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**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

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Bloom Energy Corporation,)	
)	
)	
Petitioner)	
)	
and)	
)	Docket No. _____
Atlantic City Electric Company, Jersey)	
Central Power and Light Company, Public)	
Service Electric and Gas Company, and)	
Rockland Electric Company,)	
)	
Respondents)	
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**PETITION SEEKING FORMAL HEARING AND ORDER REQUIRING
ATLANTIC CITY ELECTRIC COMPANY, JERSEY CENTRAL POWER
AND LIGHT COMPANY, PUBLIC SERVICE ELECTRIC AND
GAS COMPANY, AND ROCKLAND ELECTRIC COMPANY, TO UTILIZE
STANDARD INTERCONNECTION PROCEDURES FOR FUEL CELLS**

1. This is a petition filed pursuant to N.J.A.C. § 14:1-1 *et seq.* under the rules of practice of the Board of Public Utilities (“BPU” or “Board”) by Bloom Energy Corporation (“Bloom”). Bloom is the manufacturer of a breakthrough solid oxide fuel cell technology that generates clean, reliable, and highly efficient onsite power using an environmentally superior non-combustion process.

2. Petitioner seeks an order from the Board pursuant to N.J.S.A. § 48:3-49, *et seq.*, requiring Atlantic City Electric Company (“ACE”), Jersey Central Power and Light Company (“JCP&L”), Public Service Electric and Gas Company (“PSE&G”) and Rockland Electric Company (“RECO”) (collectively, the “Electric Distribution Companies,” or “EDCs”) to utilize the standard interconnection procedures for Class I renewable sources under N.J.A.C. § 14:8-5 *et seq.* for purposes of processing the interconnection requests of fuel cell projects.

3. The State of New Jersey has recognized that distributed generation, including all-electric fuel cells and combined heat and power (“CHP”) projects, contribute to the resiliency of New Jersey electric power grid. During Hurricane Sandy, fuel cell projects in other east coast states continued to provide an un-interrupted supply of power to customers during extended grid outages (e.g., Verizon, Garden City, New York; Bloom Energy, Newark, Delaware). In spite of this experience, New Jersey does not provide the EDCs with any standard interconnection procedures for fuel cells. The lack of clear standards with regard to the timing and costs of interconnecting fuel cells increases uncertainty and inhibits investment. Other states in the region have adopted standardized interconnection procedures that cover all distributed generation, including fuel cells (e.g., New York and Connecticut).

4. Beginning with a presentation in the summer of 2012 before the Board’s Net Metering and Interconnection Stakeholder Group, Bloom has raised the issue of the EDCs applying the same interconnection standards for all forms of distributive generation including fuel cells, without any resolution. In addition, Bloom has had meetings over the last two years with the Energy Division, the Board’s Chief of Staff, the Office of Clean Energy, and the Board Chief Counsel.

5. The controlling statute on renewable energy and net metering, the Electric Discount and Energy Competition Act (“EDECA”), codified at N.J.S.A. § 48:3-49 *et seq.*, defines “Class I Renewable Energy” broadly to include energy produced from fuel cells powered by any source.

6. The Board’s regulations regarding renewable energy sources were nevertheless codified at N.J.A.C. § 14:8 *et seq.*, to limit the definition of “Class I Renewable Energy” to require that energy produced by fuel cells be powered by renewable fuels only in order to qualify as Class I Renewable Energy.

7. Fuel cells were thereby excluded from the interconnection procedures provided for Class I Renewable Energy, codified at N.J.A.C. § 14:8-5 *et seq.*, without provision for an alternate set of procedures.

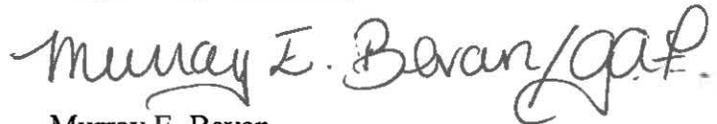
8. Currently, the New Jersey Administrative Code does not provide the EDCs with any standard interconnection procedures for fuel cells despite their high efficiency and environmental performance.

9. Pctitioner prefers to see this issue addressed in the least resource-intensive manner possible for Board staff and therefore requests that, rather than a rulemaking, the Board simply issue an Order requiring the EDCs to follow the standardized interconnection rules at Title 14 for distributed generation projects that are not considered Class I renewable pursuant to the Board’s regulations.

Therefore, Bloom Energy respectfully requests an Order from the Board directing the State’s EDCs to modify their tariffs, within ninety (90) days of the issuance of the Order, to

prohibit interconnection discrimination against fuel cells and to apply the standard interconnection procedures, codified at N.J.A.C. 14:8-5 *et seq.*, to fuel cells.

Respectfully submitted,

A handwritten signature in black ink that reads "Murray E. Bevan" followed by a stylized flourish.

Murray E. Bevan
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Date: July 29, 2014

cc: Attached service list

Petition of Bloom Energy Corporation Seeking Formal Hearing and Order Requiring Atlantic City Electric Company, Jersey Central Power And Light Company, Public Service Electric And Gas Company, And Rockland Electric Company, To Utilize Standard Interconnection Procedures For Fuel Cells
BPU Docket No. _____

SERVICE LIST

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MURRAY E. BEVAN
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July 29, 2014

VIA FEDERAL EXPRESS AND EMAIL TO kristi.izzo@bpu.state.nj.us

The Honorable Kristi Izzo
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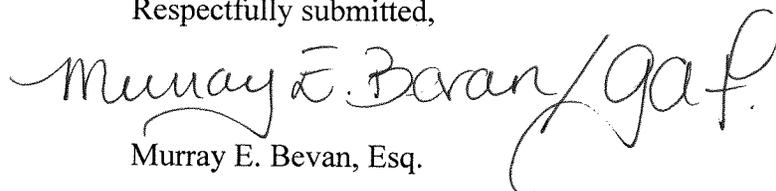
Re: Petition of Bloom Energy Corporation Seeking Formal Hearing and Order Requiring Atlantic City Electric Company, Jersey Central Power And Light Company, Public Service Electric And Gas Company, And Rockland Electric Company, To Utilize Standard Interconnection Procedures For Fuel Cells

Dear Secretary Izzo:

Enclosed for filing are an original and ten (10) copies of the Petition of Bloom Energy Corporation Seeking Formal Hearing And Order Requiring Atlantic City Electric Company, Jersey Central Power And Light Company, Public Service Electric And Gas Company, And Rockland Electric Company, To Utilize Standard Interconnection Procedures For Fuel Cells.

Also enclosed is a check in the amount of \$25.00 for the requisite filing fee. Please contact me if you have any questions regarding this petition.

Respectfully submitted,


Murray E. Bevan, Esq.

Enclosures

Cc: Service List