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MAY 07 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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May 3, 2018

Via Federal Express and E-Mail

The Honorable Upendra Chivukula
New Jersey Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350

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CASE MANAGEMENT

MAY 07 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Re: In the Matter of the Petition of Atlantic City Electric Company for
Approval of a Voluntary Program for Plug-In Vehicle Charging
BPU Docket No. EO18020190

Dear Commissioner Chivukula:

Atlantic City Electric Company ("ACE" or the "Company") opposes ChargePoint's untimely attempted joinder in Rate Counsel's Motion to Stay (the "Motion"). For the reasons previously set out in the Company's April 16, 2018 Answer to the Motion, the Company opposes a stay of this proceeding. Simply put, ACE believes a stay, whether requested by Rate Counsel or ChargePoint, is unnecessary and inconsistent with the public interest. Moreover, ChargePoint is not yet a party to this proceeding, and its untimely submission is an attempt to advance its substantive arguments. The Motion before you is a procedural one. If ChargePoint's pending motion to intervene is granted, ChargePoint will have ample opportunity to put its substantive position with respect to ACE's proposed PIV Program in the record. This is not that time.

For the foregoing reasons, ACE opposes ChargePoint's untimely request to stay this proceeding. Thank you for your attention to this matter.

Respectfully submitted,


Courtney L. Schultz, Esq.

cc: Service List (via electronic and regular mail)

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A DELAWARE LIMITED LIABILITY PARTNERSHIP

In the Matter of the Petition of Atlantic City Electric Company
for Approval of a Voluntary Program for Plug-In Vehicle Charging
BPU Docket No. EO18020190

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