atlantic city electric.

An Exelon Company

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September 1, 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 attorney is Assistant General Counsel to Atlantic City Electric Company in connection with the above referenced matter. Please accept this communication in lieu of a more formally styled motion for a modification to the Procedural Schedule in connection with the above referenced matter.¹

In an effort to fully respond to all pending discovery requests and provide an opportunity for meaningful and continued settlement discussions, all parties to this matter (the "Parties") respectfully request that Commissioner Chivukula, the assigned Hearing Officer, adopt the following changes to the existing Procedural Schedule:²

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¹ In making this request, the Parties respectfully refer to the Prehearing Order and Procedural Schedule attached thereto at Exhibit A. The Procedural Schedule was part of an Order Modifying the Procedural Schedule, dated April 9, 2020.

² The undersigned counsel has consent of the Parties to file this request with the New Jersey Board of Public Utilities (the "Board" or "BPU").

	Existing Schedule	Proposed Schedule
Rate Counsel/Intervenor Direct Testimony	September 2, 2020	September 18, 2020
Due		
Discovery Propounded on Rate	September 10, 2020	September 25, 2020
Counsel/Intervenors Direct Testimony		
Responses to Discovery	September 25, 2020	October 7, 2020
Rebuttal Testimony Filed by Parties as	October 2, 2020	October 14, 2020
Appropriate		
Discovery Requests Propounded on	October 14, 2020	October 21, 2020
Rebuttal Testimony		
Public Hearings (2)	TBA	TBA
Responses to Discovery Requests on	October 29, 2020	November 2, 2020
Rebuttal Testimony		
Settlement Conference, if Necessary	Week of	November 4 or 5, 2020
	November 2, 20202	
Evidentiary Hearings, With Oral	Week of	Week of
Surrebuttal	November 9, 2020	November 9, 2020

All other dates in the Procedural Schedule remain unchanged. The Parties also note that there is an open Motion for Leave to Intervene on Behalf of Electrify America, LLC (the "Motion") that was filed on or about August 6, 2020. Supporting and opposing papers have been filed in the matter. The Motion has not yet been decided.

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 communication is being electronically filed with the Secretary of the Board, the New Jersey Division of Rate Counsel, and the Parties. No paper copies will follow.

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

Respectfully submitted,

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

Enclosure

cc: Honorable Upendra J. Chivukula

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I/M/O Petition of Atlantic City Electric Company for Approval of a Voluntary Program for Plug-In Vehicle Charging BPU Docket No. EO18020190

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