

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

March 16, 2022

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, 1st Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

RE: In the Matter of the Letter Petition of Atlantic City Electric Company
Requesting Approval of Its Rider Remote Net Energy Metering (“RNM”) Tariff
Pursuant to N.J.A.C. 14:1-5.11 and N.J.A.C. 14:3-1.3
BPU Docket No. ET21101152

Dear Secretary Camacho-Welch:

In the above referenced docket, in accordance with N.J.A.C. 14:1-5.11 and N.J.A.C. 14:3-1.3, Atlantic City Electric Company (“ACE” or the “Company”) has requested that the New Jersey Board of Public Utilities (the “Board”) approve of the Company’s Rider RNM – Remote Net Energy Metering tariff. The Company has had meetings with Board Staff and Rate Counsel. ACE, Board Staff, Rate Counsel, and Intersect have also met to discuss the proposed RNM Tariff.

Having engaged in these various discussions, the Company believes it has reached consensus among the parties to this proceeding about the language of the RNM Tariff. ACE accordingly submits the enclosed Clean and Redlined versions of the proposed RNM Tariff (**Exhibit A**). ACE recognizes that public entities have expressed an interest in the RNM process and timely approval of the proposed RNM Tariff will enable the Company to provide this service to customers in accordance with the law.

Aida Camacho-Welch

March 16, 2022

Page 2

Pursuant to 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, on March 19, 2020, this correspondence is electronically filed with the Board and the service list, with courtesy copy to Counsel for Intersect. No paper copies will follow.

Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cynthia L.M. Holland". The signature is written in a cursive, flowing style.

Cynthia L.M. Holland

Enclosure

cc: Service List

Exhibit A

RIDER RNEM
Remote Net Energy Metering

Limitations and Qualifications for Remote Net Metering (BPU Docket No. QO18070697, Orders dated September 17, 2018 and August 18, 2021)

The Clean Energy Act, P.L. 2018, Chapter 17, Section 6 required the BPU to establish an application and approval process to facilitate Remote Net Metering in which a public entity certified to act as a host customer with a solar electric energy project may allocate credits to other public entities within the same electric public utility service territory. On September 17, 2018, the Board established the application and approval process and defined public entity for Remote Net Metering, in Docket No. QO18070697; this process was further clarified by Order dated August 18, 2021.

To qualify for Remote Net Metering a customer must be a public entity, which is a State entity, school district, county, county agency, county authority, county community college, municipality, municipal agency, municipal authority or public university that has completed the BPU-approved application process and received BPU approval for certification as a participant eligible to receive Remote Net Metering credits. A host customer is a public entity that proposes to host a solar electric generation facility on its property in the Atlantic City Electric Co. ("ACE" or the "Company") service territory. The entities designated to receive credits are considered to be receiving customers. Receiving customers must be public entities also located in the ACE service territory. Both the host customer and the receiving customer must be a customer of record of ACE. Receiving customers must maintain positive bill payment practices on their ACE account to remain eligible for credits. There may be no more than 10 receiving customer accounts per host customer. Host customer and receiving customers must be served by Basic Generation Service ("BGS") or be supplied by the same (third-party) energy supplier. None of the accounts can be included in a previous aggregation for another qualified customer facility or be a NEM customer.

Eligible public entities must follow the established application and approval process to certify public entities to act as a host customer for Remote Net Metering, requiring submittal of the BPU-approved form of "Public Entity Certification Agreement" used by the host customers and receiving customers, which shall be fully executed and provided to ACE and the BPU, reviewed by the Staff of the BPU, and approved by the BPU prior to the application of any Remote Net Metering credits. The Public Entity Certification Agreement is available on the New Jersey Clean Energy Program website as well as the Company's website in the section dedicated to information regarding net metering and interconnection processes. The standard form "Public Entity Certification Agreement" must be fully executed by the host customer and each receiving customer, be accompanied by the BPU-approved standard form of Interconnection Application (Part 1) as used for all net metered projects and be delivered to both BPU Staff and the Company. The Company and BPU Staff will review the Public Entity Certification Agreement for administrative completeness. Within 10 business days, the Company will provide its input to BPU Staff, whereupon BPU Staff will issue a notice of its findings to the contact person listed on the form. Following the issuance of a notice of administrative completeness, the Company will have 20 business days to review the application for eligibility and feasibility, including the proposed system size and all account information and make a recommendation to BPU Staff to approve or deny. In the case of a recommendation of denial, the Company will provide to BPU Staff a description of the deficiencies and potential means to correct the deficiencies. BPU Staff will present the fully executed "Public Entity Certification Agreement" and Part 1 of the Interconnection application to the Board with a recommendation for approval or denial. The Company, contingent on the cooperation of the Public Entity Applicant(s), will perform any additional technical processing of the eligible public entities' interconnection application, subject to the Board's final approval or denial. ACE is not responsible for resolving disputes which may arise between host customer and receiving customers.

Host Customer Solar Electric Generator Sizing for Remote Net Metering: The size of a host customer's solar electric generation facility shall be limited to the installed capacity that can produce electricity on an annual basis in an amount not to exceed the total average usage of the applicable host customer's electric account(s) with the Company. The host customer is not required to use more than one account for purposes of sizing the solar electric generation facility. However, the solar facility must be located on property containing at least one Company electric meter for the host customer. The host customer must identify which account(s) to use to calculate the total average usage for the previous 12 months of consumption in kWhs. The total quantity of annual, historic consumed kWh will be divided by the number of accounts, if more than one account is used, and 1,200 annual kWh per kilowatt ("kWdc") to arrive at the maximum capacity for the solar electric generation facility in kW ("kWdc" and "kWac").

Date of Issue:

Effective Date:

Issued by:

RIDER RNEM (Continued)
Remote Net Energy Metering

Billing and Credits for Remote Net Metering: No more than 10 receiving accounts may be party to a Public Entity Certification Agreement and no less than 10% of the solar electric generating facility output may be allocated to a receiving customer account and intended primarily to offset all or part of the receiving customer's own electricity requirements except to the extent that 10% of the solar electric generating facility output is greater. Receiving customers must maintain positive payment practices on their ACE accounts to remain eligible to receive credits. The terms and conditions of the Public Entity Certification Agreement, including all designated receiving accounts and their associated percentage of output allocations, shall be fixed throughout the annualized period with the exception of a once per annum opportunity to reallocate upon BPU's approval of a revision to a Public Entity Certification Agreement, which is re-executed with all parties' approval, including the Company. The host customer shall agree to the installation of a revenue grade production meter at its expense that is specified, owned, and installed by the Company. This revenue grade production meter will record the solar generation at the host site. On a monthly basis, the Company shall use the metered kWh data produced by the solar electric generation facility on the host customer property to calculate the credits due to receiving customers. The monthly output will be allocated to receiving customers according to the percentage allotments indicated on the approved Public Entity Certification Agreement. The value of a Remote Net Metering credit will reflect a rough approximation of the generation, transmission and distribution value of a kWh produced by the solar electric generation facility. Each credited kWh for a receiving customer shall offset the variable kWh charges of a receiving customer, except for the SBC charge. No fixed, demand (\$/kW), customer or SBC charges shall be offset by a remote net metering credit. On a monthly basis, the Company will credit an apportioned amount of kWh output from the solar facility in the form of kWh to be deducted from the kWh consumed by the receiving customers according to the percentage allotments indicated on the approved Public Entity Certification Agreement. The apportioned amount of solar electricity generated in kWh, the gross amount of electricity consumed and the net amount of kWh after credit allocation will be identified on the monthly electric bills of the designated receiving customer account. The receiving customers will be charged the SBC amounts attributable to the apportioned credit kWh. The application of an annualized period as currently used in the net metering rules at N.J.A.C. 14:8-4.2 shall apply to remote net metering host customers and receiving customers. Any excess generation for an individual receiving customer account after a monthly credit allocation shall be carried over to the next month within the annualized period. If an individual receiving customer account holds credits at the end of an annualized period, the account shall be trued up consistent with current net metering practice, with excess kWh compensated at the average annual LMP in the Company's transmission zone.

Remote Net Metering customers shall be responsible for all interconnection costs.

Date of Issue:

Effective Date:

Issued by:

RIDER RNEM
Remote Net Energy Metering**Limitations and Qualifications for Remote Net Metering (BPU Docket No. QO18070697, Orders dated September 17, 2018 and August 18, 2021)**

The Clean Energy Act, P.L. 2018, Chapter 17, Section 6 required the BPU to establish an application and approval process to facilitate Remote Net Metering in which a public entity certified to act as a host customer with a solar electric energy project may allocate credits to other public entities within the same electric public utility service territory. On September 17, 2018, the Board established the application and approval process and defined public entity for Remote Net Metering, in Docket No. QO18070697; [this process was further clarified by Order dated August 18, 2021](#).

To qualify for Remote Net Metering a customer must be a public entity, which is a State entity, school district, county, county agency, county authority, county community college, municipality, municipal agency, municipal authority or public university that has completed the BPU-approved application process and received BPU approval for certification as a participant eligible to receive Remote Net Metering credits. A host customer is a public entity that proposes to host a solar electric generation facility on its property in the Atlantic City Electric Co. ("ACE" or the "Company") service territory. The entities designated to receive credits are considered to be receiving customers. Receiving customers must be public entities also located in the ACE service territory. Both the host customer and the receiving customer must be a customer of record of ACE. Receiving customers must maintain positive bill payment practices on their ACE account to remain eligible for credits. There may be no more than 10 receiving customer accounts per host customer. Host customer and receiving customers must be served by Basic Generation Service ("BGS") ~~under the same eligible rate schedule~~ or be supplied by the same (third-party) energy supplier. None of the accounts can be included in a previous aggregation for another qualified customer facility or be a NEM customer.

Eligible public entities must follow the established application and approval process to certify public entities to act as a host customer for Remote Net Metering, requiring submittal of the BPU-approved form of "Public Entity Certification Agreement" used by the host customers and receiving customers, which shall be fully executed and provided to ACE and the BPU, reviewed by the Staff of the BPU, and approved by the BPU prior to the application of any Remote Net Metering credits. The Public Entity Certification Agreement is available on the New Jersey Clean Energy Program website as well as the Company's website in the section dedicated to information regarding net metering and interconnection processes. The standard form "Public Entity Certification Agreement" must be fully executed by the host customer and each receiving customer, be accompanied by the BPU-approved standard form of Interconnection Application (Part 1) as used for all net metered projects and be delivered to both BPU Staff and the Company. The Company and BPU Staff will review the Public Entity Certification Agreement for administrative completeness. Within 10 business days, the Company will provide its input to BPU Staff, whereupon BPU Staff will issue a notice of its findings to the contact person listed on the form. Following the issuance of a notice of administrative completeness, the Company will have 20 business days to review the application for eligibility and feasibility, including the proposed system size and all account information and make a recommendation to BPU Staff to approve or deny. In the case of a recommendation of denial, the Company will provide to BPU Staff a description of the deficiencies and potential means to correct the deficiencies. BPU Staff will present the fully executed "Public Entity Certification Agreement" and Part 1 of the Interconnection application to the Board with a recommendation for approval or denial. ~~The BPU's approval or denial will guide the Company action. The Company, contingent on the cooperation of the Public Entity Applicant(s), will perform any additional technical processing of the eligible public entities' interconnection application, subject to the Board's final approval or denial.~~ ACE is not responsible for resolving disputes which may arise between host customer and receiving customers.

Host Customer Solar Electric Generator Sizing for Remote Net Metering: The size of a host customer's solar electric generation facility shall be limited to the installed capacity that can produce electricity on an annual basis in an amount not to exceed the total average usage of the applicable host customer's electric account(s) with the Company. The host customer is not required to use more than one account for purposes of sizing the solar electric generation facility. However, the solar facility must be located on property containing at least one Company electric meter for the host customer. The host customer must identify which account(s) to use to calculate the total average usage for the previous 12 months of consumption in kWhs. The total quantity of annual, historic consumed kWh will be divided by the number of accounts, if more than one account is used, and 1,200 annual kWh per kilowatt ("kWdc") to arrive at the maximum capacity for the solar electric generation facility in kW ("kWdc" and "kWac").

Date of Issue:**Effective Date:****Issued by:**

RIDER R_{NE}M (Continued)
Remote Net Energy Metering

Billing and Credits for Remote Net Metering: No more than 10 receiving accounts may be party to a Public Entity Certification Agreement and no less than 10% of the solar electric generating facility output may be allocated to a receiving customer account and intended primarily to offset all or part of the receiving customer's own electricity requirements except to the extent that 10% of the solar electric generating facility output is greater. Receiving customers must maintain positive payment practices on their ACE accounts to remain eligible to receive credits. The terms and conditions of the Public Entity Certification Agreement, including all designated receiving accounts and their associated percentage of output allocations, shall be fixed throughout the annualized period with the exception of a once per annum opportunity to reallocate upon BPU's approval of a revision to a Public Entity Certification Agreement, which is re-executed with all parties' approval, including the Company. The host customer shall agree to the installation of a revenue grade production meter at its expense that is specified, owned, and installed by the Company. This revenue grade production meter will record the solar generation at the host site. On a monthly basis, the Company shall use the metered kWh data produced by the solar electric generation facility on the host customer property to calculate the credits due to receiving customers. The monthly output will be allocated to receiving customers according to the percentage allotments indicated on the approved Public Entity Certification Agreement. The value of a Remote Net Metering credit will reflect a rough approximation of the generation, transmission and distribution value of a kWh produced by the solar electric generation facility. Each credited kWh for a receiving customer shall offset the variable kWh charges of a receiving customer, except for the SBC charge. No fixed, demand (\$/kW), customer or SBC charges shall be offset by a remote net metering credit. On a monthly basis, the Company will credit an apportioned amount of kWh output from the solar facility in the form of kWh to be deducted from the kWh consumed by the receiving customers according to the percentage allotments indicated on the approved Public Entity Certification Agreement. The apportioned amount of solar electricity generated in kWh, the gross amount of electricity consumed and the net amount of kWh after credit allocation will be identified on the monthly electric bills of the designated receiving customer account. The receiving customers will be charged the SBC amounts attributable to the apportioned credit kWh. The application of an annualized period as currently used in the net metering rules at N.J.A.C. 14:8-4.2 shall apply to remote net metering host customers and receiving customers. Any excess generation for an individual receiving customer account after a monthly credit allocation shall be carried over to the next month within the annualized period. If an individual receiving customer account holds credits at the end of an annualized period, the account shall be trued up consistent with current net metering practice, with excess kWh compensated at the average annual LMP in the Company's transmission zone.

Remote Net Metering customers shall be responsible for all interconnection costs.

Date of Issue:

Effective Date:

Issued by:

In the Matter of the Petition of 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 Docket No. ET21101152

Service List

BPU

Aida Camacho-Welch •
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350
aida.camacho@bpu.nj.gov
board.secretary@bpu.nj.gov

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

Paul Lupo
paul.lupo@bpu.nj.gov

Abraham Silverman, Esq.
abe.silverman@bpu.nj.gov

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

William Barkasy
william.barkasy@bpu.nj.gov

Kelly Mooij
kelly.mooij@bpu.nj.gov

Ariane Benrey
ariane.benrey@bpu.nj.gov

B. Scott Hunter
benjamin.hunter@bpu.nj.gov

Suzanne Patnaude
suzanne.patnaude@bpu.nj.gov

Donna Thomas
donna.thomas@bpu.nj.gov

Jason Forsythe
jason.forsythe@bpu.nj.gov

Cindy Bianco
cindy.bianco@bpu.nj.gov

DIVISION OF LAW

Daren Eppley, Chief
Deputy Attorney General
Division of Law
Hughes Justice Complex
25 Market Street
P.O. Box 112
Trenton, NJ 08625
daren.eppley@law.njoag.gov

Pamela L. Owen, Assistant Chief
Deputy Attorney General
pamela.owen@law.njoag.gov

Brandon C. Simmons, Esq.
brandon.simmons@law.njoag.gov

Steven A. Chaplar, Esq.
steven.chaplar@law.njoag.gov

RATE COUNSEL

Brian O. Lipman, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003
blipman@rpa.nj.gov

Sarah H. Steindel, Esq.
ssteinde@rpa.nj.gov

Maura Caroselli, Esq.
mcaroselli@rpa.nj.gov

ACE

Cynthia L.M. Holland, Esq.
Assistant General Counsel
Atlantic City Electric Company
92DC42
500 N. Wakefield Drive
P.O. Box 6066
Newark, DE 19714-6066
cynthia.holland@exeloncorp.com

Susan DeVito
Director, Pricing and Regulatory
Services
susan.devito@pepcoholdings.com

Thomas M. Hahn
Principal Rate Analyst
thomas.hahn@pepcoholdings.com

Heather Hall
Manager, Regulatory Affairs –
New Jersey
heather.hall@pepcoholdings.com

INTERSECT ENERGY, LLC

Steven S. Goldenberg, Esquire
Giordano, Halleran & Ciesla, P.C.
125 Half Mile Road, Suite 300
Red Bank, NJ 07701
sgoldenberg@ghclaw.com