



Rockland Electric Company

Rockland Electric Company
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VIA ELECTRONIC MAIL

Brian Weeks, Esq.
Deputy Rate Counsel
State of New Jersey
Division of Rate Counsel
140 East Front Street, 4th Floor
Post Office Box 003
Trenton, New Jersey 08625-0350

Re: I/M/O Request of Rockland Electric Company for Approval
to Implement Electronic Signatures for Deferred Payment
Agreements
Docket No: EC20120755U

Dear Mr. Weeks:

Rockland Electric Company (“RECO” or the “Company”) has reviewed the comments (“Comments”) of the New Jersey Division of Rate Counsel (“Rate Counsel”), dated December 7, 2020, regarding the Company’s request for Board authorization to implement Electronic Signatures for Deferred Payment Agreements (“EDPA”) for Deferred Payment Agreements (“DPAs”). In the Comments, Rate Counsel states that it does not object to RECO’s EDPA proposal, subject to the Board’s adoption of various recommendations. RECO responds to these recommendations below. Please note that RECO is making this filing solely in electronic form pursuant to the Board’s directive in its Emergency Order dated March 19, 2020 in BPU Docket No. EO20030254.

Rate Counsel also expresses no opinion on the rate impact and prudence of the EDPA procedure or its costs and reserves the right to review those issues in the Company’s next base rate case or other appropriate proceeding. RECO agrees with Rate Counsel that any rate impact and/or prudence issues can be addressed, to the extent necessary, in the Company’s next base rate case or other appropriate proceeding. RECO also reserves all its rights in any such proceedings.

Rate Counsel's Recommendations

RECO responds below to Rate Counsel's recommendation that any Board Order approving RECO's EDPA proposal contain Rate Counsel's proposed language.

1. RECO shall embed a copy of the DPA into the body of its e-mail to the customer, so the customer may review the DPA itself in the event their electronic communication device cannot open an e-mail attachment.

Response:

RECO is agreeable to this recommendation.

2. To enhance security, RECO shall use two-step verification of the DPA signature, by sending a text to the customer's phone as well as the e-mail. The customer's confirmation of the text will allow the customer to open and electronically sign the DPA.

Response:

RECO agrees that a two-step authentication/verification process should be implemented. RECO proposes to implement a system where the customer clicks on a button in the email and has to enter their password to view the EDPA which is in the form of a secure PDF. The password is the customer's zip code. RECO would not propose to use a two-step verification utilizing texting, because we would need the customer's permission to use his/her mobile phone number.

3. RECO shall ensure that its EDPA procedures are consistent with the federal "E-SIGN Act," and the New Jersey Uniform Electronic Transactions Act.

Response:

RECO is agreeable to this recommendation.

4. RECO shall notify its customers of the EDPA procedures in both English and Spanish.

Response:

RECO is agreeable to sending customers a semi-annual bill insert in both English and Spanish. RECO also will include a message on the Orange and Rockland/RECO website.

5. RECO shall notify the Board and Rate Counsel if it anticipates any changes in its EDPA procedures.

Response:

RECO is agreeable to this recommendation.

6. RECO shall notify the Board and Rate Counsel if it learns of any problems implementing its EDPA procedures.

Response:

RECO is agreeable to this recommendation.

7. The rate impact and prudence of RECO's EDPA procedures and their costs will be reviewed in the Company's next base rate case or other appropriate proceeding.

Response:

As noted above, RECO is agreeable to this recommendation.

8. This Order shall not affect nor in any way limit the exercise of the authority of the Board or of this State, in any future petition or in any proceeding with respect to rates, franchises, service, financing, accounting, capitalization, depreciation, or any other matter affecting the Company.

Response:

RECO is agreeable to this recommendation.

Please contact me if you have any questions regarding this filing.

Very truly yours,

/s/ John L. Carley

John L. Carley
Associate General Counsel

c: (all via electronic mail)

For Board Staff:

DAG Terel Klein

Richard Lambert

Julie Ford

Carol Artale

Suzanne Patnaude