

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

In the Matter of the Petition of)
Public Service Electric and Gas Company)
for Approval of its Clean Energy Future-)
Electric Vehicle and Energy Storage)
(CEF-EVES) Program on a Regulated)
Basis)

BPU Docket No. EO18101111

**DIRECT TESTIMONY OF DANTE MUGRACE
ON BEHALF OF THE
DIVISION OF RATE COUNSEL**

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TABLE OF CONTENTS

	PAGE NO.
I. INTRODUCTION – STATEMENT OF QUALIFICATIONS.....	1
II. SCOPE AND PURPOSE OF TESTIMONY	3
III. SUMMARY AND RECOMMENDATIONS.....	4
A. The Company’s Proposed Budget for Capitalized Information Technology (“IT”) Related to its CEF-EVES Costs Should Be Capped.....	14
B. The Amortization Periods Should be Shortened To Ten Years	16
C. Administrative Costs Should be Capped.....	18
D. The Rate of Return on investment should be updated upon Board approval of rates in future rate case proceedings.	20
 APPENDIX – CURRICULUM VITAE DANTE MUGRACE	

1 **I. INTRODUCTION – STATEMENT OF QUALIFICATIONS**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 **A.** My name is Dante Mugrace. My business address is 22 Brooks Avenue, Gaithersburg,
4 MD 20877.

5 **Q. WHAT IS YOUR PRESENT OCCUPATION?**

6 **A.** I am a Senior Consultant with the Economic and Management Consulting Firm of PCMG
7 and Associates, LLC. (“PCMG”). In my capacity as a Senior Consultant, I am
8 responsible for evaluating and examining rate and rate- related proceedings before
9 various governmental entities, preparing expert testimony and reviewing and making
10 recommendations concerning revenue requirement proposals, as well as offering opinions
11 on economic policy and policy issues and methodologies used to set a value on a utility’s
12 rate base and cost of service components of revenue requirement.

13 **Q. PLEASE SUMMARIZE YOUR PROFESSIONAL EXPERIENCE.**

14 **A.** PCMG is an association of experts in utility regulation and policy, economics, accounting
15 and finance. PCMG’s members have over 75 years’ collective experience providing
16 assistance to counsel and expert testimony regarding the regulation of electric, gas, water
17 and wastewater utilities that operate under local, state and federal jurisdictions. PCMG
18 brings to client engagements a consultative and collaborative approach to the
19 identification of issues and the development of positions with strict adherence to client
20 procedures and deadlines. PCMG focuses on areas regarding revenue requirement, cost
21 of service, rate design, cost of capital and rate of return. We provide overall analyses on
22 various ratemaking concepts, as well as a review of public utility accounting methods

1 used by various public utilities and State Public Service Commissions. We also evaluate
2 the reasonableness of costs and investments that are used to set rates, and measure the
3 value of rate base, whether those costs are prudent in nature, used and useful and known
4 and measurable in utility operations. Prior to my association with PCMG, I was
5 employed as a Senior Consultant with the consulting firm of Snavely-King Majoros and
6 Associates (“SKM”) from 2013 to 2015, in the same capacity as PCMG. Prior to SKM, I
7 was employed by the New Jersey Board of Public Utilities (“NJBPU”) from 1983 to my
8 retirement in 2011. During my tenure at the NJBPU, I held various Accounting, Rate
9 Analyst, Supervisory and Management Positions. My last position was Bureau Chief of
10 Rates in the Agency’s Water Division (“Bureau Chief of Rates”). I held this position for
11 nearly 10 years. My CV is attached as Appendix A.

12 **Q. WHAT EXPERIENCE DO YOU HAVE IN THE AREA OF UTILITY RATE**
13 **SETTING PROCEEDINGS AND OTHER UTILITY MATTERS?**

14 **A.** In my capacity as Bureau Chief of Rates, I was responsible for managing, directing and
15 overseeing the rate process regarding the administrative, financial, and managerial
16 functions of the Rates Bureau. My primary duties were to ensure that the utilities had
17 sufficient revenues to cover their operating expenses, while insuring that those expenses
18 were reasonable in nature, provided benefits to customers and were in accordance with
19 Board policies, standards, and prior rate Orders. I also ensured that the utilities had the
20 opportunity to earn a reasonable rate of return on reasonable and prudent plant
21 investments, and that they were providing safe, adequate, and proper service at
22 reasonable rates. During my time at the NJBPU, I was involved in hundreds of rate and
23 rate-related proceedings that were resolved through settlement and litigated proceedings.

1 In my capacity as a Senior Consultant, I was involved in and am currently involved in
2 rate and rate-related proceedings before the Commissions in the Commonwealth of
3 Massachusetts and Pennsylvania the States of Maine, Hawaii, Maryland, New Jersey,
4 New York, North Dakota, and Ohio. In addition, I was involved in the Generic
5 Proceedings to Establish Parameters for the Next Generation Performance Based Rate
6 Plans before the Alberta Utilities Commission. I am also currently involved in a matter
7 before the Federal Energy Regulatory Commission (“FERC”) regarding a Transmission
8 Formula Rate Plan.

9 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

10 **A.** I hold a Master of Business Administration (“MBA”) degree with a concentration in
11 Strategic Management from Pace University-Lubin School of Business in New York,
12 New York. I hold a Master of Public Administration (“MPA”) degree from Kean
13 University in Union, New Jersey. I hold a Bachelor of Science (“BS”) degree in
14 Accounting from Saint Peter’s University in Jersey City, New Jersey.

15 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

16 **A.** I am testifying on behalf of the New Jersey Division of Rate Counsel (“Rate Counsel”).

17 **II. SCOPE AND PURPOSE OF TESTIMONY**

18 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

19 **A.** On October 11, 2018, the Public Service Electric and Gas Company (“PSE&G” or the
20 “Company”) filed a petition (“Petition”) with the Board of Public Utilities (“BPU” or
21 “Board”) requesting approval of a Clean Energy Future-Electric Vehicle and Energy
22 Storage (“CEF-EVES”) program on a regulated basis. I have been retained by Rate

1 Counsel to review the Company’s filing and provide recommendations on issues relating
2 to the reasonableness of the proposed revenue requirements and cost recovery
3 mechanism. My focus is on the Company’s proposed overall recovery mechanism that is
4 used to set rates in this proceeding, and the impact of the Company’s proposal with
5 respect to the rates to be charged to electric and gas utility customers. Rate Counsel
6 witnesses Dr. Ezra Hausman, PhD will provide testimony on the program and policy, and
7 David E. Peterson will provide testimony on rate design.

8 III. SUMMARY AND RECOMMENDATIONS

9 Q. PLEASE SUMMARIZE THE PROPOSED CEF-EVES PROGRAM.

10 A. PSE&G’s CEF-EVES is comprised of two components, an electric vehicle (“EV”)
11 program and an energy storage (“ES”) program. The Company, in this filing, contends
12 that the CEF-EVES Program, along with two other programs the Company has filed,
13 form the basis for a clean and resilient energy future. (Petition page 2). The CEF-EVES
14 petition asserted that this program is intended to “jumpstart” (Petition, page 2, ¶ 3) the
15 adoption of electric vehicles and energy storage technology in New Jersey, and help the
16 State meet its clean transportation and clean energy objectives. (Petition, page 2).
17 According to the Company’s claims, the CEF-EVES Program will further the State’s
18 goals by reducing greenhouse gas emissions, create green jobs, launch the electric vehicle
19 industry and energy storage technology in New Jersey and make the electric grid more
20 reliable, resilient, and safe. (Petition, page 2). PSE&G claims that its CEF-EVES
21 program is its response to recent legislative and executive actions in New Jersey that
22 support electric vehicle and energy storage projects. Further, the Clean Energy Act,
23 N.J.S.A. 48:3-87.8(d), directs the Board to initiate a proceeding to establish a process and

1 mechanism for achieving the goal of 600 megawatts of energy storage by 2021 and 2,000
2 megawatts of energy storage by 2030.¹ The Clean Energy Act also directs the Board to
3 conduct an analysis that, *inter alia*, considers whether implementation of renewable
4 electric energy storage systems would promote the use of electric vehicles in the State.
5 (N.J.S.A. 48:3-87.8(a)(2); Petition, pages 2-3).

6 Another recent law, the Plug-in Vehicle Act (“PIV Act”), N.J.S.A. 48:25-1 through -11,
7 sets goals and authorizes incentives to increase the use of PIVs in New Jersey.² The
8 legislation directs the Board to undertake certain statewide tasks, including promulgating
9 rules, conducting studies and allocating \$30 million per year from the Societal Benefit
10 Charge to subsidize the purchase of certain types of EVs and electric vehicle service
11 equipment (“EVSE”) in New Jersey. N.J.S.A. 48:25-7. The PIV Act authorizes the
12 Board to use these funds to create the Plug-in Electric Vehicle Fund and distribute rebates
13 for the purchase of electric vehicles as well as incentives for in-home electric vehicle
14 equipment. Id.³

15 **Q. PLEASE PROVIDE AN OVERVIEW OF THE COMPANY’S PROPOSAL ON**
16 **THE CEF-EVES PROGRAM.**

17 **A.** The CEF-EVES includes a total of \$261 million of investment over a period of six-years
18 and approximately \$103 million of expenses for four EV subprograms to commence upon
19 Board approval. (Petition page 3). The four EV subprograms (including the Cross –
20 Subprogram Investment) are as follows:

¹ P.L. 2018, c. 17.

² P.L. 2019, c. 362.

³ The PIV Act also allows the Board to include funds appropriated by the Legislature and utilize any return on investment of moneys deposited in the fund for the Plug-In Electric Vehicle Fund. N.J.S.A. 48:25-7a.

1	Residential Smart Charging	\$93 million
2	Level 2 Mixed-Use Charging	\$39 million
3	Public DC Fast Charging	\$62 million
4	Vehicle Innovation	\$45 million
5	Cross-Subprogram Investment	<u>\$22 million</u>
6		\$261 million

7 The CEF-ES includes five energy storage related subprograms totaling \$109.4 million
8 over a period of six-years and includes approximately \$70 million of expenses. (Petition
9 page 6). The five subprograms are as follows:

10	Solar Smoothing	\$13.1 million
11	Distribution Deferral	\$38.6 million
12	Outage Management	\$20.0 million
13	Microgrids for Critical Facilities	\$25.7 million
14	Peak Reduction for Public Sector	<u>\$11.9 million</u>
15		\$109.4 million

16 **Q. HAS THE COMPANY UPDATED ITS FILING SINCE THE OCTOBER 11, 2018**
17 **ORIGINAL FILING DATE?**

18 **A.** No. In response to RCR-A-003 and RCR-A-004, the Company continues to forecast the
19 \$103.1 million in expenses and \$260.8 million in investment over the life of the program
20 for the CEF-EV and \$70 million in expenses and \$109.4 million in investments over the
21 life of the program for the CEF-ES. I believe the Company should update all CEF-EVES
22 investment costs and expenses since this petition was filed with the Board on October 11,
23 2018, nearly two years ago, and it would be appropriate for the Company to update its
24 filing with more recent data.

1 **Q. HOW IS THE COMPANY PROPOSING TO RECOVER THE COSTS OF THE**
2 **PROGRAM?**

3 **A.** The Company proposes to recover the CEF-EVES Program costs via two components of
4 a new Technology Innovation Charge (“TIC”) to its tariff for electric service, which
5 PSE&G calls the Clean Energy Future Electric Vehicle Component (“CEF-EVC”) and
6 the Clean Energy Future Electric Storage Component (“CEF- ESC”). These new charges
7 will be applicable to all electric rate schedules on an equal cents per kilowatt-hour basis
8 in the same manner as currently utilized for all electric components of the Company’s
9 existing Green Program Recovery Charge (“GPRC”). (Swetz direct testimony, page 12).
10 In other words, under PSE&G’s proposal all ratepayers - whether they own an EV or not
11 - will be subject to the new TIC CEF-EVC recovery charge. According to Company
12 witness, Mr. Stephen Swetz, the Company proposes to implement the CEF-EVES TIC
13 charges upon Board approval, based upon forecasted expenditures and usage. The
14 Company anticipated a TIC rate effective date of April 1, 2019, with the initial period to
15 end on September 30, 2020, consistent with the rate recovery period end date for similar
16 GPRC programs. (Swetz direct testimony, page 12). After the initial period, the CEF-
17 EVES TIC rates would be updated in annual filings. (Swetz direct testimony, page 12).
18 According to Mr. Swetz, for all subsequent periods, a true-up filing will be made no later
19 than July of each year, for the period October 1 of the year through September 30 of the
20 subsequent year, plus the projected over/under deferred balance as of September 30 for
21 the current year. (Swetz direct testimony, page 13). The over/under deferred balance
22 will include actual revenue requirements through March of the current year. The charges
23 proposed in the annual filings made by July 1 of each year will go into effect

1 provisionally or as final rates on October 1 of the current year, upon issuance of a Board
2 Order authorizing these provisional or final rates. (Swetz direct testimony, page 13).

3 The Company calculated its revenue requirement based upon the following formula:

4 **Figure 1: PSEG's Revenue Requirement Calculation**

5 *Revenue Requirements = (Pre-tax Cost of Capital * Net Investment) +*
6 *Amortization and / or Depreciation + Expenses - Program Investment*
7 *Repayments + Revenue Offsets + ITC Amortization w/Tax Gross Up + Tax*
8 *Associated with ITC Basis Reduction*⁴

9 The Company computed its Pre-tax Cost of Capital based upon the most recent Board
10 authorized return on equity (9.60%) and capital structure in its 2018 base rate case
11 proceeding, resulting in an overall weighted cost Rate of Return of 6.99%.⁵ (Schedule
12 SS-CEF-TIC-1).

13 **Q. WHAT WOULD BE THE IMPACT OF THE PROGRAM ON THE COMPANY'S**
14 **RATEPAYERS?**

15 **A.** As noted above, the Company proposes to establish an initial rate for the proposed new
16 rate components for its electric customers, based upon forecasted expenditures and
17 usage.⁶ The initial rate for the TIC charge would be \$0.000163 per kWh without SUT.⁷
18 The combined initial rate from the CEF-EVES components of the TIC would be an
19 increase of \$1.24 or 0.10% on an annual basis, and the maximum increase for the period

⁴ Swetz direct testimony page 7-8.

⁵ PSE&G cited the rate of return and capital structure approved in its most recent base rate case, I/M/O PSE&G, for Approval of an Increase in Electric and Gas Rates and for Changes in Tariffs for Electric and Gas Service, B.P.U. N.J. No. 16 Electric and B.P.U. N.J. No. 16 Gas, and for Changes in Depreciation Rates Pursuant to N.J.S.A. 48:2-18, N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, and for Other Appropriate Relief, BPU Docket Nos. ER18010029 and GR18010030, Order dated October 29, 2018.

⁶ Swetz direct testimony page 12.

⁷ Ibid., page 14.

1 from October 1, 2025 through September 30, 2026 would be \$10.60, or 0.86%, or about
2 \$0.88 per month from the initial rates in effect.⁸

3 According to Company witness Mr. Swetz, the following are the initial revenue
4 requirements for the EV and ES programs and for the sixth year of the program, 2025.

5 **Table 1: PSEG's Projected Revenue Requirement**⁹

	<u>Electric - EV</u>	<u>Electric - ES</u>	<u>Total</u>
7 Initial Period	\$ 9,710,572	\$ 697,093	\$10,407,665
8 Year 6 (2025)	\$42,335,468	\$16,190,359	\$58,525,827

11 **Q. HAVE YOU REVIEWED AND EXAMINED THE COMPANY'S TESTIMONY**
12 **AND EXHIBITS IN THIS PROCEEDING?**

13 **A.** Yes, I have reviewed the direct testimony, exhibits and schedules of Company witnesses
14 Mr. Swetz, Ms. Karen Reif, and the Company's responses to data requests propounded
15 by the parties to the proceeding. I also reviewed and analyzed the Company's electronic
16 Excel spreadsheets that I received in responses to S-PSEG-REV-0030 and -0034.

17 **Q. WHAT IS YOUR OVERALL OPINION REGARDING THE COMPANY'S**
18 **PROPOSAL?**

19 **A.** I am of the opinion that the Company's proposal does not benefit ratepayers as a whole.
20 While I understand New Jersey's efforts to incentivize the use of renewable energy and
21 electric technology alternatives and in conformance with Governor Murphy's Executive

⁸ Ibid., page 15.

⁹ Attachment 3 Schedule SS-CEF-TIC-2 and TIC-3; Attachment 3 Schedule SS-CEF-EV-2 and ES-2.

1 Order No. 28¹⁰ to achieve the goals of the use of electric vehicles and energy storage
2 projects, I believe that if the Board were to approve this filing, then these costs should not
3 be fully recovered by all ratepayers, but rather recovered from ratepayers that will benefit
4 from these programs. In other words, the cost of these programs should not be socialized
5 but, rather, targeted to certain customer classes. Not all customers will purchase and own
6 electric vehicles, and not all customers even own a car, and therefore not all customers
7 will benefit from the CEF-EVES program. Given that electric vehicles cost more than
8 typical gasoline-powered vehicles, not all customers will even be able to afford the
9 purchase or lease of an EV in order to take advantage of the Company's program.
10 Requiring all Company customers to pay for the entire program is not equitable. To ask
11 all ratepayers to subsidize the Company's proposed program is not reasonable. As noted
12 by Dr. Hausman in his testimony, the adoption of the proposed EV program will result in
13 greater kWh sales revenues and provide greater profits for the Company's shareholders.
14 In this instance, the Company should subsidize or offset some of the EV costs.

15 **Q. HAS THE COMPANY QUANTIFIED HOW MANY AND WHICH CUSTOMERS**
16 **IN THE COMPANY'S SERVICE TERRITORY WILL BE ABLE TO**
17 **PARTICIPATE IN THE COMPANY'S PROPOSED EV PROGRAM?**

18 **A.** Not really. As I understand it, in order for a homeowner to qualify and support new load
19 for an EV charger, the utility service to the home needs to be upgraded, which the
20 Company proposes to upgrade at no cost to the customer. (S-PSEG-REV-0010). The
21 Company did not explain the legal authority for this proposal. The Company has not

¹⁰ Governor Philip D. Murphy, Executive Order No. 28, May 23, 2018, available at <https://www.state.nj.us/infobank/eo/056murphy/pdf/EO-28.pdf> (viewed 8/28/20). Reif testimony page 8.

1 performed a specific analysis on how many homes and what types of homes would
2 require a new utility service connection. (S-PSEG-REV-0013).

3 **Q. WHAT ABOUT THE INSTALLATION OF CHARGING EQUIPMENT IN**
4 **MUNICIPALITIES?**

5 **A.** In S-PSEG-REV-0016, the Company stated that it would be relatively easy to obtain a
6 municipal zoning permit to install charging equipment; if the equipment does not
7 conform to the zoning standards it may require a site plan or use variance approval,
8 which would require a lengthy application process, municipal review and hearing. The
9 Company also indicated that choosing site locations is complicated. (S-PSEG-REV-
10 0020). The Company stated that it did not perform a study to determine whether there
11 may be issues with its electric distribution network related to serving EV Fast Charging
12 equipment which understandably may add to the cost of its proposed EV program. (S-
13 PSEG-REV-0021).

14 **Q. DID THE COMPANY PERFORM AN ANALYSIS OF THE OPERATIONAL**
15 **AND MAINTENANCE COSTS OF RESIDENTIAL EV CHARGING?**

16 **A.** The Company has not provided or prepared a study of the operational and maintenance
17 costs of Residential EV chargers, nor requested recovery of the operational and
18 maintenance costs of residential EV charging (S-PSEG-REV-0014). The costs to
19 maintain and operate the EV charging may not be feasible for all ratepayers in the
20 Company's service territory. The Company stated that for each EV request, direct
21 current fast charger ("DCFC") stations must be individually evaluated to determine if any
22 infrastructure upgrades would be required to meet the demand. (S-PSEG-REV-0021). In

1 response to Board Staff discovery request, S-PSEG-REV-0015, PSE&G assumes that all
2 residential charging locations would require a new utility service connection.

3 **Q. DO YOU BELIEVE THAT THE COMPANY’S PROPOSAL SHOULD BE**
4 **APPROVED AT THIS TIME?**

5 **A.** No. Given these uncertainties, and the fact that the proposed rates and benefits of this
6 filing cannot be viewed in isolation, it is important to consider the combined impact of
7 this and future programs intended to reduce greenhouse gases such as EE, renewable
8 energy and Demand Response initiatives. As future additional programs are introduced,
9 rate recoveries for these programs will become “pancaked,” and ratepayers will be paying
10 for multiple programs simultaneously. There is also the need to analyze the rate impacts
11 with respect to the EMP, which has yet to be released to the public.¹¹ Further, given the
12 economic damage caused by the COVID-19 pandemic, choices have to be made about
13 which programs ratepayers can afford to fund since many are barely getting by and are
14 already having trouble paying their bills and trying to maintain steady employment.

15 **Q. SHOULD SOME OF THE COSTS OF PSE&G’S PROPOSED EV PROGRAMS**
16 **BE ASSIGNED TO THE COMPANY’S SHAREHOLDERS?**

¹¹ The Board and its partners developed the Integrated Energy Plan for New Jersey, a critical element of the EMP, to “develop a quantitative and analytical pathway to achieve the dual goals of 100% clean energy and the [greenhouse gas] emissions reductions requirements.” EMP, p. 15. However, the costs set forth in the Integrated Energy Plan “are not indicative of rate impacts.” BPU, “New Jersey Integrated Energy Plan,” Public Webinar, November 1, 2019, p. 32, available at <https://nj.gov/emp/pdf/NJ%20IEP%20Public%20Webinar%20Nov1%20Final.pdf>.

1 **A.** Yes. PSE&G acknowledged that it designed its EV program to foster greater EV sales.
2 As. Dr. Hausman noted in his testimony, the increased adoption of EVs will result in
3 greater kWh sales. All else equal, this will increase utility revenues and lead to greater
4 profits for PSE&G shareholders. Therefore, I find that if the Board approves PSE&G’s
5 EV program it would not be unreasonable to ask the Company’s shareholders to absorb
6 some or all of the EV program costs, either through a direct contribution, the use of a
7 competitive subsidiary, or an adjustment to the rate of return on program investment.

8

9 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

10 **A.** As discussed in detail in the testimonies of Rate Counsel witnesses Ezra Hausman, PhD,
11 who is providing policy recommendations, and David Peterson, who is providing rate
12 design recommendations, Rate Counsel is recommending that the Board not approve this
13 proposal. However, if the Board decides to approve all or part of the Program, I
14 recommend the following:

- 15 A. The Company’s proposed budget for Capitalized IT costs Should be
- 16 Capped.
- 17 B. The Amortization Periods Should be Shortened to Ten Years.
- 18 C. The Administrative Costs should be capped and should be reviewed in
- 19 future annual filings.
- 20 D. The Rate of Return on investment should be updated upon Board approval
- 21 of rates in future base rate proceedings.

22 My recommendations are discussed in detail below.

23

24

1 **IV. PROPOSED COST RECOVERY MECHANISM RECOMMENDATIONS**

2 **A. The Company’s Proposed Budget for Capitalized Information**
3 **Technology (“IT”) Related to its CEF-EVES Costs Should Be**
4 **Capped.**

5 **Q. WHAT IS THE LEVEL OF IT CAPITAL COSTS THAT ARE INCLUDED IN**
6 **THE COMPANY’S PROPOSAL RELATED TO ITS CEF-EV PROGRAMS?**

7 **A.** The Company’s EV proposal include an estimated \$7.359 million in IT capital
8 investments, and approximately \$15.362 million of IT expenses over the life of the
9 program. (S-PSEG-REV-30). The Company’s estimated IT capital investments and IT
10 expenses over the program life are as follows:

11 **Table 2: Capitalized IT Costs / IT Expenses**

	Capital IT	Expense IT	Total
12 Initial Period (Year 1) \$	\$2,811,000	\$1,525,146	\$4,336,146
13 Year 2-6	\$4,548,000	\$12,112,221	\$16,660,221
14 Year 7 and beyond	<u>\$ 0</u>	<u>\$1,725,199</u>	<u>\$1,725,299</u>
15			
16			
17			
18 Total	\$7,359,000	\$15,362,566	\$22,721,666

19 The Company has stated that these significant investments in IT costs are necessary and
20 will be required to ensure that the prospective and current participants have easy access to
21 subprogram information and incentives. (Reif direct testimony, page 36). Ms. Reif
22 stated that these IT investments and costs will ensure that the Company is able to qualify,
23 process, and fulfill orders in an efficient and timely manner while also understanding
24 customer and owner/operator behavior and marketplace trends. (Reif direct testimony,
25 page 36). Ms. Reif stated that spending is specific to the EV subprograms and not

1 duplicative of IT spending that is related to the Company's other clean energy programs.
2 (Reif direct testimony, page 36).

3 **Q. ARE THESE CAPITALIZED ELECTRIC AND GAS IT INVESTMENT COSTS**
4 **REASONABLE?**

5 **A.** Not really. In response to S-PSEG-REV-0030, the Company provided a breakdown of
6 CEF-EV IT costs (investment and expenses) from year 1 through year 6 and beyond. The
7 IT investments show costs for External IT and Internal IT but nothing really beyond that.
8 The same holds true for the IT expenses. These expenses only show costs for External IT
9 and Internal IT. There is no breakdown or description of costs. The IT expense shown
10 on S-PSEG-REV-0030 in the amount of \$15,362,566 is about 15% of total Program
11 Expenses.¹²Based on my review of the Petition and the Company's discovery responses,
12 it appears that at this time the Company's only breakdown of these CEF-EV-IT costs is
13 shown on Ms. Reif's direct testimony at 35.

14 The sparse information that the Company provided does not justify or support these IT
15 expenditures. The Company has spent and recovered millions of dollars in IT
16 investments in prior programs. Without more detailed explanation, these IT costs are not
17 justifiable nor reasonable. However, in the event the Board approves this proposal, I am
18 recommending that these IT costs be capped, to no more than 10% of Program expenses.

19 **Q. WHAT DID THE COMPANY PROPOSE WITH RESPECT TO ITS CEF-ES IT**
20 **COSTS?**

¹² \$15,362,566 divided by total IT expenses of \$103.1 million (Reif testimony page 35).

1 **A.** As shown in Mr. Cardenas’ direct testimony (which has now been adopted by Mr.
2 Raymond C. Alvarez, Senior Director of Asset Strategy, Technology and Systems), on
3 page 22, the Company did not propose any IT costs related to its CEF-ES program.
4 However, in response to RCR-INF-0001, the Company stated that due to its unfamiliarity
5 with running battery storage systems of the size proposed in this this filing, the Company
6 estimated the Equipment O&M line item for battery storage systems working with
7 Navigant Research as 2.2% of total hardware costs, which would be inclusive of on-
8 going IT expenses, but a detailed breakout of the IT expenses is not available. The
9 Company’s lack of knowledge provides further proof that these IT expenses should not
10 be approved without sufficient quantifiable data.

11 **B. The Amortization Periods Should be Shortened To Ten Years**

12 **Q. WHAT IS THE AMORTIZATION PERIOD THE COMPANY IS USING WITH**
13 **RESPECT TO ITS INVESTMENT, AND ITS IT CAPITAL COSTS?**

14 **A.** As shown on page 10 of the Petition, the Company has proposed the following
15 Amortization periods for certain of its CEF-EVES Investments:

16

17 **Table 3: Amortization Period – EV Program**

18	Utility Plant Investment	40 years
19	Chargers Utility Owned	10 years
20	Battery Storage	15 years
21	Chargers Regulatory Asset (non-loan)	10 year
22	Chargers Regulatory Asset (loan)	10 years
23	IT Software Investment	4 years

24

25 **Table 4: Amortization Period – ES Program**

26

1	Batteries	15 years
2	Solar Panels (acquisition/installment)	20 years
3	Inverters/Communication equipment	10 years
4	Meters / Interconnection	20 years
5		
6		

7 **Q. WHAT ADJUSTMENT ARE YOU RECOMMENDING WITH RESPECT TO**
8 **THE AMORTIZATION PERIODS USED ABOVE?**

9 **A. If the Board approves PSE&G’s proposal,** I recommend that the investments be
10 amortized over a shorter period of time, or 10 years, similar to the time period used for
11 the Company’s Board-approved energy efficiency programs (Docket No. EO11010030,
12 Order dated July 14, 2011; EO14080897, Order dated April 16, 2015; and EO17030196,
13 Order dated August 23, 2017), and in the recent Board Order addressing the Clean
14 Energy Act, dated June 10, 2020, in Docket Nos. QO19010040, QO19060748 and
15 QO17091004, at 26 and at 39.

16 **Q. WHY DO YOU RECOMMEND SHORTER AMORTIZATION PERIODS?**

17 **A.** In theory, the use of a shorter amortization period for the Company’s CEF-EVES
18 investments would result in ratepayers paying less debt service costs, equity returns and
19 taxes over the long run and over the entire Program period. It is similar to a mortgage
20 payment. As the mortgage amortization period is extended, ratepayers pay more for
21 interest costs and debt service on the principal amount. Longer amortization periods
22 typically involve smaller monthly payments and higher total interest costs over the life of
23 the loan. Shorter amortization periods generally entail larger monthly payments and
24 overall lower interest costs over the life of the loan. In the event the Board approves this
25 filing, I am recommending that a shorter amortization period be implemented that will

1 allow customers to save on interest costs over the life of the loan. Interest rates are also
2 typically lower on shorter amortization periods.

3 **Q. WHY ARE SHORTER AMORTIZATION PERIODS REASONABLE?**

4 **A.** I believe that a shorter amortization period is reasonable because reducing GHG is a
5 long-term State goal, and it is probable that the Company will continue such efforts in the
6 future. Given this, rates and benefits of this filing cannot be viewed in isolation, and it is
7 important to consider the combined impact of this and future GHG reduction programs.
8 As I previously stated, as additional programs are introduced in the future, rate recoveries
9 for these programs will become “pancaked,” and ratepayers will be paying for multiple
10 programs simultaneously. While I understand some overlap is necessary, a longer
11 amortization period will intensify the effect and the costs for ratepayers.

12 **C. Administrative Costs Should be Capped.**

13 **Q. WHAT HAS THE COMPANY PROPOSED WITH RESPECT TO ITS**
14 **ADMINISTRATIVE COSTS FOR ITS ELECTRIC EV AND ES PROGRAMS?**

15 **A.** As shown on page 35 of Ms. Reif’s testimony, the Company proposed total
16 Administrative costs for CEF-EV program in year 1 of \$3.7 million (2019) and a final
17 cumulative level of \$39.3 million. The total estimated expenditures for the EV program
18 is \$103.1 million. An analysis of these Administrative Costs in relation to the total costs
19 are as follows:

20 **Table 5: Administrative Cost - EV**

	<u>Costs</u>	<u>Percent to Total</u>
21		
22	2019	\$3.7 million 9.41%

1	2020	\$5.0 million	12.72%
2	2021	\$5.2 million	13.23%
3	2022	\$5.3 million	13.48%
4	2023	\$5.5 million	14.00%
5	2024	\$5.7 million	14.50%
6	2025	\$3.5 million	5.05%
7	Beyond 2025	<u>\$5.4 million</u>	13.74%
8		\$39.3 million	38.11%
9	Average (2019-2025)		11.77%

10
11 As shown above, these Administrative Costs gradually increase over time, with a total
12 cost of \$39.3 million representing approximately 38.00% of total Program Expenses.

13 As shown on Mr. Cardenas’ (subsequently adopted by Mr. Alvarez) testimony at 22, the
14 Company proposed total Administrative Labor costs for the CEF-ES program in Year 1
15 of \$0 and a final cost of \$10.0 million in total. The breakdown is as follows:

16 **Table 6. Administrative Costs - ES**

17		<u>Costs</u>	<u>Percent to Total</u>
18	Year 1	\$0	
19	Year 2	\$0	
20	Year 3	\$.1 million	
21	Year 4	\$.1 million	
22	Year 5	\$.1 million	
23	Year 6	\$.1 million	
24	Year 7-21	<u>\$9.5 million</u>	
25	Total	\$10.0 million	14.18%

1 As shown above, these CEF-ES Administrative costs are not realized until Year 3 and
2 stay steady through Year 6. In Years 7-21, these increases total \$9.5 million. The total
3 Administrative costs of \$10 million represents about 14.18% of total ongoing ES
4 program expenses of \$70.5 million.

5 If the Board approves PSE&G's proposal, I am of the opinion that these levels of
6 Administrative costs for the CEF-EV and CEF-ES programs should be capped. The
7 Company should have already acquired a familiarity in administering these types of
8 programs, and therefore should be able to manage its Administrative Costs within a cap.
9 Further, I recommend in the event the Board approves this filing, that the Company
10 support its Administrative Costs for the CEF-EV and CEF-ES programs in future filings
11 with detailed breakdowns and descriptions of the costs required to administer these
12 programs.

13 **D. The Rate of Return on investment should be updated upon Board**
14 **approval of rates in future rate case proceedings.**

15 **Q. WHAT ARE YOUR RECOMMENDATIONS REGARDING THE COMPANY'S**
16 **USE OF A PROPOSED 6.99% PERCENT RATE OF RETURN?**

17 **A.** The Company's proposed an overall 6.99% rate of return ("WACC") after taxes, which is
18 consistent with the rate of return established in the Company's most recent base rate
19 case.¹³ However, the cost of capital can change substantially over time. Given that
20 market conditions change over time, and capital costs appear to be on the decline, and
21 may further decline in the future, the Company's rate of return should be reviewed and

¹³ I/M/O PSE&G, BPU Docket Nos. ER18010029 and GR18010030 (Order, dated October 29, 2018).

1 reset prospectively. Market conditions are typically volatile and change over time as well
2 as the associated market risks. Changing the overall rate of return in future proceedings
3 will reflect current market conditions and volatility. Therefore, I am recommending, if
4 the Company's CEF-EVES Program and rate of return proposal is approved that the
5 Board require the Company to update the rate of return, including return on equity, debt
6 costs, debt roll-ins and capital structure if and when the Company's authorized rate of
7 return is adjusted in future base rate proceedings.

8 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

9 **A.** Yes, it does at this time. Rate Counsel reserves its right to present supplemental
10 testimony based on any updated and/or new information.

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APPENDIX A - CURRICULUM VITAE
DANTE MUGRACE

PCMG and Associates LLC

DANTE MUGRACE

Education

Master Business Administration, MBA Strategic Management, Pace University, Lubin School of Business, New York, NY, 2010

Master Public Administration, MPA, Kean University, Union, NJ, 2001

Bachelor of Science, BS. Accounting, St. Peter's University, Jersey City, NJ, 1983

Position

Senior Consultant – PCMG and Associates	2014 – present
Senior Consultant – Snavely King Majoros and Associates	2013 – 2014
Independent Consultant	2012 – 2013
Bureau Chief/Administrative Analyst/Accountant – New Jersey Board of Public Utilities	1983 – 2011

Professional Experience

Mr. Mugrace has 35 years' experience in all aspects of regulatory accounting and policy including processing, analyzing and evaluating utility rate case petitions before Public Service Commissions. Mr. Mugrace examines and evaluates rate filings, contracts, agreements and rate matters regarding utility operations and provides recommendations as to best course of action. Additionally, Mr. Mugrace analyzes and reviews utility regulatory matters and sets forth recommendations for resolution of issues, calculates total revenue requirement needed to cover operating expenses and rate of return, and researches, and evaluates regulatory utility matters to assess impact on various classes of customers, regarding rates, service, compliance and cost of service provisions, as well as annual true-up and tracking mechanisms.

Prior to undertaking consulting assignments, Mr. Mugrace was the Bureau Chief Utility Rate Manager for the New Jersey Board of Public Utilities, in which role he managed and assigned tasks to a staff of 12 professionals and supervisory personal in the daily administrative, financial and managerial functions of the Division. Mr. Mugrace's primary duties were to determine whether the utility had sufficient revenues to cover its operating expenses and earn a return on its plant investment and to ensure that the utility provided safe, reliable and continuing utility service to its customers. Mr. Mugrace set rates and charges for utility companies, which had revenues of up to \$500 million, and ensured that the revenue requirement provided for recovery of all operating expenses, return on investment and depreciation. Mr. Mugrace was also responsible for reviewing and verifying that the companies' property, plant and equipment (up to \$2.5 billion) were used and useful in providing service to its customers. Mr. Mugrace coordinated and met with the New Jersey State Department of Environmental Protection to

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determine whether water and wastewater utilities were complying with state regulations and were adhering to any regulatory agency directives or orders. Mr. Mugrace developed ways to minimize the rising costs of water utility services by investigating alternative rate structures, analyzing engineering mechanisms and techniques, looking into the feasibility of mergers and acquisitions within the water industry and reviewing financing, and rate alternatives to minimize the impact on ratepayers. Mr. Mugrace was responsible for ensuring that the rate-case process adhered the statutory timeframe for preparing, reviewing and recommending findings to the Board Commissioners on financial operations, costs, revenues and operating expenses, prior to the litigation proceedings. Mr. Mugrace also examined alternative rate recovery mechanisms and clauses, phase-ins of revenue requirements, deferral mechanisms and pass-through of rate charges. Mr. Mugrace assumed the role of Director during transition periods and Administrative changes. Finally, Mr. Mugrace conducted the recruitment and hiring of employees for placement within the Division and the Board.

Professional and Business Affiliations

- Institute of Public Utilities (IPU) Michigan State University (MSU), National Association of Regulatory Utility Commissioners (NARUC), National Association of State Utility Consumer Advocates (NASUCA)

References

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Regulatory Projects and Appearances

1. In Re; Public Service Electric and Gas Company for Approval of Changes in its Electric Green Programs Recovery Charge and its Gas Green Programs Recovery Charge 2020 PSE&G Green Programs Cost Recovery filing
(Appearance: Revenue Requirement on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket Nos. ER20060467 and GR20060468
2. In Re: Public Service Electric and Gas Company’s 2020/2021 Annual BGSS Commodity Charge filing for its Residential Gas Customers under its Pricing Mechanism and for Changes in its Balance Charge
(Appearance: Revenue Requirement on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket No. GR20060379
3. In Re: Public Service Electric and Gas Company’s 2020 Annual Margin Adjustment Clause (MAC)
(Appearance: Revenue Requirement on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket No. GR20060384
4. In Re: South Jersey Gas Company for Approval to Revise the Rider H Rate Associated with the Tax Cuts and Jobs Act of 2017
(Appearance: Revenue Requirement on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket No. GR20060382
5. In Re: Berkshire Gas Company -2019 Gas System Enhancement Program Reconciliation Filing
(Appearance: Revenue Requirement on behalf of the Massachusetts Office of the Attorney General)
Commonwealth of Massachusetts -Department of Public Utilities – DPU 20-GREC-02
6. In Re: Bay States Gas Company d/b/a Columbia Gas – 2019 Gas System Enhancement Program Reconciliation Filing.
(Appearance: Revenue Requirement on behalf of the Massachusetts Office of the Attorney General)
Commonwealth of Massachusetts – Department of Public Utilities – DPU 20-GREC-05
7. In Re: NSTAR Gas Company – 2019 Gas System Enhancement Program Reconciliation Filing
(Appearance: Revenue Requirement on behalf of the Massachusetts Office of the Attorney General)
Commonwealth of Massachusetts – Department of Public Utilities – DPU 20-GREC-06
8. In Re: South Jersey Gas Company for Approval of Increased Base Tariff Rates and Charges for Gas Service, Changes to Depreciation Rates and Other Tariff Revisions.
(Appearances: Revenue Requirement and Cash Working Capital) on behalf of the New Jersey Division of Rate Counsel.
New Jersey Board of Public Utilities – Docket No. GR20030243

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9. In Re: Jersey Central Power & Light Company for Review and Approval of Increased in, and Other Adjustments to Rates and Charges for Electric Services and approval of Other Proposed Tariff Revisions (Appearance: Revenue Requirement, Cash Working Capital, Consolidated Income Taxes, LED Conversion and Reliability Roll-In) on behalf of the New Jersey Division of Rate Counsel.
New Jersey Board of Public Utilities – Docket No. ER20020146
10. In Re: The Pittsburgh Water and Sewer Authority for approval of increased rates and charges for water and wastewater service and for approval of a multi-year rate plan. (Appearance: Accounting and Policy, Customer Service and Regulatory Policy) on behalf of the Pennsylvania Office of the Consumer Advocate)
Pennsylvania Public Utility Commission – Docket Nos. R-2020-3017951 and R-2020-3017970.
11. In Re: New Jersey-American Water Company, Inc. for approval of Increased Base Tariff Rates and Charges for Water and Wastewater Services and Other Tariff Revisions. (Appearance: Accounting and Revenue Requirement and Cash Working Capital / Consolidated Income Taxes) on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket No. WR19121516
12. In Re: Hawaiian Electric Company, Inc., for approval of a General Rate Increase and Revised Rate Schedules and Rules.
(Appearance: Accounting and Revenue Requirement on behalf of the Hawaiian Division of Consumer Advocacy)
Hawaii Public Utilities Commission – Docket No. 2019-0085
13. In Re: Mount Olive Villages Water Company for approval of an Increase in Rates for Water Service and Other Tariff Changes.
(Appearance: Accounting and Consulting Services on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket No. WR19060770
14. In Re: Mount Olive Villages Sewer Company for approval of an Increase in Rates for Sewer Service and Other Tariff Changes.
(Appearance: Accounting and Consulting Services on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket No. WR19060769
15. In Re: Public Service Electric and Gas Company for approval of changes in its Electric Green Programs Recovery and its Gas Green Programs Recovery Charge (2019 PSE&G Green Programs Cost Recovery Filing).
(Appearance: Accounting and Consulting Services on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket Nos. ER19070764 and GR19070765

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16. In Re: Proposed Amendment to N.J.A.C. 14:9- Adoption by reference to the Uniform System of Accounts for Water Utilities and Wastewater Utilities.
(Appearance: Consulting Services on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities- Docket Nos. WX19050612 (Water) and WX19050613 (Wastewater)
17. In Re: Public Service Electric and Gas Company's 2019/2020 Annual BGSS Commodity Charge filing for its Residential Gas Customers Under its Periodic Pricing Mechanism and for Changes in its Balancing Charge.
(Appearance: Revenue Requirement and accounting/consulting services on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket No. GR190600699
18. In Re: Bay States Gas Company d/b/a Columbia Gas of Massachusetts for Approval of a 2018 Gas System Enhancement Program Reconciliation Filing
(Appearance: Revenue Requirement on behalf of the Massachusetts Office of the Attorney General)
Commonwealth of Massachusetts Department of Public Utilities – Docket No. 19-GREC-05
19. In Re: NSTAR Gas Company d/b/a Eversource Energy for Approval of a 2018 Gas System Enhancement Program Reconciliation Filing
(Appearance: Revenue Requirement on behalf of the Massachusetts Office of the Attorney General)
Commonwealth of Massachusetts Department of Public Utilities – Docket No. 19-GREC-06
20. In Re: Public Service Electric and Gas Company for Approval of Gas Rate Base Adjustments Pursuant to its Gas System Modernization Program (April 2019 GSMP)
(Appearance: Revenue Requirement on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – Docket No. GR19040522
21. In Re: Kalaeloa Water Company, LLC for Approval of General Rate Case and Revised Rules, Regulations and Rates.
(Appearance: Revenue Requirement on behalf of the Hawaii Division of Consumer Advocacy)
Hawaii Public Utilities Commission – Docket No. 2019-0057
22. In Re: Elizabethtown Gas Company for Approval of an Increase in Rates and Charges for Gas Service, Changes to Depreciation Rates and Other Tariff Revisions.
(Appearance: Revenue Requirement and Other Accounting Issues on behalf of the New Jersey Division of Rate Counsel).
New Jersey Board of Public Utilities – Docket No. GR19040586
23. In Re: Petition of Peoples Natural Gas Company for Approval of an Increase in Rates for Natural Gas Distribution Service.

PCMG and Associates LLC

(Appearance: Revenue Requirement and Other Accounting Issues on behalf of the Pennsylvania Office of Consumer Advocate)

Pennsylvania Public Utility Commission – Docket No. R-2018-3006818

24. In Re: Petition of Aqua New Jersey, Inc. for Approval of an Increase in Rates for Water Service and other Tariff Changes.
(Appearance: Revenue Requirement and other Accounting Issues on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. WR18121351
25. In Re: Petition of Public Service Electric and Gas Company for Approval of its Clean Energy Future – Energy Efficiency (CEF-EE) Program on a Regulated Basis.
(Appearance: Revenue Requirement and other Accounting Issues on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket Nos. GO18101112 and EO18101113.
26. In Re: Petition of Public Service Electric and Gas Company for Approval of its Clean Energy Future – Energy Vehicle and Energy Storage (CEF-EVES) Program on a Regulated Basis. (Appearance – Revenue Requirement and other Accounting Issues on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. EO18101111.
27. In Re: Petition of New Jersey Natural Gas Company- Request for Deferred Accounting Authority for Costs Related to New Information Technology Systems . (Appearance: Impact on Revenues, prudence of costs on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. GR18101096
28. In Re: Petition for Approval of An Indirect Change in Control of the New Jersey Public Utilities Subsidiaries of SUEZ Water Resources, Inc. and Other Related Approvals.
(Appearance: Impact on Rates, Service, Employees, Positive Benefits on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. WM18090982
29. In Re: The Matter of the Merger of Roxbury Water Company into New Jersey American Water Company (Appearance: Impact on Rates, Service and Employees, Positive Benefits on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. WM18080904
30. In Re: The Matter of the Application of Maryland-American Water Company for Authorization to Adjust its Existing Schedule of Tariffs and Rates.
(Appearance: Revenue Requirement on behalf of the Maryland Office of People’s Counsel)
Maryland Public Service Commission – Case No. 9487

PCMG and Associates LLC

31. In Re: The Matter of the Joint Petition for Approval of an Increase in Rates for Water and Wastewater Service and Other Tariff Changes for SUEZ Water NJ, Inc., Toms River, Inc., Arlington Hill, Inc., West Milford, Inc., Matchaponix, Inc., and Princeton Meadows, Inc. (Appearance: Revenue Requirement and the development of Consolidated Income Taxes on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. WR18050593
32. In Re: The Matter of the Application of Atlantic City Electric Company to Adjust the Level of its Rider RGGI Rate Associated with its Solar Renewable Energy Certificate Financing Program 2018 (Appearance: Revenue Requirement on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. ER18050543
33. In Re: The Matter of the Petition of New Jersey Natural Gas Company’s Approval of the Cost Recovery Associated with Energy Efficiency Programs (Appearance; Revenue Requirement on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No, GR18050585
34. In Re: The Matter of Bay States Gas Company d/b/a Columbia Gas of Massachusetts, 2017 Gas System Enhancement Reconciliation Filing (Appearance: Revenue Requirement on behalf of the Massachusetts Attorney General’s Office of Ratepayer Advocacy)
Commonwealth of Massachusetts – Department of Public Utilities – Docket No. D.P.U. 18-GREC-05.
35. In Re; The Matter of NSTAR Gas Company d/b/a Eversource Energy, Gas System Enhancement Program Reconciliation Filing (Appearance: Revenue Requirement on behalf of the Massachusetts Attorney General’s Office of Ratepayer Advocacy)
Commonwealth of Massachusetts – Department of Public Utilities – Docket No. D.P.U. 18-GREC-06.
36. In Re: The Matter of the Merger of SUEZ Water NJ, SUEZ Water Toms River, SUEZ Water Arlington Hills, SUEZ Water West Milford, SUEZ Water Princeton Meadows and SUEZ Water Matchaponix (Appearance: Positive Benefits related to the Merger on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. WR18030266
37. In Re: The Matter of the Columbia Gas of Pennsylvania for a General Rate Increase in Distribution Gas Service (Appearance; Accounting Issues and Revenue Requirement on behalf of the Pennsylvania Office of Consumer Advocate)
Pennsylvania Public Utility Commission – Docket No. R-2018-2647577
38. In Re: The Matter of the New Jersey Board of Public Utilities Consideration of the Tax Cuts and Jobs Act of 2017 – Generic Proceeding (Appearance: Revenue Requirement on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. AX18010001

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39. In Re: Acquisition of Elizabethtown Gas, a Division of Pivotal Utilities Holdings, Inc. by ETG Acquisition Corp., a Division of South Jersey Industries, Inc., and Related Transactions. (Appearance: Customer Service Issues/Employee and Labor Relations on behalf of the NJ Division of Rate Counsel)
New Jersey Board of Public Utilities – BPU Docket No. GM17121309.
40. In Re: Middlesex Water Company – Base Rate Case Proceeding for Water Service. (Appearance: revenue requirement on behalf of the NJ Division of Rate Counsel).
New Jersey Board of Public Utilities – BPU Docket No. WR17101049.
41. In Re: Township of East Brunswick – Sewer Rate Study – (Evaluation of the existing sewer rate structure and examining and quantify costs for future expansion).
42. In Re: Montana-Dakota Utilities – Base Rate Case Proceeding for Gas Service. (Appearance: revenue requirement on behalf of the North Dakota Public Service Commission). NDPSC Docket No. PU-17-295.
43. In Re: Andover Utility Company – Base Rate Case Proceeding for Wastewater Services. (Appearance: revenue requirement on behalf of the New Jersey Division of Rate Counsel).
New Jersey Board of Public Utilities – BPU Docket No. WR17070726.
44. In Re: Public Service Electric and Gas Company- Approval of Changes in its Electric and Gas Green Programs Recovery Charges “2017 Public Service Electric & Gas Green Programs Cost Recovery Filing. (Appearance: revenue requirement on behalf of the New Jersey Division of Rate Counsel).
New Jersey Board of Public Utilities – BPU Docket Nos. ER17070724 and GR17070725.
45. In Re: Bay States Gas Company d/b/a Columbia Gas of Massachusetts, 2016 Gas System Enhancement Program Reconciliation Filing, (Appearance: revenue requirement on behalf of the Massachusetts Attorney General’s Office of Ratepayer Advocacy).
Commonwealth of Massachusetts Department of Public Utilities – Docket No. D.P.U. 17-GREC-05.
46. In Re; NSTAR Gas Company d/b/a Eversource Energy, 2016 Gas System Enhancement Program Reconciliation Filing (Appearance: revenue requirement on behalf of the Massachusetts Attorney General’s Office of Ratepayer Advocacy).
Commonwealth of Massachusetts Department of Public Utilities – Docket No. D.P.U. 17-GREC-06.
47. In Re: Petition of Columbia Gas of Maryland – Increase in rates for Distribution Service – (Appearance: revenue requirement on behalf of the Office of People’s Counsel) Public Service Commission of Maryland – Case No. 9447
48. In Re: Petition of South Jersey Gas Company – Increase in base rates for gas services – (Appearance: revenue requirement on behalf of the NJ Division of Rate Counsel)

PCMG and Associates LLC

New Jersey Board of Public Utilities – Docket No. GR17010071

49. In Re: Petition of UGI Penn Natural Gas – Increase in base rates for gas services – (Appearance: revenue requirement on behalf of the Pennsylvania Office of Consumer Advocate)
Pennsylvania Public Utilities Commission Docket No. R-2016-2580030
50. In Re: Petition of PJM Interconnection, LLC. – Mid-Atlantic Interstate Transmission, LLC. Formula Rate Filing. (Appearance on behalf of the Pennsylvania Office of Consumer Advocate).
FERC Docket No. ER17-211-000
51. In Re: Petition of Pivotal Utility Holdings, Inc. d/b/a Elizabethtown Gas Company for approval of Increased Base Tariff Rates and Charges for Gas Service and Other Tariff Revisions (Appearance: revenue requirement on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities Docket No. GR16090826
52. In Re: Petition of SUEZ Water New Jersey, et al – Approval of a Management and Services Agreement pursuant to N.J.S.A 48: 3-7.1 (Appearance on the reasonableness of contract agreements on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities Docket No. WO16080806
53. In Re: Petition of SUEZ Water Arlington Hills Inc. – Approval of an Increase in Rates for Wastewater Services and other Tariff Changes (Appearance: revenue requirement on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities Docket No. WR16050510
54. In Re: Petition of Public Service Electric and Gas Company – 2016 Marginal Adjustment Clause (MAC) (Appearance; reconciliation and rate setting on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities Docket No. GR16060484
55. In Re: Petition of Public Service Electric and Gas Company for Approval of Changes in its Electric Green Programs Recovery Charges and its Gas Green Program Recovery Charges 2016 PSEG Program Cost Recovery Filing (Appearance: reconciliation and rate setting on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities Docket Nos. ER16070613 and GR16070614
56. In Re: Petition of the Mount Olive Village Sewer Company, Inc., for Approval of an Increase in Rates for Service (Appearance: revenue requirement on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities Docket No. WR16050391

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57. In Re: Petition of the Mount Olive Village Water Company, Inc. for Approval of an Increase in Rates for Service (Appearance; revenue requirement on behalf of the New Jersey Division of Rate Counsel)
New Jersey Board of Public Utilities Docket No. WR16050390
58. In Re: Petition of Fitchburg Gas and Electric Light Company d/b/a Unitil for Approval of its 2015 Gas System Enhancement Plan Reconciliation Filing (2016) - (Analysis and Advice to Counsel: computation of the revenue requirement and rate impact on behalf of the Massachusetts Attorney General Office of Ratepayer Advocacy)
MA Department of Public Utilities Docket No. D.P.U. 16-GREC-01
59. In Re: Petition of Bay State Gas Company d/b/a Columbia Gas of Massachusetts for Approval of its 2015 Gas System Enhancement Plan Reconciliation Filing (2016) - (Appearance: computation of the revenue requirement and rate impact on behalf of the Massachusetts Attorney General Office of Ratepayer Advocacy)
MA Department of Public Utilities Docket No. D.P.U. 16-GREC-05
60. In Re: Petition for Approval of Gas Infrastructure Contract Between Public Service Company of New Hampshire d/b/a Eversource Energy and Algonquin Gas Transmission, LLC (2016) - (Analysis and Advice to Counsel: compliance with statutes and regulations, review of contract, and ratemaking on behalf of the New Hampshire Office of Consumer Advocate)
NH Public Utilities Commission Docket No. DE 16-241
61. In Re: Central Maine Power Company, Annual Compliance Filing and Price Change (2016) - (Analysis and Advice to Counsel; tax normalization regulatory asset on behalf of the Maine Office of the Public Advocate)
ME Public Service Commission Docket No. 2016-00035
62. In Re: Bulletin 2015-10 Generic Proceeding to Establish Parameters for the Next Generation PBR Plans (Appearance: productivity adjustments/performance-based ratemaking on behalf of the Alberta Utilities Consumer Advocate)
Alberta Utilities Commission Proceeding 20414
63. In Re: the Matter of Request by Emera Maine for Approval of a Rate Change (2016) - (Appearance: revenue requirement on behalf of the Maine Office of the Public Advocate)
Maine Public Utilities Commission Docket No. 15-00360)
64. In Re: the Matter of the Joint Application of the Southern Company, AGL Resources Inc., and Pivotal Holdings, Inc. d/b/a Elkton Gas (2015-2016) - (Analysis and advice to counsel: customer service impacts, employee impacts, supplier diversity on behalf of the Maryland Office of People's Counsel)
MD PSC Case No. 9404

PCMG and Associates LLC

65. In Re: the Matter of the Merger of Southern Company and AGL Inc. (2015-2016) - (Appearance: customer service impacts and employee impacts on behalf of the NJ Division of Rate Counsel)
New Jersey BPU Docket No. GM15101196
66. In Re: the Matter of the United Water New Jersey, Inc., for Approval of an Increase in Rates for Water Service and Other Tariff Changes (2015-2016) - (Appearance: revenue requirements, rate base issues and operating income on behalf of the NJ Division of Rate Counsel)
New Jersey BPU Docket No. WR15101177
67. In Re: Petition of Boston Gas Company and Colonial Gas Company d/b/a National Grid for Approval of Precedent Agreements with Millennium Pipeline Company, LLC (2015) - (Analysis: review of contract and compliance of the Gas Supply Plan on behalf of the Massachusetts Attorney General Office of Ratepayer Advocacy)
MA D.P.U. 15-130
68. In Re: Petition of Boston Gas Company and Colonial Gas Company d/b/a National Grid for Approval of Agreements for LNG or Liquefaction Services with GDF Suez Gas NA, LLC; Northeast Energy Center, LLC; Metro LNG, L.P.; and National Grid LNG (2015) - (Analysis: review of contract and compliance of the Gas Supply Plan on behalf of the Massachusetts Attorney General Office of Ratepayer Advocacy)
MA D.P.U. 15-129
69. In Re: Columbia Gas of Massachusetts CY2014 Targeted Infrastructure Reinvestment Factor (TIRF) Compliance Filing (2015) - (Appearance: computation of the revenue requirement impact on the TIRF on behalf of the Massachusetts Attorney General Office of Ratepayer Advocacy)
MA D.P.U. 15-55
70. In Re: the Matter of the Bay State Gas Company d/b/a Columbia Gas of Massachusetts for Approval of its Targeted Infrastructure Reinvestment Factor (TIRF) for CY 2013 (2014) - (Appearance: computation of the revenue requirement impact on the TIRF)
MA D.P.U. 14-83
71. In Re: the Matter of the Merger of Exelon Corporation and Pepco Holdings, Inc. (Atlantic City Electric Company) (2014-2015) - (Appearance: customer service impacts)
New Jersey BPU Docket No. EM14060581
72. In Re; of the Public Utilities Commission of Ohio, in the Matter of the Application of Aqua Ohio, Inc. to Increase its Rates and Charges for its Waterworks Service. – Revenue and Rates (2014) - (Appearance: operating income, certain rate base issues and income taxes on behalf of the Ohio Office of Consumer Counsel)
PUCO Case No. 13-2124-WW-AIR

PCMG and Associates LLC

73. In Re: New York Public Service Commission, as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. Revenue Requirement (2013-2014) – (Appearance: revenue requirement, rate base issues and operating income on behalf of the Intervenor, the County of Westchester)
NYPSC Case Nos. 13-E-0030, 13-G-0031 and 13-S-0032, et al
74. In Re: North Dakota Public Service Commission, - Application of Northern States Power Company for Authority to Increase Rates for Electric Service in North Dakota, On-Going Revenue Requirement (2013) - (Appearance: revenue requirement and rate base, operating income, operating and maintenance expenses on behalf of the North Dakota Public Service Commission Staff)
North Dakota Case No. PU-12-813
75. In the Matter of the Petition of New Jersey American Water Company for Authorization to Implement a Distribution System Improvement Charge (DSIC) Order Denying Petition and Instituting Stakeholder Process (2008) - (Case manager on policy decision and revenue requirement impact on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WO08050358
76. In the Matter of the Joint Petition of the City of Trenton, New Jersey and New Jersey-American Water Company, Inc. for Authorization of the Purchase and Sale of the Assets of the Outside Water Utility System ("OWUS") of the City of Trenton, New Jersey and for Other Relief Order Adopting Initial Decision, (2008) - (Case manager on the revenue requirement impact on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WM08010063
77. In the Matter of the Petition of United Water New Jersey, United Water Toms River, United Water Lambertville, United Water Mid-Atlantic and Gaz de France for Approval as Need for a Change in Ownership and Control (2007) - (Case manager on customer impact, employee impact and impact on rates on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WM06110767
78. In the Matter of the Petition of United Water Arlington Hills Sewerage, Inc. for an Increase in Rates for Waste Water Service and Other Tariff Changes (2009) - (Case manager on revenue requirement and overall rate proceeding on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WR08100929
79. In the Matter of the Petition of United Water New Jersey Inc. for Approval of an Increase in Rates for Water Service and Other Tariff Changes, (2009) - (Case manager on revenue requirement and overall rate proceeding on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WR08090710

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80. In the Matter of the Petition of United Water Toms River, Inc. for Approval of an Increase in Rates for Water Service and Other Tariff Changes (2008) - (Case manager on the revenue requirement and overall rate proceeding on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WR08030139
81. In the Matter of the Joint Petitioners of New Jersey-American Water Company, Inc., S.J. Services, Inc., South Jersey Water Company, Inc. and Penns Grove Water Supply Company, Inc. for Among Other Things Approval of a Change in Control of South Jersey Water Supply Company, Inc. and Penns Grove Water Supply Company, Inc. (2007) - (Case manager on the overall rate proceeding on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WM07020076
82. In the Matter of the Petition of Aqua, New Jersey, Inc. for Approval of an Increase in Rates for Water Service and Other Tariff Changes (2008) - (Case manager on revenue requirement and the overall rate proceeding on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WR0712095
83. I/M/O the Joint Petition of Thames Water, Aqua Holdings GMBH, on Behalf of Itself and Its Parent Holdings Company, RWE Aktiengesellschaft, Thames Water Aqua US Holdings, Inc., American Water works Company Inc., Thames Water Holdings Incorporated, E'town Corporation, New Jersey-American Water Company, Inc., Elizabethtown Water Company, the Mount Holly Water Company and Applied Wastewater Management, Inc. for Confirmation that the Board of Public Utilities Does Not Have Jurisdiction Over, or, Alternatively, for Approval of a Proposed Transaction Involving, Among Other Things, the Sale by Thames Water Aqua Holdings GMBH of Up to 100% of the Shares of the Common Stock of American Waterworks Company, Inc. in One or More Public Offerings (2007) - (Case manager on revenue requirement impacts, effect on rates and effect on service on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WM06050388
84. In the Matter of the Petition of Elizabethtown Water Company for Approval of an Increase in Rates for Water Service (2007) - (Case manager on revenue requirement and overall rate proceeding on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WR03070510
85. In the Matter of the Petition of New Jersey American Water Company, Inc. for Approval of Increased Tariff Rates and Charges for Water and Sewer Service; Increased Depreciation Rates and Other Tariff Revisions (2008) - (Case manager on revenue requirement and overall rate proceeding on behalf of the Staff of the NJ Board of Public Utilities)
BPU Docket No. WR08010020
86. In the Matter of Middlesex Water Company for Approval of an Increase in its Rates for Water Service and Other Tariff Changes (2007) - (Case manager on overall revenue

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requirement and overall rate proceeding on behalf of the Staff of the NJ Board of Public Utilities)

BPU Docket No. WR07040275

87. In the Matter of the Joint Petition of United Water New Jersey, Inc., United Water Arlington Hills, Inc., United Water Hampton, Inc., United Water Vernon Water Hills, Inc., and United Water Lambertville, Inc. for an Increase in Rates and Charges for Water Service and Other Tariff Changes and for Approval to Merge the Operations of the Joint Petitioners into and with United Water New Jersey, Inc. (2007) - (Case manager on revenue requirement and overall rate proceeding on behalf of the Staff of the NJ Board of Public Utilities)

BPU Docket No. WR07020135