

Cynthia L. M. Holland
Assistant General Counsel

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

Mailing Address:
92DC42

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

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

atlanticcityelectric.com

September 16, 2022

VIA ELECTRONIC MAIL

carmen.diaz@bpu.nj.gov
board.secretary@bpu.nj.gov

Carmen D. Diaz
Acting Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, NJ 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 Acting Secretary Diaz:


This submission is respectfully made on behalf of Atlantic City Electric Company (“ACE” or the “Company”) in compliance with the September 14, 2021 Order of President Fiordaliso (“September 14 Order”). In that Order, President Fiordaliso directed interested parties to submit comments addressing the questions presented no later than sixty days from the date of the Order. The President further directed that reply comments be submitted no later than twenty-one days after initial comments. Accordingly, ACE respectfully submits its initial comments with this correspondence.

Consistent with the Orders 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 and May 20, 2020, respectively, this document is being electronically filed with the Board and the New Jersey Division of Rate Counsel. No paper copies will follow.

Carmen D. Diaz
September 16, 2022
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Thank you for your time and attention to this matter. Please direct any further inquiries regarding this matter to the undersigned.

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
An Attorney at Law of the
State of New Jersey

Enclosure

cc: Service List (electronic only)

**In the Matter of the New Jersey Board of Public Utilities’
Response to the COVID-19 Pandemic
BPU Docket No. AO20060471**

Comments of Atlantic City Electric Company

Atlantic City Electric Company (“ACE” or the “Company”) appreciates the opportunity to comment in this proceeding and offers the following for consideration by the Board of Public Utilities (“Board” or “BPU”).

Background and Procedural History

Since March 2020, the COVID-19 pandemic has required meaningful response from the State’s public utilities, to ensure the continued provision of safe, adequate, and proper service to customers dealing with extraordinary circumstances. On July 2, 2020, the Board issued an Order authorizing each of the State’s public utilities to create a COVID-19 regulatory asset. The public utilities were authorized to defer the prudently incurred incremental costs related to the COVID-19 pandemic, beginning on March 9, 2020 through September 30, 2021 or 60 days after Governor Murphy issued an order, declaration, proclamation, or similar announcement that the Public Health Emergency is no longer in effect (“Regulatory Asset Period”).

On October 28, 2020, the Board issued an Order expanding the scope of this docket to examine all COVID-19 pandemic related issues by way of a generic proceeding, which allowed for a public comment period through November 30, 2020. ACE, as well as others, filed substantive comments in the docket. Notably, the Company responded to certain allegations presented by the Division of Rate Counsel (“Rate Counsel”) in this proceeding.

Prior to the conclusion of the Regulatory Asset Period, the gas public utilities sought an extension of the period through the end of 2023. On September 14, 2021, BPU issued an order extending the Regulatory Asset Period from September 30, 2021 to December 31, 2022. The order required utilities to file a petition for recovery of these assets within 60 days of this new date. As stated in the Compliance Plan required by this order, on October 1, 2021, ACE indicated that it had stopped deferring COVID-19 related expenditures to the regulatory asset on September 30, 2021.

On July 20, 2022, President Fiordaliso issued an order establishing a schedule for interested parties to comment on several questions related to the regulatory asset. In addition, motions are pending for an extension of the Regulatory Asset Period through the end of 2023. ACE does not oppose such an extension, so long as recovery can commence prior to conclusion of the Regulatory Asset Period. As to the questions presented in President Fiordaliso’s Order, ACE provides the following comments.

Bad Debt or Uncollectible Account Recovery

As an initial matter, ACE offers an overview of its established rate recovery mechanism for bad debt. For more than two decades, New Jersey law has provided an appropriate cost recovery mechanism for bad debt associated with moratoriums and other social programs. That established cost recovery mechanism is the Societal Benefits Charge (“SBC”), which was included in the Electric Discount and Energy Competition Act (“EDECA”) as part of utility restructuring. Specifically, the statute establishes a cost recovery mechanism for “social programs” that achieve public policy goals. *N.J.S.A. 48:3-60a(1)*.

Continuing established consumer protections was a major concern for the Board during restructuring. The definition of “social programs” is clarified through the legislative history behind EDECA. Specifically, in the Findings and Recommendations of the Board in BPU Docket Number EX94120585Y, the Board stated that it was “determined to preserve the provision and funding for existing social protection programs, including the winter moratorium program, the costs associated with serving ‘bad debt’ customers, low-income assistance and weatherization programs.”¹ As the Board recognized, “[e]lectric utilities have also been relied upon to ensure universal access to electricity service, to be the provider of certain social programs, and to be *an integral part of a societal safety net for those less fortunate consumers who are unable to pay their utility bills* for reasons beyond their control.”²

In response to objections to including social programs in utility rates, the Board indicated that “numerous social programs or policies,” such as the cost of serving bad debt customers, “are vitally important to numerous residents, and have become ingrained in the fabric of the State’s utility industry.”³ The Board went on to “*emphasize* that electric utilities having the obligation of implementing social programs . . . should not be financially or competitively disadvantaged as a result.”⁴ The Board then proposed a mechanism for “timely recovery of these costs by utilities”⁵ with full recognition that “actual funding levels to implement these programs will likely fluctuate as they have in the past according to economic conditions, weather, and other external factors.”⁶ The BPU’s recommendations were provided to the Legislature⁷ and plainly informed the Legislature, which established the SBC for social programs, such as moratoriums and bad debt.

¹ Findings and Recommendations, *Restructuring the Electric Power Industry in New Jersey*, Docket No. EX94120585Y (April 30, 1997) at 9.

² *Id.* at 119.

³ *Id.* at 140.

⁴ *Id.* at 9.

⁵ *Id.*

⁶ *Id.* at 141.

⁷ Letter from Board President Herbert Tate and Commissioner Carmen Armenti to Governor and Legislature (April 1997) (providing copy of the Findings and Recommendations Report).

As described below, the Company's Board-approved Tariff, at Section IV, Rider SBC, is applicable to the current situation, where the Company has borne the cost of serving non-paying customers throughout the various COVID-19-related moratoriums. This tariff rider provides for the recovery of the SBC. In accordance with EDECA, and the Board's various approvals of ACE's recovery, the Rider SBC rate includes Clean Energy Program costs, Uncollectible Account charges, Universal Service Fund Program costs, and Lifeline Program costs. Relevant to the instant proceeding, the Uncollectible Account component of Rider SBC rate was established to recover the cost of serving ACE's uncollectible (or bad debt) accounts. This uncollectible component of the Rider SBC rate was adopted on July 15, 1999 (BPU Docket No. EO97070455).

The uncollectible expense recovered through the Rider SBC, Uncollectible Account component is a percentage of the Company's customers accounts receivables balance that are anticipated to be unrecoverable. The uncollectible component of the Rider SBC rate is updated annually on June 1st through a rate filing with the Board, where Rate Counsel participates as a statutory party. The previous year's uncollectible balance is reconciled in that regulatory filing; any over or under recovered balance is recovered in the annual rate setting. During the reconciliation period any COVID-related expenses would be trued-up or down, with full view and participation of Rate Counsel. This true-up process has occurred in ACE's most recent regulatory filing, which was approved on a provisional basis by the Board in BPU Docket No. ER22020038, by Order dated May 18, 2022.

Thus, since EDECA's enactment, through the initial transition period, through the Great Recession, to the present day, the Board has consistently allowed ACE to recover the cost of social programs, such as the cost of serving bad debt or uncollectible accounts, through the Rider SBC mechanism. Accordingly, ACE maintains that continued recovery of COVID-related bad debt is appropriately recovered through the SBC.

Response to Questions Regarding Regulatory Asset Cost Recovery

The following paragraphs are ACE responses to the "Questions Regarding Regulatory Asset Cost Recovery" stated in President Fiordaliso's Order in the above referenced docket.

Question No. 1:

Has the utility received any insurance payments or any Federal funding or State funding that can be used to offset the deferred expenses? Should the uncollectibles/arrearages be treated differently from costs such as Personal Protective Equipment, etc.?

Response:

As part of the COVID-19 relief funds made available to New Jersey residents, ACE has applied over \$27.3 million in funding to customer accounts through July 2022, thereby reducing customer arrearages.

Currently, for other COVID-related expenses previously deferred in the regulatory asset, ACE has a credit balance to be returned to customers. ACE proposes to reduce the amount in uncollectibles by the amount of this credit. Effectively, ACE would then be treating both the uncollectibles and the credit amount similarly through the same SBC mechanism.

Question No. 2:

Should customer arrearages be treated differently from other expenses?

Response:

ACE submits that customer arrearages should be handled through the SBC cost recovery mechanism, currently authorized by the Board. For more than two decades, New Jersey law has provided this appropriate cost recovery mechanism for bad debt associated with moratoria and other social programs, as discussed in the above summary of bad debt and uncollectible account recovery. Because the Legislature has created this statutory rate mechanism for just this sort of cost (the cost associated with implementing a societal safety net), the customer arrearages associated with COVID-19 (the cost of serving those bad debt customers) should not be treated differently.

Currently, for other COVID-related expenses, ACE has a credit balance to be returned to customers. ACE proposes reducing the amount in uncollectibles by the amount of this credit. Therefore, ACE would treat both the uncollectibles and the credit amount similarly through the same SBC mechanism.

Question No. 3:

Should the deferred expenses be recovered in rates and amortized? If yes, how long should that amortization period be for? Should the amortization period vary and be dependent on the type of utility, size and its financial situation?

Response:

ACE is receptive to some form of amortization of the “COVID-related” bad debt expense incurred. With respect to an amortization period, the Company submits that it should be based on the dollar amount level of “COVID-related” bad debt that has been incurred.

Question No. 4:

Should the unamortized balance be subject to carrying charges?

Response:

The Company submits that interest on the uncollectible deferred balance should be calculated at ACE’s monthly actual cost of short-term debt, or if no short-term debt is outstanding, the rate on equivalent temporary cash investments shall be so used. This approach is consistent with how interest is calculated on uncollectible deferred balances that are not “COVID-related”.

Question No. 5:

Currently, the EDCs recover uncollectibles via the Societal Benefits Charge ("SBC"). Should gas and water utilities be permitted to recover uncollectibles through a SBC- type recovery mechanism?

Response:

ACE is an electric distribution company but does not oppose the gas and water utilities receiving the same type of recovery treatment as the EDCs. The applicable statutory provision, N.J.S.A. 48:3-60, does reference gas utilities as well as electric utilities.

Question No. 6:

Should the SBC-type recovery mechanism be limited to COVID-related arrearages, or should it include all arrearages?

Response:

Question 6 appears to be a continuation of Question 5; as such, ACE assumes that this question is directed to the gas utilities. Currently, the Company collects all uncollectible bad debt expenses through the Rider SBC rate discussed above. As stated in the response to Question 2, ACE maintains that the COVID-related bad debt expenses should be recovered through the same SBC mechanism.

Question No. 7:

Should the deferred COVID related expenses, including the arrearages, be shared between shareholders and ratepayers? If yes, what would the accounting treatment be?

Response:

ACE maintains that shareholders should not bear the cost of COVID-related expenses, because such a requirement would be contrary to law. The bad debt at issue is a prudently incurred cost driven by governmental directives, specifically moratoria put in place during the extraordinary circumstances of the COVID-19 pandemic. Denying recovery for prudently incurred costs resulting from the Company's response to the public health emergency would be an unconstitutional taking.⁸ Furthermore, the bad debt recovery is a "social program" already established and available as a safety net in response to this extraordinary public health emergency. As described above, the legislative history behind EDECA, the statute itself, and the existing ACE Tariff, support comprehensive Rider SBC rate recovery for the cost of serving bad debt customers,

⁸ The takings clause of the Fifth Amendment of the United States Constitution provides that "private property [shall not] be taken for public use without just compensation[.]" U.S. Const. Amend. V.2 In this regard, with respect to public utilities, the United States Supreme Court has held that "[i]f the rate does not afford sufficient compensation, the State has taken the use of utility property without paying just compensation and so violated the Fifth and Fourteenth Amendments." *Duquesne Light Co. v. Barasch*, 488 U.S. 299, 308 (1989). The New Jersey Supreme Court has similarly held that, "to avoid confiscatory results under the takings clause [with respect to regulated entities such as public utilities], 'the return should be one which is generally commensurate with returns on investments in other enterprises having comparable risks.'" *State Farm Mut. Auto. Ins. Co. v. State*, 124 N.J. 32, 48 (1991) (internal citation omitted). This proposal would deny a reasonable return; denying recovery for prudently incurred costs resulting from the Company's response to the public health emergency.

including the cost of serving bad debt customers through the COVID-19 pandemic. Bad debt associated with the COVID-19 pandemic is not like a traditional, “discretionary” charitable contribution, which involves “numerous personal choices,” and is ultimately the responsibility of the utility shareholders.⁹ The continuing COVID-related moratoriums, which contributed to the sizeable bad debt at issue, were implemented with State guidance and at State direction, ultimately by way of numerous Executive Orders and legislative mandates. ACE’s shareholders have contributed to this cause. Each year, ACE provides approximately \$1.2 million in shareholder funded, corporate contributions to non-profit partners that help those customers and community members significantly impacted by the COVID-19 pandemic. Also, shareholders already continue to fund carrying costs in the approximate range of \$5.0 million - \$8.0 million associated with higher Accounts Receivable balances and longer deferred payment arrangements. Requiring a larger, additional shareholder contribution to cover the cost of bad debt is contrary to law.

Question No. 8:

Should the COVID-related deferral be recovered in base rates or in a special purpose rider? Should the recovery mechanism be case specific dependent on the type of utility, size and its financial situation?

Response:

Currently, for the COVID-related deferral, ACE has a credit balance to be returned to customers. ACE would propose reducing the amount in uncollectibles by the amount of this credit and, therefore, treat both the uncollectibles and the credit amount similarly through the same SBC mechanism.

Question No. 9:

Should a utility carry the COVID-related expenses and arrearages into a subsequent Rate Case or file a separate petition to recover through a clause?

Response:

Currently, for the COVID-related deferral, ACE has a credit balance to be returned to customers. ACE would propose reducing the amount in uncollectibles by the amount of this credit and therefore treat both the uncollectibles and the credit amount similarly through the same SBC mechanism.

ACE submits that the COVID-related uncollectible bad debt expenses should be recovered through the established SBC mechanism, as discussed above.

⁹ *In the Matter of Petition of New Jersey American Water Company, Inc. for an Increase in Rates for Water and Sewer Service and other Tariff Modifications*, 169 N.J. 181, 194-95 (2000).

Question No. 10:

When filing for relief should the utility provide proof that it did not receive any COVID-related financial support, either in the form of Federal or State grants, insurance payouts, and/or customer repayment invoices?

Response:

With the exception of the funding applied to customer arrearages detailed in response to Question 1, ACE has not received any other COVID related financial support. Currently, for the COVID-related deferral, ACE has a credit balance to be returned to customers.

Question No. 11:

Does there need to be a true-up of the COVID arrearages, due to pay downs, Federal funds received, State funds received, Insurance funds received, etc.?

Response:

Due to the functionality of the SBC mechanism, ACE submits that a true up would occur in the ordinary course of business if any such funds were received.

Question No. 12:

If a shareholder contribution were approved for the COVID-related uncollectibles, what should be the appropriate sharing be for ratepayers and shareholders?

Response:

The approval of shareholder contributions for COVID-related bad debt for ACE would be contrary to law. ACE provided a summary of the SBC cost recovery mechanism for bad debt. As stated in the response to Question 7, the Company maintains that shareholders should not bear the cost of COVID-related expenses, such as uncollectibles. The Board has long determined that the cost of serving non-paying customers, due to moratoria, is a “social program” that provides a vital safety net. Thus, the appropriate mechanism for recovery is a complete pass through of the full costs to customers through the SBC recommended by the Board and established by the Legislature. As indicated earlier, the shareholders have already indirectly contributed millions of dollars in carrying costs to address significantly lower company cash balances due higher Accounts Receivable balances and longer deferred payment arrangements over multiple years.

Question No. 13:

Should there be a true-up of the COVID arrearages?

Response:

Due to the functionality of the SBC mechanism, ACE submits that a true up would occur in the ordinary course of business.

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

Carmen D. Diaz
Acting Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
carmen.diaz@bpu.nj.gov
board.secretary@bpu.nj.gov

Taryn Boland
Chief of Staff
taryn.boland@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

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

Brian O. Lipman, Esquire
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003
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

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

Kimberly Joyce
kajoyce@aquaaamerica.com

William C. Packer, Jr.
wcpackerjr@aquaaamerica.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

Favson 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
samsjff@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. Chowaniec
VP-State Regulatory Affairs
Charter Communications
400 Atlantic Street
Stamford, CT 06901
michael.chowaniec@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