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VIA ELECTRONIC AND REGULAR MAIL

The Honorable Kenneth Sheehan
Secretary, New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, NJ 08625-0350
kenneth.sheehan@bpu.state.nj.us

Re: In the Matter of the Verified Petition of the Retail Energy Supply Association for Board-Approved Mechanism for Third Party Suppliers to Recover Incremental Costs Incurred as a Result of PJM's Capacity Performance Proposal, Docket No. EW15010092

Dear Secretary Sheehan:

On behalf of the Retail Energy Supply Association (“RESA”),¹ we respectfully request that the Board of Public Utilities (the “Board”) promptly issue a procedural schedule regarding resolution of RESA’s Petition for Formal Hearing and Order (the “Petition”) in the above-referenced matter. As RESA explained in its Petition and subsequent filings in this matter, a Board-approved mechanism for Third Party Suppliers (“TPSs”) to recover costs incurred as a

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

Case Mgmt
J. Deutsman

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result of the PJM Capacity Performance product is necessary and must be granted as soon as possible to preserve retail competition and its benefits to electric customers in New Jersey.

Although RESA filed its Petition more than three months ago on January 20, 2014, the Board has not taken any action nor even provided a schedule setting timelines for action with regard to this proceeding. In the meantime, Atlantic City Electric Company, Jersey Central Power & Light Company, Public Service Electric and Gas Company and Rockland Electric Company (collectively “the EDCs”) and Noble Americas Energy Solutions, LLC (“Noble Solutions”) each filed a Motion to Intervene in this proceeding (the “Motions”) on February 13 and March 9, 2015, respectfully. As RESA provided in its replies to the Motions, RESA does not oppose the EDCs’ or Noble Solutions’ participation in this proceeding. RESA remains concerned, however, that the procedurally defective Motions, rather than the substantive answers to the Petition required by the Board’s Rules of Practice at N.J.A.C. 14:1-1 et seq. (the “Rules”), would cause the deployment of unnecessary time and resources of Board Staff, resulting in further delays to the resolution of this extremely important proceeding.

As RESA explained in the Petition and responses to the Motions, a Board-approved mechanism for TPSs to recover costs related to the PJM Capacity Performance product is necessary and must be granted as soon as possible to preserve a vibrant retail supply market in New Jersey. To that end, RESA filed answers to discovery propounded by the Division of Rate Counsel and will cooperate with any other discovery requests that are proffered by parties to this proceeding. RESA, however, would encourage the Board to set a tight schedule for such

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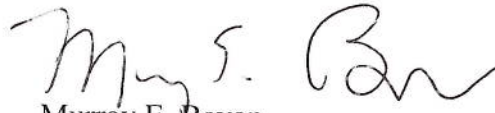
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discovery, as well as other deadlines related to this proceeding, due to the significant nature of relief requested by RESA.

We appreciate your attention to this important matter. Please do not hesitate to contact me with any questions. Thank you.

Very truly yours,


Murray E. Bevan

cc: Attached Service List

**In the Matter of the Verified Petition of the Retail Energy Supply Association for
Board-Approved Mechanism for Third Party Providers to Recover Incremental Costs
Incurred as a Result of PJM's Capacity Performance Proposal
Docket No. EW15010092**

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