



Agenda Date: 11/13/19
Agenda Item: 8G

STATE OF NEW JERSEY
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

ENERGY AND CLEAN ENERGY

IN THE MATTER OF THE PETITION OF PUBLIC)	ORDER ON MOTION FOR
SERVICE ELECTRIC & GAS COMPANY FOR)	RECONSIDERATION
APPROVAL OF ITS CLEAN ENERGY FUTURE-)	
ENERGY EFFICIENCY ("CEF-EE") PROGRAM ON A)	DOCKET NOS. GO18101112
REGULATED BASIS)	AND EO18101113

Parties of Record:

Stefanie A. Brand, Esq., Director, New Jersey Division of Rate Counsel

Matthew M. Weissman, Esq., PSEG Services Company

Daniel Greenhouse, Esq., Eastern Environmental Law Center

Steven S. Goldenberg, Esq., Giordano, Halleran & Ciesla, P.C. for New Jersey Large Energy Users Coalition

Laura Solomon, Esq., Laura Solomon and Associates for Keystone Energy Efficiency Alliance

Christopher E. Torkelson, Esq., Eckert Seamans Cherin & Mellott, LLC for Market Participants

BY THE BOARD:

This matter is before the New Jersey Board of Public Utilities ("Board" or "BPU") by way of a motion filed by multiple third party suppliers ("TPS") ("Market Participants" or "Movants")¹ pursuant to N.J.A.C. 14:1-8.6. Market Participants seeks reconsideration of the Board's February 27, 2019 order² denying Market Participants' motion for interlocutory review. The Prehearing Order, in pertinent part, denied Market Participants' motions to intervene. The Board's February 27 Order granted interlocutory review and affirmed the denials.

BACKGROUND AND PROCEDURAL HISTORY

On October 11, 2018, PSE&G filed the instant petition with the Board, seeking approval to implement 22 sub-programs, including seven (7) residential subprograms, seven (7) commercial

¹ Direct Energy Business, LLC; Direct Energy Business Marketing, LLC; Direct Energy Services, LLC; Gateway Energy Services Corporation; Centrica Business Solutions, an affiliate offering distributed energy solutions; Just Energy Group, Inc.; and NRG, Inc.

² In re the Petition of Public Service Electric & Gas Company for Approval of Its Clean Energy Future-Energy Efficiency ("CEF-EE") Program on a Regulated Basis - Request For Interlocutory Review and Motion for Reconsideration, Docket Nos. GO18101112 & EO18101113 (February 27, 2019) ("February 27 Order").

and industrial ("C&I") subprograms, and eight (8) pilot subprograms (collectively, "2018 EE Programs"). The total proposed investment for the 2018 EE Programs was approximately \$2.8 billion, including \$2.5 billion for investment and approximately \$283 million in operating and expenses over the proposed six (6) year term of the program. PSE&G proposes to recover the costs associated with the 2018 EE Programs via a new CEF-EE Program component ("CEF-EEC") of the Company's electric and gas Green Programs Recovery Charge, which would be filed annually after the proposed initial period. In addition, the Company proposes a mechanism for recovering lost revenues, called the Green Enabling Mechanism and requests Board approval of this mechanism.

On October 29, 2018, the Board designated Commissioner Dianne Solomon as the Presiding Commissioner, who was authorized to rule on all motions that arise during the pendency of these proceedings and modify any schedules that may be set as necessary to secure a just and expeditious determination of the issues.

Market Participants' Motion to Intervene

On November 16, 2018, Direct Energy, representing five (5) affiliated TPSs moved to intervene on the grounds that the 2018 EE Programs proposed by PSE&G would provide products and services already being offered in the competitive market, which would adversely affect Direct Energy as participants in that market. Direct Energy contended that approval of the 2018 EE Programs would place them and similarly situated suppliers and vendors at a competitive disadvantage because PSE&G could subsidize its products and services with ratepayer funds; provide on-bill financing that competitive businesses cannot; and use customer data to which competitors did not have access to offer value-added services that are better provided by the competitive market. Moreover, Movant objected to the potential for PSE&G to favor some vendors and suppliers over others, as well as the perceived risk that PSE&G's proposed program might achieve demand reductions without using a competitive process or using innovative approaches designed by the market.

PSE&G filed a letter objecting to Direct Energy's motion to intervene on November 28, 2018. Petitioner argued that Direct Energy's anti-competitive claims constituted a misplaced attempt to "rehash" previous policy arguments against utility involvement in providing energy efficiency services. In PSE&G's opinion, its CEP-EE petition was an inappropriate forum to do so.

Responding on December 3, 2018, Direct Energy reiterated its claims of a direct and substantial interest in several of PSE&G's proposed programs, as well as the threat to their interests if the Board approves the 2018 EE Programs. Direct Energy maintained that it needed the opportunity to propound discovery and cross examine witnesses in order to develop a record that will ensure that its interests are protected.

On December 6, 2018, Direct Energy, now referring to itself as "Market Participants," filed a supplemental motion to intervene, requesting the addition of two (2) companies, Just Energy Group Inc. ("Just Energy") and NRG Energy, Inc. ("NRG") (collectively, "Market Participants"). On December 17, 2018 PSE&G filed a letter in opposition to the motion, asserting primarily that the movants made contradictory statements: first, that the additional companies' interests aligned with those of Direct Energy, and second, that those companies would make unique contributions to the record. On December 19, 2018, Market Participants responded and stood by their contention that the interests of NRG, as a demand-side and energy efficiency business, and Just Energy, as the parent of multiple licensed third-party suppliers in the state, are aligned with those of Direct Energy.

Prehearing Order

On January 22, 2019, after consideration of these arguments, Commissioner Solomon issued the prehearing order in this matter ("Prehearing Order") in which, among other matters, she considered Market Participants' motion for intervention. While acknowledging that Market Participants' energy efficiency offerings in the competitive market gave them a significant interest in this proceeding, Commissioner Solomon concluded that "admitting each entity that has presented this argument would tend to produce delay or disruption in the proceeding." Noting that distinguishing among the various participants in the energy efficiency market would likely prove problematic, Commissioner Solomon denied the motion for intervention and instead granted Market Participants participant status, pursuant to N.J.A.C. 1:1-6.5.

Market Participants' Request for Interlocutory Review

On January 29, 2019, Market Participants filed a request for interlocutory review of the Prehearing Order insofar as it denied Market Participants' motion to intervene, on the ground that the movants' significant interest in and unique perspective on the 2018 EE Programs should outweigh the need for a prompt and expeditious proceeding. On February 1, 2019, PSE&G filed its opposition to the request, asserting that the Presiding Commissioner had appropriately balanced the factors for intervention and that none of the arguments raised warranted the reversal of the Presiding Commissioner's Order.

February 27 Order

In denying Market Participants' request for intervenor status, the Board relied upon the "implicit balancing test" established in prior Board orders. That test weighs the need and desire for development of a full and complete record against the New Jersey Administrative Code's goal of prompt and expeditious administrative proceedings. Feb 27 Order at 6. The Board recognized that the scope of the 2018 EE Programs makes it likely that, if implemented as proposed, they would affect many energy and efficiency service businesses in PSE&G's service territory. However, the Board also noted that this fact undermined Market Participants' claim to possess a unique interest in the proceeding; a total of nine (9) entities, most with competitive concerns similar to those voiced by Market Participants, had requested intervention in this proceeding. As a result, the Board granted intervention not to Market Participants, but to the Keystone Energy Efficiency Alliance ("KEEA"), a nonprofit, tax exempt 501(c)(6) corporation composed of approximately fifty energy efficiency businesses working in Pennsylvania and New Jersey.³ The Board noted that KEEA's members include one (1) of the entities that had joined the Market Participants' motion to intervene⁴, as well as three (3) businesses that had sought and been granted participant status in this matter.⁵ February 27 Order at 11.

In the February 27 Order, the Board also relied on the Board's need to meet its statutory obligations in a timely manner. "[T]he Board may not admit a party upon the assumption that the Board will nonetheless be able to fulfill its statutory obligation to act upon this petition within 180 days. Administrative efficiency must also be taken into account." February 27 Order at 8.

³ KEEA's motion to intervene before Commissioner Solomon was not filed by an attorney authorized to practice in New Jersey and was not considered in the Prehearing Order. Subsequently, KEEA acquired representation by an attorney authorized to practice in New Jersey. February 27 Order at 5.

⁴ NRG Energy, Inc.

⁵ Google, LLC; Lime Energy Co.; and Philips Lighting North America Corporation. February 27 Order at 11.

On March 8, 2019, the Market Participants filed a motion for reconsideration, arguing that KEEA could not adequately represent its interests; that the controlling statute⁶ favors competitive markets over bundled public utility services; that Market Participants' perspectives were critical to the Board's consideration of the PSE&G petition; and that Market Participants are uniquely positioned to critique a utility proposal of the size and scope of the CEP-EE Program.

On March 18, 2019 PSE&G filed its Opposition to the Motion. PSE&G asserted that the February 27 Order constituted a proper exercise of the Board's discretion and was far from meeting the standard for reconsideration that an agency decision be irrational, arbitrary, capricious, or palpably incorrect.

On March 25, 2019, Movants filed their Reply to the Opposition. Movants point to the affidavit of KEEA Policy Counsel Eric Miller as new evidence. This affidavit affirms that KEEA does not represent the positions taken by the Market Participants. Thus, according to the Market Participants, the Board was mistaken in believing that KEEA would represent interests similar to their own.

DISCUSSION AND FINDING

N.J.S.A. 48:2-40 expressly provides that the Board at any time may revoke or modify an order made by it. Twp. of Deptford v. Woodbury Terrace Sewerage Corp., 54 N.J. 418, 428 (1969); see also N.J.A.C. 14:1-8.6(b). N.J.A.C. 14:1-8.6 requires that a request for rehearing or reconsideration be done by a motion that enumerates the alleged "errors of law or fact" that the Board relied on in rendering its decision. Additionally, where an opportunity is sought to introduce additional evidence, that evidence shall be stated briefly with the reasons for failing to provide it previously.

Generally, a party should not seek reconsideration merely based upon dissatisfaction with a decision. D'Atria v. D'Atria, 242 N.J. Super. 392, 401 (Ch. Div. 1990). Rather, reconsideration is reserved for those cases where (1) the decision is based upon a "palpably incorrect or irrational basis" or (2) it is obvious that the finder of fact did not consider, or failed to appreciate, the significance of probative, competent evidence. Ibid. See Cummings v. Bahr, 295 N.J. Super. 374, 384 (App. Div. 1996). The moving party must show that the action was arbitrary, capricious, or unreasonable. D'Atria, 242 N.J. Super. at 401. The Board "will not modify an Order in the absence of a showing that the Board's action constituted an injustice or that the Board failed to take notice of a significant element of fact or law". In the Matter of the Implementation of L. 2012, c. 24, the Solar Act of 2012, Docket No. EO12090832 (July 19, 2013) at 5; In the Matter of Michael Manis and Manis Lighting, LLC - New Jersey Clean Energy Program Renewable Energy Incentive Program, Docket No. QS14040316 (April 15, 2015).

Market Participants argue that KEEA's interests are not similar to those of the Market Participants, as evidenced by the executed affidavit of KEEA Policy Counsel Eric Miller. Appendix A to Motion for Reconsideration. In his affidavit, Mr. Miller states that he has reviewed the Market Participants' motion to intervene and notes that Market Participants oppose PSE&G's use of ratepayer funds to further deploy energy efficiency equipment. This being so, "KEEA does not intend to represent the interests of the Market Participants in this proceeding." Appendix A at pars. 7, 8.

At the time it issued the February 27 Order, the Board did not know that KEEA would not represent the interests of Market Participants. That information was not yet in the record. Thus,

⁶ Electric Discount and Energy Competition Act of 1999, N.J.S.A. 48:3-49 to 98.5.

the Board could not and did not consider this probative, competent evidence. Having considered it, the Board **FINDS** that the Market Participants have an interest sufficiently different from that of any other party so as to add measurably and constructively to the scope of the case.

In addition, the Board's need to meet its statutory obligations in a timely manner is no longer the compelling concern that it was in February 2019. Since that time, the Commissioner and Board have in total approved three (3) stipulations extending the 180-day deadline.⁷ The most recent stipulation, which provides for an extension "until no later than March 16, 2020," contemplates a potential cumulative extension of approximately 250 days. September 11 Order at 10. Moreover, the stipulation provides that the parties will continue discussions of the underlying petition and may enter into a final resolution of the CEF-EE Program.⁸ The Board **FINDS** that these developments, unforeseeable at the time of the February 27 Order, mean that Market Participants' inclusion in this matter does not raise the prospect of confusion and delay.

Consequently, in light of these novel facts, the Board **FINDS** that the nature and extent of Market Participants' interest warrants intervenor status. The Board further **FINDS** that Market Participants' inclusion will add measurably and constructively to the record in this proceeding. Since the movants' significant interest in this proceeding has previously been acknowledged, the Board **HEREBY GRANTS** the motion and **REVERSES** its previous ruling.

Intervener status is conditioned upon execution of the Agreement of Non-Disclosure.

Sunrun, Inc.'s Request to Relax Rules

The Board notes that Sunrun, Inc. ("Sunrun") moved for intervention on November 16, 2018, and also sought interlocutory review of the Presiding Commissioner's denial of that motion on February 7, 2019.⁹ Following the entry of the February 27 Order Sunrun took no further action until it submitted a letter to the Board on September 13, 2019 ("Sunrun Letter") regarding the joint Stipulation of Settlement filed on September 9, 2019. The Sunrun letter notes the multiple extensions of the 180-day timeline and asks the Board to exercise its discretion with respect to procedural rules. More specifically, Sunrun asks the Board "to relax or disregard the procedural rules regarding the scope of participation and allow Sunrun to participate in any future settlement discussions and potential final resolutions and additional interim agreements[.]" Sunrun Letter at p. 2.

In response to the Sunrun Letter, PSE&G filed a letter stating that it did not object to Sunrun's involvement in settlement discussions provided several conditions were met. PSE&G Letter at p. 1. PSE&G's presented its conditions as follows: all participants to this proceeding must be offered the same opportunity; no participant's schedule might be permitted to delay scheduling settlement conferences; no participant's position would be allowed to unduly interfere with these

⁷ In the Matter of the Petition of Public Service Electric & Gas Company for Approval of Its Clean Energy Future – Energy Efficiency ("CEF-EE") Program on a Regulated Basis, BPU Docket Nos. GO18101112 & EO18101113 (June 27, 2019); In the Matter of the Petition of Public Service Electric & Gas Company for Approval of Its Clean Energy Future – Energy Efficiency ("CEF-EE") Program on a Regulated Basis, BPU Docket Nos. GO18101112 & EO18101113 (August 12, 2019); In the Matter of the Petition of Public Service Electric & Gas Company for Approval of its Clean Energy Future-Energy Efficiency ("CEF-EE") Program on a Regulated Basis, BPU Docket Nos. GO18101112 & EO18101113 (September 11, 2019).

⁷ Stipulation of Settlement, September 9, 2019, at p.4.

⁹ Sunrun initially moved for reconsideration of the Commissioner's Order but amended its motion to one for interlocutory review on February 7, 2019.

discussions; participants would not be permitted to execute any stipulation that resulted; and all attendees at settlement conferences must maintain the confidentiality of the discussions. Ibid. Sunrun thereafter responded by letter rejecting PSE&G's proposed condition that participants be excluded from executing future stipulations.

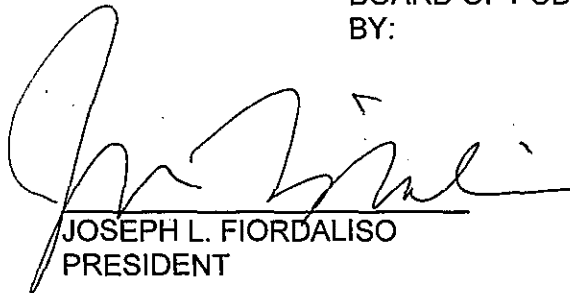
The Board does not find the Sunrun Letter seeking party status with regard to final resolutions or interim agreements persuasive. Sunrun failed to timely move for reconsideration or take any other action regarding the February 27 Order. Its letter, arriving approximately six (6) months after the deadline for a motion for reconsideration, and only after issuance of three (3) other orders in this docket, shall not be considered as such. Accordingly, the Board **DENIES** Sunrun's request and **REAFFIRMS** its ruling in the February 27 Order as it relates to Sunrun. Given this disposition, the Board need not address PSE&G's proposed conditions or Sunrun's opposition thereto.

The Board **HEREBY DIRECTS** Staff to post this Order on the Board's website.


The effective date of this Order is November 23, 2019.

DATED: 11/13/19

BOARD OF PUBLIC UTILITIES
BY:



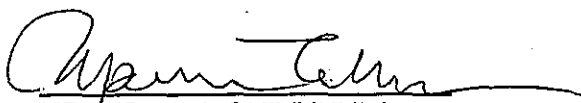
JOSEPH L. FIORDALISO
PRESIDENT



MARY ANNA HOLDEN
COMMISSIONER



DIANNE SOLOMON
COMMISSIONER

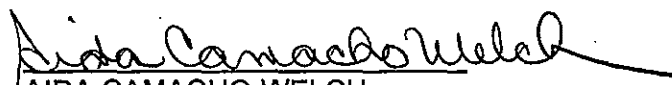


UPENDRA J. CHIVUKULA
COMMISSIONER



ROBERT M. GORDON
COMMISSIONER

ATTEST:



AIDA CAMACHO-WELCH
SECRETARY

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

In the Matter of the Petition of Public Service Electric and Gas Company for Approval of its
Clean Energy Future – Energy Efficiency (“CEF-EE”) Program on a Regulated Basis

BPU Docket Nos. GO18101112 & EO18101113

SERVICE LIST

Public Service Electric and Gas Company

PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, NJ 07102

Matthew M. Weissman, Esq.
General State Regulatory Counsel
matthew.weissman@pseg.com

Joseph F. Accardo, Jr., Esq.
Deputy General Counsel and Chief Regulatory
Officer
joseph.accardo@pseg.com

Justin B. Incardone, Esq.
Associate General Regulatory Counsel
justin.incardone@pseg.com

Michele Falcao
Regulatory Filings Supervisor
michele.falcao@pseg.com

Caitlyn White
Regulatory Case Coordinator
caitlyn.white@pseg.com

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

Ezra Hausman, Ph.D., President
Ezra Hausman Consulting
77 Kaposia St.
Auburndale, MA 02466
ezra@ezrahausman.com

Atlantic City Electric Company

Philip J. Passanante, Esq.
Assistant General Counsel
Mailstop 92DC42
500 N. Wakefield Drive
Newark, DE 19702
philip.passanante@pepcoholdings.com

Jersey Central Power & Light Company

Lauren M. Lepkoski, Esq.
FirstEnergy Service Company
Legal Department
2800 Pottsville Pike
Reading, PA 19712-6001
llepkoski@firstenergycorp.com

New Jersey Natural Gas Company

1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

Andrew K. Dembia, Esq.
Regulatory Affairs Counsel
adembia@njng.com

Rockland Electric Company

4 Irving Place, Suite 1815-S
New York, NY 10003

Margaret Comes, Esq.
Associate Counsel
comesm@coned.com

Jack Carley, Esq.
Assistant General Counsel
Consolidated Edison Company of New York,
Inc.
carleyj@coned.com

Direct Energy

Christopher Torkelson, Esq.
Eckert Seamans Cherin & Mellott, LLC
P.O. Box 5404
Princeton, NJ 08543
ctorkelson@eckertseamans.com

Karen O. Moury, Esq.
Kristine Marsilio, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com
kmarsilio@eckertseamans.com

Eastern Environmental Law Center

50 Park Place, Suite 1025
Newark, NJ 07102

Daniel Greenhouse, Esq.
Senior Staff Attorney
dgreenhouse@easternenvironmental.org

William Bittinger, Esq., Staff Attorney
wbittinger@easternenvironmental.org

Enel X North America, Inc.

Katie Guerry, Vice President
Brian Kauffman, Manager
Regulatory Affairs – North America
One Marina Park Drive
Boston, MA 02210
katie.guerry@enel.com
brian.kauffman@enel.com

William Harla, Esq.
Alice M. Bergen, Esq.
Ryan J. Scerbo, Esq.
Decotiis, Fitzpatrick, Cole & Giblin, LLP
Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, NJ 07666
wharla@decotiislaw.com
abergen@decotiislaw.com
rscerbo@decotiislaw.com

James C. Meyer
Riker Danzig Scherer Hyland & Perretti LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962-1981
jmeyer@riker.com

Sunrun Inc.

Lauri A. Mazzuchetti, Esq.
Glenn T. Graham, Esq.
Kelley Drye & Warren LLP
One Jefferson Road, 2nd Floor
Parsippany, NJ 07054
lmazzuchetti@kelleydrye.com
ggraham@kelleydrye.com

Beren Argetsinger, Esq.
Keyes & Fox LLP
P.O. Box 166
Burdett, NY 14818
bargetsinger@keyesfox.com

Tendril Networks, Inc.

Kerry Cahill, Esq.
Florio Perrucci Steinhardt & Cappelli, LLC
235 Broubalow Way
Phillipsburg, NJ 08865
kcahill@floriolaw.com

Board of Public Utilities

44 South Clinton Avenue, 9th Floor
Trenton, NJ 08625-0350

Aida Camacho-Welch, Secretary of the Board
board.secretary@bpu.nj.gov

Paul Flanagan, Esq., Executive Director
paul.flanagan@bpu.nj.gov

Division of Clean Energy

Sara Bluhm Gibson, Director
sara.bluhm@bpu.nj.gov

Kelly Mooij, Deputy Director
kelly.mooij@bpu.nj.gov

Sherri Jones, Assistant Director

Google, LLC

Bevan, Mosca & Giuditta, P.C.
222 Mount Airy Road, Suite 200
Basking Ridge, NJ 07920

Murray E. Bevan, Esq.
mbevan@bmg.law

William K. Mosca, Jr., Esq.
wmosca@bmg.law

Christopher M. Casey, Esq.
ccasey@bmg.law

Katherine M. Dailey
kdailey@bmg.law

Signify

Ben Brinkert, Esq.
3 Burlington Woods Drive
Burlington, MA 01803
ben.brinkert@signify.com

Keystone Energy Efficiency Alliance

Matt Elliott, Executive Director
14 S. 3rd Street, Second Floor
Philadelphia, PA 19106
melliott@keealliance.org

Laura Solomon, Esq.
Laura Solomon and Associates
121 Sibley Avenue
Ardmore, PA 19003
laura@laurasolomonesq.com

Lime Energy Company

Lloyd Kass
Senior Vice President, Utility Strategy
4 Gateway Center, 4th Floor
100 Mulberry Street
Newark, NJ 07102
lkass@lime-energy.com

sherri.jones@bpu.nj.gov

Benjamin S. Hunter, Manager
Bureau of Clean and Renewable Energy
benjamin.hunter@bpu.nj.gov

Mahogany A. Hall, Program Specialist 2
mahogany.hall@bpu.nj.gov

Benjamin Goldstein, Program Specialist
Trainee
benjamin.goldstein@bpu.nj.gov

Division of Energy

Stacy Peterson, Director
stacy.peterson@bpu.nj.gov

Paul Lupo, Bureau Chief, Rates & Tariffs
paul.lupo@bpu.nj.gov

Bart Kilar
bart.kilar@bpu.nj.gov

Counsel's Office

Carol Artale, Esq.
Deputy Chief Counsel
carol.artale@bpu.nj.gov

Rachel Boylan, Esq.
rachel.boyland@bpu.nj.gov

Stacy Ho Richardson, Esq.
stacy.richardson@bpu.nj.gov

Charles Gurkas, Paralegal
charles.gurkas@bpu.nj.gov

New Jersey Division of Law

124 Halsey Street
Post Office Box 45029
Newark, NJ 07101-45029

Pamela Owen, Assistant Section Chief
pamela.owen@law.njoag.gov

Matko Ilic, DAG
matko.ilic@law.njoag.gov

Nathan Howe, Esq.
McCarter & English, LLP
100 Mulberry Street
Four Gateway Center
Newark, NJ 07102
nhowe@mccarter.com

MaGrann Associates

Ben Adams
701 East Gate Drive, Suite 100
Mount Laurel, NJ 08054
policy@magrann.com

New Jersey Large Energy Users Coalition

Steven S. Goldenberg, Esq.
Giordano, Halleran & Ciesla, P.C.
125 Half Mile Road, Suite 300
Red Bank, NJ 07701-6777
sgoldenberg@ghclaw.com

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

Barbara Koonz, Esq.
Partner, Environmental Department
Greenbaum, Rowe, Smith & Davis LLP
75 Livingston Avenue
Roseland, NJ 07068
bkoonz@greenbaumlaw.com

Kenneth Maloney, Esq.
Cullen and Dykman LLP on behalf of Public
Service Electric and Gas Company
One Riverfront Plaza
kmaloney@cullenanddykman.com

Geoffrey Gersten, DAG
geoffrey.gersten@law.njoag.gov

New Jersey Division of Rate Counsel

140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003

Stefanie A. Brand, Esq., Director
sbrand@rpa.nj.gov

Brian O. Lipman, Esq., Litigation Manager
blipman@rpa.nj.gov

Felicia Thomas-Friel, Esq.
Managing Attorney – Gas
ftthomas@rpa.nj.gov

Kurt Lewandowski, Esq.
Assistant Deputy Rate Counsel
klewando@rpa.nj.gov

Sarah H. Steindel, Esq.
Assistant Deputy Rate Counsel
ssteinde@rpa.nj.gov

Maura Caroselli, Esq.
Assistant Deputy Rate Counsel
mcaroselli@rpa.nj.gov

Shelly Massey
smassey@rpa.nj.gov

Rate Counsel Consultants

David E. Dismukes, Ph.D.
Consulting Economist
Acadian Consulting Group
5800 One Perkins Place Drive, Suite 5-F
Baton Rouge, LA 70808
daviddismukes@acadianconsulting.com