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Docket #: ET21101152-

Case Caption: ATLANTIC CITY ELECTRIC COMPANY - REQUESTING APPROVAL OF ITS RIDER REMOTE NET ENERGY METERING ("RNEM") TARIFF PURSUANT TO N.J.A.C. 14:1-5.11 AND N.J.A.C. 14:3-1.3

BPU,

Our only comment is on the last sentence of the 2nd paragraph of the proposed Rider RNM

"None of the accounts can be included in a previous aggregation for another qualified customer facility **or be a NEM customer.**" **Emphasis** added is ours.

A public entity that has already maximized their limited onsite solar generation potential (by previously becoming a NEM customer through hosting a small solar system) should be able to obtain more solar energy through Rider RNM, and this language precludes that.

For example, we have a current customer that is a sewer authority public entity in ACE territory that is severely space constrained for solar and was only able to offset 20% of their usage with solar from an onsite, NEM solar project. The sewer authority wants to do more solar to save money and be even more green. The greater borough of which they are a part could host a system to offset the remainder of the sewer authority's usage (and would be the highest and best use of the potential property), but with this "None of the accounts can [...] be a NEM customer" language, the sewer authority's one and only ACE account would not be eligible for Rider RNM because they are already a NEM customer.

The administrative burden on ACE will not be large to add to the NEM production monthly on the customer bill the additional RNM production allocated. It will likely be a manual process for ACE to calculate a non-NEM customer's net energy via RNM, so should be the same cost/expense for a current NEM customer to implement solar via RNM.

From our reading of the law enacted, there is nothing in the law that precludes Remote Net Metering from public entities that already have a small onsite solar system. Also, we note that the Remote Net Metering language in the rate schedules approved by the BPU for JCP&L do not have this exclusion of current NEM customers that ACE has proposed. We would suggest striking the last portion regarding NEM customers so the last sentence reads "None of the accounts can be included in a previous aggregation for another qualified customer facility."

Thank you for your consideration.

-Anthony Fotopoulos

Partner

Keystone Power Holdings