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October 8, 2020

**VIA ELECTRONIC MAIL**  
[aida.camacho@bpu.nj.gov](mailto:aida.camacho@bpu.nj.gov)  
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Aida Camacho-Welch  
Secretary of the Board  
Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, New Jersey 08625-0350

**RE:** In the Matter of the Petition of Atlantic City Electric Company for Approval of an Energy Efficiency Program, Cost Recovery Mechanism, and Other Related Relief for Plan Years One Through Three  
BPU Docket No. EO20090621

In the Matter of the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs  
BPU Docket No. QO10010040

Dear Secretary Camacho-Welch:

The undersigned attorney is Assistant General Counsel to Atlantic City Electric Company (“ACE” or the “Company”) in connection with the above referenced matter.

Please accept this letter in lieu of a more formally styled filing pursuant to N.J.A.C. 1:1-12.2 in response to the following Motions for Intervention and/or to Participate in this matter:

- Motion to Participate filed by Rockland Electric Company (“RECO”);
- Motion to Participate filed by Jersey Central Power & Light Company (“JCP&L”);
- Motion to Participate filed by Elizabethtown Gas Company (“ETG”);
- Motion to Participate filed by South Jersey Gas Company (“SJG”);
- Motion to Intervene filed by Energy Efficiency Alliance of New Jersey (“EEA-NJ”);
- Motion to Intervene filed by New Jersey Natural Gas Company (“NJNG”); and
- Motion to Intervene filed by Public Service Electric and Gas Company (“PSE&G”).

In summary, ACE respectfully submits that (i) it has no objection to the Motions to Participate filed by RECO, JCP&L, ETG, and SJG; (ii) as permitted by N.J.A.C. 1:1-16.5, NJNG’s and PSE&G’s Motions to Intervene should be denied and treated as Motions to Participate (and granted as such); and (iii) the Company has no objection to EEA-NJ’s Motion to Intervene.

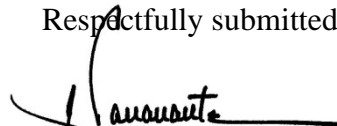
With respect to the Motions to Intervene filed by NJNG and PSE&G, ACE agrees that each utility's energy efficiency program will require coordination and involve important cost sharing and investment allocation issues, particularly in areas where gas and electric service territories overlap. ACE respectfully submits, however, that this effort – coupled with the granting of *Participant* status in each pending utility filing – can be adequately addressed through ongoing dialogue by and among the utilities. As such, the Company respectfully submits that it is appropriate to grant NJNG and PSE&G Participant but not full Intervenor status in ACE's proceeding. Note, however, that, to the extent NJNG is granted intervention in ACE's proceeding, as set forth in the Motion to Participate filed by the Company in NJNG's pending energy efficiency proceeding (BPU Docket No. GO20090622), ACE respectfully requests that it be granted intervenor status in NJNG's energy efficiency proceeding.

For the reasons set forth above, ACE respectfully submits that it supports the participation of RECO, JCP&L, ETG, SJG, NJNG and PSE&G; it does not oppose the intervention of EEA-NJ; and requests that the Board or Presiding Officer provide such other or further relief as is deemed just and reasonable.

Consistent with the Order issued by the New Jersey Board of Public Utilities (the "Board" or "BPU") in connection with *In the Matter of the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations*, BPU Docket No. EO20030254, Order dated March 19, 2020, this document is being electronically filed with the Secretary of the Board, the New Jersey Division of Rate Counsel, and the Service List. No paper copies will follow.

Thank you for your cooperation and courtesies. Feel free to contact me with any questions or if I can be of further assistance.

Respectfully submitted,



Philip J. Rasanante  
An Attorney at Law of the  
State of New Jersey

cc: Service List  
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