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December 28, 2023

Margaret Comes, Esq.
Associate Counsel
Law Department
Rockland Electric Company
4 Irving Place, 18th Floor
New York, NY 10003

Re: In the Matter of the Petition of Rockland Electric Company for Approval of its Energy Efficiency and Peak Demand Reduction Programs
BPU Docket No. QO23120875

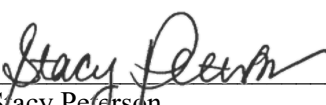
Dear Ms. Comes:

We are writing in response to the above-referenced petition, which was filed with the Secretary of the New Jersey Board of Public Utilities ("Board") on December 1, 2013.


Board Staff has reviewed the petition for completeness in accordance with the Board's July 26, 2023 Order in Docket No. QO23030150 et al. ("July Order") and determined that it is not administratively complete. For your information, enclosed is a list of deficiencies in the petition and the items required to remedy the deficiencies.

N.J.S.A. 48:3-98.1(b) provides the Board with 180 days to approve, modify, or deny Rockland Electric Company's requested recovery of costs for the above referenced program. As directed in the July 2023 Order, the 180-day review period will commence on the last filing date of the remediation of all deficiencies.

In the interest of avoiding any unnecessary delay in the Board's review of your petition, please contact us at your earliest convenience if you have any questions as to how the deficiencies can be remedied.



Stacy Peterson
Deputy Executive Director



Stacy Ho Richardson
Deputy Director, Division of Clean Energy

Core Programs

II. Program Description

a. States the following:

The utility shall provide a detailed description of each proposed program for which the utility seeks approval, including, if applicable:

- ii. *Target market segment – including eligible customers, properties, and measures/services – and eligibility requirements and processes*

This Minimum Filing Requirement (“MFR”) requires the petitioner to submit a description of the target market segment and eligibility requirements and processes. The eligibility requirements for the Income Qualified Program (e.g., income thresholds and categorical eligibility requirements) for individually screened customers was not provided.

- iv. *Proposed incentive structure or incentive ranges, including incentive payment processes and timeframes*

This MFR requires the petitioner to provide proposed incentive payment timeframes for proposed programs. This information was not provided for the Direct Install and Next Generation Savings programs.

c. States the following:

In areas where gas and electric service territories overlap, the utility shall provide a description of the program structure for coordinated, consistent delivery of programs between the utilities and estimated coordinated budgets and allocation of costs and energy savings between the utilities. The utility shall provide a description of how the utilities coordinated their program assumptions and other factors that could influence results for each coordinated program.

This MFR requires the petitioner to provide estimated coordinated budgets and allocation of costs and energy savings between the utilities. The petitioner noted that the unpredictable nature of energy costs and savings make it difficult to determine a potential budget for overlapping utilities and did not provide estimated coordinated budgets or allocation of costs and energy savings between the utilities.

Building Decarbonization Start-Up Programs

- VII. Quantitative Performance Indicators: Targets (Referencing the July 2023 Order MFR modifications in Attachment B, pg. 22).

States the following:

The utility shall file estimated values for each program year for the following metrics:

- ix. *Number of distributors and contractors engaged in the program*

This MFR requires the petitioner to file estimated values for each program year for the number of distributors and contractors engaged in the program. This information was not provided.

Demand Response Programs

2) Program Description

a) EDC DR Programs

- i) States the following:

The utility shall provide a detailed description of each proposed program for which the utility seeks approval, including, if applicable:

1) Program description/design, including:

(e) Detailed plan with timelines and planning priorities, addressing:

(i) How their proposed second Triennium DR service programs align with DR Guiding Principles;

This MFR requires the petitioner to provide a detailed plan with timelines and planning priorities, addressing how the proposed DR programs align with DR Guiding Principles. The petitioner refers to third-party aggregators and making data available in Section 3b.iii but does not directly address the DR Guiding Principles.

(iii) How the utility plans to work with stakeholders involved in creating an open, portable grid flexibility service model.

This MFR requires the petitioner to provide a detailed plan with timelines and planning priorities that address how the utility plans to work with stakeholders to create an open, portable grid flexibility service model. This information was not provided.

2) Target market segment(s) and their priorities – including:

(d) Methodology to prioritize the procurement customers for DR program participation over distribution system investments.

This MFR requires the petitioner to describe the methodology to prioritize the procurement of customers over distribution system investments. This information was not provided.

4) How demand reduction performance is measured, including data sources and methodology to calculate baseline, definition of turndown events, and capacity savings

This MFR requires the petitioner to describe how demand reduction performance is measured, as described above. The petitioner explained the methodology to calculate baseline but did not define turndown events or capacity savings.

5) Program design and measurement to minimize rebound effects after a turndown event;

This MFR requires the petitioner to describe program design and measurement to minimize rebound effects after a turndown event. This information was not provided.

7) Any mutual exclusivity terms that may be needed for avoiding double counting in newly proposed DR programs.

This MFR requires the petitioner to address mutual exclusivity terms that may be needed for avoiding double counting. This information was not provided.

8) Qualified equipment supported by incentives, such as smart thermostats and smart inverters:

(b) A description of data and communication standards. If the standard is not an internationally recognized standard, give justification for why.

This MFR requires the petitioner to describe data and communication standards pertaining to qualified equipment supported by incentives. This information was not provided.

ii) States the following:

Capital investments, such as IT hardware and infrastructure to support DR and DERMS. Such investments may be recovered through rate-basing, but must be justified in the benefit-cost analysis.

This MFR requires the petitioner to address capital investments. This information was not provided.

viii) States the following:

Program participant exit/transition financial impacts including:

- 1) Administrative updates for documentation and database management;*
- 2) Reduced amortization from early termination;*
- 3) Asset purchase revenues from sold equipment; and*
- 4) Participant exit fees collected if any.*

This MFR requires the petitioner to describe program participant exit/transition financial impacts, as described above. This information was not provided.

c) States the following:

The utility shall provide the following information about the proposed Demand Response program(s):

iii) Data Transparency

1) To support any evaluation-related work³, data should be provided by the utility or state or their program administrator in full and within four weeks of the request. Time extensions may be approved by Staff if they are received more than a week before the data are due and if a meeting has been held with the Statewide Evaluator team requesting the data to identify if there are adequate substitutes (in the Statewide Evaluator's judgment) for the initially-requested data.

This MFR requires the petitioner to provide data to support evaluation-related work in full and within four weeks of the requests, as described above. This component of the proposed program was not included.

2) Data delivery must use appropriate secure delivery systems.

This MFR requires data delivery using secure delivery systems. The petitioner did not address secure delivery systems.