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VIA E-MAIL

Kenneth J. Sheehan, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350

Re: In the Matter of the Board's Review of the Government Energy Aggregation
("GEA") Rules
BPU Docket No. EX14111343

Dear Secretary Sheehan:

As requested by Jake Gertsman, Esq. of the Counsel's Office of the New Jersey Board of Public Utilities, I am recirculating in correspondence form the contents of the initial email comments submitted February 18, 2015 on behalf of ACE, JCP&L, PSE&G and RECO (collectively, "the EDCs") following from the January 29, 2015 stakeholder meeting in connection with the above-referenced matter. Although the EDCs may provide additional reply comments should the need arise, for now we appreciate Board Staff's collaborative approach and have the following brief thoughts:

- **Additional meetings would be beneficial.** The January 29th meeting produced some positive and thoughtful dialogue, but before any significant changes to the GEA rules are contemplated, it probably would be helpful for there to be more dialogue between interested TPSs and the EDCs, facilitated by Board Staff, so that any amendments are the product of a reasoned and well-thought out approach that would be in the best interests of promulgating enduring rules that are able to withstand the test of time.
- **Regarding the rule modification raised for discussion in Point IV(4)(b) of Board Staff's Meeting Notice, it is appropriate for participating municipalities operating government energy aggregation programs to maintain a list of the names, addresses and utility account numbers of residential customers who advise that they are not interested in being involved in a GEA program, not EDCs.** With respect to interest and lack of interest in GEA programs, when a customer calls, EDC customer service representatives are properly trained to advise the customer to contact their respective municipality. This approach is consistent with N.J.S.A. 48:3-93.1, 93.2 and 94.
- **The cost and feasibility of EDI system modifications to distinguish individual switches to TPS from those resulting from a GEA program have commenced, but**

will take some time. The EDCs recognize that this might be helpful and are willing to continue analyzing and discussing with Board Staff and the TPSs as part of this stakeholder proceeding.

- **Prior to delving further into the costs associated with the additional information requested by Con Ed Solutions, the EDCs are interested in obtaining more information.** The EDCs are unclear on the benefits to either the TPS or the GEA program generally of developing a system to track and provide the granular level of data suggested by Con Ed Solutions. Prior to performing any work associated with analyzing costs, time-frame to implement and feasibility of system modifications, the EDCs believe it would be more effective for there to be additional dialogue at which time Con Ed Solutions can provide support for what it believes to be the benefits. The EDCs, Board Staff as well as other TPS can then assess whether all agree that what Con Ed Solutions is seeking would in fact be beneficial and worth the time of pursuing.

Again, the EDCs appreciate Board Staff's collaborative approach and would support continued dialogue.

Respectfully submitted,

Public Service Electric and Gas Company

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