Law Department PSEG Services Corporation 80 Park Plaza – T5, Newark, New Jersey 07102-4194 tel : 973-430-6479 fax: 973-430-5983 email: <u>martin.rothfelder@pseg.com</u>



May 3, 2013

In the Matter of the Board's Review of the Applicability and Calculation of a Consolidated Tax Adjustment

BPU Docket No. EO12121072

VIA ELECTRONIC & REGULAR MAIL

Kristi Izzo, Secretary Board of Public Utilities 44 South Clinton Avenue, 9th Floor P.O. Box 350 Trenton, New Jersey 08625-0350

Dear Ms. Izzo:

This letter is PSE&G's supplemental response to questions number 3 and 4 in the "Notice of Opportunity to Comment" dated March 6, 2013 in the above referenced docket. It supplements the response of NJUA submitted on this date, which PSE&G is participating in. An additional ten copies of this letter are enclosed. An electronic copy of these comments has also been provided to <u>rule.comments@bpu.nj.state.us</u>.

3. Please calculate a CTA for your company utilizing the current Board methodology set forth in the Board's April 20, 2004 order, *I/M/O the Verified Petition of Rockland Electric Company for the Recovery of its Deferred Balances and the establishment of Non-Delivery Rates Effective August 1, 2003 and I/M/O the Verified Petition of Rockland Electric Company for Approval of Changes in Electric Rate, its Tariff for Electric Service, its Depreciation Rates, and for Other Relief, BPU Docket Nos. ER02080614 and ER02100724.*

PSE&G SUPPLEMENTAL RESPONSE: The above mentioned *Rockland* order does not provide or define a clear methodology for a calculation. A calculation of the impact of a CTA, reflecting the most recent Rate Counsel interpretation' of the above-mentioned *Rockland* order for PSE&G is in testimony in PSE&G's most recent base rate case, BPU Docket No. GR09050422, in the filed testimony of Andrea Crane, and is also addressed in the filed testimony of Robert C. Krueger, Jr.

¹ Rate Counsel Witness Crane agreed in oral testimony that her approach to CTA for the PSE&G rate case referenced above differed from the approach Rate Counsel took to calculate a CTA in the prior PSE&G rate case.

4. If applicable, please provide the actual amount of the CTA included in your company's last base rate case.

PSE&G SUPPLEMENTAL RESPONSE: In PSE&G's most recent electric and base rate cases, BPU Docket No. GR09050422, neither the orders dated June 7, 2010 and July 9, 2010 for electric and gas, respectively, nor the settlement agreement adopted in those orders, quantify a CTA adjustment.

Sincerely,

Matin C. Pote fille