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November 4, 2020

VIA ELECTRONIC MAIL

aida.camacho@bpu.nj.gov
board.secretary@bpu.nj.gov

Aida Camacho-Welch
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, 9th 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 a
Voluntary Program for Plug-In Vehicle Charging
BPU Docket No. EO18020190

Dear Secretary Camacho-Welch:

The undersigned represents Atlantic City Electric Company ("ACE" or the "Company") in the above referenced matter.

Please accept this letter in lieu of a more formal response to the pending request for a further modification of the Amended Procedural Schedule, filed by Bevan, Mosca, & Giuditta P.C., counsel for ChargePoint, on October 29, 2020. As a preliminary matter, the Company respectfully differs with counsel's statement that ACE's rebuttal testimony constituted an "amendment" to the Company's filing. The Company was simply making a good faith effort to have its electric vehicle proposal be reflective of, and sensitive to, the Board of Public Utilities' (the "Board") policy direction as set forth in the Straw Proposal.

ACE is in agreement with most of the date changes noted in Mr. Bevan's letter. We continue to object, however, to counsel's request for written sur-rebuttal testimony. The Company respectfully submits that this extra procedural step is highly unusual, especially when the existing amended Procedural Schedule already provides for oral sur-rebuttal at the evidentiary hearings. ACE maintains that the time needed to prepare written sur-rebuttal can best be spent exploring common ground for a mutually acceptable resolution of the proposal. Moreover, no party is prejudiced in light of the fact that oral sur-rebuttal at the evidentiary hearings has already been provided for. In all other respects, ACE is in agreement with counsel's request.

Aida Camacho-Welch

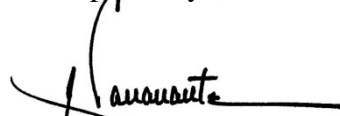
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Consistent with the Order issued by the Board in connection with *In the Matter of the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations*, BPU Docket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

Thank you for your cooperation and courtesies. Feel free to contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Passanante", written over a horizontal line.

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

Enclosure

cc: Service List (electronic mail)