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June 22, 2023

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

Dear Secretary Golden:

Please accept this letter in lieu of a more formerly styled Motion for Reconsideration and/or Clarification pursuant to N.J.A.C. 14:1-8.6 in connection with the above captioned proceeding.<sup>1</sup> For the reasons set forth herein, Atlantic City Electric Company (“ACE” or the “Company”) respectfully requests confirmation by the New Jersey Board of Public Utilities (“BPU” or “Board”) that the Company’s pending Non-Utility Generation Charge (“NGC”) and Societal Benefits Charge (“SBC”) Reconciliation Petition, BPU Docket No. ER23020057 (the “NGC/SBC Petition”), complies with the Board’s recent Order dated June 7, 2023, in the above captioned docket (the “June 7 Order”). ACE further asks that the Board confirm that the SBC is the appropriate mechanism for the Company to seek recovery of its deferred COVID-19 uncollectible expenses, as has been proposed in the NGC/SBC Petition.

### **Background**

In the June 7 Order, the Board instructed any utility that had sought commencement of cost recovery of COVID-19 deferred regulatory asset balances prior to June 7, 2023 to amend its filing to comply with the mandated requirements set forth in the June 7 Order.

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<sup>1</sup> N.J.A.C. 14:1-8.6 also states that the Board [of Public Utilities] at any time may order a ... reconsideration on its own motion and extend, revoke or modify any decision or order made by it.”

On February 1, 2023, ACE filed its NGC/SBC Petition, wherein the Company has sought commencement of cost recovery of its previously deferred Uncollectible (“UNC”) balances through its existing SBC. The NGC/SBC Petition seeks to reconcile the balances for its NGC and SBC expenses for the period June 1, 2022 through forecasts ending May 31, 2024. Included in the 2023 NGC/SBC Petition was an identification of \$25.066 million that had been deferred from cost recovery in the Company’s prior two NGC/SBC reconciliation/update filings. These were costs that, “but for” the then ongoing COVID-19 Pandemic, would have been recoverable by ACE in its 2021 and 2022 NGC/SBC reconciliation/update proceedings.

In the Company’s 2021 and 2022 NGC/SBC proceedings, the Board approved stipulations of the parties deferring cost recovery in an amount of \$15.735 million (2021 proceeding) and a deferred amount of \$9.331 million (2022 proceeding) of UNC expense related to COVID-19.<sup>2</sup> In each case, the deferred COVID-19-related UNC expenses were authorized by Board Order to be deferred for future recovery by the Company. Finally, ACE’s 2023 NGC/SBC Petition proposes to amortize the UNC COVID-19 deferred balance of \$25.066 million over a three-year period. Therefore, in the current NGC/SBC proceeding, the Company is seeking to recover \$8.33 million of its total COVID-19-related UNC deferral.<sup>3</sup>

**The Company’s February 2023 NGC/SBC Petition Is Compliant and Consistent with the Board’s June 7 Order and Existing Law**

The Company respectfully submits that its NGC/SBC Petition already complies with the five (5) requirements of the Board’s June 7 Order.

The first of the five (5) requirements established by the Board requires that the Company “[p]ropose a new, separate, special-purpose clause or rider that clearly defines the purpose and scope of the regulatory asset balances being proposed for recovery.” The SBC is a separate, special-purpose clause that was expressly established by the legislature for “social programs,” including the cost of serving bad debt (or uncollectible accounts). The SBC component of the Company’s tariff is where ACE is already authorized to recover its UNC balances from year to year and where the Board has already approved the deferral of the UNC COVID-19-related balances for 2021 and 2022. Additionally, the Company’s customers were made aware through the BPU’s website, on the Company’s website, and through social media outlets, as well as through the Public Notices that were published in newspapers throughout its service territory and mailed to all municipalities and counties with respect to the 2023 NGC/SBC Petition, that ACE is seeking cost recovery of a portion of its COVID-19-related expenses in its SBC tariff charge. ACE respectfully submits that, considering the extent and specificity of the notifications recited above and the explanation provided in those notifications, “*a new*, separate, special-purpose clause or rider” is unnecessary and unwarranted.

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<sup>2</sup> See Board Order dated June 7, 2023 in BPU Docket No. ER22020038 (2022 NGC/SBC) and Board Order dated October 6, 2021 in BPU Docket No. ER21020088 (2021 NGC/SBC).

<sup>3</sup> In the NGC/SBC Petition, the Company also proposes to refund to customers \$0.853 million, representing an over-collection of certain COVID-19-related expenses incurred by the Company.

With respect to requirement (2) of the June 7 Order, ACE's SBC tariff charge is designed to provide a volumetric rate and is applicable to all customers receiving electric service from the Company. Therefore, ACE's proposal to recover its deferred COVID-19-related expenses through its SBC UNC charge complies with requirement (2) of the Board's June 7 Order.

With respect to requirement (3) of the June 7 Order, as noted above, the Company's 2023 NGC/SBC Petition and the notifications provided in connection therewith, provide for an amortization period of three years, notwithstanding that the costs were accumulated over a two-year period. ACE respectfully submits that this is a reasonable recovery period for itself and its customers.

With respect to requirement (4) of the June 7 Order, the Company is not seeking any special carrying costs with respect to COVID-19 deferred balances. To the extent that the deferred COVID-19-related balances are included in the Company's SBC balance account, any outstanding balance is subject to the Board approved monthly interest calculation based upon the Company's short-term debt rate.<sup>4</sup>

Finally, with respect to requirement (5) of the June 7 Order, ACE respectfully submits that all relevant documentation for recovery on an amortized basis of its deferred COVID-19-related regulatory asset balance has been included in the 2023 NGC/SBC Petition and the Testimony and Exhibits attached thereto.

**EDECA Fully Supports the Recovery and Reconciliation  
of COVID-19 Uncollectible Costs Through the Societal Benefits Charge**

As demonstrated by the Company's – and the collective utilities' – numerous filings in connection with the above docket, ACE has consistently maintained that the SBC is the appropriate, legislatively sanctioned rate recovery mechanism for service of uncollectible accounts. The SBC was included in the Electric Discount and Energy Competition Act of 1999 (“EDECA”) as part of electric utility restructuring. EDECA specifically mandates that “the [B]oard shall permit each electric public utility” to recover “the costs for the social programs for which rate recovery was approved by the [B]oard prior to April 30, 1997. . . . Nothing in P.L.1999, c.23 (C.48:3-49 et al.) shall be construed to abolish or change any social program required by statute or [B]oard order or rule or regulation to be provided by an electric public utility. Any such social program shall continue to be provided by the utility until otherwise provided by law, unless the [B]oard determines that it is no longer appropriate for the electric public utility to provide the program, or the [B]oard chooses to modify the program.”<sup>5</sup> The cost of serving uncollectible accounts was such an existing social program. The SBC, therefore, is the appropriate means by which COVID-19-related arrears – the cost of serving uncollectible accounts through the Pandemic – should be recovered.

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<sup>4</sup> See Board's Order in BPU Docket No. ER02080510, dated July 8, 2004, authorizing the use of the Company's monthly actual cost of short-term debt as the interest rate to apply to the over- or under-recovered balance of the NGC/SBC.

<sup>5</sup> N.J.S.A. 48:3-60(a)(1).

The legislative history behind EDECA further reveals that the continuation of established consumer protections was a major concern for the Board, and ultimately the Legislature, during restructuring. In its Findings and Recommendations Report, dated April 30, 1997, the Board 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.”<sup>6</sup> The Board explained that electric utilities have “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.”<sup>7</sup> When some challenged that these programs should be funded with tax dollars, the Board countered that the electric utilities’ provision of “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.”<sup>8</sup> Accordingly, 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.”<sup>9</sup>

ACE maintains that the cost of serving uncollectible accounts through the COVID-19 Pandemic is a prudently incurred cost driven by governmental directives. Although a similar health emergency had not been seen for 100 years, the Company respectfully submits that the State was able to quickly respond to the COVID-19 public health emergency due, in part, to the long-established social programs established by the Board and retained through restructuring. Electric utilities, such as ACE, responded to COVID-19 by ensuring that customers had the necessary societal safety net of continued electric service during an otherwise uncertain time.

Since EDECA’s enactment, through the initial transition period and the significant economic downturn of 2008-2009 to the present, the Board has consistently authorized ACE to recover the costs of its social programs, such as bad debt or uncollectible accounts, through the SBC. Additionally, the Company’s BPU-approved Tariff, at Section IV, Rider (SBC), expressly allows for recovery of “uncollectible accounts.” Accordingly, the Company further asks that the Board confirm that the SBC is the appropriate mechanism for ACE to seek recovery of its deferred COVID-19 uncollectible expenses, as has been proposed in the Company’s NGC/SBC Petition.

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<sup>6</sup> Findings and Recommendations, Restructuring the Electric Power Industry in New Jersey, BPU Docket No. EX94120585Y (April 30, 1997) at 9 (emphasis added).

<sup>7</sup> *Id.* at 119 (emphasis added).

<sup>8</sup> *Id.* at 140.

<sup>9</sup> *Id.* at 9.

Sherri L. Golden

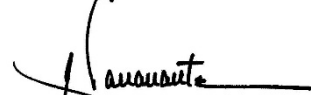
June 22, 2023

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**Conclusion**

Based upon the foregoing, the Company respectfully requests that the Board determine (1) that the existing UNC component of ACE's SBC is the appropriate regulatory mechanism for recovery of COVID-19-related regulatory asset balances; and (2) that, for purposes of compliance with the June 7 Order, “a *new*, separate special-purpose clause or rider” is not required, especially where, like here, a separate, special-purpose clause – the SBC – already exists.<sup>10</sup>

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Passanante", written over a horizontal line.

Philip J. Passanante  
An Attorney at Law of the  
State of New Jersey

Enclosure

cc: Service List

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<sup>10</sup> June 7 Order at page 4.

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

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