March 15, 2023

VIA ELECTRONIC TRANSMISSION

Acting Secretary Carmen Diaz
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 IMPLEMENTATION OF THE LIGHT EMITTING DIODE ("LED") STREETLIGHT PROGRAM
BPU DOCKET NO. QO22110710

Dear Acting Secretary Diaz:

Please accept this submission, on behalf of New Jersey Natural Gas Company ("Company" or "NJNG"), in the above captioned matter.

Background:

As set forth in the March 1, 2023 Notice seeking comments in this mater, the 2019 EMP's Goal 3.1.7 directs the Board to develop a method to encourage LED streetlight replacement programs in each electric distribution company ("EDC") territory in the State. In particular, Goal 3.1.7 states that the energy savings from replacing outdated streetlight heads, including the lightbulbs, is significant. However, LED replacement under existing EDC tariffs fails to deliver the full scope of savings on operation and maintenance. The New Jersey Board of Public Utilities is seeking to identify the lighting systems to be changed, the tariff revisions required to reflect the true value and cost of the streetlight heads and lighting replacements, issues with respect to streetlight pole ownership, operations, and maintenance, and a process for transitioning existing streetlights to LED streetlights.

Board Staff is seeking input from the EDCs, gas distribution companies ("GDCs"), municipalities, and other interested parties on the current tariff structure, energy use, technologies and their costs, and conversion costs associated with replacing all or part of current streetlights with LED lighting, as well as equipping these streetlights with potentially other technologies.

The following data contains the Company's response to gas utility specific issues.

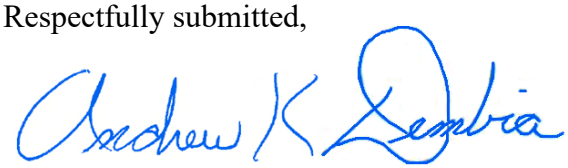
1	Do you have a complete inventory of streetlights in your service territory, including type (bulb, light fixture and pole), ownership, vintage, original cost, accumulated depreciation, and remaining service life? Please provide the most granularity possible in narrative form with a level of detail that would explain what information you have with respect to each of the listed items.	NJNG is aware of the number of municipality natural gas streetlights in its service territory. See the response to question #3.
2	What is your process and schedule for validating the streetlights inventory mentioned in Question #1 above, and when was it most recently validated?	Since the streetlights are municipally-owned, NJNG does not maintain an inventory. Municipalities notify NJNG of changes.
3	How many gas streetlights, if applicable, do you have in your service area? Please provide the breakdown according to the location in each applicable municipality.	One municipality, Borough of Rumson, has 8 natural gas streetlights in NJNG's service territory.
4	Of the streetlights in your service area, how many are municipally-owned, and how many are utility owned?	All 8 of the natural gas streetlights are municipally-owned.
5	How regularly do you replace the bulbs in the current streetlight fixtures? Please describe your streetlight replacement program(s).	N/A
6	Physical Lights A. LED Inventory i. What is your current LEDs inventory in terms of: (a) how many you have, (b) vintage year, (c) fixture types, (d) color temperature (Kelvin), (e) brightness levels (lumen output) and (f) costs for each bulb type? ii. What type of LED fixtures and bulb types (brightness level and color) could a municipality in your service territory order? Can municipalities order LED fixture and bulb types of their choice from you? iii. Do you provide bulk discounts on LED purchases and, if so, what are they? iv. Do you have a standard contract under which a municipality must procure its streetlights? B. Non-LED Inventory i. What is your current non-LED inventory? Please describe the models and numbers of each. ii. What are the costs of bulbs for each streetlight fixture type?	N/A
7	Poles A. How does your ownership model for the poles work? Please explain. B. Do you ever give municipalities an opportunity to purchase the poles from you? C. If municipalities do own the poles, what maintenance, replacement, or other pole-related services do you as an EDC provide to those municipalities? D. What challenges exist now to installing new technologies on poles such as motion activation, smart streetlight technologies, gunshot	N/A

	detection, traffic cameras, Wi-Fi hotspots, electric vehicle charging equipment, etc.? Please describe.	
8	Lighting Standards A. What standards (list all, including Bright Sky standards) do you use to inform which types of lights can be installed along various roadways, as well as in parking areas and around parks, schools, hospitals, universities, other campuses? B. How does compliance with each of these standards influence the range of fixtures you can offer to municipalities for their usage?	N/A
9	Under an accelerated LED replacement program, please describe how the stranded cost issues with respect to the following could be resolved: (a) current inventory regarding spare streetlight bulbs and (b) currently operational bulbs that have been placed in light fixtures but have not yet reached the end of their useful life. 4 Questions for EDCs, GDCs, and other stakeholders as applicable:	N/A
10	Tariffs A. What is the current utility tariff and corresponding rate structure under such tariff for electric and gas streetlights, respectively? B. What tariff and what rate structure are you using when municipalities seek to pursue an LED streetlight conversion? C. What issues have you encountered with your current tariff structure with municipalities interested in conducting an LED streetlight conversion? D. Some utilities have designed tariffs to allow municipalities that convert streetlights to LEDs to pay the associated purchase, conversion, and/or stranded costs over time at a rate no greater than the electric energy cost savings, thereby avoiding any cost increase for the municipalities or ratepayers in general. i. Do you have such a tariff to prevent cost impacts for municipalities? ii. If not, do you intend to develop one to support LED streetlight conversions? iii. What would be the impact of such a tariff on ratepayers in general? iv. What do you see as the overall benefits and drawbacks of such a proposal? E. Would there be a benefit for municipalities to own the streetlights that are converted? In other words, if renting now, they would have the option to purchase and own the streetlights and be responsible for the replacement. F. What are the benefits of the utilities retaining ownership and maintenance of the streetlights that are converted?	A. Street Lighting Service is provided under Special Provision II.1 of Service Classification GSS, General Service Small of NJNG's Tariff for Gas Service. Street Lighting customers are billed the GSS Customer Charge, Periodic Basic Gas Supply Service (BGSS) rate, and the Street Lighting Delivery Charge. B.-F. N/A
11	Please describe any additional services that utilities may provide that are integrated into the conversion of LED fixtures.	N/A

In accordance with the Order issued by the Board in connection with 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 No. EO20030254, Order dated March 19, 2020, this document is being electronically filed. No paper copies will follow.

Should you have any questions, please do not hesitate to contact me at adembia@njng.com.

Respectfully submitted,



Andrew K Dembia, Esq.
Regulatory Affairs Counsel

AKD/sf
Encl.
C: Service List