

December 16, 2005

Via Hand Delivery

Honorable Kristi Izzo, Secretary
New Jersey Board of Public Utilities
Two Gateway Center
Newark, New Jersey 07102

Re: Renewable Portfolio Standards Rules,
Proposed Readoption with Substantive Amendments
BPU Docket No.: EX05080733

Dear Secretary Izzo:

Enclosed please find an original and ten (10) copies of the submissions of the Division of the Ratepayer Advocate (“Ratepayer Advocate”) in connection with the above-referenced Renewable Portfolio Standards (RPS) rule readoption. Enclosed is one additional set of copies. Please date stamp the additional set as “filed” and return it to the courier. Thank you for your consideration and attention to this matter.

Introduction

The Ratepayer Advocate has long recognized the benefits of the New Jersey Clean Energy Program, including the promotion of energy efficiency and renewable energy generation by the Office of Clean Energy (OCE). It is the Ratepayer Advocate’s position that “clean energy is crucial for New Jersey’s future”, as it provides “substantial environmental, monetary and public health benefits”.¹ The OCE’s proposed RPS regulations will have a significant impact on the State of New Jersey and its electric utility ratepayers. It is our intention to provide the Board of Public Utilities (Board) with a broad range of data to utilize in its analyses for this important rulemaking. To that end, the Ratepayer Advocate is pleased to contribute the enclosed reports and recommendations as an additional compilation for the Board’s use in its adoption of the RPS regulations.

Enclosures

On behalf of the Ratepayer Advocate, we have enclosed the following four documents:

- *NJBPU’s Proposed Renewable Portfolio Standards Rule Analysis and Recommendations*, December 16, 2005. Prepared by: David Nichols, Ph.D.

¹ *Consumer Conservation Handbook*, (second edition, December 2004), a publication of the New Jersey Division of the Ratepayer Advocate, p.67.

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- *Estimate of Rate Impacts of Proposed New Jersey Renewable Portfolio Standard Rules, "Printouts of Workpapers Used to Prepare Estimates"* (Word document version) , December 16, 2005. Prepared by David F. Von Hippel.
- *Economic Impacts of New Jersey's Proposed Renewable Portfolio Standard, together with; Report Schedules* volume, December 16, 2005. Prepared by David E. Dismukes, Acadian Consulting Group.

The Rule Analysis and Recommendations prepared by Dr. David Nichols assesses the proposal to extend and increase solar energy and other Class I renewable energy requirements, in light of: New Jersey's existing renewable energy policies and goals; the economic impact of the RPS on electricity ratepayers; and other impacts of the RPS, including environmental benefits and its indirect effects on the state's economy. In support of these recommendations, the technical report of Dr. Von Hippel presents and documents the estimation of the rate and bill impacts—and of selected other impacts such as air pollutant emissions—of the proposed RPS.

The report prepared by Dr. Dismukes of Acadian Consulting Group (ACG) on behalf of the Ratepayer Advocate, consists of an analysis of the 2004 report prepared by the Center for Energy , Economic and Environmental Policy as it relates to the proposed RPS rules. ACG developed an independent set of rate and economic impacts associated with the proposed RPS amendments.

The Ratepayer Advocate appreciates this opportunity to comment on the proposed changes to the RPS. Please do not hesitate to contact us, should you need anything further in connection with this filing.

Respectfully submitted,

SEEMA M. SINGH, ESQ.
RATEPAYER ADVOCATE

By: _____
Felicia Thomas-Friel
Deputy Ratepayer Advocate

- c: Jeanne M. Fox, President (via hand delivery)
Frederick F. Butler, Commissioner (via hand delivery)
Connie O. Hughes, Commissioner (via hand delivery)
Suzanne Patnaude, (via hand delivery)
Mike Winka (via electronic and overnight mail)
Renewable Energy Committee Service List, (via electronic mail list server)