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Sheree L. Kelly, Esq.
Regulatory Affairs Counsel

May 16, 2023

VIA ELECTRONIC MAIL ONLY

Sherri Golden,
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue
Post Office Box 350
Trenton, New Jersey 08625-0350
Board.secretary@bpu.nj.gov

**Re: In the Matter of the Petition of South Jersey Gas Company for Approval of New Energy Efficiency Programs and the Associated Cost Recovery Pursuant to the Clean Energy Act
BPU Docket No. QO19010040 and GO20090618**

Dear Secretary Golden:

Please accept this Letter Petition¹ for filing on behalf of South Jersey Gas Company (“SJG” or “Company”) seeking approval to modify, as set forth herein, its existing Energy Efficiency (“EE”) Program previously approved in the above referenced proceeding. As discussed further below, SJG anticipates that it will experience an approximate shortfall of \$15 million in the budget related to the Efficient Products Program of its EE Program. By this Letter Petition, SJG proposes a multi-part solution to address this shortfall, thereby ensuring that the program may continue without interruption.

By Order dated April 7, 2021 (“April 2021 Order”), the Board authorized SJG to implement its current EE Program for a three (3) year period commencing July 1, 2021 and

¹ In accordance with the Order issued by the Board in connection with 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, Order dated March 19, 2020, this document is being filed electronically. No paper copies will follow.

ending June 30, 2024.² The April 2021 Order authorized SJG to offer various programs, including an Efficient Products Program. Through that Efficient Products Program, SJG provides incentives and on-bill repayment for efficient products. More specifically, the Efficient Products Program provides incentives for products that reduce energy use in the home and provides information about other programs that encourage the installation of high efficiency equipment, such as lighting, HVAC units, other heating and cooling equipment, electronics, and appliances. For selected products, on-bill repayments are available to customers to cover the remaining cost (after applying the rebate discount) of the efficient product.

The Company has been providing financing for HVAC upgrades through its Board-approved energy efficiency programs since 2009 and has established a robust trade ally network that promotes the SJG's programs to customers. Since the inception of the current on-bill repayment program, as offered through the Efficient Products Program, the Company has experienced greater participation than originally forecast. This greater than anticipated participation has depleted SJG's Efficient Products Program, on-bill repayment budget sooner than anticipated. As a result, absent the modifications sought herein, the Company estimates that the Efficient Products Program, on-bill repayment budget will be fully consumed by November 2023, which is eight months prior to the end of the EE Program term, on June 30, 2024, resulting in a shortfall of \$15 million. Exhibit A.1 attached hereto provides a schedule of the anticipated funding shortfall of approximately \$15 million in the Efficient Products Program and the offset to this shortfall by the implementation of the multi-part solution described below. Importantly, the multi-part solution must be implemented no later than August 1, 2023 to ensure the offset to the budget shortfall that will otherwise occur in November of 2023.

Absent the modification sought herein, the shortfall in the budget threatens the continuity of core energy efficiency program features that make those programs accessible to customers and provide a tool for trade allies to serve the market. Recognizing that disrupting energy efficiency markets may be contrary to the goals of the State of New Jersey, the Company hereby seeks BPU approval to implement the following multi-part solution to address this issue:

1. The April 2021 Order requires the Company to offer Efficient Products, financing for both gas and electric measures. As required by the Order, the Utilities coordinated extensively on the design of the core energy efficiency programs as well as many of the additional utility-led programs. Many of the approved programs provide an opportunity to deliver comprehensive energy efficiency solutions to customers that can reduce both their gas and electric usage and increase their energy savings. This requires the sharing of investments and savings for dual fuel projects where electric and gas utility service territories overlap. The Company hereby seeks to modify the requirement to authorize SJG to only offer incentives and on-bill repayment on projects in the Efficient Products Program on gas

² In re the Matter of the Implementation of L. 2018, C. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs, BPU Docket No. QO19010040 AND In re the Petition of South Jersey Gas Company for Approval of New Energy Efficiency Programs and Associated Cost Recovery Pursuant to the Clean Energy Act, BPU Docket No. GO20090618, Order dated April 7, 2021 ("April 2021 Order").

measures, effective mid-July 2023. The Company believes that by eliminating the need to finance electric measures (*i.e.*, air conditioning units) as of August 1, 2023, the overall total of financing for an individual project will be decreased, allowing the Company to provide on-bill repayment for more overall projects and extend the Efficient Products budget through approximately February 2024 (See, Exhibit A.2).

- 2 Because the gas-only financing modification will only reduce the Efficient Products on-bill repayment budget shortfall by approximately \$10.725 million, SJG further proposes that the restrictions on budget sector shifting contained in the April 2021 Order be lifted as well. Specifically, the April 2021 Order and associated Stipulation at page 7 provide that SJG may shift budgets out of the Residential sector or the C&I sector up to 5% of individual utility sector budgets with Staff notification (which should be provided within 30 days following the change), above 5% up to 10% with Staff approval, and over 10% with Board approval. Such budgets may be added to any subprogram(s) within the sector to which it is being transferred without limitation when the budget shift does not exceed 5%.

The Company hereby proposes that the Board lift this restriction to allow SJG to shift available budgets from other sectors upon 5 days' notice to Staff and Rate Counsel. Lifting the requirement for Staff and Board approval and a Board order will allow the Company to accommodate market need quickly and precisely. Even with this modification, the total shortfall may not be completely eliminated, however, it will at least allow the program to continue as near as as possible to the end of current the EE Term, on June 30, 2024. A sample of a proposed 5-day notice is attached hereto as Exhibit A.3.

The Company respectfully requests expedited Board approval of the within proposed two-part solution, but no later than July 12, 2023, to enable the continuation of the Efficient Products Program without interruption.

Respectfully submitted,



Sheree L. Kelly

cc: Service List

**IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR
APPROVAL OF NEW ENERGY EFFICIENCY PROGRAMS AND ASSOCIATED
COST RECOVERY PURSUANT TO THE CLEAN ENERGY ACT
BPU DOCKET NO. GO20090618**

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Updated 05.16.23

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**IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR
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BPU DOCKET NO. GO20090618**

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Exhibit A.1

Dual Fuel Eff Products OBRP Remaining Budget as of May 2023	\$11,250,000
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Month	Efficient Products OBRP Spend Based on Avg Activity a.	Efficient Products OBRP Spend Based on Multi-Part Solution 1 (Gas Only) b. & c.
May	\$1,875,000	\$1,875,000
June	\$1,875,000	\$1,875,000
July	\$1,875,000	\$1,875,000
August	\$1,875,000	\$900,000
September	\$1,875,000	\$900,000
October	\$1,875,000	\$900,000
November	\$15M Shortfall	\$900,000
December		\$900,000
January		\$900,000
February		\$225,000
March		\$4.275M Shortfall
April		
May		
June		
Total	\$11,250,000	\$11,250,000

- a. Without implementing Multi-Part Solution 1, the Efficient Products budget will be fully spent by November 2023.
- b. By implementing the Multi-Part Solution 1, offering gas only OBRP starting in August 2023, it will extend the budget until approximately February 2024. This is due to reducing the monthly OBRP spend by approximately \$975,000 by not financing electric measures.
- c. SJG forecasts approximately \$900,000 in gas only OBRP starting in August 2023.

Exhibit A.2
Efficient Products Incentive Actual/Forecast by Program Year

Program	Program Year1 Actuals	Program Year 2 Actuals and Forecast(a.)	Program Year3 Projected Remaining Budget	Total	Projected Funding Required to fully support dual fuel Participation through Program Year 3(b.)	Dollars Saved by Implementing Multi-Part Solution 1 (Gas Only OBRP)(b.)	Budget Shortfall after Implementing Multi-Part Solution 1(c.)
Efficient Products Forecast	\$19,709,989	\$28,507,760	\$10,329,447	\$58,547,196	\$15,000,000	\$10,725,000	\$4,275,000

- a. Program Year 2 includes \$22.9M in actuals and \$5.6M in forecasted budget.
- b. Projected funding required to continue offering Efficient Products dual fuel measures and financing would require an additional \$15M. By implementing Multi-Part Solution 1, SJG offering only Gas Only rebates and financing, SJG will be able to save approximately \$10.725M by funding Gas Only measures.
- c. Based on Program Year 1 Actuals & Program Year 2 Actuals and Projections an additional \$4.275M is forecasted to satisfy gas only demand through June 2024.
- d. Based on forecasted gas only monthly activity of \$900,000, SJG projects extending the Efficient Products through February 2024.

Exhibit A.3 - Multi-Part Solution 2
EET V Program Incentive Budget and Forecast

Sector	Program Component	SJG EET V Incentive Approved Budget	SJG EET V Incentive Revised Budget	Actual/Forecast Incentive Program Year 1-Program Year 3	Variance
Residential	Behavioral	\$2,812,500	\$2,699,024	\$2,699,024	\$0
	Energy Efficiency Products	\$52,098,110	\$58,547,196	\$58,547,196	\$0
	Existing Homes	\$22,507,018	\$16,171,408	\$16,171,408	\$0
Multi-Family	Multi-Family	\$4,769,323	\$4,769,323	\$4,769,323	\$0
	Direct Install	\$3,545,392	\$3,545,392	\$3,545,392	\$0
Commercial	Energy Solutions For Business	\$4,768,905	\$4,768,905	\$4,768,905	\$0
	Grand Total	\$90,501,248	\$90,501,248	\$90,501,248	\$0

Currently not projecting surplus budget available. As the Program Year 3 progresses, SJG will continue to monitor for potential budget shift opportunities to reallocate from the C&I and Multi-Family sectors to Efficient program. Exhibit B provides illustrative example of the budget notification.

Exhibit B – Illustrative Budget Notification Example



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Sheree L. Kelly, Esq.
Regulatory Affairs Counsel

January 26, 2024

VIA ELECTRONIC MAIL ONLY

Honorable Sherri Golden,
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**Re: In the Matter of Petition of South Jersey Gas Company for Approval of its EEP V – Energy Efficiency Program and Recovery of Associated Costs, BPU DOCKET NOS. QO19010040 & GO20090618
Notice to Transfer Funds**

Dear Secretary Golden:

Please allow this letter to serve as notice of budget reallocations among Energy Efficiency (“EEP V”) program sectors and subprograms, as specified below. South Jersey Gas (“SJG” or the “Company”) is providing this notice in accordance with the established Staff Notification requirements for shifting sub-program budgets within a sector as well shifting budgets out of a sector, as detailed on page seven of the Board’s April 7, 2021, Order Adopting Stipulation (“EEP V Stipulation”).¹

On June 10, 2020, the New Jersey Board of Public Utilities (the “Board”) issued an Order that directed each electric and gas public utility in the State of New Jersey to establish energy efficiency and peak demand reduction programs pursuant to the Clean Energy Act of 2018. In accordance with the June 10, 2020 Order, the EEP V Stipulation provides flexibility in the administration of the EE subprograms by allowing SJG to shift its sub-program budgets out of an individual sub-program within the Residential sector or within the C&I sector, up to 25% of the individual sub-program’s total budget with Staff notification (which should be provided within

¹Order Approving Stipulation, In the Matter of the Petition of South Jersey Gas Company for Approval of its Energy Efficiency Program (“EEP V”) on a Regulated basis, BPU Docket Nos. QO19010040 and GO20090618

30 days following the change), 25-50% with Staff approval, and over 50% with Board approval. The EEP V Stipulation also allows SJG to shift budgets out of the Residential sector or the C&I sector up to 5% of individual utility sector budgets with Staff notification (which should be provided within 30 days following the change), 5-10% with Staff approval, and over 10% with Board approval.

On July 12, 2023, the Board lifted the restriction to allow SJG to shift available sector budgets over 10% with 5 days notice to Staff and Rate Counsel to accommodate the Efficient Products budget shortfall.

The EEP V Stipulation identifies the subprogram budgets for the program’s first triennial. SJG requires certain budget adjustments to ensure that all subprograms continue uninterrupted and remain adequately funded. Specifically, the Residential Efficient Products subprogram has experienced rapid ramp up and strong customer interest.

The Company has updated the program budgets as reflected in the following table. The amounts transferred within and across sectors are within the limits permitted by the EEP V in accordance with the established Staff notification requirements.

Sector	Program Component	SJG EET V Budget	SJG EET V Shift	Delta	Subprogram Change	Sector Change
Residential	Behavioral	\$2,938,087	\$2,938,087			1%
	Energy Efficiency Products	\$66,920,289	\$67,620,289	\$700,000	1%	
	Existing Homes	\$23,703,926	\$23,703,926			
Multi-Family	Multi-Family	\$6,303,786	\$5,603,786	(\$700,000)	-11%	-11%
Commercial	Direct Install	\$4,768,302	\$4,768,302			
	Energy Solutions for Business	\$6,116,950	\$6,116,950			
	Portfolio Costs	\$4,994,682	\$4,994,682			
	Total SJG Expenditures	\$115,746,022	\$115,746,022			
	EDCs In	(\$8,363,918)	(\$8,363,918)			
	EDCs Out	\$25,884,384	\$25,884,384			
	Net Transfers To/From EDCs	\$17,520,466	\$17,520,466			
	Grand Total	\$133,266,488	\$133,266,488			

Thank you for your attention to this matter.

Respectfully,

A handwritten signature in cursive script that reads "Sheree L. Kelly". The signature is written in black ink and is positioned above the printed name.

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