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CULLEN and DYKMAN LLP  
BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

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November 1, 2018

**Via Federal Express and Electronic Mail**  
Hon. Aida Camacho-Welch, Secretary  
New Jersey Board of Public Utilities  
44 So. Clinton Avenue, 3<sup>rd</sup> Floor, Suite 314  
P.O. Box 350  
Trenton, New Jersey 08625-0350

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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

**Re: I/M/O the Petition of Pivotal Utility Holdings, Inc. d/b/a Elizabethtown Gas for the Approval of a Municipal Consent Renewing a Franchise in the Borough of Bloomsbury, Hunterdon County BPU Docket No. GE18040464**

Dear Secretary Camacho-Welch:

On behalf of Elizabethtown Gas Company, please accept for filing, an original and ten copies of these comments in response to the October 25, 2018 comments submitted by the New Jersey Division of Rate Counsel ("Rate Counsel") concerning the above-referenced Petition seeking approval of a municipal consent renewing a franchise in the Borough of Bloomsbury, Hunterdon County.

In its comments (at 4) Rate Counsel recommends that any Board order approving the Company's Petition contain the following language:

1. As required by N.J.S.A. 48:3-15, and limited by Ordinance No. 103-18, the municipal consent to construct, maintain and operate gas lines in the streets and other public places in the Borough is limited to a term not exceeding ten years.
2. This Order shall not be construed as directly or indirectly fixing for any purposes whatsoever any value of any tangible or intangible assets now owned or hereafter to be owned by the Petitioner.
3. This Order shall not affect, nor in any way limit, the exercise of the authority of this Board or of this State, in any future Petition or in any proceedings with respect to rates, franchises, service, financing, accounting, capitalization, depreciation, or in any other matter affecting the Petitioner.

*Case Mgmt  
M. Dupont, Esq.  
A. Mearns, Esq.  
T. O'Neil, Esq.  
A. Peterson*

The Company does not object to the inclusion of this language in a Board order approving this Petition.

Thank you.

Sincerely,

*Deborah M. Franco*  
Deborah M. Franco

Enclosure

cc: Chris Oprysk, BPU Staff  
Megan Lupo, BPU Staff  
Brian Weeks, Division of Rate Counsel