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FEB 22 2019

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

STEFANIE A. BRAND  
Director

February 22, 2019

*Jan D*  
*2/25/18*

**Via Hand Delivery and Electronic Mail**

Honorable Aida Camacho-Welch, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 3rd Floor, Suite 314  
P.O. Box 350  
Trenton, New Jersey 08625-0350

**Re: I/M/O the Verified Petition of Jersey Central Power & Light Company for Authorization to Revise: the Statistical Sampling Aspects of Its Electric Meter Testing Program Pursuant to N.J.A.C. 14:5-4.2, and the Form of Quarterly Reporting of Meter Test Results Pursuant to N.J.A.C. 14:3-4.7  
BPU Docket No. EO18101187**

**I/M/O the Petition of Atlantic City Electric Company to Revise and Update its Electric Meter Selective Sampling Program Pursuant to N.J.A.C. 14:5-4.2, and the Form of Quarterly Reporting of Meter Test Results Pursuant to N.J.A.C. 14:3-7  
BPU Docket No. EO18101189**

**I/M/O the Joint Petition of Public Service Electric and Gas Company for Approval of an Electric Meter Selective Sampling Program  
BPU Docket No. EO18101159**

**I/M/O the Meter Sampling Plan of Rockland Electric Company  
BPU Docket No. EO1810188**

*EO18101188*

Dear Secretary Camacho-Welch:

Please accept this letter (original and 10 copies) setting forth the position of the Division of the Rate Counsel ("Rate Counsel") in the above-referenced matters. The regulated Electric Distribution Companies ("EDC") seek approval by the New Jersey Board of Public Utilities ("BPU" or "the Board") to revise their statistical sampling meter testing

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programs and provide for a new proposed quarterly and annual reporting format for reporting meter test results.

According to the various petitions, Board Staff engaged the EDCs in informal discussions to review the EDCs electric meter selective sampling program given the advancements in meter and meter technologies and in light of the current reporting requirements. As set forth in the various petitions, the EDCs are currently operating under programs approved by the Board in the mid-1990s. As a result of the discussions between the EDCs and Board Staff it was determined that: 1) each EDC would update their electric meter test program to reflect current metering technology; 2) standardize the program to the extent possible; and, 3) implement the program consistent with the applicable American National Standards Institute (“ANSI”) standards.

Rate Counsel appreciates Board Staff’s efforts to recognize the evolution of meter technology and the potential for efficiency in the application of uniform standards.

In response to Rate Counsel discovery the EDCs indicated that if the Board approves the proposed change to the electric meter test program the result would either be no net annual change in cost or would reduce compliance costs to ratepayers. Consequently, Rate Counsel has no objection to the EDC petitions.

Respectfully submitted,

STEFANIE A. BRAND  
DIRECTOR, DIVISION OF RATE COUNSEL

By: 

James Glassen, Esq.  
Assistant Deputies Rate Counsel

c: Service List (Regular and Electronic Mail)

**I/M/O JCP&L FOR AUTHORIZATION  
TO REVISE: THE STATISTICAL  
SAMPLING ASPECTS OF ITS  
ELECTRIC METER TESTING  
PROGRAM  
BPU Dkt. No.: EO18101187**

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**I/M/O THE PETITION OF ATLANTIC  
CITY ELECTRIC COMPANY TO  
REVISE AND UPDATE ITS ELECTRIC  
METER SAMPLING PROGRAM  
BPU Dkt. No.: EO18101189**

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**I/M/O Public Service Electric and Gas  
Electric Meter Selective Sampling Program  
BPU Dkt. No.: EO18101159**

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**In the Matter of the Meter Sampling  
Plan of Rockland Electric Company  
BPU Docket No. EO18101188**

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