

# Morgan Lewis

**Mark A. Lazaroff**

Partner  
+1.215.963.4603  
mark.lazaroff@morganlewis.com

December 5, 2023

**VIA ELECTRONIC MAIL**

Sherri L. Golden, Secretary  
New Jersey Board of Public Utilities  
P.O. Box 350  
44 South Clinton Avenue, 1st Floor  
Trenton, New Jersey 08625-0350

**Re: *In re the Verified Petition of Jersey Central Power & Light Company for Approval of JCP&L's Energy Efficiency and Conservation Plan Including Energy Efficiency and Peak Demand Reduction Programs (JCP&L EE&C), BPU Docket No. EO20090620***

Dear Secretary Golden:



We represent Jersey Central Power & Light Company (“JCP&L” or the “Company”) in the above-referenced proceeding. We hereby submit this letter petition in lieu of a formal petition to the New Jersey Board of Public Utilities (the “Board” or BPU”) on behalf of JCP&L to respectfully request an extension of the Company’s Triennium 1 energy efficiency and peak demand reduction programs by six months. This letter petition is being submitted pursuant to the Board’s October 25, 2023 Order in BPU Docket No. QO23030150.<sup>1</sup>

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<sup>1</sup> See *In re the Implementation of P.L. 2018, c. 17, the New Jersey Clean Energy Act of 2018, Regarding the Second Triennium of Energy Efficiency and Peak Demand Reduction Programs*, BPU Docket No. QO23030150, Order (Oct. 25, 2023) (the “Triennium 1 Extension Order”).

**Morgan, Lewis & Bockius LLP**

2222 Market Street  
Philadelphia, PA 19103-3007  
United States

 +1.215.963.5000  
 +1.215.963.5001

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As detailed in this letter petition and the accompanying Exhibit A, the Company is also seeking approval of a \$69,290,584 budget for the extension period.

## **I. BACKGROUND**

On September 25, 2020, JCP&L filed a Petition with the Board requesting approval of a proposed Energy Efficiency and Conservation Plan (“Triennium 1 EE&C Plan” or the “Plan”). By Order dated April 27, 2021, the Board approved a stipulation of settlement authorizing JCP&L to implement the Company’s Triennium 1 EE&C Plan, as modified, for a three-year term (July 1, 2021 through June 30, 2024).<sup>2</sup> The Triennium 1 EE&C Plan includes seven programs and eleven sub-programs, with a total budget of \$203,032,357. In the April 2021 Order, the Board further approved the recovery of Triennium 1 EE&C Plan costs and the revenue impact of sales losses resulting from the Plan through a component of JCP&L’s Rider Regional Greenhouse Gas Initiative Recovery Charge (“Rider RRC”) and Rider Lost Revenue Adjustment Mechanism Charge (“Rider LRAM”), respectively.

On May 24, 2023, the Board approved certain aspects of the next cycle of energy efficiency and peak demand reduction programs (“Triennium 2”) to be implemented from July 1, 2024 through June 30, 2027.<sup>3</sup> The remaining aspects of the Triennium 2 framework were adopted by

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<sup>2</sup> See *In re the Verified Petition of Jersey Central Power & Light Company for Approval of JCP&L’s Energy Efficiency and Conservation Plan Including Energy Efficiency and Peak Demand Reduction Programs (JCP&L EE&C)*, Docket Nos. QO19010040 and EO20090620, Order Adopting Stipulation (Apr. 27, 2021) (the “April 2021 Order”).

<sup>3</sup> *In re the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs*, BPU Docket Nos. QO19010040, QO23030150, and QO17091004, Order Directing the Utilities to Propose Second Triennium Energy Efficiency and Peak Demand Reduction Programs (May 24, 2023).

Board Order dated July 26, 2023.<sup>4</sup> Electric and gas public utilities were originally directed to make Triennium 2 program filings by October 2, 2023, but the filing due date was later revised to December 1, 2023.<sup>5</sup>

On October 25, 2023, the Board issued the Triennium 1 Extension Order, which extended the term of Triennium 1 by six months to December 31, 2024, and adjusted the start date of Triennium 2 to January 1, 2025 (Triennium 2 will continue to end on June 30, 2027). The Board also directed the electric and gas public utilities to file a letter petition to extend their respective Triennium 1 programs, without changes to the existing programs. Each utility's six-month Triennium 1 extension must: (1) meet energy savings targets equivalent to 50% of the utility's Program Year 3 ("PY3") targets; and (2) include a budget that does not exceed 50% of the utility's PY3 budget. The utilities are further authorized to shift program budgets within the same sector or among sectors during the six-month Triennium 1 extension period, according to the budget shifting provisions established for Triennium 2.

This letter petition is filed pursuant to the Board's filing directive in the Triennium 1 Extension Order.

## **II. SIX-MONTH EXTENSION OF THE TRIENNIUM 1 EE&C PLAN**

JCP&L respectfully requests Board approval to continue to implement the Company's existing portfolio of programs in the Triennium 1 EE&C Plan through December 31, 2024, with

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<sup>4</sup> *In re the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs*, BPU Docket Nos. QO19010040, QO23030150, and QO17091004, Order Directing the Utilities to Propose Second Triennium Energy Efficiency and Peak Demand Reduction Programs (July 26, 2023).

<sup>5</sup> *See In re the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs*, BPU Docket Nos. QO19010040, QO23030150, and QO17091004, Order Designating Commissioner, Setting Manner of Service and Bar Dates (Sept. 27, 2023).

**Sherri L. Golden, Secretary**  
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**December 5, 2023**  
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an incremental budget for the six-month extension period of \$69,290,584. JCP&L would continue to recover Triennium 1 EE&C Plan costs, including the costs of the extension period, through Rider RRC. JCP&L would also continue to recover the revenue impact of sales losses resulting from the Plan through Rider LRAM.

The methodology used by JCP&L to determine the incremental budget amount is consistent with the guidance provided by Board Staff through the Utility Working Group discussion process. The budget calculations supporting the incremental budget are attached to this letter petition as Exhibit A. This level of incremental funding is required to ensure all programs remain in market and available through the extended period of Triennium 1.

As of June 30, 2023, JCP&L had \$138,581,168 remaining of its Triennium 1 EE&C Plan budget. Combining this remaining budget with the proposed six-month extension budget results in a total budget of \$207,871,752 for the extended PY3, which runs for 18 months from July 1, 2023 to December 31, 2024.

In accordance with the Triennium 1 Extension Order, the energy savings target for JCP&L's six-month extension period is 50% of the energy savings target established for PY3 in the Board's June 10, 2020 Order,<sup>6</sup> or an estimated 102,076 megawatt hours ("MWh") in net annual energy savings and 1,224,200 MWh in net lifetime energy savings.<sup>7</sup>

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<sup>6</sup> *In re the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs*, BPU Docket Nos. QO19010040, QO19060748, and QO17091004, Order (June 10, 2020).

<sup>7</sup> April 2021 Order, Attachment A, p. 93, Table 11.

### **III. NOTICE OF FILING**

The Company will electronically serve notice and a copy of this filing, including Exhibit A, upon Rate Counsel and the Department of Law and Public Safety. Copies of this filing will also be sent electronically to the persons identified on the accompanying service list. Finally, a copy of JCP&L's filing will be available on the Company's website at [https://www.firstenergycorp.com/jersey\\_central\\_power\\_light/regulatory.html](https://www.firstenergycorp.com/jersey_central_power_light/regulatory.html).

### **IV. REQUESTED BOARD FINDINGS**

Based upon the foregoing, including the budget calculations provided as Exhibit A, JCP&L respectfully requests that the Board grant this letter petition and issue an order finding that:

1. The six-month extension of JCP&L's Triennium 1 EE&C Plan is in the public interest, and the Company is authorized to implement and administer PY3 of the Triennium 1 EE&C Plan through December 31, 2024;
2. JCP&L is authorized to utilize an incremental budget for the six-month Triennium 1 extension period of \$69,290,584, for a total revised PY3 budget of \$207,871,752;
3. The Company is permitted to utilize deferred accounting and recover all reasonably incurred costs associated with the Triennium 1 EE&C Plan, including the extension period, consistent with the Rider RRC cost recovery mechanism previously approved by the Board;
4. JCP&L is permitted to recover, through Rider RRC, the costs of any projects the Company has committed to undertake, as well as projects that have commenced, prior to December 31, 2024, and may continue those projects for any completion and close-out activities;

5. The Company is permitted to recover the revenue impact of sales losses resulting from the Triennium 1 EE&C Plan, consistent with the Rider LRAM previously approved by the Board;

6. JCP&L's energy reduction target for the six-month extension period is an estimated 102,076 MWh in net annual energy savings and 1,224,200 MWh in net lifetime energy savings;

7. For purposes of evaluation and reporting, the extended PY3, which is an 18-month period from July 1, 2023 through December 31, 2024, will be used; and

**Sherri L. Golden, Secretary**  
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**December 5, 2023**  
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8. The Company shall be granted such other relief as the Board deems just and reasonable.

Respectfully submitted,



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Mark A. Lazaroff  
Catherine G. Vasudevan  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103-3007  
215.963.4603 (bus)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)

Michael J. Martelo  
Jersey Central Power & Light Company  
300 Madison Avenue  
Morristown, NJ 07962-1911  
[mmartelo@firstenergycorp.com](mailto:mmartelo@firstenergycorp.com)

Tori L. Giesler  
Jersey Central Power & Light Company  
2800 Pottsville Pike  
Reading, PA 19612-6001  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

*Counsel for*  
*Jersey Central Power & Light Company*

Date: December 5, 2023

cc: Service List

**Exhibit A**

**Maximum Budget Calculation:**

Utility	Triennium 1 Program Budget	PY1 Program Budget (Actual Spend per filed report)	PY2 Program Budget (Actual Spend per filed report)	Commitments (as of 6/30/2023)	Remaining Budget	50% / Half Year Value
JCP&L	\$ 203,032,357	\$ 15,823,241	\$ 48,627,948	\$ -	\$ 138,581,168	\$ 69,290,584

**Budget:**

Program	Current Approved Triennium 1 Budget (\$M)	Proposed Extension Budget (\$M)	Total Extended Triennium 1 Budget (\$M)
Efficient Products	\$ 59,136,139	\$ 17,682,385	\$ 76,818,524
Home Performance with Energy Star	\$ 19,907,837	\$ 6,989,754	\$ 26,897,591
Quick Home Energy Check-up	\$ 6,290,830	\$ 1,907,915	\$ 8,198,745
Moderate Income Weatherization	\$ 13,951,299	\$ 4,631,283	\$ 18,582,582
Behavioral	\$ 3,700,804	\$ 1,223,525	\$ 4,924,329
Multifamily	\$ 6,678,525	\$ 1,949,462	\$ 8,627,987
Direct Install	\$ 24,270,994	\$ 8,228,918	\$ 32,499,912
Prescriptive / Custom	\$ 50,633,091	\$ 16,833,763	\$ 67,466,854
Energy Management	\$ 5,645,320	\$ 3,059,034	\$ 8,704,354
Engineered Solutions	\$ 9,763,104	\$ 4,827,140	\$ 14,590,244
Home Optimization & Peak Demand Reduction	\$ 3,054,413	\$ 1,957,404	\$ 5,011,818
<b>Total Budget</b>	<b>\$ 203,032,357</b>	<b>\$ 69,290,584</b>	<b>\$ 272,322,941</b>
Admin/O&M (embedded in the table above)	\$ 26,567,151	\$ 7,551,023	\$ 34,118,173





### JCPL T1 Verification.docx

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#### E-Signature Summary

**E-Signature 1: Edward C. Miller (ECM)**

December 05, 2023 08:39:22 -5:00 [8765B64F6FFF] [148.108.100.144]  
emille3@firstenergycorp.com (Principal) (Personally Known)

**E-Signature Notary: Kori Rebecca Auman-Krebs (KRK)**

December 05, 2023 08:39:22 -5:00 [8FAD66DBB368] [98.237.82.177]  
kauman@firstenergycorp.com  
I, Kori Rebecca Auman-Krebs, did witness the participants named above electronically sign this document.



STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Verified Petition : BPU Docket No. EO20090620
of Jersey Central Power & Light :
Company For Approval of JCP&L's :
Energy Efficiency and Conservation :
Plan Including Energy Efficiency and :
Peak Demand Reduction Programs :
(JCP&L EE&C) :

AFFIDAVIT OF VERIFICATION

Edward C. Miller, being duly sworn upon his oath, deposes and says:

1. I am Manager, Compliance & Development, in the Energy Efficiency Department for FirstEnergy Service Company, and I am duly authorized to make this Affidavit of Verification on behalf of Jersey Central Power & Light Company, the Petitioner named in the foregoing Letter Petition.

2. I have read the contents of the foregoing Letter Petition, and I hereby verify that the statements of fact and other information contained therein are true and correct to the best of my knowledge, information, and belief.

Edward C. Miller
Signed on 2023/12/05 08:39:22 -5:00
Edward C. Miller

Commonwealth of Pennsylvania )
County of York )

Sworn to and subscribed before me
this 5th day of December, 2023

[Handwritten signature of Kori Rebecca Auman-Krebs]

Kori Rebecca Auman-Krebs
NOTARY PUBLIC

Commonwealth of Pennsylvania - Notary Seal
Kori Rebecca Auman-Krebs, Notary Public
Berks County
My Commission Expires Feb 14, 2027
Commission Number 1345524

Notarial act performed by audio-visual communication

9493A33B-57D1-47CB-A-C8D-9C5C75B35937 -- 2023/12/05 08:32:49 -5:00 --- Remote Notary



In the Matter of the Verified Petition of Jersey Central Power & Light Company For  
Approval of JCP&L's Energy Efficiency and Conservation Plan Including Energy and  
Peak Demand Reduction Programs (JCP&L EE&C)  
BPU Docket No. EO20090620

**SERVICE LIST**

**N.J. BPU**

Sherri L. Golden  
Secretary of the Board  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 1st Floor  
P.O. Box 350  
Trenton, NJ 08625-0350  
[board.secretary@bpu.nj.gov](mailto:board.secretary@bpu.nj.gov)  
[sherri.golden@bpu.nj.gov](mailto:sherri.golden@bpu.nj.gov)

Robert Brabston  
Executive Director  
[robert.brabston@bpu.nj.gov](mailto:robert.brabston@bpu.nj.gov)

Stacy Peterson  
Deputy Executive Director  
[stacy.peterson@bpu.nj.gov](mailto:stacy.peterson@bpu.nj.gov)

**GENERAL COUNSEL'S OFFICE**

Michael Beck, General Counsel  
[michael.beck@bpu.nj.gov](mailto:michael.beck@bpu.nj.gov)

Carol Artale, Deputy General Counsel  
[carol.artale@bpu.nj.gov](mailto:carol.artale@bpu.nj.gov)

Heather Weisband  
Senior Counsel  
[heather.weisband@bpu.nj.gov](mailto:heather.weisband@bpu.nj.gov)

Michael Hunter, Regulatory Officer  
[michael.hunter@bpu.nj.gov](mailto:michael.hunter@bpu.nj.gov)

Steven Athanassopoulos  
Legal Specialist  
[steven.athanassopoulos@bpu.nj.gov](mailto:steven.athanassopoulos@bpu.nj.gov)

Rachel Boylan  
Legal Specialist  
[rachel.boylan@bpu.nj.gov](mailto:rachel.boylan@bpu.nj.gov)

Kevin Nedza, Senior Project Manager  
[kevin.nedza@bpu.nj.gov](mailto:kevin.nedza@bpu.nj.gov)

Dustin Wang, Program Specialist  
[Dustin.wang@bpu.nj.gov](mailto:Dustin.wang@bpu.nj.gov)

Alexis Trautman, Research Scientist  
[alexis.trautman@bpu.nj.gov](mailto:alexis.trautman@bpu.nj.gov)

David Titus, Program Specialist Trainee  
[david.titus@bpu.nj.gov](mailto:david.titus@bpu.nj.gov)

**N.J. BPU-OFFICE OF THE  
ECONOMIST**

Dr. Benjamin Witherell  
Director  
[benjamin.witherell@bpu.nj.gov](mailto:benjamin.witherell@bpu.nj.gov)

Jackie O'Grady  
[Jackie.ogrady@bpu.nj.gov](mailto:Jackie.ogrady@bpu.nj.gov)

**N.J. BPU-DIVISION OF CLEAN  
ENERGY**

Stacy Ho Richardson  
Acting Co-Director  
[stacy.richardson@bpu.nj.gov](mailto:stacy.richardson@bpu.nj.gov)

Rupa Deshmukh  
Senior Program Manager  
[rupa.deshmukh@bpu.nj.gov](mailto:rupa.deshmukh@bpu.nj.gov)

Philip Chao  
Senior Program Manager  
[philip.chao@bpu.nj.gov](mailto:philip.chao@bpu.nj.gov)

**N.J. BPU-DIVISION OF ENERGY &  
WATER**

Mike Kammer  
Director  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350  
[mike.kammer@bpu.nj.gov](mailto:mike.kammer@bpu.nj.gov)

Bart Kilar  
[bart.kilar@bpu.nj.gov](mailto:bart.kilar@bpu.nj.gov)

William Barkasy  
[william.barkasy@bpu.nj.gov](mailto:william.barkasy@bpu.nj.gov)

Anthony DeAnni  
[anthony.deanni@bpu.nj.gov](mailto:anthony.deanni@bpu.nj.gov)

**N.J. BPU-DIVISION OF STATE  
ENERGY SERVICES**

Sara Bluhm Gibson  
Director  
[sara.bluhm@bpu.nj.gov](mailto:sara.bluhm@bpu.nj.gov)

**DIVISION OF LAW**

Daren Eppley  
Deputy Attorney General, Section Chief  
Richard J. Hughes Justice Complex  
Public Utilities Section, 7th Floor West  
25 Market Street, P.O. Box 112  
Trenton, NJ 08625  
[daren.eppley@law.njoag.gov](mailto:daren.eppley@law.njoag.gov)

Pamela L. Owen  
Deputy Attorney General, Assistant  
Section Chief  
[pamela.owen@law.njoag.gov](mailto:pamela.owen@law.njoag.gov)

Paul Youchak, Deputy Attorney General  
[paul.youchak@law.njoag.gov](mailto:paul.youchak@law.njoag.gov)

Matko Ilic, Deputy Attorney General  
[matko.ilic@law.njoag.gov](mailto:matko.ilic@law.njoag.gov)

Steven Chapler, Deputy Attorney General  
[steven.chaplar@law.njoag.gov](mailto:steven.chaplar@law.njoag.gov)

Michael Beck, Deputy Attorney General  
[Michael.beck@law.njoag.gov](mailto:Michael.beck@law.njoag.gov)

Brandon Simmons, Deputy Attorney  
General  
[brandon.simmons@law.njoag.gov](mailto:brandon.simmons@law.njoag.gov)

**RATE COUNSEL**

Brian O. Lipman  
Director  
Division of Rate Counsel  
140 East Front Street, 4th Floor  
P.O. Box 003  
Trenton, NJ 08625-0003  
[blipman@rpa.nj.gov](mailto:blipman@rpa.nj.gov)

Maura Caroselli  
Manager, Gas and Clean Energy  
[maura.caroselli@rpa.nj.gov](mailto:maura.caroselli@rpa.nj.gov)

Sarah H. Steindel  
Assistant Deputy Rate Counsel  
[ssteindel@rpa.nj.gov](mailto:ssteindel@rpa.nj.gov)

Mamie W. Purnell  
Assistant Rate Counsel  
[mamie.purnell@rpa.nj.gov](mailto:mamie.purnell@rpa.nj.gov)

Megan Lupo  
Assistant Deputy Rate Counsel  
[mlupo@rpa.nj.gov](mailto:mlupo@rpa.nj.gov)

**RATE COUNSEL CONSULTANTS**

David Dismukes, Ph.D.  
Consulting Economist/Managing Partner  
Acadian Consulting Group  
5800 One Perkins Place, Suite 5F  
Baton Rouge, LA 70808  
[daviddismukes@acadianconsulting.com](mailto:daviddismukes@acadianconsulting.com)

Ezra Hausman, Ph.D.  
President  
Ezra Hausman Consulting  
77 Kaposia Street  
Auburndale, MA 02466  
[ezra@ezrahausman.com](mailto:ezra@ezrahausman.com)

Dante Mugrace  
Senior Consultant  
c/o Karl Richard Pavlovic  
PCMG and Associates, LLC  
22 Brookes Avenue  
Gaithersburg, MD 20877  
[dmugrace@pcmgregcon.com](mailto:dmugrace@pcmgregcon.com)

### **JCP&L**

Jersey Central Power & Light Company  
300 Madison Avenue  
Morristown, NJ 07962-1911

Tori L. Giesler  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

Michael J. Martelo  
[mmartelo@firstenergycorp.com](mailto:mmartelo@firstenergycorp.com)

Mark A. Mader  
[mamader@firstenergycorp.com](mailto:mamader@firstenergycorp.com)

Kurt E. Turosky  
[turoskyk@firstenergycorp.com](mailto:turoskyk@firstenergycorp.com)

Edward C. Miller  
[emille3@firstenergycorp.com](mailto:emille3@firstenergycorp.com)

Carol Pittavino  
[cpittavino@firstenergycorp.com](mailto:cpittavino@firstenergycorp.com)

Kori Auman-Krebs  
[kauman@firstenergycorp.com](mailto:kauman@firstenergycorp.com)

Viktor Lackmann  
[vlackmann@firstenergycorp.com](mailto:vlackmann@firstenergycorp.com)

Victoria Lora Reyes  
[mlora\\_reyes@firstenergycorp.com](mailto:mlora_reyes@firstenergycorp.com)

Mark A. Lazaroff  
Catherine G. Vasudevan  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103-2921  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)

Brendon J. Baatz  
Vice President  
Gabel Associates, Inc.  
417 Denison Street  
Highland Park, NJ 08904  
[brendon@gabelassociates.com](mailto:brendon@gabelassociates.com)

### **ENERGY EFFICIENCY ALLIANCE OF NJ**

Nathan C. Howe  
1085 Raymond Boulevard  
Newark, NJ 07102  
[nathan.howe@klgates.org](mailto:nathan.howe@klgates.org)

Erin Cosgrove  
701 E. Gate Drive  
Mt. Laurel, NJ 08054  
[ecosgrove@eeafnj.org](mailto:ecosgrove@eeafnj.org)

### **THE BUILDING PERFORMANCE ASSOCIATION**

Kara Saul Rinaldi  
Vice President of Government Affairs,  
Policy and Programs  
[no address]  
[kara.saul-rinaldi@building-performance.org](mailto:kara.saul-rinaldi@building-performance.org)

Sabine Rogers  
Public Policy Associate  
On behalf of Building Performance  
Association  
[sabine@annndyl.com](mailto:sabine@annndyl.com)

### **NEW JERSEY LARGE ENERGY USERS COALITION**

Steven S. Goldenberg  
Giordano, Halleran & Ciesla, P.C.  
125 Half Mile Road, Suite 300  
Red Bank, NJ 07701-6777  
[sgoldenberg@ghclaw.com](mailto:sgoldenberg@ghclaw.com)

Paul F. Forshay, Esq.  
Eversheds Sutherland (US) LLP  
7001 Sixth Street, N.W., Suite 700  
Washington, D.C. 20001-3980  
[paulforshay@eversheds-sutherland.us](mailto:paulforshay@eversheds-sutherland.us)

### **ACE**

Philip J. Passanante  
Assistant General Counsel  
Pepco Holdings LLC – 92DC42  
500 N. Wakefield Drive  
Newark, DE 19702-5440  
[philip.passanante@pepcoholdings.com](mailto:philip.passanante@pepcoholdings.com)

Jessica Yu  
Manager – Energy Efficiency & Demand  
Response Portfolio  
Planning, Design and Evaluation  
Edison Place  
701 9<sup>th</sup> Street  
Washington, D.C. 20001  
[jessica.yu@exeloncorp.com](mailto:jessica.yu@exeloncorp.com)

William R. Ellis  
Pepco's Regional Vice President  
Government & External Affairs  
[wrellis@pepco.com](mailto:wrellis@pepco.com)

Marisa Slaten, Esq.  
Director, Regulatory Services & Strategy  
Pepco Holdings  
[marisa.slaten@exeloncorp.com](mailto:marisa.slaten@exeloncorp.com)

Susan DeVito  
Director, Pricing and Regulatory Services  
[susan.devito@pepcoholdings.com](mailto:susan.devito@pepcoholdings.com)

Thomas M. Hahn,  
Principal Rate Analyst  
[thomas.hahn@pepcoholdings.com](mailto:thomas.hahn@pepcoholdings.com)

Heather Hall  
Manager, Regulatory Affairs NJ  
[heather.hall@pepcoholdings.com](mailto:heather.hall@pepcoholdings.com)

Wayne Hudders  
Manager, Demand Response and  
Energy Efficiency Evaluation  
701 9th St NW  
Washington, DC 20068  
[wayne.hudders@pepcoholdings.com](mailto:wayne.hudders@pepcoholdings.com)

Susan Marinelli, Sr. Program Manager  
Energy Wise Rewards and NJ EE  
Programs  
[smarinelli@pepcoholdings.com](mailto:smarinelli@pepcoholdings.com)

David Pirtle  
[dpirtle@pepcoholdings.com](mailto:dpirtle@pepcoholdings.com)

Nick Rosenthal  
[nrosenthal@pepcoholdings.com](mailto:nrosenthal@pepcoholdings.com)

### **NEW JERSEY NATURAL GAS COMPANY**

Andrew K. Dembia  
Regulatory Affairs Counsel  
1415 Wyckoff Road  
P.O. Box 1464  
Wall, NJ 07719  
[adembia@njng.com](mailto:adembia@njng.com)

Anne-Marie Peracchio  
Director, Conservation & Clean Energy  
Policy  
[aperacchio@njng.com](mailto:aperacchio@njng.com)

John Astorino  
[jastorino@njng.com](mailto:jastorino@njng.com)

James Corcoran  
[jcorcoran@njng.com](mailto:jcorcoran@njng.com)

Susan Ellman  
[sellman@njng.com](mailto:sellman@njng.com)

Jerome Ryan  
[jryan@njng.com](mailto:jryan@njng.com)

Judy DeSalvatore  
[jdesalvatore@njng.com](mailto:jdesalvatore@njng.com)

Susan Fastuca  
[sfastuca@njng.com](mailto:sfastuca@njng.com)

Marianne Harrell  
[mharrell@njng.com](mailto:mharrell@njng.com)

Mark G. Kahrer  
[mkahrer@njng.com](mailto:mkahrer@njng.com)

Christopher Micak  
[cmicak@njresources.com](mailto:cmicak@njresources.com)

Tina Trebino  
[ttrebino@njng.com](mailto:ttrebino@njng.com)

**ROCKLAND ELECTRIC COMPANY**

Margaret Comes  
Associate Counsel  
4 Irving Place, Suite 1815-S  
New York, NY 10003  
[comesm@coned.com](mailto:comesm@coned.com)

John Carley  
Associate General Counsel  
[carleyj@coned.com](mailto:carleyj@coned.com)

Donald Kennedy  
Director of Energy Services  
Orange & Rockland Utilities, Inc.  
390 West, Route 59  
Spring Valley, NY 10977  
[kennedyd@oru.com](mailto:kennedyd@oru.com)

Charmaine Cigliano  
Section Manager Customer Energy  
Services [ciglianoc@oru.com](mailto:ciglianoc@oru.com)

Jon Hilowitz  
[hilowitzj@oru.com](mailto:hilowitzj@oru.com)

Cheryl Ruggiero  
[ruggieroc@coned.com](mailto:ruggieroc@coned.com)

Jeremy Scott  
[scottje@oru.com](mailto:scottje@oru.com)

**PSE&G**

Joseph F. Accardo Jr.  
Vice President Regulatory &  
Deputy General Counsel  
PSEG Services Corporation  
80 Park Plaza, T5  
P.O. Box 570  
Newark, NJ 07102  
[joseph.accardojr@pseg.com](mailto:joseph.accardojr@pseg.com)

Danielle Lopez, Esq.  
Associate Counsel – Regulatory  
[danielle.lopez@pseg.com](mailto:danielle.lopez@pseg.com)

Bernard Smalls  
Paralegal  
[bernard.smalls@pseg.com](mailto:bernard.smalls@pseg.com)

Michele Falcao  
Regulatory Case Supervisor  
[michele.falcao@pseg.com](mailto:michele.falcao@pseg.com)

Caitlyn White  
Regulatory Case Coordination  
[caitlyn.white@pseg.com](mailto:caitlyn.white@pseg.com)

Matthew M. Weissman  
General State Regulatory Counsel  
[matthew.weissman@pseg.com](mailto:matthew.weissman@pseg.com)

Susanna Chiu, Director  
Energy Services  
[susanna.chiu@pseg.com](mailto:susanna.chiu@pseg.com)

Todd Van Aken  
Manager  
Energy Services, Commercial and  
Industrial Programs  
[todd.vanaken@pseg.com](mailto:todd.vanaken@pseg.com)

Rachael Fredericks  
Manager  
Energy Services, Residential Programs  
[rachael.fredericks@pseg.com](mailto:rachael.fredericks@pseg.com)

Victor S. Viscomi  
Director  
Project Support  
[victor.viscomi@pseg.com](mailto:victor.viscomi@pseg.com)

Mark Scorsolini  
[mark.scorsolini@pseg.com](mailto:mark.scorsolini@pseg.com)

Tim Fagan  
[tim.fagan@pseg.com](mailto:tim.fagan@pseg.com)

Michael Palladino  
[michael.palladino@pseg.com](mailto:michael.palladino@pseg.com)

Ileana Hernandez  
[ileana.hernandez@pseg.com](mailto:ileana.hernandez@pseg.com)

**GOOGLE**

Murray E. Bevan  
Jennifer McCave  
Bevan, Mosca, Giuditta P.C.  
222 Mount Air Road, Suite 200  
Basking Ridge, NJ 07920  
[mbevan@bmg.law](mailto:mbevan@bmg.law)  
[jmccave@bmg.law](mailto:jmccave@bmg.law)

**SJI UTILITIES**

Sheree Kelly  
Regulatory Affairs Counsel  
[skelly@sjindustries.com](mailto:skelly@sjindustries.com)

Maureen Minkel  
Senior Director, Energy Efficiency &  
Conservation  
South Jersey Gas Company  
One South Jersey Place  
Atlantic City, NJ 08401  
[mminkel@sjindustries.com](mailto:mminkel@sjindustries.com)

W. Peter Druckenmiller  
Program Manager, Energy Efficiency  
Energy Efficiency and Conservation  
[wdruckenmiller@sjindustries.com](mailto:wdruckenmiller@sjindustries.com)

Michael Savacool  
Senior Financial Analyst  
[msavacool@sjindustries.com](mailto:msavacool@sjindustries.com)

Jim Fredericks  
Senior Rate Analyst  
[jf Fredericks@sjindustries.com](mailto:jf Fredericks@sjindustries.com)

Carolyn A. Jacobs  
Regulatory Compliance Specialist  
[cjacobs@sjindustries.com](mailto:cjacobs@sjindustries.com)

**ELIZABETHTOWN GAS COMPANY**

Dominick DiRocco  
Vice President Rates and Regulatory  
Affairs  
SJI Industries  
1 South Jersey Plaza  
Folsom, NJ 08037  
[ddirocco@sjindustries.com](mailto:ddirocco@sjindustries.com)

Frank Vetri  
Manager, Energy Efficiency Programs  
520 Green Lane  
Union, NJ 07083  
[fvetri@sjindustries.com](mailto:fvetri@sjindustries.com)

Susan Potanovich  
Rates Analyst Lead  
[spotanovich@sjindustries.com](mailto:spotanovich@sjindustries.com)

**CERTIFICATE OF SERVICE**

I hereby certify that, on the within date, I caused the foregoing letter petition to be served by email upon those individuals listed on the enclosed service list.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Mark A. Lazaroff", written in a cursive style.

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Mark A. Lazaroff