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September 6, 2023

VIA ELECTRONIC MAIL

sherri.golden@bpu.nj.gov board.secretary@bpu.nj.gov

Sherri L. Golden, RMC
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 Implementation of Executive Order 317 Requiring the Development of Natural Gas Utility Emission Reduction Plans BPU Docket No. GO23020099

Dear Secretary Golden:

By way of follow up and response to the Notice of Technical Conference (the "Notice") released by the New Jersey Board of Public Utilities (the "Board" or "BPU") on or about July 27, 2023, Atlantic City Electric Company ("ACE" or the "Company") appreciates the opportunity to submit comments in BPU Docket No. GO23020099.

ACE recognizes the threat climate change presents to the State of New Jersey and remains committed to being a partner in helping the State meet its critical climate change goals. As reflected in the Notice¹ and Executive Order No. 317, electric utilities, including the Company, have a central role in advancing and enabling solutions to mitigate the impact of climate change, especially as customers increasingly adopt electric vehicles and electrify buildings.

The energy transformation underway in New Jersey is part of a broader market transformation that will fundamentally change the way businesses and residents consume energy. ACE will need ongoing partnerships with the Board, key policymakers, and local stakeholders as the Company anticipates and invests in new infrastructure to effectively manage the energy system transformation, including increasing electrification, envisioned by the State. To continue to plan for and enable New Jersey's climate policies, ACE has an ongoing and increasing need for specific data that reflects the location and timing for new areas of residential and commercial demand arising from electric vehicle charging, new all-electric construction, large energy conversion

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¹ Notice EO317TechConference.pdf (nj.gov)

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efforts, and other usage and construction specifications. This data will be crucial to assess the level and types of investment(s) required to enable these growth impacts.

As an electric utility, it is ACE's responsibility to ensure that its customers continue to have access to safe, reliable, affordable, and clean energy, and the Company has extensive system processes to accommodate short- and long-term needs to that end. Accommodations for electrification will vary based on localized grid conditions, as well as constantly evolving customer energy needs. Solutions to meet these demands range from replacement of secondary cables to accommodate increased energy needs for individual services, new express feeders to serve large customers or fleet electrification, and/or new substations in areas where increasing customer requirements will result in new or additional investment.

ACE appreciates the opportunity to comment on this important matter and looks forward to continuing to partner with the Board and key stakeholders to achieve New Jersey's climate and clean energy goals.

Respectfully submitted,

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

cc: Stacy Peterson, Deputy Executive Director, BPU