



Agenda Date: 4/27/16
Agenda Item: 8D

STATE OF NEW JERSEY
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
Post Office Box 350
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

CLEAN ENERGY

MARK NAPIER,)	ORDER
Petitioner)	
)	
V.)	
)	
PUBLIC SERVICE ELECTRIC AND GAS COMPANY,)	BPU Docket No. EC13111051 ¹
Respondent)	OAL Docket No. PUC 02807-14

Parties of Record:

Mark Napier, Petitioner, pro se
Sheree L. Kelly, Esq., Public Service Electric and Gas Company

BY THE BOARD:

Petitioner Mark Napier ("Mr. Napier" or "Petitioner"), a participant in the New Jersey solar market who owns two solar generation facilities, asks the New Jersey Board of Public Utilities ("Board") to reverse its approval of a solar generation program owned and operated by Public Service Electric and Gas Company ("PSE&G"), a public utility providing electric and gas service ("Respondent").²

PROCEDURAL HISTORY AND RECORD

On January 7, 2013, Petitioner filed a complaint in the Superior Court of New Jersey against Public Service Electric and Gas Company and Public Service Enterprise Group (collectively, "PSE&G" or "Respondent"). Petitioner filed the Complaint on behalf of himself and a putative class of all persons with a financial stake in the Solar Renewable Energy Certificate ("SREC") market of New Jersey between 2009 and 2012. Petitioner alleged that PSE&G had received more SRECs than it was entitled to as a result of not having complied with the same solar energy generation reporting scheme with which Petitioner and all other solar generators were required to comply. As a result, Petitioner argued, the value of "legitimately-obtained SRECs" was devalued and Petitioner and the other members of the putative class had sustained economic damage. Petitioner sought to recover damages based upon the legal theories of

¹ The Initial Decision indicates an incorrect Docket Number, GR13040302. The correct docket number is shown in the caption of this Order.

² Petitioner also named Public Service Enterprise Group Incorporated ("PSEG"), a holding company that owns PSE&G.

unfair competition and unjust enrichment. Napier v. Pub. Serv. Elec. & Gas Co., Dkt. No. A-4532-12T1 (App. Div. July 15, 2014) at p 4-5 (Todd Hranica's Certification in Support of PSE&G Motion to Dismiss ("Certification") at Attachment B, pp. 4-5).

In March 2013, PSE&G filed a motion in lieu of an answer, seeking dismissal of the complaint for failure to state a claim upon which relief can be granted ("Motion to Dismiss"). Id. at p 6. On April 22, 2014, the motion judge entered an order of dismissal with prejudice. Petitioner then filed a notice of appeal. Ibid.

On November 6, 2013, while the appeal was pending, Petitioner filed this petition with the Board asking that the Board "reject the Pole Mount System from the program." Motion for Summary Decision at Attachment A.³ According to Petitioner, "[t]he system panels have not been metered and PSEG is receiving far more energy credit than [sic] the system is actually producing." The petition further alleges that "PSEG did not comply with the rules and regulations like the rest of the Solar owners." Ibid. Petitioner requests that the Board "deny PSEG of any SREC and Solar Energy credit going back to the approval in 2009." Petitioner also stated that "I have extensive documentation to prove my accusations."

On March 11, 2014, with the appeal still pending, the Board transmitted the Petition to the New Jersey Office of Administrative Law ("OAL") for a hearing as a contested case. On July 15, 2014, the Appellate Court affirmed the trial court's dismissal of the complaint, with the modification that the dismissal was without prejudice as to claims made before the Board on any viable legal theory. Slip Op. at 19.

On August 21, 2014, Respondent filed an Answer in which it argued that since it operated the pole-mounted portion of Solar 4 All in accordance with the Board Order approving the Solar 4 All program⁴ and the requirements of PJM Interconnection LLC ("PJM"), Petitioner failed to state a claim upon which relief may be granted.⁵ Respondent further alleged that the Petition was deficient on its face for failure to allege any facts in support of its allegations.

On October 2, 2014, Respondent filed a motion for summary decision at the OAL ("Motion for Summary Decision"), arguing in its brief ("PSE&G Brief") that Petitioner fails to allege any facts in support of his "unsubstantiated allegations" that Respondent is not complying with applicable rules and that the solar generation from its pole-mounted solar facilities is not being accurately measured. PSE&G Brief at 1. Respondent asserted that the Board specifically reviewed and approved the manner in which energy output from the pole-mounted solar facilities would be measured; as a result, Respondent says, its Wholesale Market Participation Agreement ("WMPA") provides that these units must comply with the monitoring standards in the PJM Manuals. PSE&G Brief at 2, Certification at 25 and Appendices D and E. Further, Respondent stated that the Board had ordered that PSE&G satisfy Board rules, Id. at 2; that PJM issues manuals which provide the rules for measurement of energy generation and participation in the

³ Petitioner uses the term "Pole Mount System" to refer to the pole-mounted portion of the Solar 4 All program through which PSE&G owns and operates approximately 125 megawatts ("MW") of solar generation facilities throughout its service territory. The pole-mounted portion consists of solar panels ("Solar Facilities") mounted upon utility poles.

⁴ I/M/O Petition of Public Service Electric and Gas Company for Approval of a Solar Generation Investment Program and an Associated Cost Recovery Mechanism, Dkt. EO09020125, Order dated August 3, 2009.

⁵ PJM, which is charged with ensuring the reliability of the electric power supply to multiple states, accepts the generation figures produced by a sample of metered pole-mounted generation and the use of modelling algorithms.

SREC market, id. at 8; and that PSE&G's WMPA with PJM provides that Solar 4 All generation units must comply with the monitoring standards in the PJM manuals. id. at 2. Respondent also noted that under the terms of the Solar 4 All Order, all revenues from the sale of SRECs and of generation must be applied against the charge its ratepayers pay to cover the cost of PSE&G's investment in Solar 4 All. (PSE&G Brief at 2.)

By letter dated October 20, 2014, Petitioner filed a motion to compel discovery.⁶ Petitioner stated that it was not possible for him to substantiate his allegations regarding the alleged over-reporting of solar generation and associated receipt of excessive SRECs without receiving this discovery. On October 28, 2014, Respondent filed a letter in opposition to Petitioner's motion to compel discovery. On November 22, 2015, Petitioner filed his opposition to the motion for summary decision, together with supplementation of Petitioner's motion to compel, alleging that the OAL could not determine that there was no factual issue unless PSE&G produced all the documentation that Petitioner had requested.⁷ (Petitioner's Brief in Opposition to Motion for Summary Decision ("Petitioner's Brief") at 1-2.) On December 1, 2014, Respondent filed a response to Petitioner's opposition to the motion for summary decision, as well as supplementing Respondent's opposition to the motion to compel.

Oral argument was held on August 26, 2015, and the record closed on that date.

On February 3, 2016, Administrative Law Judge Elia Pelios issued an initial decision in which he granted the motion for summary decision. On Feb 12, 2016, Mr. Napier filed exceptions to the initial decision and on March 2, 2016, PSE&G filed replies to the exceptions.

On March 22, 2016, the Board filed with the OAL an Order authorizing an extension of time to issue a final decision for forty-five days, through May 5, 2016.

INITIAL DECISION SUMMARY

The Factual Discussion reviewed the history of the Solar 4 All program's development from the petition filed on February 10, 2009 through the Solar 4 All Order approving the stipulation of settlement entered into by PSE&G, Board staff, the Division of Rate Counsel, and several intervening parties. Initial Decision at 2-3. PSE&G had proposed metering a sample of the pole-mounted units and using modeling algorithms to determine the collective output of all of the pole-mounted solar panels. id. at 2. According to the petition, "each unit may not be individually metered. The hourly output of the solar systems in this segment will be determined through the use of a calculated load profile, which will be credited by metering a sample of these systems with interval meters." id. at 3.

Citing to the Certification at 21, the ALJ stated that the Solar 4 All Order recognized that the output from the pole-mounted solar panels would be metered and verified pursuant to the requirements established by PJM Interconnection, LLC ("PJM"). Initial Decision at 3. In addition, PJM issues manuals that provide rules for measuring energy output and also, through its subsidiary PJM-EIS, verifies the accuracy of reported solar generation on which SRECs are created. the SREC participating in SREC markets and the Board has designated a subsidiary of

⁶ Petitioner had begun to serve discovery in May 2014 and to seek the assistance of Administrative Law Judge ("ALJ") Pelios to compel responses in June 2014. Exceptions at 6-8 and Attachments thereto.

⁷The procedural history in the Initial Decision erroneously states that Board staff ("Staff") filed a brief in support of the PSE&G motion on December 1, 2014. Staff did not file a brief or take a position on the merits of the matter in the proceedings at the OAL.

PJM, PJM-EIS, as the entity that issues SRECs.⁸ (Initial Decision at 3.) The ALJ found that PSE&G had worked with PJM to ensure that an accurate metering system was established. Id. at 4.

The WMPA requires that PSE&G's pole-mounted units comply with the monitoring standards in the PJM Manuals. Describing the implementation of the metering protocol, the Initial Decision states that PSE&G submits hourly generation from fifty groups of the pole-mounted solar facilities to PJM. Each group contains a sample panel with a revenue-grade meter. After PSE&G has aggregated the production data into hourly bins, the data is sent to PJM where it is used to issue payments for energy sales. At the end of each month, PJM makes the data available to PJM-EIS and it serves as the basis for the creation of SRECs. (Initial Decision at 3-4.)

In his legal analysis, ALJ Pelios reviewed the standard for summary decision. Initial Decision at 5-6. He also summarized the legal basis for the Renewable Portfolio Standard and the role played by SRECs in the regulatory scheme. Id. at 6-8. After summarizing the facts provided in the Certification, he stated that Napier had failed to meet the requirements in N.J.A.C. 1:1-12.5(b); he had not provided a responding certification setting forth specific facts showing a genuine issue that can only be determined by an evidentiary proceeding. Instead of providing facts, Napier had provided argument. The Napier brief argued, first, that Respondent's motion should not be granted because Respondent had not produced all the discovery Napier had requested. To the contrary, ALJ Pelios determined that Respondent had reasonably responded to Petitioner's discovery requests. Petitioner also argued that "[t]he system panels have not been metered and PSEG is receiving far more energy credit than [sic] the system is actually producing." Initial Decision at 9. However, Petitioner had not provided any facts in response to the Certification to show that a genuine issue existed as to whether PSE&G's methodology for calculating its solar power generation had been approved by PJM-EIS GATS as conforming to PJM metering requirements or whether PJM-EIS GATS had verified PSE&G's meter readings for accuracy in determining the number of SRECs to issue to PSE&G. Id. at 9.

ALJ Pelios concluded that there is no genuine issue of material fact with respect to "the appropriateness of the methodology by which PSE&G calculates its solar power generation in order to receive SRECs." Ibid. Accordingly, the ALJ granted PSE&G's motion for summary decision and dismissed Napier's petition. Id. at 9-10.

EXCEPTIONS

On February 12, 2016, Petitioner filed exceptions to the Initial Decision. Petitioner argues that ALJ Pelios erred in describing his Petition as a "challenge to the methodology by which respondent Public Service Electric and Gas calculates its solar power generation under the company's solar 4 All Program." Exceptions at 2. Petitioner asserts that the Petition seeks an opportunity to "discuss and dispute the amount of energy credit and the SREC credit that PSEG was and still is receiving or [sic] the Solar 4 All Pole Mount System." Ibid.

⁸ N.J.A.C. 14:4-1.2 defines "PJM Environmental Information Services" or "PJM-EIS" as "the wholly-owned subsidiary of PJM Technologies, Inc. . . . [PJM-EIS] provides environmental and emissions attributes reporting and tracking services to its subscribers in support of renewable portfolio standards[.]" Also, "Generation Attributes Tracking System" or "GATS" is defined as "the environmental and emissions attributes tracking system for electric generation that is administered by [PJM-EIS]." N.J.A.C. 14:8-2.2.

Petitioner believes that such a dispute is warranted based on his claim that PSE&G has provided "no valid proof" that the solar panels are creating 40MW of power,⁹ although the ratepayers, he states, will pay \$750,000,000 for Solar 4 All. Petitioner relies upon the fact that generation is calculated on the basis of a "sampling" of the total number of solar panels. According to Petitioner, PSE&G is defrauding both the ratepayers and other solar generators by receiving credit for generation that he says is not occurring because of shading, damage, and panels that do not exist. (Exceptions at 1-3.)

Petitioner also asserts that PSE&G has neither proven that it is complying with PJM nor that the Solar 4 All facilities are producing the power PSE&G claims they produce. Petitioner states that ALJ Pelios issued the Initial Decision instead of ruling upon Petitioner's motion to compel and provides an example of the discovery that he seeks to compel. This example asks for very specific information on compliance, such as copies of each PJM manual with which PSE&G complies, the precise "PJM Rules" that are followed for metering and verification, and the names of persons responsible for compliance. Petitioner alleged that PSE&G's response, directing Petitioner to the PJM website and to the Solar 4 All Order, provided no information and asserts that Judge Pelios should have gotten "actual proof of compliance" with the requirements of the WMPA rather than relying upon the Certification. (Exceptions at 2-6.)

Petitioner also asserts that the Initial Decision does not acknowledge that Petitioner tried for months to get the ALJ to compel discovery from PSE&G. Petitioner asserts that on several occasions, he made Judge Pelios aware that he was following up with PSE&G on detailed deficiency letters but refrained from filing a motion to compel because Judge Pelios had stated that he would prefer to handle matters informally. (Exceptions at 6-7 and Exhibit C.) As a result, Petitioner says that he was "strung along by PSE&G for months with Judge Pelios's full knowledge and participation before filing a motion." (Exceptions at 7.) Petitioner asserts that Judge Pelios has now suggested that the motion was late and constituted Petitioner's first attempt to raise these issues. Ibid.

REPLIES TO EXCEPTIONS

Respondent argues that the Exceptions do not meet the standard set by the OAL's Rules of Practice, namely N.J.A.C. 1:1-18.4(b) and that the Petition fails to state a claim on which relief may be granted. Respondent's Replies to Exceptions ("Replies"). Respondent also states that Petitioner is being disingenuous by claiming that he has not received discovery since he was given "wide latitude." (Replies at 2.)

After summarizing the procedural history of this matter, Respondent argues that Petitioner has presented no factual evidence and relied upon "his own conclusory allegations." (Replies at 4.) Respondent supports ALJ Pelios's determination that Petitioner had not provided any specific factual statements to support his claims. Characterizing Petitioner's basic claim as "failure to comply with the Solar 4 All Program requirements as approved by the Board" and receiving too many SRECs as a result. (Replies at 5.) Respondent repeats that Petitioner has failed to state any facts to support his argument. (Replies at 6.)

⁹ PSE&G sought and the Solar 4 All Order granted approval for development of 40MW dc of pole-mounted solar generation. The record reflects that as of September 24, 2014, PSE&G had installed approximately 174,300 solar panels. Certification at 11.

DISCUSSION AND FINDINGS

As a threshold matter, the Board addresses Respondent's argument that Petitioner has failed to meet the standard for exceptions. Exceptions shall "specify the findings of fact, conclusions of law . . . to which exception is taken" and set out both "specific findings of fact [and] conclusions of law", as well as "supporting reasons." N.J.A.C. 1:1-18.4(1)-(3). Petitioner's exceptions do not meet that standard; however, the Board notes that the New Jersey courts have generally allowed pro se litigants greater latitude in adhering to procedural requirements. Although pro se litigants are not entitled to greater rights than are litigants who are represented, it is nevertheless fundamental that the court system "protect the procedural rights of all litigants and to accord procedural due process to all litigants. What constitutes due process varies with the circumstances of each case as well as with the individual situation of particular litigants." Rubin v. Rubin, 188 N.J. Super. 155, 159 (App. Div. 1982). In light of this precedent, the Board has reviewed Petitioner's exceptions and will address them although they are procedurally defective.

This matter involves a ruling upon a motion for summary decision. Under N.J.A.C. 1:1-12.5(a), "[a] party may move for summary decision upon all or any of the substantive issues in a contested case." The summary decision "may be rendered if the papers and discovery which have been filed, together with the affidavits, if any, show that there is no genuine issue as to any material fact challenged and that the moving party is entitled to prevail as a matter of law." N.J.A.C. 1:1-12.5(b). Determining whether a genuine issue of material fact exists "requires the motion judge to consider whether the competent evidential materials presented, when viewed in the light most favorable to the non-moving party, are sufficient to permit a rational fact finder to resolve the alleged disputed issue in favor of the non-moving party." Brill v. Guardian Life Insurance Co. of America, 142 N.J. 520, 540 (1995).

State policy promotes renewable energy generation, including solar generation.¹⁰ Toward that end, the Legislature established the Renewable Portfolio Standard ("RPS"), which requires each Electric Distribution Company ("EDC") to create or purchase a certain number of Renewable Energy Certificates ("RECs") each year, based upon the EDC's annual retail sales. EDECA at 87. Pursuant to EDECA, the Board has promulgated rules governing renewable portfolio standards. N.J.A.C. 14:8-2.1 to -2.11. Under those standards, an electric power supplier "that sells electricity to retail customers in New Jersey . . . shall include in its electric energy portfolio electricity generated from renewable energy sources," including specifically solar electric power. N.J.A.C. 14:8-2.1(a); N.J.A.C. 14:8-2.3. A supplier may meet its solar electric power generation requirements through the retirement of SRECs. N.J.A.C. 14:8-2.3(c). Additionally, the Board "shall require submittal of information and certifications needed to enable the Board or its designee to verify the generation that forms the basis of the requested RECs" and "shall require inspections, as appropriate, of generation equipment, monitoring and metering equipment, and other facilities relevant to verifying electric generation." N.J.A.C. 14:8-2.9(g).

As summarized above, the Certification and its supporting attachments demonstrate that PSE&G's proposal to meter a sample of the pole-mounted units and use modeling algorithms to determine the collective output of all the pole-mounted units was before the Board in the Solar 4 All proceeding. Mr. Hranica attested to the fact that PSE&G worked with PJM to ensure that an accurate metering system was established and that PJM accepts the methodology of metering a

¹⁰ See, e.g., Electric Discount and Energy Competition Act, N.J.S.A. 48:3-49 to -98.4, at -50 and -87 ("EDECA"); N.J.S.A. 48:3-98.1; New Jersey Energy Master Plan.

sample of the pole-mounted units and using modeling algorithms to determine the collective hourly output of all the pole-mounted panels.

Petitioner argues that that Solar 4 All does not generate as much energy as is reported to PJM-GATS and that Respondent thus receives SRECs to which it is not entitled. (Exceptions at 2-3.) In support of this claim, Petitioner asserts that he has seen solar panels shaded by trees and panels that have fallen to the ground. He states that he will be not be able to demonstrate his claims unless PSE&G provides the discovery he has sought and that the ALJ erred in "ignoring" his motion to compel discovery, as well as his previous efforts to obtain that discovery. (Exceptions at 5-7.)

Petitioner's argument centers on his claim that PSE&G knowingly overstates the generation from the Solar 4 All facilities in order to receive SRECs in excess of its "fair share." ALJ Pelios, based upon his reading of the Solar 4 All Order and the relevant information presented by the parties, found that PSE&G's metering and reporting of the pole-mounted units were in compliance with the Order and with the requirements of PJM-GATS. The ALJ found that there was no material issue of disputed fact regarding PSE&G's compliance with the Solar 4 All Order and that PSE&G was entitled to summary decision as a matter of law. The Board concurs.¹¹ The Solar 4 All petition proposed a "sampling" methodology. When it approved the Stipulation, the Board did not reject this methodology. The WMPA requires that the metering equipment for the pole-mounted portion of Solar 4 All be installed as required by PJM Manuals. PJM, which was designated as the Regional Transmission Authority,¹² charged with ensuring the reliability of the electric power supply to multiple states, accepts the generation figures produced by a sample of metered pole-mounted generation and the use of modelling algorithms.

The Board **HEREBY AFFIRMS** the ALJ's finding that there is no genuine issue of material fact with respect to the sufficiency of and the regulatory authority for the methodology by which PSE&G receives credit for the solar power generation of the pole-mounted facilities and SRECs created on that basis. Respondent is thus entitled to summary decision as a matter of law.

Petitioner argues, however, that he cannot demonstrate the existence of an issue of material fact without the discovery responses which PSE&G has refused to provide. The Board does not disagree with ALJ Pelios' determination that PSE&G has provided reasonable responses to Petitioner's discovery, but it will attempt to further address Petitioner's concern. Petitioner appears to believe that if he were in possession of more information on the individual generation of each pole-mounted facility, he would have facts which would demonstrate that PSE&G does not produce as much solar power as it receives credit for because there exist numerous solar panels that are damaged, fallen, or "don't exist." That is not the case.

In addition, Petitioner has argued that the ALJ erred in "taking Todd Hranica's word" for numerous statements of fact. Exceptions at 5. However, under the OAL's Rules of Practice, a certification is accepted as evidence. See N.J.A.C. 1:1-15.6. Mr. Hranica testified to these facts acknowledging that he would be subject to punishment for any willfully false statement. In addition, almost every statement made in the Certification is documented in an attachment. The Certification largely restates matters contained in the Stipulation, the Solar 4 All Order, the

¹¹ Moreover, the Board believes that Petitioner's allegation that PSE&G is inflating its solar generation in order to enrich itself through the associated SRECs is alleviated by the requirement in the Stipulation that all revenue from sales of capacity or SRECs is applied to reduce the amount Respondent recovers in rates for this program.

¹² <http://www.ferc.gov/market-oversight/mkt-electric/pjm.asp>

WMPA, or other attachment. Thus, Petitioner's assertion that the ALJ merely "took [Todd Hranica's] word" is inaccurate.

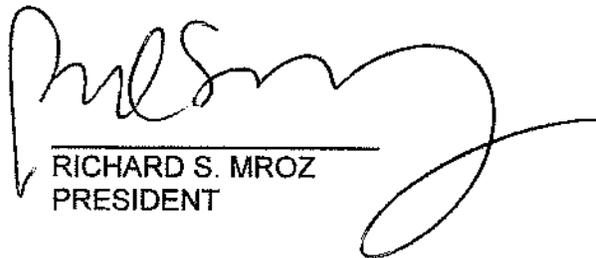
Indeed, Petitioner did not proffer any expert testimony or credible testimony in support of his claims that PSE&G was receiving far more energy credit than the system was actually producing. Further, Petitioner proffered no legal basis in support of his request that the Board "order PSEG to compensate all Solar owner [sic] for fraudulently devaluating our SRC's." Petition.

Upon careful review and consideration of the record, and based on the foregoing, the Board **FINDS** that ALJ Pelios correctly determined that Petitioner had failed to raise a genuine issue of material fact regarding the installation and maintenance of Solar 4 All and that summary decision was appropriate. The Board therefore **HEREBY ADOPTS** the Initial Decision, subject to the findings and conclusions in this Order. The Board also **FINDS** that Petitioner has failed to raise any claims for which he is entitled to relief from the Board. Accordingly, the Board **HEREBY DISMISSES** the petition with prejudice.

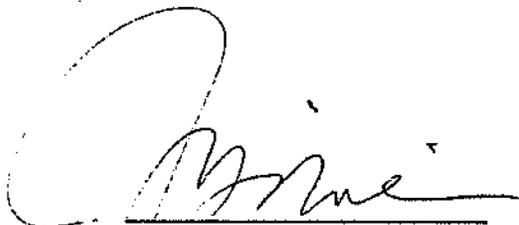
This Order shall be effective on May 5, 2016.

DATED: 4/27/16

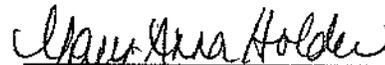
BOARD OF PUBLIC UTILITIES
BY:



RICHARD S. MROZ
PRESIDENT



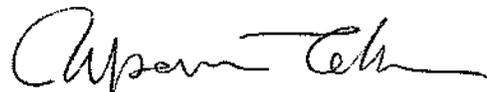
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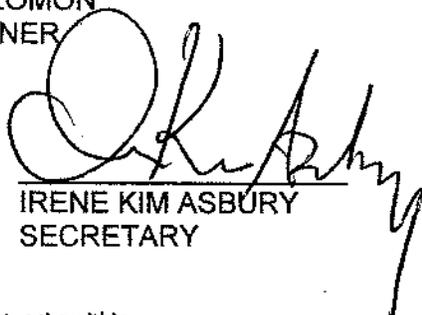


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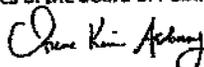
UPENDRA J. CHIVUKULA
COMMISSIONER

ATTEST:



IRENE KIM ASBURY
SECRETARY

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



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