



filed
7/22/14

State of New Jersey
DIVISION OF RATE COUNSEL
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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

July 18, 2014

STEFANIE A. BRAND
Director

REC'D
JUL 21 PM 1 51
CASE MANAGEMENT

Via Electronic Mail and US Regular Mail

TO: Service List

ER14060613

Re: **In the Matter of the 2014/2015 Annual Compliance Filing For a Change in the Statewide Electric and Gas Permanent Universal Service Fund Program Factors within the Electric and Gas Societal Benefits Charges Rates Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:21.1**

BPU Docket No. ER14060613

Enclosed please find the Division of Rate Counsel's discovery requests RCR-1 through RCR-8 in the above-referenced matter.

Please responds to the requests and submit copies of the documents requested herein in accordance with the agreed schedule in this matter.

Please note that all discovery requests are of a continuing nature and should be updated, if necessary, over the course of the proceeding. Also, provide a designation on each response identifying the witness sponsoring the answer and finally, please provide the response on three-hole punch paper.

007MS
12-14-10

Also, please update your service list in this matter by adding the following attorneys and consultant on behalf of the Division of Rate Counsel:

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Ami Morita, Esq.
Felcia Thomas-Friel, Esq.
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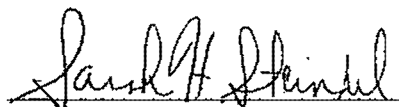
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By copy of this letter I am requesting that the other parties to this matter also amend their service lists as indicated above. Thank you for your attention to this matter.

Very truly yours,

STEFANIE A. BRAND
DIRECTOR, DIVISION OF RATE COUNSEL

By: 
Sarah H. Steindel
Assistant Deputy Rate Counsel

c: Service list

**In the Matter of the 2014/2015 Annual Compliance Filing For a Change in the Statewide Electric and Gas Permanent Universal Service Fund Program Factors within the Electric and Gas Societal Benefits Charges Rates Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:21.1
BPU Docket No. ER14060613**

**DIVISION OF RATE COUNSEL'S DISCOVERY REQUESTS
TO THE NEW JERSEY GAS AND ELECTRIC UTILITIES**

- RCR-1. Please identify, describe, quantify, and correct any errors and/or omissions in the utilities' compliance filings. Please also identify, describe and quantify any and all material changes that have occurred following the filing of the Compliance plans.
- RCR-2. Please update all estimates with actual results once they become known.
- RCR-3. Please provide support and confirmation for the anticipated Department of Community Affairs program administrator budget in the amount of \$7,726,195.
- RCR-4. Refer to the template included in Attachment A to PSE&G's Compliance filing. Therein, the "Jurisdictional Revenue Percentages" for the purpose of calculating the Lifeline rates are 33% to the gas utilities and 67% to the electric utilities. For purposes of calculating the USF rate, however, the percentages are 23.736% to the gas utilities and 76.264% to the electric utilities. Please explain why the allocation factors for the gas/electric split are different for developing the Lifeline rates than what is used for developing the USF rates.
- RCR-5. Refer to the template provided as an attachment to PSE&G's Compliance Filing, specifically the pages marked "Gas Pmts to State" and "Elec Pmts to State". Therein the footnote states that ETG, ACE, RECO, and JCP&L's USF recoveries paid to Clearinghouse are based on actual account by account billing of USF charges and may vary from the pre-tax USF rate due to rebilling cumulative rounding effect, late bills, rebilling, and rate changes." Please explain the basis for the USF recoveries shown on these schedules for the remaining utilities that are not identified in the footnote.
- RCR-6. For those electric and gas utilities that seek recovery of administrative costs, please provide a detailed description and quantitative summary of the administrative costs for which the individual utilities seek recovery.
- RCR-7. For those electric and gas utilities that seek recovery of administrative costs, please provide a detailed schedule showing each utility's administrative costs by cost category, by year, for each of the last three years.

RCR-8. Please provide a statement supporting the inclusion of estimated (rather than actual only) utility administrative costs in determining USF rates.

I/M/O the 2014/2015 Annual Compliance Filings For a Change In the Statewide Electric and Gas Permanent Universal Service Fund Program Factors Within the Electric and Gas Societal Benefits Charges Rates Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:21.1
BPU Docket No. ER14060613

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