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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

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CASE MANAGEMENT

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August 27, 2019

Via Regular Mail and Electronic Mail

Justine Incardone, Esq.  
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FORWARDED  
CASE MANAGEMENT  
2019 SEP - 3 / 10 09  
BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

Re: I/M/O Petition of Public Service Electric & Gas Co. For  
Approval of Its Clean Energy Future-Energy Cloud ("CEF-  
EC") Program on a Regulated Basis  
BPU Docket No. EO18101115

Dear Mr. Incardone:

This letter is in response to your letter dated August 23, 2019 in connection with the above referenced matter proposing, among other things, testimony in Fall 2019, evidentiary hearings in January 2020, and Board action in February 2020. Rate Counsel objects to PSE&G's proposed schedule for the following reason.

On November 19, 2018, Rate Counsel filed a Motion to Dismiss in the above-referenced matter. PSE&G responded on November 29, 2018 and Rate Counsel filed a Reply on December 6, 2018. Rate Counsel's Motion has been pending before the Board since that time. In the Motion, Rate Counsel noted the moratorium on pre-approval of AMI petitions imposed on all of the State's electric utilities in I/M/O Petition of Rockland Electric Co. for Approval of an Advanced Metering Program; and For Other Relief, BPU Docket No. ER16060524, Order dated 8/23/17 ("RECO AMI Order"). In the RECO AMI Order, the Board on its own initiative adopted a moratorium on both pre-approval of and cost recovery for any AMI petitions until it reviewed Rockland's fully-implemented program and issued further guidance to electric utilities. Rockland base rate case, of which review of its completed AMI investment is a component, is currently pending before the Office of Administrative Law with evidentiary hearings scheduled for January 2020. The moratorium on pre-approval of AMI is still in place since the Rockland matter has not concluded. The purpose for the moratorium was to allow Rockland's pilot to proceed so that all stakeholders can better understand whether the proposal for broad

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August 27, 2019

Page 2

replacement of meters with AMI is cost effective. The Board is retaining an expert in the Rockland matter to assist with this process. PSE&G's petition should not proceed until all data in the Rockland pilot has been received, evaluated, and acted on by the Board.

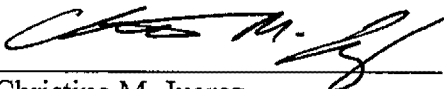
The moratorium imposed by the Board, however, is not a bar to the utilization of AMI, only to its pre-approval. The RECO AMI Order specifically stated that a utility may install AMI meters in its service territory, subject to a prudence review in a future rate case. Therefore, PSE&G is free to begin replacing meters in its service territory with AMI meters, as part of the normal course of its meter replacement schedule.

Because PSE&G's AMI petition seeks the pre-approval currently barred by the Board's moratorium, it is inappropriate for PSE&G's proposed schedule to go forward. Accordingly, a procedural schedule in this matter should not be set.

Respectfully submitted,

STEFANIE A. BRAND  
Director, Division of Rate Counsel

By:

  
Christine M. Juarez  
Asst. Deputy Rate Counsel

cc: Service List (*via e-mail and regular mail*)

**IMO THE PETITION OF PUBLIC SERVICE  
ELECTRIC AND GAS COMPANY FOR  
APPROVAL OF ITS CLEAN ENERGY FUTURE  
ENERGY EFFICIENCY, CLEAN ENERGY  
FUTURE ELECTRIC VEHICLE AND ENERGY  
STORAGE, AND ITS CLEAN ENERGY FUTURE  
ENERGY CLOUD ("CEF-EC")  
BPU DKT. NO. EO18101115**

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