

RECEIVED
2015 JAN 13 PM 1 41
NJ BPU
MAILROOM

State of New Jersey
DIVISION OF RATE COUNSEL
140 EAST FRONT STREET, 4TH FL
P. O. BOX 003
TRENTON, NEW JERSEY 08625

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

STEFANIE A. BRAND
Director

January 12, 2015

Via Electronic Mail and US Regular Mail

Mary Patricia Keefe, Esq.
Elizabethtown Gas Company
300 Connell Drive, Suite 3000
Berkeley Heights, NJ 307922

Re: In the Matter of the Petition of Pivotal Utility Holdings, Inc. d/b/a
Elizabethtown Gas to Revise the Remediation Adjustment Clause
Component of its Societal Benefits Charge Rate
BPU Docket No. GR14101135

Dear Ms. Keefe:

Enclosed please find the Division of Rate Counsel's discovery request **RCR-A-15** in the above-referenced matter.

Pursuant to N.J.A.C. 1:1-10.4, please respond to the request and submit copies of the documents requested herein within fifteen (15) days or submit a schedule of reasonable compliance within fifteen (15) days from receipt of this letter.

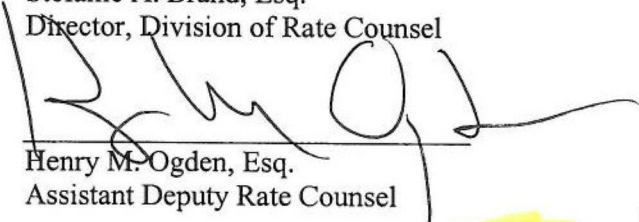
Please note that all discovery requests are of a continuing nature and should be updated, if necessary, over the course of the proceeding. Also, provide a designation on each response identifying the witness sponsoring the answer and finally, please provide the response on three-hole punch paper.

Your prompt handling of this request is appreciated. If you have any questions, please call me at (609) 984-1460.

Very truly yours,

Stefanie A. Brand, Esq.
Director, Division of Rate Counsel

By:


Henry M. Ogden, Esq.
Assistant Deputy Rate Counsel

HMO/sm
c: Service List
Enclosure

CMS
Legal
DAG
RPA
Energy CS
M. Lupo

**In the Matter of the Petition of Pivotal Utility Holdings, Inc. d/b/a
Elizabethtown Gas to Revise the Remediation Adjustment Clause
Component of its Societal Benefits Charge Rate**

BPU Docket No.: GR14101135

DIVISION OF RATE COUNSEL DISCOVERY REQUESTS

- RCR-A-15. With regard to the Quarterly Update Report -- July 2014 through September 2014 provided by cover letter dated January 8, 2015, please provide the following information:
- a. Provide the reasons for and nature of the \$25.3 million Third Party Recoveries shown on line 10.
 - b. Provide updated RAC filing schedules reflecting these Third Party Recoveries and all other actual results experienced through September 2014 as per the Quarterly Update Report.

I/M/O the Petition of Pivotal Utility
Holdings, Inc. d/b/a Elizabethtown
Gas to Revise The Remediation
Adjustment Clause Component of Its
Societal Benefits Charge Rate
BPU Docket No.: GR14101135

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

Stefanie A. Brand, Director
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Brian O. Lipman, Litigation Manager
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Felicia Thomas-Friel, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Henry M. Ogden, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

James W. Glassen, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Chief Counsel
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Robert Catona
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Megan Lupo
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Jerome May, Director
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Henry Rich
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Robert Schultheis
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Scott Sumliner
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Beverly Tyndell
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Alex Moreau, DAG
Division of Law
124 Halsey Street, 5th Floor
P.O. Box 45029
Newark, NJ 07101

Babette Tenzer, DAG
Division of Law
124 Halsey Street, 5th Floor
P.O. Box 45029
Newark, NJ 07101

Steven Cook
Elizabethtown Gas
300 Connell Drive, Suite 3000
Berkeley Heights, NJ 07922

Thomas Kaufmann
Elizabethtown Gas
300 Cornell Drive, Suite 3000
Berkeley Heights, NJ 07922

Mary Patricia Keefe, Esq.
Elizabethtown Gas
300 Connell Drive, Suite 3000
Berkeley Heights, NJ 07922

Susan Potanovich
Elizabethtown Gas
300 Connell Drive, Suite 3000
Berkeley Heights, NJ 07922

Greg Corbett
AGL Resources
Ten Peachtree Place
Atlanta, GA 30309

David Weaver
AGL Resources
Ten Peachtree Place
Atlanta, GA 30309

Erica McGill
AGL Resources
Ten Peachtree Place
Atlanta, GA 30309

Deborah Franco, Esq.
Cullen and Dykman
100 Quentin Roosevelt Blvd.
Garden City, NY 11530

Kenneth T. Maloney, Esq.
Cullen and Dykman, LLP
1101 14th Street NW, Suite 550
Washington, DC 20005

Mr. Robert J. Henkes
Henkes Consulting
7 Sunset Road
Old Greenwich, CT 06870