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March 1, 2021

Via Electronic Mail

Ms. Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9TH Floor
P.O. Box 350
Trenton, New Jersey 08625-0350
Board.Secretary@bpu.nj.gov

**Re: I/M/O the New Jersey Board of Public Utilities' Response to the
COVID-19 Pandemic
BPU Docket No. AO20060471**

Dear Secretary Camacho-Welch:

Please accept for filing in the above-referenced matter the comments of the New Jersey Division of Rate Counsel ("Rate Counsel"). Consistent with the March 19, 2020 Order of the New Jersey Board of Public Utilities ("Board") in I/M/O the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations, BPU Docket No. EO20030254, copies of this comment letter are being filed with the Secretary of the Board and provided electronically to each person on the service list by electronic mail only. No paper copies will follow. **Please acknowledge receipt of this comment letter.** Thank you for your consideration and attention to this matter.

Introduction

The Board has recognized that the COVID-19 crisis threatens both public utility companies and ratepayers. The looming risk of utility service disconnections to thousands of customers who cannot pay their bills presents another acute threat from the pandemic to public health. The financial damage is substantial and continues to grow. It is essential to address those arrearages without causing further hardship for either those still able to pay their bills or the utilities. Rate Counsel anticipates that this proceeding, by carefully considering the issues below, can develop a fair and equitable resolution of the economic harm to public utilities and their customers from this terrible pandemic. Rate Counsel looks forward to continuing to work with the Board, regulated utilities and other interested parties to address the utilities' arrearages while protecting ratepayers from an inordinate share of that burden.

As directed by President Fiordaliso's January 28 Order and the February 1 Notice of Public Hearing, Rate Counsel submits these comments on the impact of the COVID-19 pandemic on the ability of customers to pay bills; the mounting arrearages; the sufficiency of existing payment assistance programs; and further actions necessary to address these issues. Many of Rate Counsel's views on these issues are incorporated in the Petition Rate Counsel filed on October 2, which has been incorporated into this proceeding, and in our November 30, 2020 comments to the Board, which we incorporate into these comments by reference. Rate Counsel will address here additional comments as requested in the February 1 Notice of Public Hearing.

Rate Counsel Comments

Rate Counsel urges the Board to seek a proper balance as we look for solutions to address the impact of the COVID-19 pandemic on the ability of customers to pay their bills; to ensure sufficient payment assistance for those in need; and to take any further actions necessary to

address the myriad of issues resulting from this global pandemic. It is important to remember that every measure comes at a cost and that cost should not and cannot be borne solely by the same people who continue to suffer from the economic ravages that have resulted from this historic pandemic. We have heard over and over that “we are all in this together,” and in looking at how to address the COVID-related arrearages, those words are undoubtedly true.

The impact of the pandemic is grim. According to the United States Centers for Disease Control and Prevention (“CDC”), as of February 23, more than 22,000 New Jerseyans have died as a result of COVID-19.¹ That places New Jersey as the state with the fifth highest number of COVID-19 deaths in the country,² and the highest death rate.³

While the scope and severity of damage is widespread, it has been catastrophic for those least able to afford it. Thousands have lost their jobs and cannot afford to pay their bills.⁴ The number of COVID-19 cases in New Jersey grew quickly, and since last March, New Jerseyans

¹ As of February 23, 2021, CDC reported the total death count for NJ at 22,874, including 20,585 confirmed deaths and 2,289 probable deaths. UNITED STATES CENTERS FOR DISEASE CONTROL AND PREVENTION, *United States COVID-19 Cases and Deaths by State*, available at <https://covid.cdc.gov/covid-data-tracker/#cases>

² *Id.*

³ As of February 23, 2021, CDC reported the death rate for NJ at 257 for every 100,000 residents. UNITED STATES CENTERS FOR DISEASE CONTROL AND PREVENTION, *COVID-19 Death Rate in the US reported to the CDC, by State/Territory*, available at https://covid.cdc.gov/covid-data-tracker/#cases_deathsper100k

⁴ During the February 25 public hearing, the claim was made that a large set of the ratepayers in arrearage are not “low” income. PSE&G went further and said about 70% of its customers in arrearage are not low income. This claim was unsupported by any data nor its source provided. The issue should be further explored in this proceeding. If this claim is correct, it may show that economic hardship has spread beyond the “low-income” population and now affects “working poor” and middle class customers as well. As explained below, this may require a different response than previous arrearages.

have filed more than 2 million initial unemployment claims.⁵⁶ Governor Murphy has said the current economic crisis “can only be rivaled by two other times in our state’s entire 244-year history – the Great Depression and the Civil War.”⁷ He also said “[a]most everybody is hurting, but particularly, low-income workers and their families have been crushed. ... Small businesses have been crushed. ... The impact has been staggering across the board.”⁸

For many, this is a matter of survival. Protection from cold and darkness, and indeed from losing a place to live, comes only from the statewide moratoria on utility shutoffs and residential evictions. At this moment, thousands of New Jerseyans fear they will lose basic services. That reality must shape the Board’s response.

And this trial is far from over. At this time, the best experts in the world cannot predict when this pandemic will abate, or when society will recover from the damage. As of February

⁵ Press Release, NEW JERSEY DEPT. OF LABOR & WORKFORCE DEVELOPMENT, *NJ Labor Dept.: Jobless Workers Have Received \$23.4B in COVID-Related Benefits*, Feb. 25, 2021, available at https://www.nj.gov/labor/lwdhome/press/2021/20210225_paymentsupdate.shtml.

⁶ The unemployment rate in NJ fell from 10.2 % in November 2020 to 7.6% in December 2020, “primarily due to New Jersey residents leaving the labor force rather than finding employment.” That 7.6% is more than twice the pre-pandemic unemployment rate of 3.7 % in December 2019. Press Release, NEW JERSEY DEPT. OF LABOR & WORKFORCE DEVELOPMENT, *New Jersey Employment Contracts in December to End Year*, Jan. 21, 2021, available at <https://www.nj.gov/labor/lpa/pub/emp/press/pressrelease/prelease.pdf>

Moreover, even before the pandemic, times were tough for many in NJ. In 2019, 10% of New Jersey residents had 12-month incomes below the federal poverty level. US CENSUS BUREAU, 2019 American Community Survey, available at <https://data.census.gov/cedsci/table?q=0400000US34&tid=ACSDP5Y2019.DP03>.

⁷ Phil Murphy (@GovMurphy), Twitter (Aug. 25, 2020, 10:26 AM), <https://twitter.com/govmurphy/status/1298265560325615626>.

⁸ *New Jersey Gov. Phil Murphy: Economic Impact Has Been ‘Staggering Across The Board’*, National Public Radio (Sept. 8, 2020) available at <https://www.npr.org/sections/coronavirus-live-updates/2020/09/08/910788634/new-jersey-governor-on-the-coronavirus-in-his-state>

23, 2021, only 14.1% of New Jersey residents had received even one of their two COVID-19 vaccination injections, and only 6.5% had received both.⁹ It cannot be assumed that the economy will recover tomorrow, next week, or next month.¹⁰ Accordingly, measures must be selected that recognize that the pandemic is far from over, that the economic recovery will be gradual, and that the harm will be lasting for those living on fixed and low incomes and the unemployed.

All of this is reflected in the growing arrearages owed on customer bills. As shown on the attached charts,¹¹ the total of all utility arrearages at the end of 2020 was over \$700 million, an increase of 89% from the total year-end arrearages in 2019. Put differently, as of year-end 2020, consumers owed \$333 million *more* than they did as of year-end 2019. As of December 2020, approximately \$650 million was owed on gas and electric bills and approximately \$60 million was owed to the State's investor-owned water utilities.¹² Over 1.24 million utility accounts were in arrears as of year-end 2020. Over 525,000 residential customers, and over 91,000 commercial and industrial customers, would be disconnected if there was no moratorium on shutoffs. With every billing cycle that passes, the total amount of arrearages is likely increasing. Hopefully those numbers will change as our economy recovers, but it is clear that the

⁹ See *How the Vaccine Rollout Is Going in Your State*, New York Times (Feb. 23, 2021) available at <https://www.nytimes.com/interactive/2020/us/covid-19-vaccine-doses.html>

¹⁰ The U.S. Bureau of Labor Statistics forecasts that, even when the economy recovers, employment opportunities will shrink for less educated and lower paid workers. See Jed Kolko, *The Jobs the Pandemic May Devastate: An updated forecast by the Bureau of Labor Statistics has alarming news for people with a high school diploma or less*, New York Times (Feb. 22, 2021), available at <https://www.nytimes.com/2021/02/22/upshot/jobs-future-pandemic-.html>

¹¹ Rate Counsel compiled these attachments based on the utilities' discovery answers. We welcome any corrections from the utilities as appropriate.

¹² Data for publicly owned water and wastewater utilities is not currently available, but it must be assumed that they face similar arrearages.

scale of this problem is too large for the solutions to come from a single source. We must look for all available sources of help to address these arrearages.

This proceeding also needs to address the two different ways uncollectibles are collected. New Jersey's electric utilities recover uncollectibles through their respective Societal Benefit Charge filings, while the New Jersey gas utilities and investor-owned water utilities recover their bad debt through base rate case filings. A base rate case adds a prudence review, but either process imposes the entire recoverable cost on other ratepayers. For all utilities, the Board should review uncollectibles related to the pandemic in this proceeding to ensure that there is an equitable solution that is not wholly borne by the ratepayers.

Attempting to recover the full cost of the utilities' uncollectibles from customers who may now be able to pay their bills will raise rates and likely cause more customers to fall behind. The Board also must resist the call by some to shore up the economy by spending ever-increasing amounts of ratepayer money. The utility sector is not the part of our economy most hurt by the pandemic, and these projects will not be a boon for the economy. Increasing utility rates with multiple infrastructure projects, however, will compound ratepayers' problems. The worst possible outcome would be a spending spree that increases rates, causes more ratepayers to fall behind on their bills, further increases utility uncollectibles, and leads to more arrearages and service disconnections after the shutoff moratorium expires. In selecting remedial measures the Board must ensure that it will at least, in the words of the timeless aphorism, "do no harm."

Over the past several years, New Jersey's electric and gas utilities have received Board approval to invest billions of dollars in new infrastructure in New Jersey. These projects were designed to meet reliability, resiliency and safety goals, but were non-revenue producing. Utility proposals, such as those raised in NJUA's first round of comments in this matter, to pursue a

new round of infrastructure spending as an “economic stimulus” to offset the pandemic-related downturn, are misguided and will do little to alleviate New Jersey’s current economic problems, as they will add further to the bills many New Jerseyans are already struggling to pay.

The pandemic has not impacted all sectors of the economy equally. Hardest hit are the service sectors, restaurants, entertainment, tourism, etc. While some expansion of new sectors of the economy may be helpful, simply spending more on traditional utility-related infrastructure will not help the economic sectors that need it most. At the same time, increased utility rates reduce disposable household income and result in higher business and industry costs. More money spent on increased utility bills means less money available to spend or invest in other areas of the New Jersey economy, and makes New Jersey a more expensive place to do business. New Jersey natural gas delivery rates (“base rates”) have already increased by over 40 percent over the past five years, and electric base rates have increased by 43 percent over the last ten years. Now is not the time for further rate increases.

This proceeding must look at what measures we can take that will fairly and equitably allocate the economic fallout from this pandemic and prevent further harm. We have to look at what ratepayers can and should pay toward the utilities’ uncollectibles while so many ratepayers and the entire economy are experiencing financial setbacks. To simply ask either ratepayers or utilities to absorb this level of arrearages is likely to create further harm – either by raising rates and causing more customers to be unable to pay, or by impacting the utility’s revenues to a point where they must seek rate increases. It is a problem that can only be solved through a cooperative solution that involves contributions from multiple sources.

Rate Counsel respectfully recommends that the upcoming stakeholder meetings called for in the Procedural Order include a dialog and exchange of ideas to address several critical tasks.

First, we need to calculate the total amount of all utility arrearages. Rate Counsel began that process with initial discovery which has been answered by most utilities. However, not all of the information is maintained in a uniform fashion and it will need to be updated. It is likely that the numbers will change as the economy opens up and this should provide valuable information on how much of the problem is permanent and how much is temporary. In addition, as the Board is well aware, the data obtained through discovery regarding water utilities only captures a small portion of the overall data for water. Other state agencies will need to get involved to help determine a way to address customers served by publicly owned water utilities.

Second, we will need to explore the availability of payment assistance programs and their eligibility guidelines, to see if modifications are needed to fit the current crisis. Several of the utilities have indicated their efforts to advertise the availability of assistance programs, but they have not seen the expected results. Several utilities have implied that this is because customers are taking unfair advantage of the shutoff moratorium. It is just as likely, however, that the assistance programs have eligibility criteria that were designed for quite different circumstances. In this pandemic, many people who never before needed assistance suddenly find themselves in economic need. They do not identify as “low income” or may not be able to produce the traditional paperwork, such as a prior year’s tax return, needed to demonstrate eligibility for assistance. A hard look needs to be taken at the eligibility guidelines for these programs and whether they can be adapted to those who, because of this pandemic, suddenly find themselves in need. Again, other state agencies will need to be brought into these discussions and a creative outlook, rather than a suspicious one, will be necessary to bring the needed assistance to these customers.

Third, we will need to identify other sources of funds to reduce the total amount of utility arrearages. As noted above, the total numbers are simply too large for other ratepayers to pay or for the utilities to absorb. Federal funds via the CARES Act or other stimulus legislation may be available, and other funding sources should be explored. If the total amount of arrearages can be reduced, solving this problem will be easier. Once the overall number is whittled down, the parties will need to determine the extent to which customers can pay once the economy improves (though DPAs, debt forgiveness or some other mechanism), which customers can get assistance, what other sources of funds can be tapped into, then some combination of arrearage forgiveness with socialization of the remainder can be determined. Rate Counsel is prepared to offer ideas and work with participants, with the goal of developing a fair and equitable resolution.

In the meantime, Rate Counsel respectfully urges that the moratorium on utility shutoffs, which is scheduled to expire in two weeks, be extended. The arguments put forth by some utilities at the hearing that many other states have allowed their moratoria to expire without resulting hardship are not accurate and should be rejected. Just like in New Jersey, because of the hardship caused by the COVID-19 pandemic, utility providers in every state temporarily suspended service disconnections for customers who could not pay their entire utility bills.¹³ Significantly these companies regularly implement similar policies as required by state law that protect ratepayers during winter and summer months. According to the National Energy Assistance Directors' Association, 40 states implement annual winter shutoff moratoria to prevent disconnections for customers who cannot pay their bills. Many states that allowed their

¹³ National Association of Regulatory Utility Commissioners, *Map of Disconnection Moratoria*, updated Feb. 22, 2021, available at <https://www.naruc.org/compilation-of-covid-19-news-resources/map-of-disconnection-moratoria/>.

temporary COVID-related moratoria to expire have active winter moratoria that continue to protect customers. As of February 25, 2021, only six states had neither an active mandatory COVID-related nor a winter moratorium on utility service disconnections.¹⁴ Even in those six states, many utilities are voluntarily continuing their own COVID shutoff moratoria.¹⁵ In fact, 89% of Americans are protected under either a winter or COVID-related shutoff moratorium.¹⁶ The Board should ensure that New Jersey ratepayers continue to receive this same basic protection until an equitable solution can be found.

Conclusion

Rate Counsel appreciates the opportunity to comment and anticipates that, by considering the issues noted above, this proceeding will develop fair and equitable measures to address the financial harm to public utilities and their customers from this terrible pandemic.

Respectfully submitted,

STEFANIE A. BRAND
DIRECTOR, DIVISION OF RATE COUNSEL

By: /s/ Brian Weeks
Brian Weeks
Deputy Rate Counsel

cc: Electronic Mailing List

¹⁴ NEADA, *Winter and COVID-19 Utility Shutoff Moratoriums*, updated Feb. 17, 2021, available at <https://neada.org/wintercovid19moratoriums/>

¹⁵ *Id.* On Feb. 25, 2021, the Oregon Public Utility Commission extended its mandatory moratorium on service disconnections to June 30, 2021. See Oregon PUC Media Release, *Oregon Utility Regulators Extend Customer Protections*, available at <https://www.oregon.gov/puc/news-events/Documents/PR-202103.pdf>.

¹⁶ NEADA, *Winter and COVID-19 Utility Shutoff Moratoriums*, updated Feb. 17, 2021, available at (See Table 2 and Table 3).

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TOTAL (RESIDENTIAL AND NON-RESIDENTIAL) ACCOUNTS (AS OF 12/31/20)

Utility	2019	2020	Customers in Arrears	Pending Disconnect	Increase in Arrearages: 2019 - 2020	Customers in Arrears > 90	Customers in Arrears > 150	Total # of Accounts	Does data include arrearages <30 days?
PSE&G	\$ 190,260,895	\$ 401,290,258	513,990	407,649	\$ 211,029,363	108,360	76,143	4,252,290	no
Total PSE&G	\$ 190,260,895	\$ 401,290,258	513,990	407,649	\$ 211,029,363	108,360	76,143	4,252,290	
JCP&L	\$ 54,996,835	\$ 94,833,807	103,195	70,164	\$ 39,836,972	55,770	n/a	1,146,758	unclear
ACE	\$ 46,104,249	\$ 79,117,080	108,884	30,457	\$ 33,012,831	50,912	n/a	563,277	unclear
RECO	\$ 817,962	\$ 1,630,034	7,208	5,082	\$ 812,072	1,916	1,017	73,745	unclear
Butler	\$ 140,246	\$ 394,651	1,530	660	\$ 254,405	n/a	n/a	11,507	no
Total Electric	\$ 102,059,292	\$ 175,975,572	220,817	106,363	\$ 73,916,280	108,598	1,017	1,795,287	
SJG	\$ 31,953,826	\$ 38,177,003	69,276	26,020	\$ 6,223,176	38,529	30,614	n/a	no
ETG	\$ 10,064,702	\$ 19,255,481	150,312	98	n/a	50,891	n/a	300,687	unclear
NJNG	\$ 6,236,476	\$ 14,167,901	104,980	36,189	\$ 7,931,425	36,189	23,582	558,569	no
Total Gas	\$ 48,255,004	\$ 71,600,385	324,568	62,307	\$ 23,345,381	125,609	54,196	859,256	
Total Gas and Electric	\$ 340,575,192	\$ 648,866,215	1,059,375	576,319	\$ 308,291,023	342,567	131,356	6,906,833	
NJ - Am. Water	\$ 14,198,677	\$ 25,522,585	116,120	28,664	\$ 11,323,908	n/a	n/a	691,742	yes
Suez	\$ 12,046,599	\$ 23,436,109	38,589	8,413	n/a	n/a	n/a	n/a	n/a
Middesex Water	\$ 6,085,226	\$ 8,226,187	20,823	596	\$ 2,140,961	n/a	n/a	n/a	yes
Atlantic Sewer	\$ 1,736,483	\$ 1,597,655	1,487	666	\$ (138,827)	n/a	n/a	n/a	yes
Aqua New Jersey	\$ 739,741	\$ 1,466,560	8,469	2,534	\$ 726,820	n/a	n/a	n/a	yes
Gordon's Corner	\$ 80,896	\$ 115,153	1,254	88	n/a	n/a	n/a	n/a	yes
Montague Water	\$ 32,553	\$ 75,375	n/a	175	\$ 42,822	n/a	n/a	n/a	no
Fayson Lake	n/a	\$ 20,038	48	48	n/a	n/a	n/a	n/a	no
Lake Lenape	\$ 3,283	\$ 5,533	31	10	\$ 2,250	n/a	12	n/a	no
Mt. Olive Villages	\$ 548	\$ 3,062	19	19	\$ 2,514	1	n/a	n/a	no
Midtown Water	\$ -	\$ -	-	-	\$ -	-	-	n/a	n/a
Total Water	\$ 34,924,006	\$ 60,468,258	186,840	41,213	\$ 25,544,252	1	12	691,742	
Total - All Utilities	\$ 375,499,198	\$ 709,334,473	1,246,215	617,532	\$ 333,835,275	342,568	131,368	7,598,575	

Source: Utilities' responses to Rate Counsel Questions 1 through 5 in BPU Docket No. AO20060471

Notes:

Data for PSE&G is based on the utility's combined electric and gas accounts

Accounts shown as >90 days may also include accounts in arrears >150 days: whether "buckets" are additive may be unclear.

For SJG. number shown >90 days includes "older" buckets as well

Gordon cannot generate reports separately for residential and commercial customers; commercial customers make up 2.5% of customer base.

n/a means the data was not provided: in some instances data for accounts in arrears >121 days was provided, but not data for >150 days

ARREARAGES AND PENDING DISCONNECTION: DECEMBER 31, 2020

Utility	Arrearages			Accounts in Arrears			Pending Disconnection		
	Total	Residential	C & I	Total	Residential	C & I	Total	Residential	C & I
PSE&G	\$ 401,290,258	\$ 263,338,027	\$ 137,952,231	513,990	428,237	85,753	407,649	367,954	39,695
Total PSE&G	\$ 401,290,258	\$ 263,338,027	\$ 137,952,231	513,990	428,237	85,753	407,649	367,954	39,695
JCP&L	\$ 94,833,807	\$ 62,853,140	\$ 31,980,667	103,195	91,975	11,220	70,164	30,469	39,695
ACE	\$ 79,117,080	\$ 66,635,144	\$ 12,481,936	108,884	98,242	10,642	30,457	27,652	2,805
RECO	\$ 1,630,034	\$ 1,360,004	\$ 270,030	7,208	6,214	994	5,082	4,154	928
Butler	\$ 394,651	\$ 291,016	\$ 103,634	1,530	1,327	203	660	457	203
Total Electric	\$ 175,975,572	\$ 131,139,304	\$ 44,836,267	220,817	197,758	23,059	106,363	62,732	43,631
SJG	\$ 38,177,003	\$ 32,550,701	\$ 5,626,301	69,276	63,860	5,416	26,020	24,355	1,665
ETG	\$ 19,255,481	\$ 15,311,985	\$ 3,943,496	150,312	138,755	11,557	98	69	29
NJNG	\$ 14,167,901	\$ 10,636,461	\$ 3,531,441	104,980	98,350	6,630	36,189	34,272	1,917
Total Gas	\$ 71,600,385	\$ 58,499,147	\$ 13,101,238	324,568	300,965	23,603	62,307	58,696	3,611
Total Gas and Electric	\$ 648,866,215	\$ 452,976,478	\$ 195,889,737	1,059,375	926,960	132,415	576,319	489,382	86,937
NJ - Am. Water	\$ 25,522,585	\$ 20,162,946	\$ 5,359,639	116,120	106,969	9,151	28,664	26,174	2,490
Suez	\$ 23,436,109	n/a	n/a	38,589	n/a	n/a	8,413	7,244	1,169
Midsex Water	\$ 8,226,187	\$ 3,995,355	\$ 4,230,832	20,823	18,100	2,723	596	576	20
Atlantic Sewer	\$ 1,597,655	\$ 1,174,798	\$ 422,857	1,487	1,370	117	666	624	42
Aqua New Jersey	\$ 1,466,560	\$ 1,230,136	\$ 236,424	8,469	8,025	444	2,534	2,431	103
Gordon's Corner	\$ 115,153	n/a	n/a	1,254	n/a	n/a	88	n/a	n/a
Montague Water	\$ 75,375	\$ 73,786	\$ 1,590	n/a	n/a	n/a	175	172	3
Fayson Lake	\$ 20,038	\$ 20,038	\$ -	48	48	-	48	48	-
Lake Lenape	\$ 5,533	\$ 5,533	\$ -	31	31	-	10	10	-
Mt. Olive Villages	\$ 3,062	\$ 3,062	\$ -	19	19	-	19	19	-
Midtown Water	\$ -	\$ -	\$ -	-	-	-	-	-	-
Total Water	\$ 60,468,258	\$ 26,665,654	\$ 10,251,342	186,840	134,562	12,435	41,213	37,298	3,827
Total - All Utilities	\$ 709,334,473	\$ 479,642,132	\$ 206,141,079	1,246,215	1,061,522	144,850	617,532	526,680	90,764

Source: Utilities' responses to Rate Counsel Questions 1 through 5 in BPU Docket No. AO20060471

Notes:

Data for PSE&G is based on the utility's combined electric and gas accounts

n/a means the data was not provided

Summing the total residential arrearages and the total commercial/industrial arrearages yields a number less than total arrearages because Suez does not provide class-specific data, nor does Gordon's Corner

In the Matter of the New Jersey
Board of Public Utilities'
Response to the COVID-19
Pandemic
BPU Docket No. AO20060471

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