

October 29, 2020

VIA EMAIL ONLY

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
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**RE: I/M/O the Petition of Atlantic City Electric Company for Approval of a
Voluntary Program for Plug-in Vehicle Charging
BPU Docket No. EO18020190
Proposed Changes to Procedural Schedule**

Dear Secretary Camacho-Welch:

Please accept this letter in lieu of a more formally styled motion for a modification to the Procedural Schedule in the above referenced matter.

Atlantic City Electric (“ACE”) recently amended its petition through its rebuttal testimony without advance notice to the other parties. Therefore, the intervenors were deprived of the opportunity to address ACE’s revised program offerings 7 through 9 in their pre-filed testimony. In order to provide a fair opportunity for intervenors to develop a comprehensive record, ChargePoint, Rate Counsel, EVgo, and Electrify America respectfully request that Commissioner Chivukula, the assigned Hearing Officer, adopt the following changes to the existing Procedural Schedule. Tesla and Greenlots do not object to these requested modifications to the procedural schedule.

The following proposed changes to the procedural schedule would allow intervenors an opportunity to submit pre-filed sur-rebuttal testimony regarding ACE’s recent changes to its proposed offerings 7 through 9 and require ACE to update its discovery responses prior to the evidentiary hearings. Board Staff has informed us that Commissioner Chivukula is available on the proposed new evidentiary hearing dates, and ACE has agreed to these new dates as well. ACE has also agreed to provide updates to its discovery responses (if needed) between November 4th and November 6th.

	Existing Schedule	Proposed Schedule
Public Hearings (2)	TBA	TBA
Responses to discovery requests on Rebuttal Testimony	November 4, 2020	November 4, 2020
Settlement conferences	November 4, 5, and 6, 2020	November 4, 5, and 6, 2020
ACE's updated discovery responses due		November 6, 2020
Sur-Rebuttal Testimony filed by Intervenors (limited to addressing ACE's revisions to Offerings 7 through 9)		November 10, 2020
Evidentiary Hearings with oral surrebuttal	November 12 and 13, 2020	November 17, 19, and 20, 2020
Initial Briefs due	TBD by Commissioner at evidentiary hearings	TBD by Commissioner at evidentiary hearings

Consistent with the Board's Order dated March 19, 2020, in Docket No. EO20030254 temporarily waiving certain requirements for non-essential obligations, we are submitting only electronic copies of this correspondence.

Respectfully submitted,



Murray E. Bevan

cc: Commissioner Chivukula
Service List