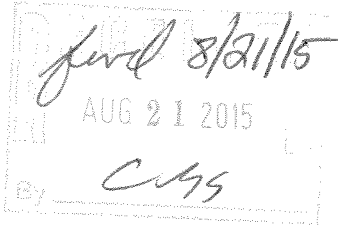


Matthew M. Weissman
General Regulatory Counsel - Rates

Law Department
PSEG Services Corporation
80 Park Plaza – T5, Newark, New Jersey 07102-4194
973-430-7052 fax: 973-430-5983
email: matthew.weissman@pseg.com



RECEIVED

AUG 21 2015

BOARD OF PUBLIC UTILITIES
MAIL ROOM



August 20, 2015

In the Matter of the
2015/2016 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. ER15060732

VIA ELECTRONIC & OVERNIGHT MAIL

Irene Kim Asbury, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

Dear Secretary Asbury:

On behalf of Atlantic City Electric Company (“ACE”), New Jersey Natural Gas Company (“NJNG”), Elizabethtown Gas Company (“ETG”), Jersey Central Power & Light Company (“JCP&L”), Public Service Electric and Gas Company (“PSE&G”), Rockland Electric Company (“RECO”), and South Jersey Gas Company (“SJG”) (collectively, the “Utilities”), please accept for filing an original and 10 copies of these joint comments submitted in response to the comments filed by the Division of Rate Counsel (“Rate Counsel”) on August 17, 2015 in the above-referenced matter.

CMS
Dist/Asbury

In its Comments, Rate Counsel states that it “is not opposed to the proposed USF and Lifeline rates becoming effective on October 1, 2015.” Rate Counsel at p. 6. Nor does Rate Counsel “object to the utilities’ request for recovery of their actual administrative costs incurred associated with the USF program (given that actual expenditures will replace the utilities’ forecasts for the months of May through September 2015 in the reconciliation to be reflected in the utilities’ 2016/2017 Annual Compliance Filing).” Id. at p.6. It should be noted that the Utilities are requesting recovery of administrative expenses for the period July 1, 2014 through September 30, 2014 as well as administrative expenses for the period October 1, 2014 through June 30, 2015 as shown below:

ADMINISTRATIVE COSTS

	Admin Expenses July 2014- September 2014	Admin Expenses October 2014-June 2015	Carrying Costs	Total Requested Admin Expenses
ACE	\$2,536	\$0	\$0	\$2,536
JCP&L	\$5,905	(\$10,809)	\$0	(\$4,904)
PSE&G- E	\$0	\$0	\$0	\$0
RECO	\$122	\$452	\$0	\$574
subtotal	\$8,563	(\$10,357)	\$0	(\$1,794)
ETG	\$0	\$0	\$0	\$0
NJNG	\$720	\$6,448	\$26	\$7,194
PSE&G-G	\$0	\$0	\$0	\$0
SJG	\$2,150	\$6,205	\$40	\$8,395
subtotal	\$2,870	\$12,653	\$79	\$15,589
TOTAL E&G	\$11,433	\$2,296	\$79	\$13,794

Rate Counsel notes correctly that “the utilities updated calculations reflecting two additional months of actual data would result in a very slight decrease in the USF rates for the electric utilities.” Id. at p.6.

The Utilities note that the decision whether to implement the rates derived in the original filing with actual data thru April or the updated rates with actual data thru June 2015 rests with the Board. In the past, the Board has chosen to implement USF rates based on the most recent updated USF and Lifeline data provided by the Utilities, which are subject to Board Staff’s and Rate Counsel’s review.

Conclusion

Based on the record in this proceeding, including Rate Counsel’s comments, the Utilities respectfully urge the Board to approve the USF and Lifeline Rates and the administrative expenses (based on the administrative expenses from July 2014 through June 2015 as clarified above). This would include Board approval of the full recovery of the administrative expenses for each of the Utilities, as applicable, in the month following Board approval of the 2015/2016 USF and Lifeline rates from funds disbursed to the Utilities by the USF Trust Fund and maintained by the New Jersey State Department of Treasury.

Please feel free to contact me with any questions regarding this correspondence.

Respectfully,



ACE

Joseph Janocha
Atlantic City Electric Co. - 63ML38
5100 Harding Highway
Atlantic Regional Office
Mays Landing NJ 08330
(609) 625-5868
joseph.janocha@pepcoholdings.com

ACE

Gary Zibinski
Pepco Holdings, Inc.
New Castle Regional Office
401 Eagle Run Road
Newark DE 19714
(302) 283-6035
gary.zibinski@pepcoholdings.com

AGL/Elizabethtown

Mary Patricia Keefe
Elizabethtown Gas
520 Green Lane
Union NJ 07083
(908) 662-8452
mkeefe@aglresources.com

BPU

Irene Kim Asbury
Board of Public Utilities
44 South Clinton Avenue, 9th Flr.
9th Floor
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-1599
Irene.Asbury@bpu.state.nj.us

BPU

Julie Ford-Williams
Board of Public Utilities
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
julie.ford@bpu.state.nj.us

BPU

Jerome May
Board of Public Utilities
Division of Energy
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-3960
Jerome.may@bpu.state.nj.us

ACE

Philip J. Passanante
Atlantic City Electric Co. - 89KS42
800 King Street, 5th Floor
P.O. Box 231
Wilmington DE 19899-0231
(302) 429-3105
philip.passanante@pepcoholdings.com

AGL/Elizabethtown

Deborah M. Franco
Cullen and Dykman LLP
Garden City Center
100 Quentin Roosevelt Blvd.
Garden City NY 11530-4850
(516) 357-3878
dfranco@cullenanddykman.com

AGL/Elizabethtown

Susan Potanovich
Elizabethtown Gas
520 Green Lane
Union NJ 07083
(908) 662-8462
spotanov@aglresources.com

BPU

Alice Bator
Board of Public Utilities
Division of Energy
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 943-5805
alice.bator@bpu.state.nj.us

BPU

Eric Hartsfield
Board of Public Utilities
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 777-3300
eric.hartsfield@bpu.state.nj.us

BPU

Stacy Peterson
Board of Public Utilities
Division of Energy
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-4517
stacy.peterson@bpu.state.nj.us

ACE

Roger E. Pedersen
Atlantic City Electric Co. - 63ML38
5100 Harding Highway
Mays Landing NJ 08330
(609) 625-5820
roger.pedersen@pepcoholdings.com

AGL/Elizabethtown

Thomas Kaufmann
Elizabethtown Gas
520 Green Lane
Union NJ 07083
(908) 662-8461
tom.kaufmann@aglresources.com

BPU

William Agee Esq.
Board of Public Utilities
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-1616
william.agee@bpu.state.nj.us

BPU

Maureen Clerc
Board of Public Utilities
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-4219
Maureen.Clerc@bpu.state.nj.us

BPU

Peter Hilerio
Board of Public Utilities
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-4136
peter.hilerio@bpu.state.nj.us

BPU

Andrea Reid
Board of Public Utilities
Division of Energy
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-4518
andrea.reid@bpu.state.nj.us

BPU

Robert Schultheis
Board of Public Utilities
Division of Energy
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 984-9633
robert.schultheis@bpu.state.nj.us

DAG

Geoffrey Gersten
NJ Dept. of Law & Public Safety
Division of Law
124 Halsey Street, 5th Flr.
P.O. Box 45029
Newark NJ 07101
(973) 648-3510
geoffrey.gersten@dol.lps.state.nj.us

JCP&L

Michael J. Connolly
Windels Marx Lane & Mittendorf, LLP
One Giralda Farms
Madison NJ 07940
973-966-3244
mconnolly@windelsmarx.com

JCP&L

Mark Mader
Jersey Central Power & Light Co.
300 Madison Avenue
P.O. Box 1911
Morristown NJ 07962-1911
(973) 401-8697
mamader@firstenergycorp.com

NJNG

Tina Trebino
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall NJ 07719
(732) 938-7331
Trebino@njng.com

PSE&G

Matthew M. Weissman Esq.
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark NJ 07102
(973) 430-7052
matthew.weissman@pseg.com

BPU

Albert Weierman
Board of Public Utilities
Division of Audits
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-1682
Albert.Weierman@bpu.state.nj.us

DAG

Patricia A. Krogman DAG
NJ Dept of Law & Public Safety
Division of Law
124 Halsey Street, 5th Flr.
P.O. Box 45029
Newark NJ 07101
(973) 648-3441
patricia.krogman@dol.lps.state.nj.us

JCP&L

Gabrielle A. Figueroa
Windels Marx Lane & Mittendorf, LLP
One Giralda Farms
Madison NJ 07940
(973) 966-3214
gfigueroa@windelsmarx.com

NJNG

Andrew K Dembia Esq.
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall NJ 07719
(732) 938-1073
adembia@njng.com

PSE&G

Connie E. Lembo
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark NJ 07102
(973) 430-6273
constance.lembo@pseg.com

Rate Counsel

Stefanie A. Brand
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
sbrand@rpa.state.nj.us

BPU

John Zarzycki
Board of Public Utilities
Division of Energy
44 South Clinton Avenue, 9th Flr.
P.O. Box 350
Trenton NJ 08625-0350
(609) 341-5738
john.zarzycki@bpu.state.nj.us

JCP&L

Sally J. Cheong
Jersey Central Power & Light Co.
300 Madison Avenue
P.O. Box 1911
Morristown NJ 07962-1911
(973) 401-8699
scheong@firstenergycorp.com

JCP&L

Lauren M. Lepkoski Esq.
First Energy Corporation
2800 Pottsville Pike
Reading PA 19612-6001
(610) 921-6213
llepkoski@firstenergycorp.com

NJNG

Marianne Harrell
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall NJ 07719
732-938-1257
mharrell@njng.com

PSE&G

Tracy Morgan
PSEG Services Corporation
80 Park Plaza, T8
P.O. Box 570
Newark NJ 07102
(973) 430-6420
tracy.morgan@pseg.com

Rate Counsel

Lisa Gurkas
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
lgurkas@rpa.state.nj.us

Rate Counsel

Brian O. Lipman
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
brian.lipman@rpa.state.nj.us

Rate Counsel

Felicia Thomas-Friel
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
fthomas@rpa.state.nj.us

RECO

John L. Carley Esq.
Consolidated Edison Co. of NY
Law Dept.
4 Irving Place, Room 1815-S
New York NY 10003
(212) 460-2097
carleyj@coned.com

RECO

Tineesha McMullen
Rockland Electric Company
One Blue Hill Plaza
Pearl River NY 10965
(845) 577-3816
mcmullent@oru.com

SJG

Carolyn Jacobs
South Jersey Gas Company
One South Jersey Plaza
Route 54
Folsom NJ 08037
(609) 561-9000 X4212
cjacobs@sjindustries.com

Rate Counsel

Ami Morita
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
amorita@rpa.state.nj.us

Rate Counsel Consultant

David E. Peterson
Chesapeake Regulatory Consultants, Inc.
10351 Southern Maryland Blvd.
Suite 202
Dunkirk MD 20754-9500
(410) 286-9500
davep@chesapeake.net

RECO

Margaret Comes
Consolidated Edison Co. of NY
Law Dept
4 Irving Place
New York NY 10003
(212) 460-3013
comesm@coned.com

RECO

Cheryl M. Ruggiero
Rockland Electric Company
4 Irving Place
2nd Floor East
New York NY 10003
(212) 460-3189
ruggieroc@coned.com

SJG

Ira G. Megdal Esq.
Cozen O'Connor
457 Haddonfield Road, Suite 300
Libertyview
Cherry Hill NJ 08002
(856) 910-5019
imegdal@cozen.com

Rate Counsel

Sarah Steindel
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
ssteinde@rpa.state.nj.us

RECO

William A. Atzl Jr.
Rockland Electric Company
4 Irving Place
Room 515-S
New York NY 10003
(212) 460-3308
atzlw@coned.com

RECO

Barbara Devito
Rockland Electric Company
One Blue Hill Plaza
Pearl River NY 10965
(845) 577-3382
Devitob@oru.com

SJG

Kenneth J. Barcia
South Jersey Gas Company
One South Jersey Plaza
Route 54
Folsom NJ 08037
(609) 561-9000 x4983
kbarcia@sjindustries.com