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October 16, 2020

Margaret Comes, Esq, Associate Counsel
4 Irving Place Room 1815-S
New York, New York 10003

Re: IN THE MATTER OF THE IMPLEMENTATION OF P.L. 2018, C. 17 REGARDING THE ESTABLISHMENT OF ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION PROGRAMS

IN THE MATTER OF THE PETITION OF ROCKLAND ELECTRIC COMPANY FOR APPROVAL OF ITS ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION PROGRAMS

BPU DOCKET NOS. QO19010040 AND EO20090623

Dear Ms. Comes:

We are writing in response to the above-referenced petition, which Rockland Electric Company (“RECO” or “the Company”) filed with the Secretary of the New Jersey Board of Public Utilities (“Board”) on September 25, 2020.

Board Staff has reviewed the petition for completeness, in accordance with the Board’s June 10, 2020 Order in Docket Nos. QO19010040, QO19060648, and QO17091004 (“June 2020 Order”). Staff has determined that the petition is not administratively complete. We have enclosed, for your information, a list of the deficiencies in the petition and the information/documentation required to remedy the deficiencies.

N.J.S.A. 48:3-98.1(b) provides the Board with 180 days to approve, modify, or deny RECO’s requested recovery of costs for the above-referenced program. As stated in the Board’s May 2008 Order in Docket No. EO08030164, the 180-day review period will commence on the last filing date of the remediation of all deficiencies.

Should you have any questions, please contact the undersigned.

Sincerely,

Stacy Peterson
Director, Division of Energy

Kelly Mooij
Director, Division of Clean Energy

I. General Filing Requirements

a. States the following:

The utility shall provide with all filings information and data pertaining to the specific program proposed as set forth in applicable sections of N.J.A.C. 14:1-5.11 and N.J.A.C. 14:1-5.12.

The filing is missing information related to N.J.A.C. 14:1-5.12 (11).

b. States the following:

All filings shall contain information and financial statements for the proposed program(s) in accordance with the applicable Uniform System of Accounts that is set forth in N.J.A.C. 14:1-5.12. The utility shall provide the Accounts and Account numbers that will be utilized in booking the revenues, costs, expenses, and assets pertaining to each proposed program so that they can be properly separated and allocated from other regulated and/or other programs.

This Minimum Filing Requirement (“MFR”) requires the petitioner to submit the accounts and account numbers that will be utilized in booking the revenues, costs, expenses and assets. The filing does not appear to delineate all accounts that will be used or provide proposed journal entries.

c. States the following:

The utility shall provide supporting explanations, assumptions, calculations, and work papers as necessary for each proposed program and cost recovery mechanism petition filed under N.J.S.A. 48:3-98.1. The utility shall provide electronic copies of such supporting information, with all inputs and formulae intact, where applicable.

The filing is missing work papers for the Cost-Benefit Model.

II. Cost Recovery Mechanism

a. States the following:

The utility shall provide appropriate financial data for the proposed program(s), including estimated revenues, expenses, and capitalized investments for each of the first three years of operations and at the beginning and end of each year of the three-year period. The utility shall include pro forma income statements for the proposed program(s) for each of the first three years of operations and actual or estimated balance sheets at the beginning and end of each year of the three-year period.

The Company did not include pro forma income statements or estimated balance sheets for each of the first three year periods.

b. States the following:

The utility shall provide detailed spreadsheets of the accounting treatment of the proposed cost recovery, including describing how costs will be amortized, which accounts will be debited or credited each month, and how the costs will flow through the proposed method of recovery of program costs.

This MFR requires the petitioner to describe how costs will be amortized and which accounts will be debited and credited each month, as well as how the costs will flow. The filing does not include proposed journal entries that would show how the costs will flow and which accounts would be debited and credited.