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Regulatory Affairs Counsel

March 15, 2023

Via email: [board.secretary@bpu.nj.gov](mailto:board.secretary@bpu.nj.gov)

Carmen D. Diaz  
Acting Board Secretary and Acting Custodian  
44 South Clinton Avenue  
Post Office Box 350  
Trenton, NJ 08625-0350

**RE: In The Matter of The Implementation of the Light Emitting Diode (“LED”)  
Streetlight Program  
Docket No.: QO22110710**

Dear Acting Board Secretary Diaz:

Elizabethtown Gas Company (“ETG”) and South Jersey Gas Company (“SJG”) (collectively “the Companies”) respectfully offer these comments in response to the New Jersey Board of Public Utilities’ (“Board”) request for comment 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.

As an initial matter, the Companies note that the gas streetlighting in their service territories is supplied by the Companies under their respective Gas Light Service Tariffs (“Tariff”) provided to streetlight facilities owned by various New Jersey municipalities. As such, it is the municipalities’ *i.e.*, customers’ decision as to whether to replace the existing streetlights with LED lighting.

In addition, given the limited number of customers who receive this service, there is a limited revenue impact to the Companies themselves. For example, the estimated annual 2022 revenue for SJG and ETG amounted to \$62,100 and \$1,586, respectively.

At the same time, the financial impact to our customers may be significant insofar as it will require the customers to replace their facilities, the cost of which could be material. In addition, to the extent there are dedicated SJG and ETG facilities used by the gas lights, there could be a further cost impact to the Companies to abandon the gas lines. Ultimately, as should always be the case, customer choice and a full understanding of economic impact should be considered before a decision is made to replace gas street lighting with an LED design.

Thank for the opportunity to provide this information and allowing us to work together to support New Jersey's environmental goals. As an organization, SJI, the parent of SJG and ETG, is committed to investing in new technologies that will safely, reliably, and affordably deliver low carbon energy to the more than 700,000 families and businesses that we serve across our State. As New Jersey focuses on the most cost-effective means to achieve its clean energy goals, the continued availability of natural gas represents a safe, reliable, affordable, and clean solution for our customers.

### **Questions**

The Companies have provided responses to those questions applicable to GDCs.

**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.**

**ETG:** Yes. 12 gas streetlights in the Township of Scotch Plains.

**SJG:** Yes. 432 gas streetlights as follows:

Cape May	179 Gas Lights
Cherry Hill	128 Gas Lights
Williamstown	125 Gas Lights

**2. What is your process and schedule for validating the streetlights inventory mentioned in Question #1 above, and when was it most recently validated?**

**ETG:** Billing data is used to validate the inventory.

**SJG:** On site validation is completed monthly.

**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.**

See response to #1 above.

**4. Of the streetlights in your service area, how many are municipally owned, and how many are utility owned?**

All the streetlights in ETG and SJG's service territories are municipally owned.

**5. How regularly do you replace the bulbs in the current streetlight fixtures? Please describe your streetlight replacement program(s).**

**ETG:** The Company does not maintain the streetlights, as per the Tariff.

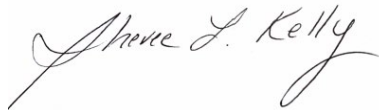
**SJG:** The gas lamp mantles are replaced on a “as needed basis” inspections of the lamps and mantles are completely monthly. SJG completes walking surveys to identify issues or concerns.

**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?**

Not applicable.

The Companies appreciate the opportunity to provide the within comments.

Respectfully submitted,

A handwritten signature in cursive script that reads "Sheree L. Kelly". The signature is written in dark ink and is positioned above the printed name.

Sheree L. Kelly, JD, MBA  
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