



State of New Jersey  
DIVISION OF RATE COUNSEL  
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*Governor*

SHEILA OLIVER  
*Lt. Governor*

STEFANIE A. BRAND  
*Director*

May 15, 2020

**VIA ELECTRONIC MAIL**

Honorable Aida Camacho-Welch, Secretary  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

**Re: I/M/O the Implementation of P.L 2018, C. 17 Regarding the Establishment  
of Energy Efficiency and Peak Demand Reduction Programs  
BPU Docket No. QO19010040**

**I/M/O the Clean Energy Act of 2018 - Utility Demographic Analysis  
BPU Docket No. QO19060748**

**Rate Counsel's Initial Comments Regarding Equity in Energy Efficiency**

Dear Secretary Camacho-Welch:

Please accept for filing this letter being submitted on behalf of the New Jersey Division of Rate Counsel ("Rate Counsel") in response to the Stakeholder Notice ("Notice") for the May 4, 2020 Equity in Energy Efficiency ("EE") Meeting circulated by the Staff of the Board of Public Utilities on April 27, 2020. The Notice referenced the Utility Demographic and Firmographic Profile ("Demographic Analysis Study" or "Report"), dated April 30, 2020, which was prepared by the DNV-GL Company pursuant to the Board Order dated October 7, 2019. In that Notice, the Board requested public comments in response to the May 4<sup>th</sup> meeting and the Demographic Analysis Study by May 15, 2020.

In lieu of additional substantive comments at this time, Rate Counsel refers the Board to Rate Counsel's Comments submitted on April 15, 2020 in response to the Straw Proposal for New Jersey's Energy Efficiency and Peak Demand Reduction Programs ("the Straw Proposal") which includes

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comments regarding our current position on equity issues in energy efficiency. Therein, Rate Counsel expressed support for the creation of an Equity Working Group to address equitable access to EE programs and cautioned against using cost benefit metrics, such as the Utility Cost Test, which might work against the adoption of low-income EE programs. In addition, Rate Counsel called for increased interaction with community groups and state agencies to address access to EE programs. Finally, Rate Counsel highlighted the need to consider rate affordability, particularly in the midst of the effects of state-wide pandemic health emergency.

At this time, Rate Counsel reserves its right to submit additional comments pertaining to equity in energy efficiency and the Demographic Analysis Study based on our continued review of the voluminous Demographic Analysis Study, the raw data files that supplemented the Report received from the utilities late last week, the May 15 presentation from the consultant who prepared the demographic study, and any further information received from the BPU's Office of Clean Energy on this matter.

An electronic copy of this letter will be emailed to [EnergyEfficiency@bpu.nj.gov](mailto:EnergyEfficiency@bpu.nj.gov).

**Please acknowledge receipt of these comments.**

Thank you for your consideration and attention to this matter.

Respectfully submitted,

STEFANIE A. BRAND  
Director, Division of Rate Counsel

By: /s/ Kurt S. Lewandowski  
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Assistant Deputy Rate Counsel

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