

150 W State Street, Suite 5
Trenton, NJ 08608-1105

267-533-1671 – MS Teams
609-909-7033 – Trenton Office
609-393-0243 – Facsimile
cynthia.holland@exeloncorp.com

Mailing Address:

92DC42
500 N. Wakefield Drive
P.O. Box 6066
Newark, DE 19714-6066

atlanticcityelectric.com

July 29, 2021

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 New Jersey Board of Public Utilities' Response to the
COVID-19 Pandemic
BPU Docket No. AO20060471

Dear Secretary Camacho-Welch:

Pursuant to an Order Authorizing Establishment of a Regulatory Asset for Incremental COVID-19 Related Expenses (the "Order"), approved and issued by the New Jersey Board of Public Utilities (the "Board") on July 2, 2020, New Jersey's regulated utilities were authorized to defer COVID-19-related incremental costs and related offsets into a regulatory asset.

As stated in the Order:

the Board **HEREBY AUTHORIZES** each of the State's regulated utilities to create a COVID-19-related regulatory asset by deferring on their books and records the prudently incurred incremental costs related to COVID-19 beginning on March 9, 2020, and through September 30, 2021, or 60 days after Governor Murphy issues an order, declaration, proclamation, or similar announcement that the Public Health Emergency is no longer in effect, or in the absence of such an order, declaration, proclamation or similar announcement, 60 days from the time the Public Health Emergency automatically terminates pursuant to N.J.S.A. 26:13-3(b), whichever is later.

Aida Camacho-Welch

July 29, 2021

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In compliance with the Order and consistent with its terms, Atlantic City Electric Company (“ACE” or the “Company”) has tracked such prudently incurred incremental costs and includes the most current quarterly report as **Attachment 1**.¹ ACE will continue reporting these relevant costs on a quarterly basis.

The COVID-19-related incremental costs included in ACE’s report include lost late payment revenues, personal protective equipment, cleaning/sanitizing costs, hospital feeder inspections, and other costs. Additionally, the attached report includes informational data regarding aging of accounts receivable balances, as well as write-off information and number of reconnected customers, and a Cost Savings (Offsets) tab. Like other uncollectible expenses, the COVID-19-related incremental uncollectible expenses will be addressed in the Company’s next Societal Benefits Charge update/reconciliation filing and not included in the COVID-19 regulatory asset.

Considerations and costs related to the COVID-19 Pandemic remain very fluid, as do any incremental offsets. The Board has recently ordered changes to the Fresh Start and Universal Service Fund programs and required compliance by October 1, 2021. In addition, working group meetings continue and motions have been filed by certain utilities in this docket. Accordingly, ACE reserves the right to add additional incremental costs to this report or future quarterly reports.

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 letter and its attachment(s) are being electronically filed with the Secretary of the Board and the New Jersey Division of Rate Counsel. No paper copies will follow.

Should you have any questions or concerns regarding the above, please do not hesitate to contact me.

Respectfully submitted,



Cynthia L.M. Holland
An Attorney at Law of the
State of New Jersey

Enclosure

cc: Service List

¹ In light of exigencies created by the COVID-19 pandemic, **Attachment 1** is accompanied by a Certification in lieu of an Affidavit of Verification. The individual providing the Certification is a corporate officer of ACE.

Attachment 1

Atlantic City Electric Company ("ACE")
New Jersey
COVID-19 - Incremental Costs

	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Total
Incremental Costs due to Waiver of Disconnections																	
Note 1 Lost Late Payment Revenues	3,411	11,205	9,974	12,790	17,800	29,373	19,641	9,312	9,927	11,205	15,253	14,386	9,770	11,598	(1,348)	(17,954)	\$ 166,345
Total Incremental Costs due to Waiver of Disconnections	\$ 3,411	\$ 11,205	\$ 9,974	\$ 12,790	\$ 17,800	\$ 29,373	\$ 19,641	\$ 9,312	\$ 9,927	\$ 11,205	\$ 15,253	\$ 14,386	\$ 9,770	\$ 11,598	\$ (1,348)	\$ (17,954)	\$ 166,345
Note 2 Cost Savings (Offsets)	-	(107,793)	(192,540)	(179,378)	(131,075)	(154,807)	(157,801)	(152,193)	(164,186)	(173,271)	(176,597)	(153,700)	(189,600)	(186,774)	(195,298)	(182,713)	\$ (2,497,726)
Incremental PPE, Cleaning, Other																	
Personal Protective Equipment (PPE)	5,008	182,065	193,493	63,702	41,541	37,920	19,533	30,861	38,867	28,381	25,737	12,924	10,950	20,590	7,638	5,172	724,381
Cleaning	5,870	20,432	30,082	27,187	29,891	21,123	6,857	16,895	23,988	34,613	24,562	16,647	7,249	9,946	29,162	9,003	313,508
Hospital Feeder Inspections	-	-	39	-	-	-	-	-	-	-	-	-	-	-	-	-	39
Health Screening	-	-	29,662	25,183	37,674	6,534	-	-	-	-	-	-	-	-	-	-	99,053
Sequestering - Hotels	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bright Horizons	-	2,591	120,350	76,723	67,379	32,908	(6,586)	15,264	-	-	-	-	-	-	-	-	308,629
Other	614	19,726	26,022	30,681	53,187	29,718	45,849	29,334	63,540	44,428	32,159	17,969	10,850	5,092	2,000	1,392	412,561
Total Incremental PPE, Cleaning, Other	11,492	224,813	399,648	223,476	229,672	128,202	65,653	92,354	126,395	107,423	82,457	47,540	29,049	35,628	38,800	15,566	1,858,171
New Jersey Allocation %	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Total Atlantic City Electric Company ("ACE") New Jersey Allocated	11,492	224,813	399,648	223,476	229,672	128,202	65,653	92,354	126,395	107,423	82,457	47,540	29,049	35,628	38,800	15,566	1,858,171
Total Atlantic City Electric Company ("ACE") New Jersey	\$ 14,903	\$ 128,225	\$ 217,083	\$ 56,888	\$ 116,398	\$ 2,769	\$ (72,507)	\$ (50,527)	\$ (27,863)	\$ (54,643)	\$ (78,886)	\$ (91,774)	\$ (150,782)	\$ (139,548)	\$ (157,846)	\$ (185,101)	\$ (473,210)
Total Cumulative Atlantic City Electric Company ("ACE") New Jersey	\$ 14,903	\$ 143,128	\$ 360,211	\$ 417,100	\$ 533,498	\$ 536,266	\$ 463,759	\$ 413,233	\$ 385,370	\$ 330,727	\$ 251,840	\$ 160,066	\$ 9,284	\$ (130,263)	\$ (288,109)	\$ (473,210)	

Footnotes:

Note 1 Refer to tab "Late Payment" for further support.

Atlantic City Electric Company ("ACE")
New Jersey
COVID-19 - Incremental Late Payment Fees

	Note 2											
	<u>Mar-20</u>	<u>Apr-20</u>	<u>May-20</u>	<u>Jun-20</u>	<u>Jul-20</u>	<u>Aug-20</u>	<u>Sep-20</u>	<u>Oct-20</u>	<u>Nov-20</u>	<u>Dec-20</u>	<u>Jan-21</u>	
Note 1 Baseline Late Payment Fees (Per Rates)	7,108	11,160	9,920	12,790	17,602	19,544	18,851	9,226	9,769	10,994	15,164	
Actual Late Payment Fees (GAAP)	3,697	(45)	(54)	-	(198)	(9,830)	(791)	(86)	(159)	(210)	(89)	
Incremental Lost Late Payment Fees	3,411	11,205	9,974	12,790	17,800	29,373	19,641	9,312	9,927	11,205	15,253	

Footnotes:

Note 1 The amounts reflected in Line 1 represent the annual late payment fees included in ACE Y 2018 ER18080925, pro rated monthly based on the NJ monthly base distribution revenues in ACE Y 2018 ER18080925.

Note 2 Please refer to NJ Docket No. AO20060471, pages 3-4 for support regarding dates used for March 2020 pro-ratio.

"In view of these extraordinary circumstances and in an effort to minimize the financial impact of COVID-19 on the State's regulated utilities, the Board hereby authorizes each of the State's regulated utilities to create a COVID-19 related regulatory asset by deferring on their books and records the prudently incurred incremental costs related to COVID-19 beginning on March 9, 2020 and through September 30, 2021, or 60 days after Governor Murphy issues an order, declaration, proclamation, or similar announcement that the Public Health Emergency is no longer in effect, or in the absence of such an order, declaration, proclamation or similar announcement, 60 days from the time the Public Health Emergency automatically terminates pursuant to N.J.S.A. 26:13-3(b), whichever is later."

Atlantic City Electric Company ("ACE")
New Jersey
COVID-19 - Offsets

	<u>Mar-20</u>	<u>Apr-20</u>	<u>May-20</u>	<u>Jun-20</u>	<u>Jul-20</u>	<u>Aug-20</u>	<u>Sep-20</u>	<u>Oct-20</u>	<u>Nov-20</u>	<u>Dec-20</u>	<u>Jan-21</u>
Note 1 Baseline Travel, Meals, Entertainment (Per Rates)	-	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614
Actual Travel Meals, Entertainment	-	110,821	26,074	39,236	87,539	63,807	60,812	66,421	54,428	45,343	42,017
Incremental COVID-Related Savings	-	107,793	192,540	179,378	131,075	154,807	157,801	152,193	164,186	173,271	176,597

Footnotes:

Note 1 Amounts represent a twelve-month average of ACE and PHISCO allocated travel and meals & entertainment costs from ACE Y 2018 ER18080925 (January 2018 - December 2018).

**Atlantic City Electric Company ("ACE")
New Jersey
COVID-19 - Incremental Costs
Other Data**

	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20
Receivable Aging Data (AVR \$)											
0-30 Days	49,746,172	42,512,628	44,860,247	35,298,231	44,889,552	82,333,130	93,950,811	83,654,838	55,606,286	50,559,872	60,406,187
31-60 Days	12,746,794	10,884,831	12,521,984	11,749,117	8,480,397	10,110,831	17,636,353	18,770,863	17,985,726	11,865,624	9,465,393
61-90 Days	6,039,013	7,899,478	7,346,620	7,515,076	7,033,467	4,950,589	6,099,837	9,413,128	12,437,450	11,295,547	6,517,737
91-120 Days	3,186,241	4,459,105	6,503,741	5,605,073	5,773,020	5,157,274	4,190,572	4,753,974	7,073,206	9,976,143	9,032,547
121-150 Days	3,102,139	2,474,353	3,957,333	5,639,327	4,674,436	4,637,380	3,843,944	3,476,938	4,033,694	6,221,735	9,098,402
151+ Days	11,728,896	12,078,606	13,300,578	15,723,938	19,432,334	22,098,755	23,658,751	20,260,275	20,378,461	22,329,091	26,045,559
Total	\$ 86,549,255	\$ 80,309,001	\$ 88,490,503	\$ 81,530,762	\$ 90,283,206	\$ 129,287,959	\$ 149,380,268	\$ 140,330,015	\$ 117,514,824	\$ 112,248,012	\$ 120,565,826
Receivable Aging Data (Total Customers)											
0-30 Days	286,593	262,687	271,395	277,482	269,352	282,563	281,203	291,839	277,315	286,221	298,231
31-60 Days	48,080	46,755	43,494	40,181	37,490	36,180	46,863	47,020	50,602	43,150	45,838
61-90 Days	22,545	25,864	24,637	22,213	18,049	15,247	15,787	20,838	26,144	25,522	18,267
91-120 Days	15,097	16,270	17,864	16,137	14,393	10,663	9,007	10,036	13,815	17,490	16,830
121-150 Days	12,199	10,995	13,014	13,979	11,827	9,839	7,875	6,610	7,899	10,975	14,100
151+ Days	79,691	82,013	85,163	89,819	94,067	94,986	94,438	84,100	81,884	83,284	87,211
Total	464,205	444,584	455,567	459,811	445,178	449,478	455,173	460,443	457,659	466,642	480,477
Write-Offs Data											
Actual Write-Off	863,626	440,380	(9,359)	(31,937)	(17,390)	125,595	801,213	3,923,101	169,307	14,236	30,212
Recoveries	(161,618)	(208,462)	(159,300)	(132,771)	(99,683)	(105,571)	(90,662)	(87,441)	(133,298)	(98,779)	(81,835)
Net Write-Offs	702,007	231,918	(168,659)	(164,709)	(117,073)	20,024	710,551	3,835,660	36,010	(84,543)	(51,624)
Cumulative Number of Customers Reconnected		32	101	186	213	219					

I/M/O 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 Nos. EO20030254 and AO20060471

Service List

BPU

Aida Camacho-Welch
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
aida.camacho@bpu.nj.gov
board.secretary@bpu.nj.gov

Christine Sadovy, Esquire
Chief of Staff
christine.sadovy@bpu.nj.gov

Robert Brabston, Esquire
Executive Director
robert.brabston@bpu.nj.gov

Stacy Peterson
Deputy Executive Director
stacy.peterson@bpu.nj.gov

Abraham Silverman, Esquire
General Counsel
abe.silverman@bpu.nj.gov

Carol Artale, Esquire
Deputy General Counsel
carol.artale@bpu.nj.gov

Heather Weisband, Esquire
heather.weisband@bpu.nj.gov

Alice Bator
Director, Division of Audits
alice.bator@bpu.nj.gov

Michael Kammer
Director, Division of Water
michael.kammer@bpu.nj.gov

Jamie Saunders
Deputy Director, Division of Energy
jamie.saunders@bpu.nj.gov

Lawanda Gilbert
Director, Division of Cable
Television and Telecommunications
lawanda.gilbert@bpu.nj.gov

Julie Ford-Williams
Director
Division of Customer Assistance
julie.ford@bpu.nj.gov

DIVISION OF LAW

Daren Eppley, Esquire
Division of Law
Hughes Justice Complex
Public Utilities Section
25 Market Street
P.O. Box 112
Trenton, NJ 08625
daren.eppley@law.njoag.gov

Pamela Owen, Esquire
pamela.owen@law.njoag.gov

RATE COUNSEL
Stefanie A. Brand, Esquire
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003
sbrand@rpa.nj.gov

Brian O. Lipman, Esquire
blipman@rpa.nj.gov

T. David Wand, Esquire
dwand@rpa.nj.gov

Susan McClure, Esquire
smcclure@rpa.nj.gov

Brian Weeks, Esquire
bweeks@rpa.nj.gov

Maria Novas-Ruiz, Esquire
mnovas-ruiz@rpa.nj.gov

Bethany Rocque-Romaine, Esquire
bromaine@rpa.nj.gov

Robert Glover, Esquire
rglover@rpa.nj.gov

Debora Layugan
dlayugan@rpa.nj.gov

RATE COUNSEL CONSULTANT

Susan Baldwin
13 Church Hill Street
Watertown, MA 02472
smbaldwinconsulting@gmail.com

ELECTRIC & GAS COMPANIES

ACE

Philip J. Passanante, Esquire
Assistant General Counsel
Atlantic City Electric Company
92DC42
500 N. Wakefield Drive
Newark, DE 19714-6066
philip.passanante@pepcoholdings.com

PSE&G

Matthew Weissman, Esquire
PSE&G
80 Park Plaza, T-5
Newark, NJ 07102-4194
matthew.weissman@pseg.com

Danielle Lopez
danielle.lopez@pseg.com

Bernard Smalls
bernard.smalls@pseg.com

Caitlyn White
caitlyn.white@pseg.com

Michele Falco
michele.falco@pseg.com

JCP&L

Joshua Eckert, Esquire
JCP&L
300 Madison Avenue
Morristown, NJ 07960
jeckert@firstenergycorp.com

ROCKLAND

John L. Carley, Esquire
Consolidated Edison Co. of NY
4 Irving Place
New York, NY 10003
carleyj@coned.com

NJNG

Andrew K. Dembia, Esquire
1415 Wycoff Road
P.O. Box 1464
Wall, NJ 07719
adembia@njng.com

**SOUTH JERSEY GAS &
ELIZABETHTOWN GAS**

Deborah Franco, Esquire
Regulatory Affairs Counsel
520 Green Lane
Union, NJ 07083
dfranco@sjindustires.com

BOROUGH OF BUTLER

Robert H. Oostdyk, Jr., Esquire
Murphy McKeon P.C.
51 Route 23 South
P.O. Box 70
Riverdale, NJ 07457
roostdyk@murphymckeonlaw.com

James Lampmann
Borough Administrator
1 Ace Road
Butler, NJ 07405
jlampmann@butlerborough.com

WATER/WASTEWATER COMPANIES**Gordon's Corner Water Company**

David G. Ern, President
27 Vanderburg Road
P.O. Box 145
Marlboro, NJ 07746
dgern@gordonscornerwater.com

Eric Olsen
eolsen@gordonscornerwater.com

Aqua NJ, Inc.

Adam Burger
10 Black Forest Road
Hamilton, NJ 08691
aburger@aquaamerica.com

Kimberly Joyce
kajoyce@aquaamerica.com

William C. Packer, Jr.
wcpackerjr@aquaamerica.com

NJ American Water Company

Bruce V. Miller, Esquire
Sarmili Saha, Esquire
Cullen Dykman LLP
One Riverfront Plaza
Newark, NJ 07102
bmiller@cullenllp.com
saha@cullenllp.com

Debbie Albrecht
debbie.albrecht@amwater.com

Fayson Lakes Water Company

John Cannie, President
160 Boonton Avenue
Kinnelon, NJ 07405
flwc@optonline.net

Montague Water Company

Steve Lubertozzi, President
2335 Sanders Road
Northbrook, IL 60062
steve.lubertozzi@uiwater.com

Middlesex Water Company

Dennis W. Doll
481 C Route 1 South, Suite 400
Iselin, NJ 08830
ddoll@middlesexwater.com

Jay Kooper
jkooper@middlesexwater.com

Suez Water NJ, Inc.

Rodolphe Bouichou
461 From Road, Suite 400
Paramus, NJ 07652
rodolphe.boulchou@suez.com

Mark Janovic
mark.janovic@suez.com

Jim Cagle
jim.cagle@suez.com

Midtown Water Company

John J. Brunetti, President
1655 US Highway 9
Old Bridge, NJ 08857

Shore Water Company

Samuel Faiello, President
105-23rd Avenue
South Seaside Park, NJ 08752
samsjf@verizon.net

Gloria Stuart
glorstuart@comcast.com

Simmons Water Company

David B. Simmons, Jr., President
P.O. Box 900
Branchville, NJ 07826
dbsjr@simmonstransport.com

Atlantic City Sewer Company

Tom Kavanaugh
Carl Cordek
1200 Atlantic Avenue, Suite 300
Atlantic City, NJ 08401
tkavanaugh@acsewerage.com
cordekc@aol.com

Lake Lenape Water Company

Jeffrey Fuller, President
83 Eagle Chase
Woodbury, NJ 11797
jmf1294@yahoo.com

Mt. Olive Villages Water Company

Henry K. Schwartz, President
200 Central Avenue
Mountainside, NJ 07902
zln1@aol.com

MUNICIPAL WATER COMPANIES

Richard Calbi, Director
Village of Ridgewood
131 N. Maple Avenue, Suite 5
Ridgewood, NJ 07450
rcalbi@ridgwoodnj.net

Chris O'Leary, General Manager
Borough of Park Ridge Water
53 Park Avenue
Park Ridge, NJ 07656
coleary@parkridgeboro.com

Art Dysart, Superintendent
Clinton Water and Sewer Utility
43 Leigh Street
Clinton, NJ 08809
artdysart@clintonnj.gov

Andrew Dujack, President
Town of Dover Water Commissioners
100 Princeton Avenue
Dover, NJ 07801

Robert Kinsey, Superintendent
Town of Dover Water
37 North Sussex Street
Dover, NJ 07801
rkinsey@dover.nj.us

John Allsebrook, Superintendent
Borough of Berlin Water Department
59 South White Horse Pike
Berlin, NJ 08009
dpwsupt@berlinnj.org

Kristin Epstein, Assistant Director
Trenton Water Works
333 Cortland Street
P.O. Box 528
Trenton, NJ 08604
kepstein@trentonnj.org

Patricia McGowan, Water Clerk
City of Bordentown Water Department
324 Farnsworth Avenue
Bordentown, NJ 08505
pmcgowan@cityofbordentown.com

John J. Wells, Licensed Operator
jwalls@cityofbordentown.com

Steve DiOrio, Superintendent
Collingswood Water Department
215 Hillcrest Avenue
Collingswood, NJ 08108
sdiorio@collingswood.com

Mike McIntyre, Director
Wildwood Water Utility
3416 Park Boulevard
Wildwood, NJ 08260
mmcintyre@wildwoodnj.org

**CABLE TV AND
TELECOMMUNICATIONS**

Altice USA (f/k/a/ Cablevision)
Marilyn D. Davis, Area Director
Government Affairs
Altice USA
494 Broad Street, 9th Floor
Newark, NJ 07102
marilyn.davis16@alticeusa.com

**Charter Communications f/k/a
Time Warner**
Michael A. Chowanec
VP-State Regulatory Affairs
Charter Communications
400 Atlantic Street
Stamford, CT 06901
michael.chowanec@charter.com

Comcast
Elizabeth Murray
Senior Director or Regulatory Affairs
Comcast
50 Randolph Road
Somerset, NJ 08873
elizabeth_murray@comcast.com

Stephanie Kosta
Vice President – Government Affairs
Comcast
3800 Horizon Boulevard, Suite 300
Trevose, PA 19053
stephanie_kosta@comcast.com

**Service Electric Cable TV of
Hunterdon, Inc.**
John Capparell
General Manager
Service Electric Cable TV
2260 Avenue A, LVIP#1
Bethlehem, PA 18017
jcapparell@spectv.com

Jennifer Brown
Regulatory Affairs Director
brownj@spectv.com

**INCUMBENT LOCAL
EXCHANGE CARRIERS (ILECS)**

Verizon New Jersey, Inc.
Ava-Marie Madeam
Vice President - State Regulatory
Affairs NY, NJ, CT
999 West Main Street, 3rd Floor
Freehold, NJ 07728
avamarie.p.madeam@verizon.com

Sylvia Del Vecchio, Manager
Verizon New Jersey, Inc.
9 Gates Avenue, 2nd Floor
Montclair, NJ 07042-3399
sylvia.i.del.vecchio@verizon.com

Richard C. Fipphen, Esquire
Assistant General Counsel
Verizon New Jersey, Inc.
140 West Street, 6th Floor
New York, NY 10007
richard.fipphen@verizon.com

CenturyLink
Josh Motzer
Director – State Government
Relations
37 W. Broad Street, Suite 470
Columbus, OH 43215
josh.motzer@centurylink.com

**Momentum Telecom
(Warwick Valley)**
Virginia O'Hanlon
Manager - Regulatory & Tax
Compliance
47 Main Street
Warwick, NY 10990
vohanlon@momentumtelecom.com

AT&T
Charlene Brown
VP External Affairs – NJ
AT&T
192 West State Street
Trenton, NJ 08873
cb1362@att.com

**Service Electric of Cable TV
New Jersey, Inc.**
Robert H. Williams, Esquire
General Manager
320 Sparta Avenue
Sparta, NJ 07871
bobw@secable.com

Robbin Blessing
Assistant Manager
robbin@secable.com

AARP
Janine G. Bauer, Esquire
101 Grovers Mill Road, Suite 200
Lawrenceville, NJ 08648
jbauer@szaferman.com

Evelyn Liebman
Director of Advocacy
AARP NJ State Office
303 George Street, Suite 505
New Brunswick, NJ 08901
eliebman@aarp.org