and Fuel Mix info is queried directly from Generation Attribute Tracking System (GATS), via the PJM System Mix Report for the applicable reporting period.

- c. *In reporting your product's fuel mix, i.e., "Energy Source", are Renewable Energy Certificates (RECs) used in the calculation of fuel mix? If so, how are the RECs incorporated into the fuel mix reported and how is this information disclosed to the public?*

Response: RECs are incorporated into the fuel mix calculation by including the RECs with the appropriate fuel type total. Other fuel types are then adjusted based on the percentage of RECs incorporated into the total to account for the increase in quantity.

- d. *In reporting your product's Air Emissions, are Renewable Energy Certificates (RECs) used in the calculation? If so, how are the reported emissions calculated?*

Response: RECs are not used in calculating emissions in the EID. The PJM Fuel System Mix for the applicable reporting period is used to calculate emissions relative to the New Jersey Benchmark, as established by the Department of Energy: Energy Information Administration publication EIA-0629 "State Electricity Profiles," page 186 Table 1; 1996 Summary Statistics, February 1999.

- e. *Please provide a sample of the label provided to consumers.*

Response: A sample of the ACE EID is attached as **Exhibit A**.

2. *What method(s) do you use to distribute the label?*

Response: The environmental disclosure label is distributed to all customers of the Company as part of their bill.

3. *Do you have an alternative method you believe would make developing and distributing this label easier? Please explain.*

Response: ACE has no comments at this time. The Company reserves the right to comment on this item as this proceeding develops.

4. *Are the compliance instructions in the Secretary's Letter clear and understandable? How can they be improved?*

Aida Camacho-Welch

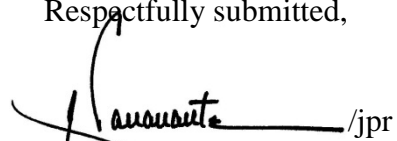
August 27, 2018

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Response: It is not clear whether the default values in the template must be used in its exact form or whether it can be modified by the supplier. In addition, the emissions benchmark is not clear. A suggestion would be to use a benchmark tied to the PJM System Mix.

ACE appreciates the opportunity to comment on this Staff Straw Proposal and Request for Comments. Feel free to contact the undersigned with any questions you may have with regard to this filing.

Respectfully submitted,

 /jpr
Philip J. Passanante
An Attorney at Law of the
State of New Jersey

Enclosure

cc: Ronald K. Jackson, Research Scientist, BPU

Exhibit A

Environmental Disclosure for the Electricity Product of Atlantic City Electric

Electricity Supplied from June 1, 2016 to May 31, 2017

Electricity can be generated in a number of ways with different impacts on the environment. The standardized environmental information shown below allows you to compare this electricity product with electricity products offered by other electric suppliers.

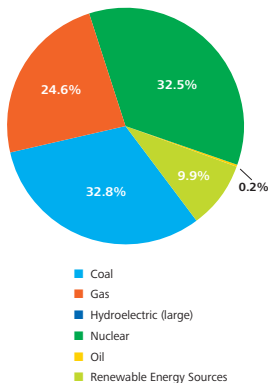
Energy Source

Atlantic City Electric relied on these energy resources to provide the electricity product.

Coal	32.8%
Gas	24.6%
Hydroelectric (large)	0.0%
Nuclear	32.5%
Oil	0.2%
Renewable Energy Sources	
Captured methane gas	0.3%
Fuel cells	0.0%
Geothermal	0.0%
Hydroelectric (small)	1.0%
Solar	3.1%
Solid waste	3.0%
Wind	2.3%
Wood or other biomass	0.2%
Total	100.00%

Renewable Energy Sources
Subtotal 9.9%

Energy Source



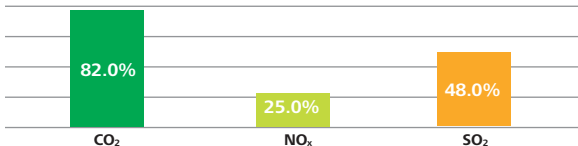
Air Emissions

The emission data represent the average amount of air pollution associated with the generation of electricity in the PJM Interconnection region. This amount is compared to the New Jersey benchmark.* The benchmark approximates the average emission rate for all electricity generation in New Jersey.

* Benchmarks are based on the Department of Energy: Energy Information Administration publication EIA-0629 "State Electricity Profiles," p.186 Table 1. 1996 Summary Statistics, February 1999.

Air Emissions

NJ Benchmark 100%



CO₂ is a "greenhouse gas" which may contribute to global climate change. NO_x and SO₂ react to form acids found in acid rain. NO_x also reacts to form ground level ozone, an unhealthy component of "smog."

Emission Source	CO ₂	NO _x	SO ₂
Total	82.0%	25.0%	48.0%

Energy Conservation

For this reporting period, Atlantic City Electric's investment in energy conservation measures did not result in any avoided generation or avoided associated air emissions.

Avoided Generation	Avoided Air Emissions
0 kWh	0 tons CO ₂
	0 tons NO _x
	0 tons SO ₂

If you have any questions about this information, please call Customer Care at 1-800-642-3780.



An Exelon Company

August 27, 2018

Via email to publiccomments@njcleanenergy.com

Ronald K Jackson
Research Scientist
NJBPU - OCE
44 S. Clinton Avenue – 7th Floor
PO Box 350
Trenton, New Jersey 08625-0350

Re: Request for Comments – Environmental Information Disclosure (“EID”) Label
BPU Docket No. QO18070800

Dear Mr. Jackson:

Jersey Central Power & Light Company (“JCPL” or the “Company”) appreciates the opportunity to respond to the Board Staff’s request for comments regarding the Environmental Information Disclosure (“EID”) Label, BPU Docket No. QO18070800. Below are the Company’s responses to the questions posed.

1. Does your company develop and use an environmental disclosure label that is different than the default label provided by the Board?

Response:

No, the Company uses the default label provided by the Board.

If you answered yes to question 1:

- a. What claims does your company make about the environmental aspects of the electricity product(s) sold?
- b. What information do you use to develop your label and where do you get this information?
- c. In reporting your product’s fuel mix, i.e., “Energy Source”, are Renewable Energy Certificates (RECs) used in the calculation of fuel mix? If so, how are the RECs incorporated into the fuel mix reported and how is this information disclosed to the public?
- d. In reporting your product’s Air Emissions, are Renewable Energy Certificates (RECs) used in the calculation? If so, how are the reported emissions calculated?
- e. Please provide a sample of the label provided to consumers.

2. What method(s) do you use to distribute the label?

Response

The Company publishes the label as a bill insert included in customer electric bills during the November billing cycle and it is posted on the FirstEnergy Website under the Jersey Central Power & Light Bill Inserts.

3. Do you have an alternative method you believe would make developing and distributing this label easier? Please explain.

Response

The Company has no suggestions for an alternative method.

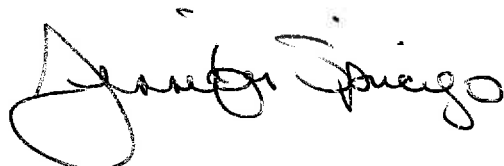
4. Are the compliance instructions in the Secretary's Letter clear and understandable? How can they be improved?

Response

The instructions are clear and understandable. JCP&L understands that the New Jersey benchmarks for CO₂, NO_x and SO₂ used in the current label represent the generation output characteristics within the State of New Jersey. The New Jersey benchmarks (588 lb/MWh for CO₂, 0.12 lb/MWh for NO_x, and 0.06 lb/MWh for SO₂,) are considerably lower than the PJM System Mix outputs of 998 lb/MWh for CO₂, 0.76 lb/MWh for NO_x, 1.20 lb/MWh for SO₂. JCP&L notes the BGS Supply characteristics are very similar to the PJM System Mix, indicating that its BGS Suppliers, for the most part, are sourcing supply from the PJM markets. Also, there is no product available to BGS Suppliers in the PJM Market that mimics the generator output characteristics for the State of New Jersey. Therefore, JCP&L believes that the PJM System Mix modified to include and reflect the Renewable Portfolio Standards in New Jersey would be a more appropriate benchmark for BGS Supply.

The Company appreciates the opportunity to provide these comments, which it hopes will be helpful. If there are any questions, please contact me.

Very Truly Yours,



Jennifer Spricigo

**Environmental Information Disclosure (“EID”) Label
Staff Straw Proposal and Requests for Comments – August 2, 2018
BPU Docket No. QO18070800**

Rockland Electric Company Response

1. *Does your company develop and use an environmental disclosure label that is different than the default label provided by the Board?*

The Rockland Electric Company (“Rockland” or “the Company”) label is similar to the default label, but it does not include the circle showing “Energy Source.” However, the Rockland label lists the Energy Source and Air Emissions, as does the default label. The Rockland label also does not include the box at the bottom of the default label which is entitled “Energy Conservation.”

If you answered yes to question 1:

- a. *What claims does your company make about the environmental aspects of the electricity product(s) sold?*

Aside from the listing of Energy Source and Air Emissions as noted above, Rockland does not make any claims about the environmental aspects of the electricity product(s) sold.

- b. *What information do you use to develop your label and where do you get this information?*

Rockland’s Eastern division customers are supplied power by PJM, and its Central and Western division customers are supplied power by the NYISO. The Central and Western divisions represent approximately ten percent of Rockland’s load. Rockland uses the PJM System Mix for the fuel mix and emission rates for its Eastern Division. Rockland uses U.S. Environmental Protection Agency data for the fuel mix and emission rates for the Central and Western divisions. Rockland then uses a load-weighted average to determine fuel mix and emissions data for the entire Rockland service territory for the EID label.

- c. *In reporting your product’s fuel mix, i.e., “Energy Source”, are Renewable Energy Certificates (RECs) used in the calculation of fuel mix?*

Rockland does not use RECs in the calculation of the fuel mix.

- d. *If so, how are the RECs incorporated into the fuel mix reported and how is this information disclosed to the public?*

As noted above, Rockland does not use RECs in the calculation of the fuel mix.

- c. *In reporting your product’s Air Emissions, are Renewable Energy Certificates (RECs) used in the calculation? If so, how are the reported emissions calculated?*

Rockland does not use RECs in the calculation of Air Emissions.

- e. *Please provide a sample of the label provided to consumers.*

Rockland's sample label is attached to these responses at page three below.

2. What method(s) do you use to distribute the label?

The EID is distributed as a bill insert and is posted on Rockland's website.

3. Do you have an alternative method you believe would make developing and distributing this label easier? Please explain.

Rockland does not have an alternative method to suggest for distributing the label, but has suggestions for clarifying how the label is developed in its response to question number four below.

4. Are the compliance instructions in the Secretary's Letter clear and understandable? How can they be improved?

It is unclear in the Secretary's Letter whether suppliers/providers are required to use the BPU default label as is, or if it is only a sample format. Also, the Secretary's Letter should explain what information should be included in the Energy Conservation label section of the default label. Finally, the benchmarks should be a uniform benchmark for the State that uses the PJM system mix.

Labeling electricity: It's the law

The State of New Jersey requires all electricity suppliers to provide standardized environmental information so you'll know the resources used to generate electricity (coal, natural gas, hydroelectric, nuclear, solar or other renewable source) and the air emissions associated with the method of generating electricity and how it compares to the statewide benchmark. In accordance with the law, Rockland Electric is providing you with environmental data, based on the most recently available fuel and emissions information, which is for the period January through June 2017. Rockland Electric will update and distribute this information twice each year. If you purchase electricity from a supplier other than Rockland Electric, that supplier also is required to provide you with standardized environmental information.

oru.com

 Printed on recycled paper and is recyclable.

180204 1712-0240-R

Label based on Department of Energy Generation Data

Environmental Information for the Electricity Product

(based on the data for electricity supplied from January through June 2017 by Rockland Electric Company).

Electricity can be generated in a number of ways with different impacts on the environment. The standardized environmental information shown below allows you to compare this electricity product with electricity products offered by other electric suppliers.

Energy Source

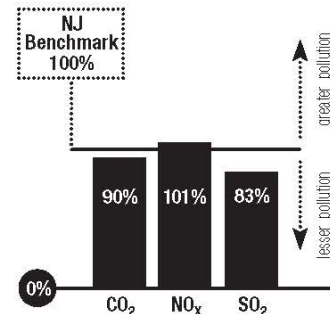
Rockland Electric relied on these energy resources to provide the electricity product.

Nuclear	36.4%
Natural Gas	27.4%
Coal	26.3%
Oil	0.2%
Renewable energy	
Hydroelectric	5.5%
Wind	2.8%
Solid Waste	0.5%
BioMass	0.6%
Solar	0.3%
Total	100%

Air Emissions

The amount of air pollution associated with the generation of the electricity product is shown. This amount is compared to a New Jersey benchmark. The benchmark approximates the average emission rate for all electricity generation in New Jersey.

CO₂ is a greenhouse gas which may contribute to global climate change. SO₂ and NO_x react to form acids found in acid rain. NO_x also reacts to form ground level ozone, an unhealthy component of "smog."



New Jersey is part of the PJM Interconnection, which is a regional transmission organization that coordinates the movement of wholesale electricity in all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia. Rockland Electric uses the PJM fuel mix to supply electricity for its customers.

MURRAY E. BEVAN
mbevan@bmg.law

August 27, 2018

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

New Jersey Board of Public Utilities
Office of Clean Energy
44 South Clinton Avenue, 3rd Floor, Suite 314
Trenton, NJ 08625-0350
publiccomments@njcleanenergy.com
Attn: Ron Jackson

***Re: Environmental Information Disclosure (“EID”) Label
Staff Straw Proposal and Request for Comments
Docket No. QO18070800***

Comments of the Retail Energy Supply Association (“RESA”)

Mr. Jackson:

This firm is counsel to the Retail Energy Supply Association (“RESA”),¹ a diverse group of retail electric and gas suppliers that share a common vision that competitive retail energy markets deliver more efficient, customer-oriented outcomes than do vertically-integrated, regulated utility providers. Many RESA members actively participate as licensed third party suppliers (“TPSS”) in New Jersey’s retail electric market. As licensed TPSSs, they are required to provide an environmental information disclosure to their customers every year, per New Jersey’s regulations.

Before addressing the questions posed by Staff in their letter, RESA will address Staff’s below assertion:

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

Staff currently believes that supplier/providers should be prohibited from the use of unbundled RECs in their EID where the original underlying electricity generated by the renewable resource has been sold separately. Supplier/providers may only make environmental claims about electricity products that can verify use of the underlying electricity and the retirement of the RECs. Staff will be considering this position as well as the above issues through this stakeholder process in order to develop recommendations for the Board.

This assertion warrants further discussion in a stakeholder meeting with TPSs and other market participants. While RESA accepts this is Staff's position, this information initially was shared with suppliers as part of the annual meeting to discuss renewable portfolio standard ("RPS") compliance. The topic of RECs – including excess RECs above RPS requirements – was resolved over a decade ago in a PJM stakeholder process in which New Jersey Board staff participated. The entire purpose of PJM-GATS is to track each supplier's REC purchases and ensure that each REC is counted only once – whether it is for RPS compliance or for voluntary renewable products that go beyond what is required for RPS compliance. RESA notes that New Jersey was an active participant in the development of GATS.

RESA believes suppliers and providers should be allowed to convene with Staff to understand any changes in Staff's position and develop an environmental disclosure label that accurately demonstrates to New Jersey customers the environmental attributes and benefits of the electricity they consume, including reflecting the renewable attributes of RECs purchased on behalf of customers.

While each of RESA's licensed members offer myriad products, including "green" products which exceed the requirements of the State's RPS, and therefore each of RESA's members has a distinct approach to providing this information to their respective customers, RESA offers these general comments in response to the Staff Straw Proposal circulated earlier this month.

1. Does your company develop and use an environmental disclosure label that is different than the default label provided by the Board?

RESPONSE:

RESA members comply with the Board's requirements in a variety of ways; many use the Board's default template. RESA believes that more suppliers would use the default label if it was provided in an easily-accessible location. The label template is currently found under "Forms and Applications" under the "Board Agenda Business" link on the Board's website. Most TPS information usually can be found on the Division of Energy landing page. Moving the template and associated Secretary's letter to the Division of Energy page, which already has links to pertinent TPS information (including the Contract Summary, Initial and Renewal Applications, and EDI documents) provides consistency for TPSs and ensures the information TPSs need to comply with the Board's regulations are located in a single and logical location.

RESA also believes that the Secretary's Letter, which includes instructions for the label, should not be marked as "EID Amendments," as this is confusing. The Secretary's letter should also be included on the link to "Secretary's Letters."

If you answered yes to question 1:

- a. What claims does your company make about the environmental aspects of the electricity product(s) sold?
- b. What information do you use to develop your label and where do you get this information?
- c. In reporting your product's fuel mix, i.e., "Energy Source", are Renewable Energy Certificates (RECs) used in the calculation of fuel mix? If so, how are the RECs incorporated into the fuel mix reported and how is this information disclosed to the public?
- d. In reporting your product's Air Emissions, are Renewable Energy Certificates (RECs) used in the calculation? If so, how are the reported emissions calculated?
- e. Please provide a sample of the label provided to consumers.

RESPONSE:

RESA is not responding to the individual questions here as they are more suited to individual suppliers rather than an association of suppliers. However, RESA notes that the regulations really don't reflect the intent of the label. The default label doesn't allow TPSs to show customers (particularly those customers that have purchased a "green" product in excess of the State's Renewable Portfolio Standard ("RPS")) the renewable content of the energy they are purchasing. The requirement to show PJM system mix, which does not reflect the PJM RECs the supplier purchased and retired on behalf of their customers to back up their renewable energy claims is confusing to those customers. The customers only

see a label showing “brown” or “dirty” commodity sources. Those customers are left wondering what they actually bought. It is misleading and inapposite to the Board’s own regulations which prohibit misleading customers. It is concerning to RESA that the Board is essentially forcing suppliers to mislead customers with the current label requirements.

2. What method(s) do you use to distribute the label?

RESPONSE:

RESA members distribute their label in a variety of ways. Some members include the label as part of their customer contracts. Others include the label in their marketing materials. Others mail them to customers on an annual basis.

3. Do you have an alternative method you believe would make developing and distributing this label easier? Please explain.

RESPONSE:

RESA believes that TPSs should have an easy option to send their label to customers in the customer’s bill as an insert postcard, similar to the method employed by the utilities, or to include a bill message to customers with information on accessing a new label, such as a website link. As the utilities send out their labels annually at the end of the year, TPSs should have the option to use a similar mechanism to distribute the label to their customers. The specifics of this process could be arranged through the EDI Working Group.

4. Are the compliance instructions in the Secretary’s Letter clear and understandable? How can they be improved?


RESPONSE:

For purposes of this response, RESA refers to the instructions dated October 27, 2017. RESA understands that the purpose of the rule is to ensure that customers are apprised of the mix of fuels included in their electric commodity supply. RESA is confused by this instruction as it singles out “new” products, then requires suppliers of “new” products to comply with the same rules as existing products. This information seems unnecessary – under the rule TPSs are required to provide the appropriate label to customers annually as directed by the Board, whether the product is “new” or not. The regulations do not draw a distinction between “new” products and those products that have been available on the market for a longer period of time, and the label instructions should not draw such an unnecessary distinction.

Mr. Ron Jackson
August 27, 2018
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RESA appreciates that the Board has undertaken this stakeholder proceeding and is happy to participate in future discussions, if any, regarding a more accurate or alternative environmental label design, and improved means of its distribution to customers.

Respectfully submitted,



Murray E. Bevan

From: [Moses Cheung](#)
To: publiccomments@njcleanenergy.com
Cc: ["Jackson, Ronald"](#)
Subject: RE: BPU Docket No. QO18070800 - Environmental Information Disclosure ("EID") Label Straw Proposal
Date: Monday, August 13, 2018 6:54:23 PM
Attachments: [image001.png](#)

Please accept this email as response from Choice Energy LLC d/b/a 4 Choice Energy ("Choice") to the subject requests for comments.

Question #1: Does your company develop and use an environmental disclosure label that is different than the default label provided by the Board?

Answer: No, Choice strictly adheres to the default label as provided by the Board.

Question #2: What method(s) do you use to distribute the label?

Answer: Choice uses the following methods to distribute the label:

- a. An actual copy is mailed with every initial enrollment welcome package;
- b. An actual copy is mailed with every renewal notice;
- c. An explicit and conspicuous disclosure is made in all initial enrollment welcome letters and all renewal notices that annual updates are posted to the company's website; and
- d. Annual distribution is made via timely updates posted to the company's website.

Question #3: Do you have an alternative method you believe would make developing and distributing this label easier? Please explain.

Answer: No, Choice does not have any recommendation for an alternative method.

Question #4: Are the compliance instructions in the Secretary's Letter clear and understandable? How can they be improved?

Answer: Yes, Choice believes the Secretary's Letter is sufficiently clear and understandable, and does not have any recommendation for improvement.

Thanks.

--Moses

Moses Cheung
Choice Energy, LLC dba 4 Choice Energy, LLC



www.4ChoiceEnergy.com

From: Jackson, Ronald
Sent: Monday, August 13, 2018 3:33 PM
To: Jackson, Ronald
Subject: Environmental Information Disclosure ("EID") Label Straw Proposal
To EDCs, BGS Providers and Third Party Suppliers,

**Environmental Information Disclosure ("EID") Label
Staff Straw Proposal and Requests for Comments
BPU Docket No. QO18070800**

As discussed at the EY 2018 RPS Compliance Coordination meeting, attached is the Staff EID Label Straw Proposal.

Stakeholders are encouraged to submit responses to the questions and written comments. All

comments must be sent by email, in Microsoft Word Format, or a format that can be converted to Word, to: publiccomments@njcleanenergy.com. All comments must include the above referenced Caption and Docket Number in the subject line. All comments must be received on or before **August 27, 2018**. Late submissions will not be accepted. The Secretary's Letter will be posted by **October 1, 2018** and the EID labels are due by **December 1, 2018**.

Please contact Ronald Jackson with any questions.

Ronald K Jackson

Research Scientist

NJBPU – OCE

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