



VIA EMAIL

aida.camacho@bpu.nj.gov

board.secretary@bpu.nj.gov

Aida Camacho-Welch
Secretary of the Board
New Jersey 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 the Smart Energy Network Program and Cost Recovery Mechanism and Other Related Relief.
BPU Docket No. EO20080541**

Dear Secretary Camacho-Welch:

On behalf of the Energy Efficiency Alliance of New Jersey (“EEA-NJ”), please accept for filing the attached Motion to Participate in the above-captioned matter. Please do not hesitate to contact us with questions or comments.

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 Motion is being electronically filed with the Secretary of the Board. No paper copies will follow.

Respectfully Submitted,

A handwritten signature in black ink that reads 'Erin Cosgrove'.

Erin Cosgrove
Director of Regulatory Affairs
Energy Efficiency Alliance of New Jersey

Cc: See attached service list

**State of New Jersey
Board of Public Utilities**

**IN THE MATTER OF THE PETITION
OF ATLANTIC CITY ELECTRIC
COMPANY FOR APPROVAL OF THE
SMART ENERGY NETWORK
PROGRAM AND COST RECOVERY
MECHANISM AND OTHER RELATED
RELIEF.**

Docket No.: EO20080541

MOTION TO PARTICIPATE

The Energy Efficiency Alliance of New Jersey (“EEA-NJ”) respectfully requests the New Jersey Board of Public Utilities (“Board”), pursuant to N.J.A.C. § 1:1-16.1, *et seq.*, grant its motion for participation in the above-captioned matter. All communications and correspondence concerning this proceeding should be directed to:

Erin Cosgrove
Energy Efficiency Alliance of New Jersey
701 E. Gate Dr.
Mt. Laurel, NJ 08054
(609) 710 - 0177
ecosgrove@eeaofnj.org

A. Introduction

1. EEA-NJ is a 501(c)(6) trade association that, together with its sister organization the Keystone Energy Efficiency Alliance (“KEEA”), represents 75 business members. These members manufacture, design, and implement energy efficiency improvements in buildings across Pennsylvania and New Jersey on behalf of regulated utilities, the state, and ratepayers.

2. On February 19, 2020, the New Jersey Board of Public Utilities (“Board” or “BPU”) found that Advanced Metering Infrastructure (“AMI”) “has the potential to benefit the distribution system, streamline and modernize utility operations, provide an enhanced

customer experience, and benefit the environment.”¹ As a result of this, and other, findings the Board ordered that all New Jersey electric distribution companies file petitions for AMI implementation.

3. On August 26, 2020, Atlantic City Electric Company (“ACE”) filed a plan to deploy an AMI program throughout its service territory, known as the Smart Energy Network.

B. Motion to Participate

4. Pursuant to N.J.A.C. § 1:1-16.6(a) a party may participate in a matter where they may have “a significant interest in the outcome” of those proceedings. N.J.A.C. § 1: 1-16.6(b) further provides that, a “judge shall consider whether the participant’s interest is likely to add constructively to the case without causing undue delay or confusion.”

5. EEA-NJ has a significant interest in this case and will be able to add constructively without causing confusion or delay.

6. EEA-NJ and its New Jersey members have a significant interest in this case. EEA-NJ is a 501(c)(6) trade association that represents the energy efficiency industry. EEA-NJ represents 75 business members that manufacture, design, and implement energy efficiency improvements in buildings across New Jersey on behalf of regulated utilities, the State, and ratepayers. Advanced Metering Infrastructure (“AMI”) programs provide the opportunity to improve and advance energy efficiency and demand response program offerings across the state.

¹ See I/M/O the Petition of Rockland Electric Company for Approval of An Advanced Metering Program; and for Other Relief, BPU Docket No. ER16060524, Decision and Order (dated February 19, 2020 and effective on February 29, 2020), at 2.

7. EEA-NJ is a well-established energy efficiency organization in New Jersey and offers a unique perspective of the energy efficiency business experience. EEA-NJ has been a constructive and unique presence in numerous Board stakeholder meetings, often offering comments. Therefore, EEA-NJ can add measurably and constructively to the case by offering its perspective and expertise.

8. Finally, EEA-NJ's intervention in this action will not cause any confusion or undue delay. EEA-NJ will aim to play a constructive role throughout this proceeding by coordinating its efforts with other parties and abiding the schedule set forth by the Board.

9. For the foregoing reasons, EEA-NJ respectfully requests that the Board grant this motion, and grant EEA-NJ participant status in this proceeding.

WHEREFORE, because EEA-NJ has a significant interest in this case and will add constructively to the case without undue delay or confusion, EEA-NJ respectfully requests participation in this proceeding.

Date: October 14, 2020

Respectfully submitted,



Erin Cosgrove, Esq.
Director of Regulatory Affairs
Energy Efficiency Alliance of New Jersey
701 E. Gate Dr.
Mt. Laurel, NJ 08054
(609) 710 - 0177
ecosgrove@eeaofnj.org

VERIFICATION

I hereby verify that the facts contained in the foregoing pleading are true and accurate to the best of my knowledge and that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter.

Date: October 14, 2020

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

Matt Elliott
Executive Director
Energy Efficiency Alliance of New Jersey
701 E. Gate Dr.
Mt. Laurel, NJ 08054
(609) 710 - 0177

**State of New Jersey
Board of Public Utilities**

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Docket Nos.: EO20080541

CERTIFICATION OF SERVICE

I, **ERIN COSGROVE**, of full age, certify as follows:

1. I am an attorney of the State of New Jersey and serve as Director of Regulatory Affairs to the Energy Efficiency Alliance of New Jersey, the Participant in the matter.
2. I hereby certify, on the date below, I caused the within Motion to Participate to be filed with the New Jersey Board of Public Utilities through sending an electronic copy to the Board Secretary's office at aida.camacho@bpu.nj.gov and board.secretary@bpu.nj.gov.
3. I further certify that, on the date below, I caused a complete copy of the Motion to Participate to be sent by electronic mail to each of the parties listed in the attached Service List.
4. 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 Motion is being electronically filed and no paper copies will follow.

5. I further and finally certify that the foregoing statements made by me are true. I am aware that, if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: October 14, 2020



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Mt. Laurel, NJ 08054
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Network Program and Cost Recovery Mechanism and Other Related Relief
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