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August 26, 2014

In the Matter of the Petition of Public Service Electric and Gas Company for Approval of a Solar Generation Investment Program and an Associated Cost Recovery Mechanism

BPU Docket No. EO09020125

## VIA E-MAIL AND REGULAR MAIL

Kristi Izzo, Secretary Office of the Secretary Board of Public Utilities 44 South Clinton Avenue, 9th Floor P.O. Box 350 Trenton, New Jersey 08625-0350

Dear Secretary Izzo:

Please accept for filing the attached Affidavit asserting the confidentiality of certain data contained in PSE&G's Solar4All Monthly OCE Database Upload for the month of July 2014 that has been provided only in electronic form to the Board of Public Utilities' consultant, AEG, in compliance with the BPU decision in the above-captioned matter.

If you have any questions concerning this correspondence or the attached Affidavit, please contact me by phone or electronically.

Respectfully submitted,

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E-MAIL ONLY:

Elizabeth Ackerman Scott Hunter Bethany Rocque-Romaine Linda Wetzel Stefanie Brand Felicia Thomas-Friel Nisha Menon - AEG

## STATE OF NEW JERSEY

## BOARD OF PUBLIC UTILITIES

I/M/O Petition of PSE&G for Approval of a

Solar Generation Investment Program and

Associated Cost Recovery Mechanism

and

I/M/O the Petition of PSE&G for Approval of

an Extension of a Solar Generation -

Investment Program

Docket Numbers EO09020125

& EO12080721

STATE OF NEW JERSEY :

COUNTY OF ESSEX

Todd Hranicka, being of full age and duly sworn deposes and says:

I am the Director of Solar Energy for Public Service Electric and Gas Company (PSE&G) and, as such, I am responsible for reporting to the Board of Public Utilities (BPU) certain data for PSE&G's Solar 4 All Programs as approved by the BPU in an Order Approving Stipulation, I/M/O Petition of PSE&G for Approval of a Solar Generation Investment Program and Associated Cost Recovery Mechanism (Docket Number E009020125), dated August 3, 2009, and in I/M/O the Petition of PSE&G for Approval of an Extension of a Solar Generation Investment Program (Dkt. No. E012080721), dated May 29, 2013.

- I make this affidavit in support of PSE&G's request for confidential treatment of portions of PSE&G's Solar 4 All Monthly Activity Report (the Data), which is submitted electronically to the Board's consultant, Applied Energy Group.
- 3. Project specific cost information (Confidential Cost Information), which the BPU has requested be included in the Data, is proprietary, commercially sensitive financial information. If

this information were publicly available, PSE&G's competitors would have access to this commercially sensitive information. Access to this Confidential Cost Information would provide these competitors with an informed understanding of how PSE&G bids for specific projects and potentially permit the competitors to develop strategies to gain an unfair advantage in the solar marketplace in which PSE&G participates.

- 4. PSE&G has taken purposeful measures to prevent dissemination of the Confidential Cost Information. Access to the information is restricted to a small number of people within PSE&G. The Confidential Cost Information is not contained in materials that are available to the general public.
- 5. PSE&G requests that the BPU maintain the confidentiality of the Confidential Cost Information for an indefinite period of time. The release of PSE&G's Confidential Cost Information from past years may enable PSE&G's competitors to make an educated guess at PSE&G's current bidding process.
- 6. The Data also contains information that identifies certain PSE&G customer names and locations (Customer Information). In compliance with *N.J.A.C.* 14:4-7.8, PSE&G similarly takes purposeful measures to prevent dissemination of Customer Information, which includes customer names and addresses. *N.J.A.C.* 14:4-1.2. The measures taken by PSE&G to prevent disclosure of Customer Information are as follows: restricting access to customer information; requiring password-protected access to computers; and requiring logging out of the computer network in the evening. In addition, Public Service provides training to employees regarding the confidential nature of customer information and has implemented processes that prohibit the release of customer information to third parties in the absence of customer consent.

7. The harmful effects that disclosure would have upon PSE&G's customers includes but is not limited to, affording marketers information about New Jersey ratepayers in the absence of the customers' consent, including information about their utility account numbers and renewable expenditures that could be misused to the detriment of those customers.

8. Therefore, the Board should grant PSE&G's request for confidential treatment of the Data.

9. I swear that the foregoing statements are true to the best of my knowledge.

10. PSE&G submits the following as the addressee for communications from the custodian for this information pursuant to *N.J.A.C.* 14:2-12.1 et seq. The Company hereby requests that all custodian communications (oral and written), including without limitation, the notices listed in *N.J.A.C.* 14:1-12.7 and 12.9 be directed to the following designee.

Sheree Kelly, Esq.
Assistant General Regulatory Counsel
PSEG Services Corporation
80 Park Plaza –T5G
Newark, New Jersey 07102
Tel. No. (973) 430-6468
E-mail: Sheree Kelly@pseg.com

Todd Hranicka

Director of Solar Energy, PSE&G

Subscribed and sworn to before

me this 25 day of August 2014

Notary Public

My Commission Expires:

BERNADETTE A. CURTIS NOTARY PUBLIC OF NEW JERSEY My Commission Expires 5/8/2018