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January 31, 2019

HAND-DELIVERED

Ms. Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 S. Clinton Avenue, 3rd Floor, Suite 314
Trenton, New Jersey 08625-0350

**Re: I/M/O the Implementation of L. 2018, c. 16 Regarding the Establishment of
A Zero Emission Certificate Program for Eligible Nuclear Power Plants
BPU Docket No. EO18080899**

Dear Secretary Camacho-Welch:

Please accept for filing an original and ten (10) copies of the Division of Rate Counsel's Comments and supporting certifications of Ms. Andrea Crane and Messrs. Robert Fagan and Maximillian Chang in the above matter. The comments contain information claimed to be confidential therefore Rate Counsel is filing both a **confidential and a redacted version with the Board**. Hard copies of the confidential version are **only** being provided to Secretary Camacho-Welch, President Joseph Fiordaliso, Thomas Walker and Jeffrey W. Mayes, Esq., counsel for Independent Market Monitor for PJM. Electronic copies of the redacted version are being sent to all parties on the attached service list. Hard copies of the redacted version will be available upon request. Confidential versions redacted separately for PSE&G and Exelon will be provide to those parties once completed.

Enclosed is an additional copy of the materials transmitted. Please stamp and date the copy as "filed" and return it in the enclosed self-addressed stamped envelope. Thank you for your consideration and assistance.

Respectfully submitted,



Stefanie A. Brand
Director, Division of Rate Counsel

c: President Joseph Fiordaliso
Thomas Walker, Director
Jeffrey W. Mayes, Esq.
Service List

I/M/O THE IMPLEMENTATION OF L. 2018,
C. 16 REGARDING THE ESTABLISHMENT
OF A ZERO EMISSION CERTIFICATE
PROGRAM FOR ELIGIBLE NUCLEAR
POWER PLANTS
BPU Dkt. No.: EO18080899
CONFIDENTIAL LIST

***Indicates parties receiving
confidential version**

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