

150 W State Street, Suite 5 Trenton, NJ 08608-1105

Mailing Address: 92DC42 500 N. Wakefield Drive P.O. Box 6066 Newark, DE 19714-6066 267-533-1671 – MS Teams 609-909-7033 – Trenton Office 609-393-0243 – Facsimile cynthia.holland@exeloncorp.com

atlanticcitvelectric.com

April 1, 2024

#### 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, 1<sup>st</sup> Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

RE: In the Matter of the Petition of Atlantic City Electric Company Pursuant to N.J.A.C. 14:3-5.1(e) for Approval to Close Its Customer Service Offices Located at 5071 State Route 42, Turnersville, New Jersey and 420 North Main Street, Cape May Courthouse, New Jersey BPU Docket No. \_\_\_\_\_\_

Dear Secretary Golden:

On behalf of Atlantic City Electric Company ("ACE"), enclosed herewith for filing is a Certified Petition seeking authorization to close two of ACE's five customer service offices pursuant to <u>N.J.A.C.</u> 14:3-5.1 and approval to amend its filed Tariff to reflect the closure of those two locations in accord with N.J.A.C. 14:1-5.11.

Pursuant to the Order issued by the Board in connection with *In the Matter of 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 petition is being electronically filed with the Secretary of the Board, the Division of Law, and the New Jersey Division of Rate Counsel. No paper copies will follow.

Thank you for your consideration and courtesies. Feel free to contact me with any questions or if I can be of further assistance.

Respectfully submitted,

Cynthia L.M. Holland An Attorney at Law of the State of New Jersey

Enclosures

cc: Service List

IN THE MATTER OF THE PETITION OF ATLANTIC CITY ELECTRIC COMPANY PURSUANT TO N.J.A.C. 14:3-5.1(e) FOR APPROVAL TO CLOSE ITS CUSTOMER SERVICE OFFICES LOCATED AT 5071 STATE ROUTE 42, TURNERSVILLE, NEW JERSEY AND 420 NORTH MAIN STREET, CAPE MAY COURT HOUSE, NEW JERSEY STATE OF NEW JERSEY

BOARD OF PUBLIC UTILITIES

BPU DOCKET NO. \_\_\_\_\_

PETITION

Petitioner, **ATLANTIC CITY ELECTRIC COMPANY** ("ACE" or the "Company"), having its principal offices and mailing address of 5100 Harding Highway, Mays Landing, in the State of New Jersey 08330, respectfully submits this Petition to the New Jersey Board of Public Utilities (the "Board") for authorization to close two of ACE's five customer service offices pursuant to N.J.A.C. 14:3-5.1 and approval to amend its filed Tariff to reflect the closure of those two locations in accord with N.J.A.C. 14:1-5.11. In support of this Petition, the Company states the following:

#### **OFFICE CLOSURES**

- 1. The Company is a public utility corporation organized and existing under the laws of the State of New Jersey and subject to the regulatory jurisdiction of the Board. The Company is engaged in the purchase, transmission, distribution, and sale of electric power to approximately 565,000 residential, commercial, and industrial customers in southern New Jersey. The Company provides default electricity supply to retail customers who do not choose a competitive supplier.
- 2. The Company currently maintains five customer service offices within its authorized Service Territory. Of these five offices, ACE seeks to close the offices located at 5071 State Route 42 in Turnersville, New Jersey (the "Turnersville Location") and 420 North Main

Street in Cape May Court House, New Jersey (the "Cape May Court House Location"). These offices are currently utilized by only a very small number of ACE customers, primarily for making bill payments.

- 3. Both the Turnersville Location and the Cape May Courthouse Location have experienced significant declines in usage over the years, a trend that began prior to and was then accelerated by the COVID-19 pandemic. This declining usage is detailed in the supporting testimony of Witnesses Hightower and Stephens included with this Petition.
- 4. As the trends in customer usage of these offices has declined, the usage of electronic payment methods has significantly increased. Improvements in technology, such as Interactive Voice Response ("IVR"), also present user-friendly self-service options that have effectively eliminated the need for many customers to visit an office location. Indeed, when most customers present questions unrelated to making a payment at an office location, they are directed to make use of courtesy phones to self-serve through the IVR. This upward trend in electronic payment and IVR usage is further discussed in the supporting testimony of Witnesses Hightower and Stephens included with this Petition.
- 5. In person payment alternatives to the Turnersville Location and Cape May Court House Location are also available to customers. The Company offers over 50 alternative payment locations in and around the Cape May Court House Location and the Turnersville Location. The all-in-one Fiserv system allows merchants, such as Walmart, to accept payments at 143 locations across the State of New Jersey. Six of those locations are present in the Company's service territory. These alternative payment locations are discussed in the supporting testimony of Witnesses Hightower and Stephens.

- 6. Although the Department of Community Affairs ("DCA") offers customers both in person and online options to enroll in assistance programs, the DCA provides far fewer paper applications for use at office locations; instead, encouraging electronic enrollment. Notwithstanding the declining usage of the Turnersville Location and the Cape May Court House Location, the Company has seen a 41.8% increase in assistance enrollments from 2017 to 2023, which is largely attributable to enhanced processes that limit incomplete applications and online enrollments. This upward trend in assistance enrollments at a time when in person payments are dramatically declining is addressed more fully in the supporting testimony of Witnesses Hightower and Stephens.
- 7. Safety and security concerns reinforce the need to close the Turnersville Location and Cape May Court House Location. Currently, employees are handling currency at the Turnersville Location near the public without ballistic-resistant glass or drywall, or a reinforced door separating the employees and public spaces. The facility is also lacking a panic room to accommodate the employees' retreat, if needed. Hardening the Turnersville Location would require multiple, costly capital improvements to make it safer and secure for employees.
- 8. The Cape May Court House Location also presents safety and security concerns due to its location within the same facility as the Cape May Operations Center, which includes the Company's fleet division. Because of this co-location, customers must navigate through constant traffic of both compact and large service vehicles. Public access to the Cape May facility encourages more vehicle and pedestrian traffic, which increases the risk of accidents and potential serious bodily injury to a visitor. These safety and security concerns, as well as the cost associated

with the necessary improvements to address these concerns, are discussed in the supporting testimony of Witnesses Hightower and Stephens.

9. The foregoing paragraphs, along with the supporting testimony of Witnesses Hightower and Stephens, demonstrate that closure of these offices is neither unreasonable nor unduly prejudicial to customers. Witness Perry's testimony discusses the Company's compliance with N.J.A.C. 14:3-5.1 and relates the Company's position to prior Board precedent authorizing the closure of public utility offices based upon similar facts in the record.

#### **TARIFF MODIFICATIONS**

10. ACE proposes Tariff changes to Section II, Terms and Conditions, Paragraph 6.4 to reflect the removal of these office locations from the Company's listed payment locations.

#### **NOTICE AND COMMUNICATIONS**

- 11. Pursuant to the requirements of N.J.A.C. 14:3-5.1(e)(2), the Company will publish a closure notice attached hereto as **Exhibit A** (the "Closure Notice") in newspaper(s) in general circulation serving the affected area(s). The Company will also post the Closure Notice on the Company's website.
- 12. The Company will post a copy of the notice attached as **Exhibit B** (the "Door Notice") on the front door and/or in the front reception area of the each of the effective offices: the Turnersville Location and the Cape May Court House Location. The Door Notice will also be translated into Spanish.
- 13. In addition, ACE will send a copy of a cover letter, attached as **Exhibit C**, and the Closure Notice to the clerks of each affected municipality pursuant to N.J.A.C. 14:3-5.1(e)(2).

14. To keep the public fully informed of the office closures, Witness Perry's supporting

testimony discusses additional communications the Company proposes for customers.

15. Because the Company does not propose any rate changes in connection with its

proposed Tariff changes, public notices will not need to be published or served pursuant to

N.J.A.C. 14:1-5.12(b)1 and 3, (c) and (d). Moreover, there is no requirement for public hearings

in the Company's service area. Thus, the Company is not proposing such in this Petition.

16. Service of this filing along with the exhibits shall be provided by electronic mail to

Rate Counsel and the Deputy Attorneys General at the Department of Law and Public Safety,

Division of Law. Electronic copies of the Petition, along with the exhibits and supporting

testimony shall also be sent to the persons identified in the Service List attached hereto.

17. Communications and correspondence regarding this matter should be sent to

Petitioner's counsel at the following address:

Cynthia L. M. Holland, Esq.

**Assistant General Counsel** 

Atlantic City Electric Company – 92DC42

500 North Wakefield Drive

P.O. Box 6066

Newark, DE 19714-6066

(267) 533-1671

Email: cynthia.holland@exeloncorp.com

with copies to the following representatives of the Company:

Heather Hall

Manager, Regulatory Affairs – New Jersey

Pepco Holdings LLC – 92DC56

500 North Wakefield Drive

P.O. Box 6066

Newark, DE 19714-6066

Email: heather.hall@pepcoholdings.com

and

5

Carlee Harbright Senior Rate Analyst, Regulatory Affairs – New Jersey Atlantic City Electric Company 5100 Harding Highway Mays Landing, NJ 08330

Email: carlee.harbright@exeloncorp.com

#### OFFICE CLOSURE AND TARIFF EFFECTIVE DATE

18. The Company proposes to close the offices and make its Tariff changes effective on **July 1, 2024** and respectfully requests that the Board retain this proceeding and take action on this Petition prior to that date.

#### **EXHIBITS AND SUPPORTING TESTIMONY**

- 19. Attached as **Exhibit A** is the Company's proposed Closure Notice to be published.
- 20. Attached as **Exhibit B** is the Company's proposed Door Notice to be posted.
- 21. Attached as **Exhibit C** is the Company's proposed cover letter enclosing the Closure Notice to the municipal clerks of the effected communities.
- 22. Attached as **Exhibit D** is the Company's proposed redlined version of Section II Standard Terms and Conditions.
- 23. Attached as **Exhibit E** is the Company's proposed clean formatted version of Section II Standard Terms and Conditions.
- 24. The proposed office closures, as described in this Petition, are also supported by the Direct Testimony of Witness Amber Perry along with the Direct Testimony of Panel Witnesses Willa J. Hightower and Edward W. Stephens.

6

WHEREFORE, the Petitioner, ATLANTIC CITY ELECTRIC COMPANY, respectfully requests that the New Jersey Board of Public Utilities:

- (i) grant authorization and approval for ACE to close its Turnersville Location;
- (ii) grant authorization and approval for ACE to close its Cape May Court House Location;
- (iii) grant approval of the associated Tariff revisions proposed herein; and
- (iv) grant such other or further relief as may be necessary.

Respectfully submitted,

On behalf of

ATLANTIC CITY ELECTRIC COMPANY

Dated: April 1, 2024

CYNTHIA L. M. HOLLAND

An Attorney at Law of the State of New Jersey

Atlantic City Electric Company – 92DC42

500 N. Wakefield Drive

P.O. Box 6066

Newark, DE 19714-6066

Phone: (267) 533-1671

IN THE MATTER OF THE PETITION OF ATLANTIC CITY ELECTRIC COMPANY PURSUANT TO N.J.A.C. 14:3-5.1(e) FOR APPROVAL TO CLOSE ITS CUSTOMER SERVICE OFFICES LOCATED AT 5071 STATE ROUTE 42, TURNERSVILLE, NEW JERSEY AND 420 NORTH MAIN STREET, CAPE MAY COURT HOUSE, NEW JERSEY

### STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

#### **CERTIFICATION IN SUPPORT OF PETITION**

AMBER M. PERRY, of full age, certifies as follows:

- 1. I am the Vice President of Regulatory Policy and Strategy of and for Atlantic City Electric Company ("ACE"), the Petitioner named in the foregoing Petition. I am duly authorized to make this Certification on ACE's behalf.
- 2. I hereby certify that I have read the contents of the foregoing Petition and supporting documents thereto.
- 3. I further and finally certify that the information contained therein is true and correct to the best of my knowledge, information, and belief. I am aware that, if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:	3/25/2024	Amber M. Perry
		AMBER M. PERRY $^{\prime\prime}$

### Exhibit A

Notice of Filing to Customers

### NOTICE OF FILING TO CUSTOMERS OF ATLANTIC CITY ELECTRIC COMPANY

("Closure Notice")

**ATLANTIC CITY ELECTRIC COMPANY** ("ACE" or the "Company") has filed a petition with the New Jersey Board of Public Utilities (the "Board" or "BPU") for authorization to close its existing offices located at 5071 State Route 42 in Turnersville, New Jersey and 420 North Main Street in Cape May Court House, New Jersey (the "Petition"). Complete copies of the Petition and all accompanying documents, including this Closure Notice and the BPU Docket Number assigned to the filing, are posted on the Company's website at www.atlanticcityelectric.com/PublicPostings.

Notice of this closure will also be prominently posted at each of the locations proposed for closure. A copy of this Closure Notice is being served upon the municipal clerks in Turnersville and Cape May Court House. The Petition and this Closure Notice have also been sent to the New Jersey Division of Rate Counsel, who will represent the interests of all ACE customers in this proceeding.

**PLEASE TAKE NOTICE** that you have the right to submit any written comments on this pending application to the Board on or before April 26, 2024. Members of the public may file comments with the Secretary of the Board either via e-mail in pdf or Word format to Board.Secretary@bpu.nj.gov or by using the "Post Comments" button on the Board's Public Document Search tool, https://publicaccess.bpu.state.nj.us. Comments are considered public documents for purposes of the State's Open Public Records Act. Only documents that are intended to be public should be submitted using the "Post Comments" button on the Board's Public Document Search tool. Any confidential information should be submitted in accordance with the procedures set forth in N.J.A.C. 14:1-12.3. In addition to hard copy submissions, confidential information may also be filed electronically via the Board's e-filing system or by email to the Secretary of the Board, Sherri L. Golden, RMC. Please include "Confidential Information" in the subject line of any email. Instructions for confidential e-filing are found on the Board's webpage at https://www.nj.gov/bpu/agenda/efiling/.

Emailed and/or written comments may be submitted to:

Sherri L. Golden, Secretary of the Board 44 South Clinton Ave., 1st Floor

44 300th Ctiliton / Wc., 13t 1 tool

PO Box 350

Trenton, NJ 08625-0350 Phone: (609) 913-6241

Email: board.secretary@bpu.nj.gov

All comments should include the name of the Petition and the docket number. (The docket number was not available at the time of publication of this Public Notice but will be posted on the Company's website.) Although written and emailed comments will be given equal consideration and will be made part of the final record, the recommended method of transmittal is by email or the public document portal to ensure timely receipt.

**PLEASE TAKE FURTHER NOTICE** that the general public and customers affected by the proposed office closings may contact the Company at 1.800.642.3780 for billing, service and sales inquiries.



### Exhibit B

English

#### PUBLIC NOTICE FOR POSTING AT LOCATION

("Door Notice")

ATLANTIC CITY ELECTRIC COMPANY (the "Company") has filed a petition with the
New Jersey Board of Public Utilities (the "Board" or "BPU") for authorization to close its existing
offices located at 5071 State Route 42 in Turnersville, New Jersey and 420 North Main Street in Cape
May Court House, New Jersey (the "Petition"). Complete copies of the Petition and all accompanying
documents, including this Closure Notice, are posted on the Company's website at
www.atlanticcityelectric.com/PublicPostings. The Petition has been docketed by the Board as BPU
Docket No

PLEASE TAKE NOTICE that you have the right to submit any written comments on this pending application to the BPU on or before April 26, 2024.

Comments may be submitted directly to the specific docket number listed above using the "Post Comments" button on the Board's Public Document Search tool, <a href="https://publicaccess.bpu.state.nj.us">https://publicaccess.bpu.state.nj.us</a>. Comments are considered public documents for purposes of the State's Open Public Records Act. Only documents that are intended to be public should be submitted using the "Post Comments" button on the Board's Public Document Search tool. Any confidential information should be submitted in accordance with the procedures set forth in N.J.A.C. 14:1-12.3. In addition to hard copy submissions, confidential information may also be filed electronically via the Board's e-filing system or by email to the Secretary of the Board, Sherri L. Golden, RMC. Please include "Confidential Information" in the subject line of any email. Instructions for confidential e-filing are found on the Board's webpage at <a href="https://www.nj.gov/bpu/agenda/efiling/">https://www.nj.gov/bpu/agenda/efiling/</a>.

Emailed and/or written comments may also be submitted to:

Sherri L. Golden, Secretary of the Board 44 South Clinton Ave., 1st Floor PO Box 350
Trenton, NJ 08625-0350

Phone: (609) 913-6241

Email: board.secretary@bpu.nj.gov

All comments should include the name of the Petition and the docket number. Although both written and emailed comments will be given equal consideration and will be made part of the final record, the recommended method of transmittal is by email or the public document portal to ensure timely receipt.

**PLEASE TAKE FURTHER NOTICE** that the general public and customers affected by the proposed office closings may contact the Company at 1.800.642.3780 for billing, service and sales inquiries.

Dated: April 1, 2024 Atlantic City Electric Company

### Exhibit B

Spanish

#### AVISO PÚBLICO PARA PUBLICARSE EN EL LUGAR

("Aviso de puerta")

ATLANTIC CITY ELECTRIC COMPANY (la "Empresa") ha presentado una petición ante la Junta de Servicios Públicos de New Jersey (la "Junta" o la "BPU") para obtener autorización para cerrar sus oficinas existentes ubicadas en 5071 State Route 42 en Turnersville, New Jersey y 420 North Main Street en Cape May Court House, New Jersey (la "Petición"). Las copias completas de la Petición y todos los documentos que la acompañan, incluido este aviso de cierre, se publican en el sitio web de la Empresa en <a href="www.atlanticcityelectric.com/PublicPostings">www.atlanticcityelectric.com/PublicPostings</a>. La Junta registró la Petición con el siguiente n.º de expediente de la BPU: \_\_\_\_\_\_\_\_\_.

TENGA EN CUENTA que tiene derecho a enviar cualquier comentario por escrito sobre esta solicitud pendiente a la BPU hasta el 26 de abril de 2024.

Los comentarios pueden enviarse directamente en el número de expediente específico mencionado anteriormente utilizando el botón "Post Comments" (Publicar comentarios) en la herramienta de búsqueda de documentos públicos de la Junta, <a href="https://publicaccess.bpu.state.nj.us">https://publicaccess.bpu.state.nj.us</a>. Los comentarios se consideran documentos públicos a los efectos de la Ley de Registros Públicos Abiertos del Estado. Solo se deben enviar los documentos que estén destinados a publicarse, utilizando el botón "Post Comments" (Publicar comentarios) en la herramienta de búsqueda de documentos públicos de la Junta. Cualquier información confidencial se debe presentar de acuerdo con los procedimientos establecidos en la sección 14:1-12.3 del Código Administrativo de New Jersey (N.J.A.C.) Además de las presentaciones impresas, la información confidencial también se puede presentar de manera electrónica a través del sistema de presentación electrónica de la Junta o por correo electrónico a la secretaria de la Junta, Sherri L. Golden, RMC. Incluya "Información confidencial" en la línea de asunto de cualquier correo electrónico. Las instrucciones para la presentación electrónica confidencial se encuentran en la página web de la Junta en <a href="https://www.nj.gov/bpu/agenda/efiling/">https://www.nj.gov/bpu/agenda/efiling/</a>.

Los comentarios enviados por correo electrónico o por escrito también pueden enviarse a:

Sherri L. Golden, secretaria de la Junta 44 South Clinton Ave., 1st Floor PO Box 350 Trenton, NJ 08625-0350

Teléfono: (609) 913-6241

Correo electrónico: board.secretary@bpu.nj.gov

Todos los comentarios deben incluir el nombre de la petición y el número de expediente. Aunque tanto los comentarios escritos como los enviados por correo electrónico se considerarán por igual y formarán parte del registro final, el método recomendado de transmisión es por correo electrónico o por el portal de documentos públicos, con el fin de que se garantice la recepción oportuna.

**TENGA EN CUENTA** que el público en general y los usuarios afectados por los cierres de oficinas propuestos pueden comunicarse con la Empresa llamando al 1.800.642.3780 para las consultas sobre facturación, servicios y ventas.

Fecha: 1 de abril de 2024 Atlantic City Electric Company

### Exhibit C

Turnersville



AN EXELON COMPANY

April 1, 2024

Ms. Christine Ciallella Township Clerk Township of Washington 523 Egg Harbor Road Sewell, NJ 08080

Dear Ms. Ciallella:

Please accept this correspondence on behalf of Atlantic City Electric Company. We are reaching out to inform you that an application has been submitted to the Board of Public Utilities requesting the closure of an office in your jurisdiction. Enclosed is a notice that explains where additional details may be obtained and where comments can be filed. This notice will be published in area newspapers; notice will also be posted at the location.

Atlantic City Electric will continue operating three recently renovated Courtesy Centers in Egg Harbor Township, Millville, and Ventnor City.

For additional information about the Courtesy Center closings, alternative payment locations or billing questions, customers can call 1-800-642-3780.

If you have any additional questions or concerns, please feel free to contact me.

Thank you,

Kevin Bass Sr. External Affairs Specialist Alternative Payment Locations:

Walmart 3501 Route 42, Turnersville, N.J.

Walmart 2291 North 2nd Street, Millville, N.J.

Customers can also use our "Find a Payment Location" tool to find additional authorized payment locations in our service area by entering their zip code at atlanticcityelectric.com/Payment

### Exhibit C

Cape May Court House



AN EXELON COMPANY

April 1, 2024

Ms. Kimberly Osmundsen
Business Administrator/Township Clerk
Township of Middle
33 Mechanic Street
Cape May Court House, NJ 08210

Dear Kimberly:

Please accept this correspondence on behalf of Atlantic City Electric Company. We are reaching out to inform you that an application has been submitted to the Board of Public Utilities requesting the closure of an office in your jurisdiction. Enclosed is a notice that explains where additional details may be obtained and where comments can be filed. This notice will be published in area newspapers; notice will also be posted at the location.

Atlantic City Electric will continue operating three recently renovated Courtesy Centers in Egg Harbor Township, Millville, and Ventnor City.

For additional information about the Courtesy Center closings, alternative payment locations or billing questions, customers can call 1-800-642-3780.

If you have any additional questions or concerns, please feel free to contact me.

Thank you,

Ronnie Town External Affairs Manager Alternative Payment Locations:

Walmart 3159 Route 9 South, Rio Grande, N.J.

Walmart 6801 Black Horse Pike, Egg Harbor Township, N.J.

Customers can also use our "Find a Payment Location" tool to find additional authorized payment locations in our service area by entering their zip code at atlanticcityelectric.com/Payment

### Exhibit D

Tariff – Redlined

#### TERMS AND CONDITIONS OF SERVICE

#### 6. METERING, BILLING AND PAYMENT FOR SERVICE (Continued)

#### 6.4 Payment of Bills:

Bills are payable upon presentation, at any location identified by the Company as a payment office, Courtesy Center or authorized collection agency, within twenty (20) days of the postmarked date.

Overdue bills for non-residential customers are subject to a late payment charge as specified on Rate Schedule CHG. This charge will be applied to amounts billed including accounts payable and unpaid late payment charge amounts applied to previous bills, which are not received by the Company within forty-five (45) days for non-residential customers, following the due date specified on the bill. The amount of the late payment charge to be added to the unpaid balance for non-residential customers shall be determined by multiplying the unpaid balance by the late payment charge rate as specified in Rate Schedule CHG. When payment is received by the Company from a customer who has an unpaid balance which includes charges for late payment, the payment shall be applied first to such charges and then to the remainder of the unpaid balance.

New Jersey public utility companies, subject to the New Jersey State Excise Tax, shall be billed net of such taxes.

#### **Courtesy Center Locations**

Egg Harbor Township	6814 Tilton Rd, Egg Harbor Township, NJ 08234
Ventnor	5014 Wellington Ave, Ventnor City, NJ 08406
Cape May Court House	420 S Main St, Cape May Court House, NJ 08210.
Millville	1101 N. 2nd St , Millville NJ 08332
Turnersville	5101 Rt42 Turnersville NJ 08012

#### 6.5 Billing Period:

Except as hereinafter provided under normal course of business, customers shall be billed monthly. Bills for other than thirty (30) days shall be prorated. Where credit situations require, the Company may read meters and render bills at shorter intervals.

Date of Issue: November 30, 2023 Effective Date: December 1, 2023

Issued by: J. Tyler Anthony, President and Chief Executive Officer – Atlantic City Electric Company Filed pursuant to Board of Public Utilities of the State of New Jersey directives associated with the BPU Docket No. ER23020091

### Exhibit E

Tariff - Clean

#### TERMS AND CONDITIONS OF SERVICE

#### 6. METERING, BILLING AND PAYMENT FOR SERVICE (Continued)

#### 6.4 Payment of Bills:

Bills are payable upon presentation, at any location identified by the Company as a payment office, Courtesy Center or authorized collection agency, within twenty (20) days of the postmarked date.

Overdue bills for non-residential customers are subject to a late payment charge as specified on Rate Schedule CHG. This charge will be applied to amounts billed including accounts payable and unpaid late payment charge amounts applied to previous bills, which are not received by the Company within forty-five (45) days for non-residential customers, following the due date specified on the bill. The amount of the late payment charge to be added to the unpaid balance for non-residential customers shall be determined by multiplying the unpaid balance by the late payment charge rate as specified in Rate Schedule CHG. When payment is received by the Company from a customer who has an unpaid balance which includes charges for late payment, the payment shall be applied first to such charges and then to the remainder of the unpaid balance.

New Jersey public utility companies, subject to the New Jersey State Excise Tax, shall be billed net of such taxes.

**Courtesy Center Locations** 

Egg Harbor Township	6814 Tilton Rd, Egg Harbor Township, NJ 08234	
Ventnor	5014 Wellington Ave, Ventnor City, NJ 08406	
Millville	1101 N. 2nd St , Millville NJ 08332	

#### 6.5 Billing Period:

Except as hereinafter provided under normal course of business, customers shall be billed monthly. Bills for other than thirty (30) days shall be prorated. Where credit situations require, the Company may read meters and render bills at shorter intervals.

Date of Issue:	Effective Date:
Issued by:	

#### ATLANTIC CITY ELECTRIC COMPANY

## BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES DIRECT TESTIMONY OF AMBER M. PERRY BPU DOCKET NO. \_\_\_\_

2		I. INTRODUCTION AND PURPOSE
3	Q1.	Please state your name and position.
4	A1.	My name is Amber M. Perry. I am the Vice President of Regulatory Policy &
5		Strategy for Pepco Holdings LLC ("PHI"), a subsidiary of Exelon Corporation ("Exelon").
6	Q2.	On whose behalf are you submitting Direct Testimony in this case?
7	A2.	I am submitting this Direct Testimony on behalf of Atlantic City Electric Company
8		("ACE" or the "Company"). This testimony was prepared by me or under my direct
9		supervision and control. The sources for my testimony are Company records, public
10		documents, and my personal knowledge and experience.
11	Q3.	What are your responsibilities as Vice President of Regulatory Policy & Strategy?
12	A3.	I am responsible for regulatory and energy acquisition matters for two of PHI's
13		regulated utility subsidiaries: ACE and Delmarva Power & Light Company ("Delmarva
14		Power"). In this capacity, I am responsible for regulatory affairs related to PHI's utility
15		business before the New Jersey Board of Public Utilities ("BPU" or the "Board"),
16		Delaware Public Service Commission, and the Federal Energy Regulatory Commission. I
17		also participate in PHI's analysis of regulatory issues and the development of positions on
18		those issues.

#### 1 Q4. Please state your educational background and professional experience.

Q5.

A5.

A4.

I hold a Bachelor of Science degree in Finance from Howard University and a Master of Business Administration from Johns Hopkins University. Before joining Constellation Energy, I worked in the consumer products, telecommunications, financial services, and consulting industries. I joined Constellation Energy in 2008 working in Financial Planning and Analysis. In 2012, I accepted a position as the Project Lead within the Finance Systems Transition Team supporting the merger between Exelon and Constellation. In 2014, I was promoted to Senior Manager within the Commercial Information Technology and Finance Group. In 2016, I was named the Continuous Improvement (Lean/Six Sigma) Master under Exelon. Then, within Exelon Audit Services, I was promoted to Senior Manager in 2018 and then Director in 2020. After approximately two and a half years, I joined PHI Customer Strategy and Governance as a Director in 2022. In early 2023, I was named Vice President of Regulatory Policy and Strategy.

#### What is the purpose of your Direct Testimony?

The purpose of my Direct Testimony is to introduce the Company's application for the closure of two Courtesy Care Centers in its service territory due to evolving customer preferences, declining usage, and security concerns. The Company is proposing to make this adjustment while maintaining the avenues that customers most regularly choose to engage with the Company. Importantly, this request is consistent with the requirements contained within N.J.A.C. 14:3-5.1, as well as prior decisions from the Board authorizing office closures. Finally, my testimony will introduce the Company Witnesses, who will discuss the Company's proposal in more detail.

1	<b>Q6.</b>	How is your testimony organized?
2	A6.	My Direct Testimony is organized as follows:
3 4 5 6 7		<ul> <li>Overview of the Company's proposal</li> <li>A discussion on how the Company's proposal is consistent with Board policies and procedures, including N.J.A.C. 14:3-5.1</li> <li>Introduction of Company Witnesses</li> </ul>
8 9		II. OVERVIEW OF THE COMPANY'S PROPOSAL
10	Q7.	Can you provide an overview of the Company's application?
11	A7.	The Company is filing this application to support the closure of two Courtesy Care
12		Centers, one located in Cape May Court House, and one located in Turnersville. Both are
13		within the ACE service territory. This application will demonstrate consistency with
14		N.J.A.C. 14:3-5.1, and similar requests from other utilities that the BPU has approved. In
15		particular, the application includes discussion of the timing of the proposed office closures,
16		the reasonableness of proposed closures, the proposed closures are in the public interest,
17		the available alternatives to customers, and the notification process the Company plans to
18		use for the proposed closures.
19	Q8.	At a high level, can you describe the reasons for the proposed closure of these two
20		courtesy care centers?
21	A8.	Since 2013, the Company has noted significant declining customer activity at the
22		Cape May Court House and Turnersville Courtesy Care Centers. The Company also noted
23		that customer usage of electronic payment options, such as direct debit and use of the
24		mobile applications and digital platforms, has increased in that same timeframe. Customers
25		also have access to more than 50 alternative payment locations within close proximity to
26		these two Courtesy Care Center locations. Additionally, the Cape May Court House and

Turnersville locations lack the security features and safety measures that other courtesy
centers offer for both employees and customers. Company Witnesses Hightower and
Stephens provide greater detail on the security concerns, decrease in activity at these
courtesy care centers, increased use of digital platforms, and other trends in customer
service and bill payment.

A10.

A9.

### Q9. Do other options exist for the various customer support provided at the Company's Courtesy Care Centers?

Yes. When customers have questions about their bill or service, they can contact customer service by phone, through a mobile application, or through the Company's website. Customers can make payments by phone, mobile application, on-line, direct debit, auto-pay, PayPal, or by mailing a check. In addition to these options for payments, the Company has partnered with a number of other local businesses where customers can make payments in person. These locations can be found using a search feature available on the Company website and on ACE's mobile application. Company Witnesses Hightower and Stephens provide testimony further describing these alternative options for customer support and bill payment in greater detail.

### Q10. How has the Company educated Customers on how to access the various digital platforms for their customer service needs?

The Company has provided information on its digital platforms and tools, self-service options, paperless billing through bill inserts, and postings on its website and social media platforms. Additionally, the Company's energy assistance team attends local community and resource events throughout its service territory where they provide

1		customer education on available digital platforms for support and information on available
2		bill assistance programs.
3	Q11.	Has the Company conducted any customer satisfaction surveys related to the
4		available bill payment options?
5	A11.	Yes, according to a survey conducted in 2023 the majority of customers (80%)
6		indicate ACE does a "good job" of providing customers with options to pay their bills.
7		ACE customers who have used "My Account" to pay their bill or view their energy use are
8		satisfied with their experience, with 88% indicating that "My Account" is useful. 1
9	Q12.	Is the Company aware of any similar requests for closures of offices recently
10		approved by the BPU for any other utilities?
11	A12.	Yes. In 2022, the BPU approved the closure of a South Jersey Gas Company
12		("South Jersey Gas") customer service center in Pleasantville, NJ. <sup>2</sup> The Board determined
13		that South Jersey Gas had demonstrated customer usage decline and had established that
14		other locations were available for in person payment, with the nearest location being 5
15		miles away. The BPU recognized in their order of approval that South Jersey Gas
16		anticipated an approximate cost savings from that closure of \$172,000 in annual operations
17		and maintenance costs as a result of the proposed closure.
18		In 2021, the Board approved a petition filed by Suez Water New Jersey Inc. ("Suez
19		Water") to close a customer payment window in Hackensack, NJ. <sup>3</sup> In that matter, the Board

<sup>&</sup>lt;sup>1</sup> Escalent 2023 ACE Customer Satisfaction Survey of 875 customers.

<sup>&</sup>lt;sup>2</sup> "In The Matter of The Petition of South Jersey Gas Company for Approval of The Closure of Its Office Located At 111 North Franklin Boulevard, Pleasantville, New Jersey Pursuant to N.J.A.C. 14:3-5.1(e) BPU Docket No. GO21101159

<sup>&</sup>lt;sup>3</sup> "In The Matter of The Petition of Suez Water New Jersey Inc. For Approval to Close Its Customer Payment Window At 69 Devoe Place, Hackensack, NJ BPU Docket No. WO21050790

determined that Suez Water had demonstrated that the office was not a secure facility which required several upgrades to make it safer for employees, entry and exit to the office was limited due to a narrow driveway, inadequate social distancing capabilities, and that there were several alternative ways that customers could make payments.

A13.

And lastly, in 2022, the Board approved a petition filed by the United Telephone Company of New Jersey, Inc. (United Telephone) to transition its regional business office to a solely virtual customer assistance platform due to the expected changes in customer interaction as a result of the COVID-19 pandemic.<sup>4</sup> In that matter, the Board determined that United Telephone demonstrated that this transition and use of a third party vendor (Western Union) for fee-free payments by customers was appropriate.

### Q13. Do you feel that the Company's proposed closures are consistent with the facts that the Board found reasonable in these prior cases?

Yes, as further discussed by Company Witnesses Hightower and Stephens, and consistent with the South Jersey Gas matter, the Company is also seeing a decline of customer usage of these two Courtesy Care Centers. However, consistent with both the South Jersey Gas and United Telephone matters, customers would not be disadvantaged by the closures because there are 18 third party vendor locations, including 1 fee free option within 18 miles of the Cape May Court House location and 32 third party vendor locations including 1 fee free option within 12 miles of the Turnersville location. Additionally, as further discussed by Witnesses Hightower and Stephens, the Company also anticipates that these proposed closures will result in a savings of \$40,000 in annual operations and \$1.5M

<sup>&</sup>lt;sup>4</sup> United Telephone Company of New Jersey, Inc. D/B/A Centurylink of Changes In The Clinton, New Jersey Business Office Functions Pursuant to N.J.A.C. 14:3-5.1(c) BPU Docket No. TO20070476

1		in renovation costs. Finally, the security concerns and challenges associated with access
2		which is shared with Company equipment and vehicles, and available alternatives for
3		payments described in Company testimony, as was the case in the Suez Water matter, also
4		provide a reasonable basis for the proposed closures.
5 6	III.	THE COMPANY'S PROPOSAL IS CONSISTENT WITH THE REQUIREMENTS OF N.J.A.C. 14:3-5.1
7 8	Q14.	Is the Company's request supported by the requirements of N.J.A.C. 14:3-5.1?
9	A14.	Yes, the proposed closures are supported by the requirements of N.J.A.C. 14:3-
10		5.1e-f, including the timing of the proposed closures, public impacts of the proposed
11		closures, notification requirements, and the maintenance and provision of a toll-free
12		telephone number for the general public and affected customers.
13	Q15.	Can you discuss the timing of the proposed closure of these two Courtesy Care Center
14		locations?
15	A15.	The regulations require that the Company apply to the Board at least 60 days prior
16		to the proposed closure. The Company is proposing to close these two locations on July 1,
17		2024, which is greater than 60 days from the date of this application. This is consistent
18		with the requirements of N.J.A.C. 14:3-5.1(e)1.
19	Q16.	Does the Company's application demonstrate that the proposed closures are
20		reasonable and in the public interest as required by the regulations?
21	A16.	Yes, based on the declining trends in customer usage of these centers compared to
22		other options offered by the Company including the use of digital platforms and the
23		customer use and availability of third-party locations in the area for bill payment, all
24		discussed in greater detail in the Direct Testimony of Company Witnesses Hightower and

8	Q17.	N.J.A.C 14.3-5e(2) requires that the Company provide notice to its customers and the
7		interest.
6		that the Company's proposal is not unreasonable or unduly prejudicial to the public
5		Water and United Telephone based on similar circumstances further supports the finding
4		Stephens. Prior Board Orders, approving the office closures of South Jersey Gas, Suez
3		these closures and are also discussed in detail by Company Witnesses Hightower and
2		unduly prejudice the public interest. Security concerns further justify the reasonableness of
1		Stephens, the Company has demonstrated that the closure is not unreasonable and will not

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

A18.

A17.

N.J.A.C 14.3-5e(2) requires that the Company provide notice to its customers and the clerk of each affected municipality by posting notice of the proposed closures at the office location and in the newspapers serving the affected area. Can you describe how the Company will be meeting this requirement?

Yes. The Company will provide notification to the clerk and its customers in both Cape May Court House and Turnersville through published notifications in the Press of Atlantic City and the Courier Post. Exhibit A of this application contains these notifications. Additionally, the Company will also post a notice at both the Cape May Court House and Turnersville Courtesy Care Centers letting customers know the Courtesy Care Centers are closing, the proposed date of closure, and the location of the nearest alternate payment locations. Exhibit B of this application contains these posted notifications from both Courtesy Care Center locations.

#### Can you describe the information that will be contained within these notifications? Q18.

The notifications and postings will provide customers information about the alternatives available for bill payments and customer service. Additionally, as required by N.J.A.C. 14.3-5.1(e)2 i and ii, these notifications will inform customers of their right to

1		present to the Board, in writing, any objections they may have to the office closure or
2		relocation; and will specify a date for submission of comments to the BPU. The notice
3		posted by the Company at both the Cape May Court House and Turnersville Courtesy Care
4		Centers will be in both English and Spanish.
5	Q19.	In addition to the notifications you just described, is the Company proposing any
6		other means of keeping its customers informed of their service options available after
7		the proposed closures of the Cape May Court House and Turnersville locations?
8	A19.	Yes, the Company will also post messages on its social media accounts, including
9		its Facebook and X (formerly known as Twitter) accounts, alerting customers to the change
10		and the other options and locations available for service. The Company will also directly
11		notify by mail, in both English and Spanish, the customers who made payments at
12		Turnersville and Cape May Court House within 12 months of the proposed closure. The
13		Company will update its website on April 1, 2024 to reflect these changes and proposes
14		tariff modifications noting the closure of these two locations. Finally, the Company has an
15		active toll-free number which has been included in the notice posted at the office locations
16		and in the newspaper notifications discussed above.
17	Q20.	Pursuant to N.J.A.C. 14:3-5.1(e)3, does the Company acknowledge that the proposed
18		closures cannot take effect until it has been informed in writing that the Board has
19		approved its request?
20	A20.	Yes, the Company understands this requirement and will not close its offices until

it has been informed in writing that the Petition has been approved.

21

1	Q21.	You previously mentioned that the Company will maintain and provide a toll-free
2		telephone number for the general public and affected customers. Can you elaborate?
3	A21.	Yes. In accordance with N.J.A.C. 14:3-5.1(f), the Company has an active toll-free
4		telephone number (800-642-3780), which has Spanish speaking prompts. This number will
5		be included in the required notifications and postings I previously discussed and can be
6		used to request additional information about the proposed Courtesy Care Center closings,
7		alternative payment locations, and billing questions.
8	Q22.	What other steps does the Company require to proceed with the closure of these two
9		locations?
10	A22.	The Company's Petition also requests the Board's simultaneous approval of a Tariff
11		revision, which, if approved, would remove the listing of these two office locations from
12		the Company's filed Tariff. The Company understands that the Order approving the office
13		closure may include a timeline for submission of the Tariff revisions.
14		IV. INTRODUCTION OF COMPANY WITNESSES
15 16	Q23.	Who are the Company witnesses that provide Direct Testimony in support of this
17		application?
18	A23.	This filing is supported by my Direct Testimony and the Direct Testimonies of two
19		Company Witnesses, Company Witness Willa J. Hightower, Vice President of Customer
20		Operations, and Company Witness Edward W. Stephens, Senior Manager of Customer
21		Experience. This witness panel will provide further detail on the proposed closure of two
22		Customer Courtesy Care Centers and demonstrate how the Company's application is
23		consistent with the requirements contained within N.J.A.C. 14:3-5.1.

#### **Witness Perry**

- 1 Q24. Does this conclude your Direct Testimony?
- 2 A24. Yes, it does.

#### ATLANTIC CITY ELECTRIC COMPANY

# BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES DIRECT TESTIMONY OF WILLA J. HIGHTOWER AND EDWARD W. STEPHENS BPU DOCKET NO.

1		I. INTRODUCTION
2	Q1.	Please state your name and position.
3	A1.	My name is Willa J. Hightower. I am the Vice President of Customer Operations
4		for Pepco Holdings LLC ("PHI"), a subsidiary of Exelon Corporation ("Exelon").
5		My name is Edward W. Stephens. I am the Senior Manager of Customer Experience
6		for Pepco Holdings LLC ("PHI"), a subsidiary of Exelon Corporation ("Exelon").
7	Q2.	On whose behalf are you submitting Direct Testimony in this case?
8	A2.	We are testifying on behalf of Atlantic City Electric Company ("ACE" or the
9		"Company").
10	Q3.	Ms. Hightower, what are your responsibilities as Vice President of Customer
11		Operations?
12	A3.	I oversee five Customer Operations functions for PHI's utilities -ACE, Delmarva
13		Power for both Maryland and Delaware, and Potomac Electric Power Company ("Pepco")
14		for both Maryland and D.C.: (1) Meter Services and Meter Operations; (2) Billing; (3)
15		Customer Call Centers; (4) Revenue Management; (5) Large Customer Services; and (6)
16		Customer Strategy & Governance.

1	Q4.	Mr. Stephens, what are your responsibilities as Senior Manager of Customer
2		Experience?
3	A4.	I oversee three functions in support of Customer Experience for PHI's utilities -
4		ACE, Delmarva Power for both Maryland and Delaware, and Pepco for both Maryland and
5		D.C.: (1) Customer Insights; (2) Regulatory and Executive Customer Relations; (3) and E-
6		Channels.
7	Q5.	Ms. Hightower, please state your educational background and professional
8		experience.
9	A5.	I hold a bachelor's degree in Industrial Engineering from Georgia Institute of
10		Technology and a master's degree in Business Administration - Finance from Georgia
11		State University. In 2002, I joined Exelon Corporation ("Exelon") as a senior budget and
12		strategic analyst. Over the course of my 20 years at Exelon, I have held many manager and
13		director roles with increasing levels of responsibilities in the areas of financial planning
14		and reporting, process improvements, revenue and load forecasting, post-merger
15		integrations, and customer operations. I became the director of Customer Strategy and
16		Governance for PHI in July 2020, and I assumed my current role as Vice President of
17		Customer Operations in March 2022.
18	Q6.	Mr. Stephens, please state your educational background and professional experience.
19	A6.	I hold a bachelor's degree in Business Administration - Accounting from
20		Monmouth University. In 2007, I joined Exelon Corporation (PECO) as an Associate
21		Business Analyst in Field and Meter Services. Over the course of my 16 plus years at
22		Exelon, I have held various analyst and leadership roles with increasing levels of
23		responsibility throughout customer operations including credit and collections, call center,

1		and field and meter services. I assumed my current role as Sr. Manager of Customer
2		Experience for PHI in November 2020.
3	Q7.	Ms. Hightower, have you previously submitted testimony before the BPU or other
4		regulatory agencies?
5	A7.	Yes, I previously submitted testimony before the Delaware, Maryland, and District
6		of Columbia Public Service Commissions.
7	Q8.	Mr. Stephens, have you previously submitted testimony before the BPU or other
8		regulatory agencies?
9	A8.	No, I have not previously submitted testimony.
10	Q9.	What is the purpose of your Direct Testimony?
11	A9.	The purpose of our Direct Testimony is to provide details to support the proposed
12		closure of two offices within the Company's authorized Service Territory, which have been
13		identified in the Petition as the Cape May Court House Location and the Turnersville
14		Location. ACE is proposing the closure of these two office locations due to declining
15		customer usage, an increase in alternate payment methods, and security concerns.
16	Q10.	Please summarize why ACE is proposing to close the two courtesy centers.
17	A10.	ACE is proposing to close the two courtesy centers due to a downward trend in
18		payments being processed on-site, an upward trend in customers using electronic payment
19		methods, the availability of additional third-party retail payment locations, and security
20		concerns. Only 1% of total payments made by customers in 2023 were processed at a
21		courtesy center. Additionally, electronic payments have increased over the last five years
22		(2019 to 2023) as a result of additional electronic payment channels and new technology
23		added to the Company's online and phone self-service channels. The Company has also

partnered with additional third-party retail locations where customers can make a payment such as Walmart. As a result, the need for customers to visit the courtesy center locations has been significantly reduced. In addition, the Cape May and Turnersville centers present safety risks for employees and the public due to their lack of safety enhancements which are present at the remaining three locations. Three courtesy centers will remain open: Millville, Egg Harbor and Ventnor. The three remaining centers have been renovated to enhance safety features and each are easily accessible via public transportation.

#### Q11. How do customers utilize the Courtesy Centers?

A11.

Customers primarily utilize the Courtesy Centers to make payments. In addition to making payments, employees at these centers can assist visitors with simple billing questions such as balances owed on their accounts. Visitors can also learn about requirements to enroll in energy assistance at the centers; however, enrollments in energy assistance programs are not completed at the centers. If a customer has an inquiry unrelated to simple billing questions and payments, the courtesy center staff would direct the customer to use a courtesy center phone to obtain the information through the Company's self-service channels, which is no different than the customer making a call from home.

#### Q12. How is your testimony organized?

- A12. Our Direct Testimony is organized as follows:
- 19 I. Introduction and Purpose of Testimony
- 20 II. Overview of ACE Customer Courtesy Centers
- 21 III. Declining Payment Volume at Courtesy Center Locations
- IV. Available Payment Channels
- V. Alternative In-Person Payment Options Available to Customers

- 1 VI. Impact on Low-Income Customers
- VII. Additional Support for Closing the Courtesy Centers
- 3 VIII. Conclusion

4

5

6

7

8

9

10

11

A13.

#### II. OVERVIEW OF ACE CUSTOMER COURTESY CENTERS

#### Q13. Please provide an overview of the Customer Courtesy Centers.

There are currently five customer courtesy center locations in ACE's service territory. Customers primarily use them to make in-person payments. They are located in Cape May County (Cape May Court House location), Gloucester County (Turnersville location), Cumberland County (Millville location), Atlantic County (Egg Harbor and Ventnor locations). Exhibit 1 shows a map of the Courtesy Centers located in ACE's service territory.

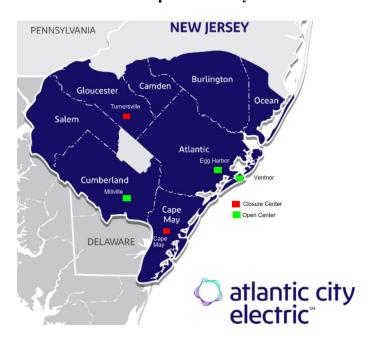


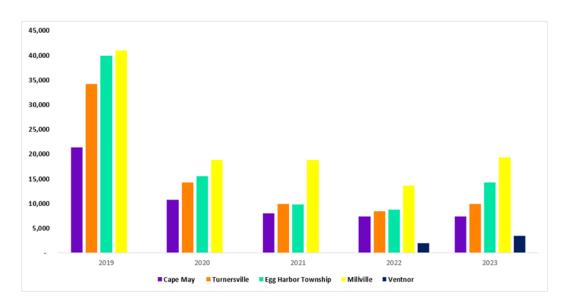
Exhibit 1: Map of Courtesy Centers<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> https://www.atlanticcityelectric.com/about-us/company-information

### Q14. Please explain the rationale for closing the Cape May Court House and Turnersville locations.

A14.

The Cape May Court House and Turnersville locations are in need of renovations to address safety and security concerns which are present in the remaining three other locations. Given the minimal usage of these centers, it is not reasonable or beneficial to customers to undertake costly new renovations at these locations. Additionally, there are numerous other options for customers to make payments, which is the primary reason for visits to the center, these are discussed later in this testimony. Exhibit 2 below shows the annual volumes for the existing five locations from 2019 to 2023. Cape May and Turnersville had the lowest annual payment volume of the five centers with the exception of Ventnor which was recently relocated.



**Exhibit 2: Overview of Courtesy Center Payment Annual Volumes** 

- 12 Q15. Please identify and describe each of the ACE Customer Courtesy Centers.
- 13 A15. ACE currently has five courtesy centers that are open in the Service Territory across
  14 Gloucester, Cape May, Atlantic and Cumberland counties:

Turnersville Location: This courtesy center is in the Priscilla Towne Center Plaza along
with several other businesses. A commercial parking lot is located in front of the office and
it is not well lit. The current layout of the office poses safety risks for employees who
routinely handle cash. The office is lacking some of the safety features of the Company's
other locations, such as ballistic-resistant glass and drywall, reinforced doors separating
the employees and public spaces, and a panic room.
Cape May Court House Location: This courtesy center is located within ACE's Cape
May Operations Center, which includes the Company's vehicle fleet division. Because of
this co-location, customers visiting this office must navigate across a vehicle lot that has
constant traffic of both compact and large service vehicles. Public access to the office
encourages more vehicle and pedestrian traffic, which increases the risk of accidents and
potential serious bodily injury to visitors as well as an increased risk to the Company's
operations due to them being exposed to potential criminal activity. Providing continued
public access to this office creates unnecessary risks for the public and the Company. This
location also lacks some of the safety features of the other locations like ballistic glass and
a panic room.
Egg Harbor Location: This courtesy center is located in the Egg Harbor Township Plaza
with several other active businesses on site. Egg Harbor is easily accessible via public
transportation, conveniently served by seven New Jersey Transit bus lines. There is a well-
lit commercial parking lot in front of the courtesy center. The Company performed
significant renovation work at this facility such as moving cashier windows and doors back
eight feet for increased security. The Company added dividers between phones used by the
public to reach ACE's Customer Service for privacy and lowered the phones to

accommodate customers who have disabilities. A shelf to write checks was added on the wall next to cashier windows. In the inner office, a panic room was added that employees can retreat to if needed. Millville Location: This courtesy center is located within a shopping center in Millville, NJ. Millville is easily accessible via public transportation. It is served by three New Jersey Transit bus lines. There is a well-lit commercial parking lot located in front of the courtesy center. The Company performed significant renovation work at this facility such as moving cashier windows and doors back eight feet for increased security, as well as building a panic room that employees could retreat to if needed. A wall was removed to extend the new floor-to-ceiling cashier wall. The Company added dividers between phones used by the public to reach ACE's Customer Service for privacy and lowered the phones to accommodate customers who have disabilities. A shelf to write checks was added on the wall next to cashier windows. Ventnor Location: On October 30, 2020, ACE filed a petition, pursuant to N.J.A.C. 14:3-5.1(e), to relocate its office at 2430 Atlantic Avenue, Atlantic City, New Jersey, to 5100 Wellington Avenue, Ventnor, New Jersey. This proposal was approved, and the new location was opened in July 2022. This center is in a well-lit shopping mall with public parking and is easily accessible from the Atlantic City Expressway. The Ventnor office is also easily accessible via public transportation and is conveniently served by two New Jersey Transit bus lines. This office location is 1,500 square feet, which has allowed for community outreach events. The larger space also allows for greater social distancing, which protects the health and safety of ACE customers and employees. For safety and security, the Ventnor location has ballistic-resistant glass, ballistic-resistant-drywall, and a

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

reinforced door separating the employee and public spaces. The office also has a panic room.

## III. DECLINING PAYMENT VOLUME AT COURTESY CENTER LOCATIONS

#### Q16. Please describe the declining trend in payment volume at Courtesy Centers.

3

4

5

9

10

11

12

13

A16. In 2023, 54,386 payments were made at ACE offices, in contrast to 174,327 in 2019 which represents a 69% decrease. This declining trend is described in more detail by location below.

#### Q17. Please provide an overview of the Cape May Court House location volume trends.

A17. The volume of customer payment activity at this location declined from 32,133 payments in 2013, to 7,396 payments in 2023. This shows an overall usage decline of approximately 77% from 2013 to 2023. Please see Exhibit 3, which depicts this usage decline.

35,000 25,000 20,000 15,000 5,000 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023

**Exhibit 3: Cape May Court House Payment Volume** 

#### Q18. Please provide an overview of the Turnersville location volume trends.

1

7

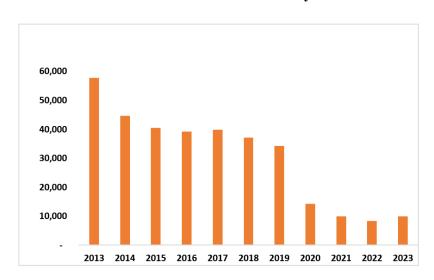
8

9

10

11

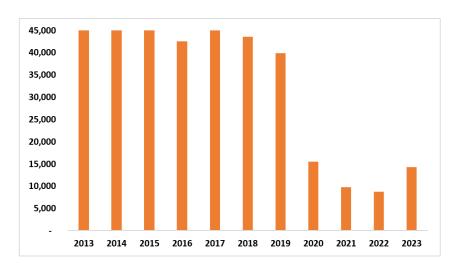
2 A18. The volume of customer payment activity at this location declined from 57,760 payments in 2013, to 9,900 payments in 2023. This shows an overall usage decline of approximately 83% from 2013 to 2023. Please see Exhibit 4, which depicts this usage decline.



**Exhibit 4: Turnersville Payment Volume** 

#### 6 Q19. Please provide an overview for the Egg Harbor Township location volume trends.

A19. The volume of customer payment activity at this location declined from 53,425 payments in 2013, to 14,287 payments in 2023. This shows an overall usage decline of approximately 73% from 2013 to 2023. Please see Exhibit 5 below, which depicts this usage decline. Despite this decline, the number of payments made at the Egg Harbor Township facility exceeds that of the Cape May and Turnersville locations.



**Exhibit 5: Egg Harbor Township Payment Volume** 

#### 1 Q20. Please provide an overview of the Millville location volume trends.

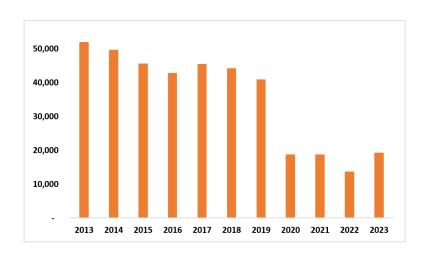
2

3

4

5

A20. The volume at this location declined from a which is the primary reason for visits to the center of 51,900 payments in 2013, to 19,333 payments in 2023. This shows an overall usage decline of approximately 63% from 2013 to 2023. Please see Exhibit 6 below, which depicts this usage decline.



**Exhibit 6: Millville Payment Volume** 

- 1 Q21. Please provide an overview of the Ventnor location volume trends.
- As discussed above, ACE relocated this courtesy center from Atlantic City to Ventnor in July 2022. Therefore, there is no historical data for this location prior to the opening date. In 2023, there were 3,464 payments processed at this location.

#### IV. AVAILABLE PAYMENT CHANNELS

6 Q22. Please describe the trends in customer payment channels.

5

10

11

12

7 A22. Customers continue to migrate to electronic payment solutions due to improvements in technology. In 2023, 75.08% of payments were received electronically versus 58.3% in 2016. Exhibit 7 shows how the trend in electronic payments has increased.

80.0% 75.08% 75.0% 73.1% 69.4% 70.0% 65.0% 62.0% 60.0% 55.0% 50.0% 2016 2017 2018 2019 2020 2021 2022 2023

**Exhibit 7: Increase of Electronic Payments** 

This payment trend illustrates that customers are taking advantage of the various available electronic platforms to make their payments.

- Q23. What other forms of electronic payment platforms are available to customers?
- 13 A23. The electronic platforms include:
- **Direct Debit** Customers can select to have ACE pull the amount due directly from their bank account. These payments are set up through the ACE website.

- Paymentus This is a web-based electronic bill payment system which allows customers
   to process payments over the phone.
- Speedpay Customers can make payments via the Company's website.
- Wells Fargo ACH Commercial customers can schedule electronic payment transfers
   between their bank account and the Company.
- Wells Fargo Ebox Customers can set up automatic payments through their bank rather
   than the through the Company's website.
- 8 Q24. What forms of non-electronic payment options are available to customers?
- 9 A24. Other non-electronic payment options include:
- ACE NJ Walk-In Center Customers can visit courtesy centers and pay via cash, check,
   or money order. They can also drop off checks after hours in a drop box.
- Wells Fargo Lockbox Customers can mail in their payments to the PO Box displayed on the bill.
- Other Payment Options: Customers also have the option to make payments with the

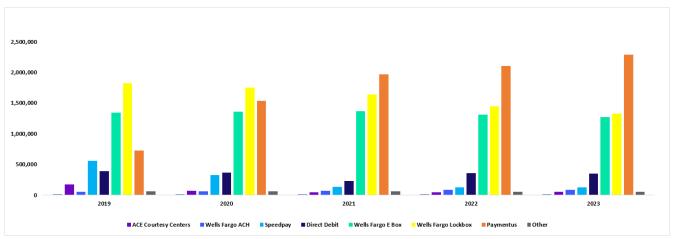
  Account Processing Solutions (APS) retail partners like Walmart at no cost, and Western

  Union Payment Centers and Convenience Pay for a fee.
- 17 Q25. Please describe the trend in payments being processed at Courtesy Centers compared 18 to other payment options.
- 19 A25. The Company has seen a declining trend in customer payments being made at a courtesy
  20 center while there has been an increase in payments being made in other electric and non21 electric payment options. The leading payment option in the last three years has been
  22 Paymentus which is a web-based electronic bill payment system which allows customers

to process payments over the phone. Please Exhibit 8 below showing trends in payment channels from 2019 to 2023.

Exhibit 8: Payments by Channel<sup>2</sup>

A26.



### Q26. What recent technology advances have driven the reduction in the Courtesy Center usage?

The Company has made significant technological advances over the last several years. Customers can now utilize the Company's Interactive Voice Response ("IVR") to complete most transactions. This user-friendly self-service option effectively eliminates the need to visit a courtesy center. In fact, if a customer visits a courtesy center and has questions unrelated to making a payment or simple balance questions, the courtesy center staff will direct the customer to use one of the available phones to contact the IVR. Customers can perform the following actions using the IVR: report an outage, obtain an outage update, make a payment, obtain balance information, add or update phone numbers,

<sup>&</sup>lt;sup>2</sup> Other payment in Exhibit 8 is composed of retail payment centers, e.g., APS, Western Union Payments, Western Union Convenience Pay, and Walmart.

obtain a payment arrangement, receive a payment extension, start or stop budget billing, and start or stop service.

#### V. ALTERNATIVE IN-PERSON PAYMENT OPTIONS AVAILABLE TO

#### 4 CUSTOMERS

3

5

6

7

8

9

10

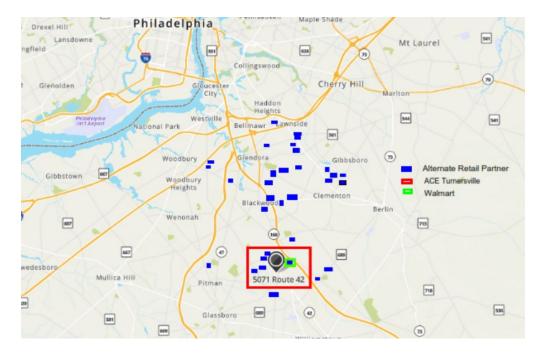
11

12

A27.

# Q27. Do other in-person payment options exist for customers previously making payments in the Cape May Court House and Turnersville locations?

The Company has partnered with more than 50 retail locations to allow customers to make payments in and around the Cape May Court House and Turnersville Courtesy Center locations. Customers can locate these alternative payment locations using a search feature available on ACE's website and mobile application. As demonstrated in Schedule (WJH,EWS)-1 and Exhibit 9 below, there are 32 alternative in-person payment locations within an average of seven miles of the Turnersville Courtesy Center.



**Exhibit 9: Turnersville Alternative Payment Locations** 

- 1 As shown in Schedule (WJH,EWS)-2 and Exhibit 10 below, there are 18 alternative in-
- 2 person payment locations within an average of 11 miles of the Cape May Court House
- 3 Courtesy Center.

**Exhibit 10: Cape May Alternative Payment Locations** 



#### 4 Q28. What costs are associated with the use of the alternative payment locations?

Malmart allows customers to process payments for free utilizing Fiserv. Fiserv is an all-in-one system that allows merchants to accept payments. There are 143 Fiserv locations in the State of New Jersey and six of those locations are located in the ACE service territory. There are two Fiserv locations within two and five miles of the Turnersville and Cape May Court House locations respectively. ACE customers used these

payment locations to make over 46,000 payments during 2023. Please see Schedule (WJH,EWS)-3 for a list of Fiserv payment locations in the State of New Jersey.

A29.

#### VI. IMPACT ON LOW INCOME CUSTOMERS

#### Q29. Would low-income customers be impacted from closing these two courtesy centers?

ACE is committed to enhancing equity in the communities it serves and ensuring low- and moderate-income customers have access to the tools and resources they need to manage their energy service. Data suggests that low-income customers will be minimally impacted by the closures, if at all. Customers who would typically visit these centers will have the ability to either visit a nearby payment location, pay online, or pay by phone. According to 2018-2022 Census data, most of the customers in these two counties have access to the web. Of the four counties in the ACE service territory with a courtesy center, customers in Cape May and Gloucester counties, including low-income customers, are in the two counties with the highest percent of households with a computer (Turnersville 95.3% and Cape May 94.9%). Additionally, these two counties also have the lowest percentage of people in poverty (Gloucester County 7.6% and Cape May County 9.6%.<sup>3</sup>). Based on this data, and the increasing trend in electronic payments, there is sufficient support for the conclusion that these customers can take advantage of the online payment options offered.

<sup>&</sup>lt;sup>3</sup> https://www.census.gov/quickfacts/fact/table/gloucestercountynewjersey/INC910222#INC910222 https://www.census.gov/quickfacts/fact/table/capemaycountynewjersey/PST045222

Q30.	How would the closing of the courtesy centers impact Customer Enrollment in Ener				
	Assistance Programs?				

A31.

A30.

While customers can obtain a list of required documents for Energy Assistance applications at the Company's courtesy centers, they cannot submit applications at these locations. The Department of Community Affairs (DCA) is the State Agency that administers energy assistance in New Jersey. DCA offers customers the option to apply via paper and online. Over the last year, DCA has drastically reduced the number of paper applications provided, which pushes customers to the online application. Customer enrollments for energy assistance have increased by 9.2% since 2022. There was a 13.5% increase from 2021 to 2022. Despite fewer paper applications and declining visits to the Company's courtesy centers; ACE has seen a 41.8% increase in enrollments from 2017 (pre-pandemic) to 2023. Therefore, the availability of a courtesy centers does not appear to impact access to energy assistance programs.

# Q31. Please discuss the various ways that customers are informed about energy assistance programs, including the types of outreach ACE provides to customers throughout its service territory?

In partnership with South Jersey Gas and community agencies, ACE hosts a series of pop-up events at local festivals, resource events, job fairs, back to school events, and various other community events. This allows the Company to leverage shared efforts by various agencies and industry partners with the same goal of reaching communities and increasing awareness about available energy assistance programs. This communication is dispersed by placing signage at facilities, email lists, and distributing flyers to increase awareness about events.

#### VII. ADDITIONAL SUPPORT FOR CLOSING THE COURTESY CENTERS

#### 2 Q32. What other reasons support closing the two Courtesy Centers?

1

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

A33.

- A32. In addition to the reduction in customer activity, there are potential security risks associated with these two locations. The Company also expects to realize some cost savings as a result of the closures, which would lower the Company's operational costs.
- Q33. Please discuss the Safety and Security concerns that further support the closure of
   these two courtesy centers.

The Turnersville and Cape May Court House locations do not protect employees who routinely handle cash in public sight. This is a high security risk for employees and the public, as there have been several security incidents at and around the Company's courtesy centers which led the Company to enhance its security features at its other courtesy centers. Renovating the Turnersville and Cape May Court House courtesy centers to include the safety features present at some of the other locations would cost approximately \$1.5M. Furthermore, the Cape May Court House courtesy center is located within the same facility as the Cape May Court House Operations Center, which includes the Company's fleet division. Because of this, a customer visiting the Cape May Court House courtesy center must navigate across a vehicle lot that has constant traffic of both typical and large work vehicles. Public access to the Cape May Court House facility encourages more vehicle and pedestrian traffic, which increases the risk of accidents and potential serious bodily injury to visitors as well as an increased risk to the Company's operations being exposed to potential criminal activity. Providing continued access to Cape May courtesy center creates unnecessary risks for customers and the Company.

The cost of addressing these safety issues through the relocation or renovation of the facilities is not prudent given the steady decline in customers that use the facilities, a trend that began prior to the pandemic, and is expected to continue as technology continues to improve and the availability of alternative payment methods increases.

#### What are the cost savings associated with closing the two centers?

The closure of the Turnersville and Cape May Court House courtesy centers will result in a cost reduction. Currently the courtesy centers are staffed with three contractors which cost approximately \$210K annually. These positions will be eliminated if the centers are closed. Additionally, there will be cost savings of \$19K, annually, from terminating the lease at the Turnersville location. These items are currently recovered in rates and will result in a cost savings to customers. If the closures are not approved, there will be additional costs of approximately \$1.5M associated with renovating the centers and leasing a new space for the Cape May Court House location. In addition, the Company would also incur costs to repurpose the existing Cape May space.

#### VIII. CONCLUSION

#### Q35. Does this conclude your Direct Testimony?

17 A35. Yes, it does.

**O34.** 

A34.

# Schedule (WJH,EWS)-1

Location: 5101 Rt42 Turnersville NJ 08012	Vendor	Street Address	City/State	Fee Free	Miles from Payment Office	Xtreme Locator
Walmart	Fiserv	3501 NJ-42	Turnersville, NJ 08012	YES	2	Х
RITE AID	Western Union	2 S BLACK HORSE PIKE	TURNERSVILLE, NJ 08012	No	5	Х
WALGREENS #1531	Western Union	625 N BLACK HORSE PIKE	TURNERSVILLE, NJ 08012	No	6	Х
YOGIS QUICK SHOP	Western Union	192 FRIES MILL RD	TURNERSVILLE, NJ 08012	No	1	Х
RITE AID #236	Western Union	1360 BLACKWOOD CLEMENTON RD	CLEMENTON, NJ 08021	No	6	Х
PREET FOOD MART	Western Union	1411 CHEWS LANDING RD	LAUREL SPRINGS, NJ 08021	No	7	Х
RITE AID #10440	Western Union	1492 CHEWS LANDING RD	LAUREL SPRINGS, NJ 08021	No	7	Х
RITE AID #4739	Western Union	2090 ERIAL CLEMENTON RD	SICKLERVILLE, NJ 08081	No	8	Х
ACME #3994	Western Union	415 EGG HARBOR RD	SEWELL, NJ 08080	No	3	Х
DEPTFORD GRILL & DELI	Western Union	1700 COOPER ST	DEPTFORD, NJ 08096	No	8	Х
WALGREENS #17747	Western Union	500 EGG HARBOR RD	SEWELL, NJ 08080	No	3	Х
RITE AID #4601	Western Union	100 WARWICK RD	STRATFORD, NJ 08084	No	9	Х
UNITED CHECK CASHING	Western Union	1390 BLACKWOOD CLEMENTON RD	CLEMENTON, NJ 08021	No	7	Х
RITE AID #1860	Western Union	490 HURFFVILLE CROSSKEYS RD	SEWELL, NJ 08080	No	4	Х
WALGREENS #10490	Western Union	1601 KEARSLEY RD	SICKLERVILLE, NJ 08081	No	8	Х
WALGREENS #7649	Western Union	1301 BLACK HORSE PIKE	GLENDORA, NJ 08029	No	4	Х
ACME #2998	Western Union	501 E EVESHAM RD	RUNNEMEDE, NJ 08078	No	9	Х
UNITED CHECK CASHING	Western Union	71 S WHITE HORSE PIKE	STRATFORD, NJ 08084	No	10	Х
RITE AID #1716	Western Union	101 WHITE HORSE PIKE	CLEMENTON, NJ 08021	No	8	Х
RICK'S FARM	Western Union	428 N WARWICK RD	SOMERDALE, NJ	No	10	Х
FAMILY FINANCIAL CENTER	Western Union	211 E GIBBSBORO RD	LINDENWOLD, NJ 08021	No	9	Х
RITE AID #843	Western Union	608 N WARWICK RD	SOMERDALE, NJ 08083	No	10	Х
SUPER 7 FOOD MARKET	Western Union	219 E GIBBSBORO RD	CLEMENTON, NJ 08021	No	9	Х
ACME #2956	Western Union	515 CROSS KEYS RD	SICKLERVILLE, NJ 08081	No	6	Х
ZEE MART	Western Union	430 E GIBBSBORO ROAD	LINDENWOLD, NJ 08021	No	9	Х
WALGREENS #5986	Western Union	590 CROSS KEYS RD	SICKLERVILLE, NJ 08081	No	5	Х
WALGREENS #5836	Western Union	1408 DELSEA DR	DEPTFORD, NJ 08096	No	9	Х
RITE AID #10462	Western Union	500 WOODBURY GLASSBORO RD	SEWELL, NJ 08080	No	7	Х
RITE AID #10468	Western Union	860 COOPER ST	DEPTFORD, NJ 08096	No	10	Х
WALGREENS #4059	Western Union	100 N WHITE HORSE PIKE	MAGNOLIA, NJ 08049	No	10	Х
RITE AID #789	Western Union	501 CLEMENTS BRIDGE RD	BARRINGTON, NJ	No	12	Х
GLOBAL CURRENCY SERVICES #11	Western Union	115 S BLACK HORSE PIKE	BELLMAWR, NJ 08031	No	5	Х

Western Union Locations **does charge a FEE** for bill payment (quick collect or convenience pay). FISERV locations **does not charge** a fee for bill payment

# Schedule (WJH,EWS)-2

Location (Cape May Court House) 420 S Main St, Cape May Court House, NJ 08210	Vendor	Street Address	City/State	Fee Free	Miles from Payment Office	Xtreme Locator
Walmart #003337	Fiserv	3159 Route 9 South	Rio Grande, NJ 08242	YES	5	Х
ACME #859	Western Union	15 AVALON BLVD	CAPE MAY COURTHOUSE, NJ 08210	No	5	Х
ACME #890	Western Union	11 S. DENNIS ROAD	CAPE MAY COURTHOUSE, NJ 08210	No	1	Х
Dollar General #13407	Western Union	1616 Route 9 North	Swainton, NJ 08210	No	5	Х
ACME #996	Western Union	6212 Landis Ave	Sea Isle City, NJ 08243	No	14	Х
WALGREENS #10491	Western Union	3300 ROUTE 9 S	Rio Grande, NJ 08242	No	7	Х
RIO CHECK CASHING	Western Union	1304 ROUTE 47 STE 31	Rio Grande, NJ 08242	No	8	Χ
ACME #2838	Western Union	2400 DELAWARE AVE	NORTH WILDWOOD, NJ 08260	No	9	Х
RITE AID #1258	Western Union	3400 NEW JERSEY AVE	WILDWOOD, NJ 08260	No	9	Х
DOLLAR General #18175	Western Union	4000 NEW JERSEY AVE	WILDWOOD, NJ 08260	No	9	Х
WALGREENS #120030491	Western Union	5000 PARK BLVD	WILDWOOD, NJ 08260	No	10	Х
ACME #821	Western Union	5300 PARK BLVD	WILDWOOD, NJ 08260	No	10	Х
ACME #996	Western Union	6212 LANDIS AVE	Sea Isle City, NJ 08243	No	14	Х
WALGREENS #19918	Western Union	3221 BAYSHORE RD	NORTH CAPE MAY, NJ 08204	No	11	Χ
ACME #2855	Western Union	3845 BAYSHORE RD	NORTH CAPE MAY, NJ 08204	No	13	Х
ACME #3835	Western Union	2087 SHORE ROAD	SEAVILLE, NJ 08230	No	13	Х
ACME #845	Western Union	315 OCEAN ST	CAPE MAY, NJ 08204	No	12	Х
DOLLAR GENERAL #14641	Western Union	105 SOUTH SHORE RD US 9	MARMORA, NJ 08223	No	18	Х

Western Union Locations **does charge a FEE** for bill payment (quick collect or convenience pay). FISERV locations **does not charge** a fee for bill payment

# Schedule (WJH,EWS)-3

Name	Address	City	State	Zip	Phone #
ATLANTIC COMMUNICATIONS GROUP	2722-B ATLANTIC AVE	ATLANTIC CITY	NJ	08401	(609) 449-0010
RICK'S FARM	428 NORTH WARWICK RD	SOMERDALE	NJ	08083	(856) 435-5000
WAL-MART STORES, INC #03830	631 RT. 9 S.	LITTLE EGG HARBOR	NJ	08087	(609) 296-2430
ONE STOP SHOPPE	396 WHITE HORSE PIKE	ATCO	NJ	08004	(856) 753-5443
WAL-MART STORES, INC #05012	1750 NOTTINGHAM WAY	HAMILTON	NJ	08619	(609) 438-4093
ONE STOP SHOPPE	300 PARKVILLE STATION RD	MANTUA	NJ	08051	(856) 468-1789
WAL-MART STORES, INC #03212	6801 BLACK HORSE PIKE	EGG HARBOR TOWNSHIP	NJ	08234	(609) 415-6353
HYLTON CHECK CASHING	9003 N CRESCENT BLVD	PENNSAUKEN	NJ	08110	(856) 662-2100
CUMBERLAND CHECK CASHING	100 E COMMERCE ST	BRIDGETON	NJ	08302	(856) 691-7705
WILLIAMSTOWN CHECK CASHING	1951 N. BLACK HORSE PIKE	WILLIAMSTOWN	NJ	08094	(856) 262-8888
DOVER CHECK CASHING	2305 ATLANTIC AVE	ATLANTIC CITY	NJ	08401	(609) 345-8181
WAL-MART STORES, INC #05944	934 ROUTE 73	MOUNT LAUREL	NJ	08054	(856) 372-6130
TRADERS VARIETY AND NEWS	1951 BLACK HORSE PIKE	WILLIAMSTOWN	NJ	08094	(856) 728-8050
THE UPS STORE #1314	237 SOUTH DELSEA DR	VINELAND	NJ	08360	(856) 692-4900
UNITED CHECK CASHING	1390 BLACKWOOD CLEMENTON RD	CLEMENTON	NJ	08021	(856) 784-1410
INSTANT CASHING	333 SICKLERVILLE RD	SICKLERVILLE	NJ	08081	(856) 728-8181
CHECK CASHING SERVICES	116 N BROADWAY	CAMDEN	NJ	08102	(856) 338-0852
UNITED CHECK CASHING	518 N. DELSEA DR.	GLASSBORO	NJ	08028	(856) 863-1155
WAL-MART STORES, INC #03078	290 STATE ROUTE 18	EAST BRUNSWICK	NJ	08816	(732) 955-0871
WAL-MART STORES, INC #03159	1 TETERBORO LANDING DR	TETERBORO	NJ	07608	(201) 375-4002
WAL-MART STORES, INC #01742	3501 ROUTE 42	TURNERSVILLE	NJ	08012	(856) 629-3888
WAL-MART STORES, INC #01807	265 ROUTE 73 NORTH	WEST BERLIN	NJ	08091	(856) 753-8787
WAL-MART STORES, INC #01844	950 ROUTE 37 WEST	TOMS RIVER	NJ	08755	(732) 349-6000
WAL-MART STORES, INC #01869	150 ROUTE 70 EAST	MARLTON	NJ	08053	(856) 983-2100
WAL-MART STORES, INC #01921	525 RTE. 72 WEST	MANAHAWKIN	NJ	08050	(609) 978-8300
WAL-MART STORES, INC #01977	1872 ROUTE 88	BRICK	NJ	08723	(732) 840-7772
WAL-MART STORES, INC #02003	979 ROUTE#1 SOUTH	NORTH BRUNSWICK	NJ	08902	(732) 545-4499
SUN WHOLESALE- MAYA KIOSK	2157 ADMIRAL WILSON BLVD	CAMDEN	NJ	08109	(856) 338-8948
LATINO FOOD MARKET - MAYA KIOSK	490 N EGG HARBOR RD	HAMMONTON	NJ	08037	(609) 567-5363
FREMONT STOP AND SHOP - MAYA KIOSK	306 HILLSIDE AVE	CAMDEN	NJ	08105	(856) 541-2920
QUISQUELLA SUPER MARKET - MAYA KIOSK	123 1ST STREET	ELIZABETH	NJ NJ	07206	(856) 236-3288
LA DOMINICANA MINI MARKET - MAYA KIOSK	1210 YORKSHIP SQUARE	CAMDEN	NJ NJ	08104	(856) 541-2359
CHEO SUPERMARKET - MAYA KIOSK EIGHT FIVE SIX MARKET- MAYA KIOSK	2220 RIVER ROAD 2798 BENSON ST	CAMDEN	NJ NJ	08105 08105	(856) 365-0031 (856) 966-0333
SASSI LIQUOR	116 NORTH VIRGINIA AVE.	CARNEYS POINT	NJ	08069	(856) 299-1610
UNITED CHECK CASHING	71 SOUTH WHITE HORSE PIKE	STRATFORD	NJ	08089	(856) 309-1211
ONE STOP SHOPPE	931 WEST RED BANK AVE	WEST DEPTFORD	NJ	08096	(856) 853-9160
WAL-MART STORES, INC #02041	709 SOUTH BROADWAY	PENNSVILLE	NJ	08070	(856) 935-8200
WAL-MART STORES, INC #02090	230 STATE HIGHWAY	FRANKLIN	NJ	07416	(973) 209-4242
WAL-MART STORES, INC #02108	4620 BLACK HORSE PIKE	MAYS LANDING	NJ	08330	(609) 625-8200
WAL-MART STORES, INC #02109	2291 NORTH SECOND STREET	MILLVILLE	NJ	08332	(856) 825-4200
WAL-MART STORES, INC #02195	4900 U.S. HWY. #9	HOWELL	NJ	07731	(732) 886-9100
WAL-MART STORES, INC #02254	55 S. WHITE HORSE PIKE	HAMMONTON	NJ	08037	(609) 567-2700
WAL-MART STORES, INC #02294	150 RT. 31 N.	FLEMINGTON	NJ	08822	(908) 788-7739
WAL-MART STORES, INC #02497	1236 ROUTE 22	PHILLIPSBURG	NJ	08865	(908) 454-3622
WAL-MART STORES, INC #02503	1885 ROUTE 57 - SUITE 100	HACKETTSTOWN	NJ	07840	(908) 979-9342
WAL-MART STORES, INC #02518	700 MARKETPLACE BLVD.	HAMILTON	NJ	08691	(609) 585-1463
WAL-MART STORES, INC #02582	ROUTE 513 AND I-78	CLINTON	NJ	08809	(908) 730-8665
WAL-MART STORES, INC #02604	26 HAMPTON HOUSE RD/ROUTE 206	NEWTON	NJ	07860	(973) 300-1859
WAL-MART STORES, INC #02633	1303 CENTENNIAL AVE.	PISCATAWAY	NJ	08854	(732) 562-1771
WAL-MART STORES, INC #02651	100 NO. MAIN STREET	MANVILLE	NJ	08835	(908) 575-8997
WAL-MART STORES, INC #02825	1126 ROUTE 9	OLD BRIDGE	NJ	08857	(732) 525-8030
WAL-MART STORES, INC #02841		LUMBERTON	NJ	08048	(609) 702-9200
	1740 ROUTE 38	LOTIBLICTOR			
WAL-MART STORES, INC #02871	1740 ROUTE 38 2501 ROUTE 130 SOUTH	CINNAMINSON	NJ	08077	(856) 303-2119
WAL-MART STORES, INC #02871 WAL-MART STORES, INC #03236			CN CN	08077 07728	(856) 303-2119 (732) 780-3048
·	2501 ROUTE 130 SOUTH	CINNAMINSON			, ,
WAL-MART STORES, INC #03236	2501 ROUTE 130 SOUTH 326 WEST MAIN STREET	CINNAMINSON FREEHOLD	ŊĴ	07728	(732) 780-3048

Name	Address	City	State	Zip	Phone #
WAL-MART STORES, INC #03337	3159 ROUTE 9 SOUTH	RIO GRANDE	NJ	08242	(609) 465-2204
WAL-MART STORES, INC #03339	1070 W. LANDIS AVE.	VINELAND	NJ	08360	(856) 205-9940
WAL-MART STORES, INC #03422	2000 CLEMENTS BRIDGE RD.	WOODBURY	NJ	08096	(856) 384-3211
WAL-MART STORES, INC #03443	48 ROUTE 23 NORTH	RIVERDALE	NJ	07457	(973) 835-5812
WAL-MART STORES, INC #03469	1601 WEST EDGAR ROAD	LINDEN	NJ	07036	(908) 474-9055
WAL-MART STORES, INC #03520	400 PARK PLACE	SECAUCUS	NJ	07094	(201) 325-9280
WAL-MART STORES, INC #03562	189 ROUTE 46 WEST	SADDLE BROOK	NJ	07663	(201) 226-0575
WAL-MART STORES, INC #03598	235 RIDGEDALE AVENUE	CEDAR KNOLLS	NJ	07927	(973) 889-8646
WAL-MART STORES, INC #03795	2100 88TH ST.	NORTH BERGEN	NJ	07047	(201) 758-2810
WAL-MART STORES, INC #04153	2825 HIGHWAY RTE 18	OLD BRIDGE	NJ	08857	(732) 955-0139
WAL-MART STORES, INC #04456	315 WHITE HORSE PIKE S.	MAGNOLIA	NJ	08049	(856) 545-9052
WAL-MART STORES, INC #05047	130 BLACKHORSE PIKE	AUDUBON	NJ	08106	(856) 310-1470
WAL-MART STORES, INC #05077	300 WOOTTON STREET	BOONTON	NJ	07005	(973) 299-3943
WAL-MART STORES, INC #05111	1501 ROUTE 22 WEST	WATCHUNG	NJ	07069	(908) 756-1925
WAL-MART STORES, INC #05142	3575 ROUTE 66 WEST	NEPTUNE	NJ	07753	(732) 922-8084
WAL-MART STORES, INC #05178	220 ENTERPRISE DRIVE	ROCKAWAY	NJ	07866	(973) 361-6089
WAL-MART STORES, INC #05201	2220 RT. 27	EDISON	NJ	08817	(732) 650-1297
WAL-MART STORES, INC #05281	306 US HIGHWAY 9 NORTH	WOODBRIDGE	NJ	07095	(732) 826-4652
WAL-MART STORES, INC #05340	500 ROUTE 38	CHERRY HILL	NJ	08002	(856) 665-5430
WAL-MART STORES, INC #05384	1130 HIGHWAY 77	BRIDGETON	NJ	08302	(856) 453-0418
WAL-MART STORES, INC #05364	580 RT. 9 N.	LANOKA HARBOR	NJ	08302	(609) 242-4231
WAL-MART STORES, INC #05417	150 HARRISON AVE.	KEARNY	NJ	07032	(201) 955-0280
·	1350 DELSEA DR.	WEST DEPTFORD	NJ	08051	` '
WAL-MART STORES, INC #05476			_		(856) 686-0133
WAL-MART STORES, INC #05952	174 PASSAIC ST.	GARFIELD	NJ NJ	07026	(973) 773-0573
WAL-MART STORES, INC #05867	500 BAYONNE CROSSING WAY	BAYONNE	NJ NJ	07002	(201) 620-6137
WAL-MART STORES, INC #03070	1840 SOUTH BLACK HORSE PIKE	WILLIAMSTOWN	NJ NJ	08094	(856) 629-2054
WAL-MART STORES, INC #02040	2106 MT HOLLY ROAD	BURLINGTON TOMO DIVIER	NJ NJ	08016	(609) 386-8400
CHECKS 2 CASH	970 RIVER AVENUE	TOMS RIVER	NJ NJ	08753	(732) 244-2814
CONOCO	303 S WHITE HORSE PIKE	MAGNOLIA	NJ NJ	08049	(860) 800-2646
MANMIT CHECK CASHING INC	2762 MT. EPHRAIM AVE	CAMDEN	NJ NJ	08104	(856) 365-0158
ONE STOP SHOPEE FOOD MARKET	36 N DELSEA DR	GLASSBORO	NJ	08028	(856) 863-1442
MEXICO LINDO SERVICES LLC-1889	1205 B SPRINGFIELD AVE	IRVINGTON	NJ	07111	(973) 375-7378
RINCONCITO MUSICAL CORP	342 MAIN ST	HACKENSACK	NJ 	07601	(201) 487-1018
GALLOS I CORP	694 MAIN AVE	PASSAIC	NJ 	07055	(973) 779-3444
GALLOS II CORP	167 FRENCH ST	NEW BRUNSWICK	NJ 	08901	(732) 296-0116
ELIZABETH AGENCY LLC	611 MAIN ST	ASBURY PARK	NJ 	07712	(732) 776-5206
CHRISTIANS SERVICES LLC	87 ELMORA AVE	ELIZABETH	NJ	07202	(908) 289-3250
ARTEAGAS AGENCY LLC	1623 MAIN ST	BELMAR	NJ 	07719	(732) 280-7071
ISACC TRAVEL AGENCY INC	102 SHREWSBURY AVE	RED BANK	NJ	07701	(732) 530-3535
GALLOS III CORP	229 MONROE STREET	PASSAIC	NJ	07055	(973) 928-1402
BUENAVISTA MULTISERVICES LLC #2	6603 BERGENLINE AVENUE	WEST NEW YORK	NJ	07093	(201) 751-4229
MZ MULTISERVICES LLC	250 WANAQUE AVE	POMPTON LAKES	NJ	07442	(973) 910-6652
BUENAVISTA MULTISERVICES LLC #3	5003 BERGENLINE AVENUE	WEST NEW YORK	NJ	07093	(201) 758-7388
ENVIOS AVA CORP I	186 SOMERSET ST.	NORTH PLAINFIELD	NJ	07060	(908) 561-3047
MOBIL AND ENVIOS MULTISERVICES LLC	318 MAIN ST	BRADLEY BEACH	NJ	07720	(732) 774-0811
ENVIOS AVA CORP II	400 WEST FRONT ST.	PLAINFIELD	NJ	07060	(908) 444-8041
SERVI EXPRESS MULTISERVICES LLC	447-21 AVE	PATERSON	NJ	07513	(973) 925-7191
MACARA EXPRESS 2 LLC	332 KEARNY AVE	KEARNY	NJ	07032	(551) 580-7419
MACARA EXPRESS LLC	217 CENTRAL AVE	EAST NEWARK	NJ	07029	(973) 900-9623
ENVIOS AVA CORP III	249 E FRONT ST	PLAINFIELD	NJ	07060	(908) 941-4997
MACARA EXPRESS 3 LLC	416 MORRIS AVE	ELIZABETH	NJ	07208	(908) 436-3660
LATIN TRAVEL MULTISERVICES INC	25 PACIFIC ST	NEWARK	NJ	07105	(973) 817-9646
AGENCIA Y CULTURA LATINA LLC	298 SHREWSBURY AVE	RED BANK	NJ	07701	(732) 212-8400
ENVIOS AVA CORP V	210 WATCHUNG AVE	PLAINFIELD	NJ	07060	(908) 279-6944
N AND M MULTISERVICES INC	336 BLOOMFIELD AVE	NEWARK	NJ	07107	(973) 412-1011
PUNTO LATINO LLC	225 LAFAYETTE ST	NEWARK	NJ	07105	(973) 351-4480
MACARA EXPRESS 4 LLC	56 WILSON AVE	NEWARK	NJ	07105	(973) 732-2505
COSTAMAR EXPRESS MULTISERVICES INC	204 FERRY ST	NEWARK	NJ	07105	(973) 732-5151

Name	Address	City	State	Zip	Phone #
LETICIA PHONES AND MORE LLC	2801 BERGENLINE AVE	UNION CITY	NJ	07087	(201) 334-6490
UNIQUE SHOP LLC	124 POLK ST	NEWARK	NJ	07105	(973) 589-3879
J I DIVISA EXPRESS LLC	4904 PARK AVENUE	WEEHAWKEN	NJ	07086	(551) 556-8764
GUERRA ENTERPRISES INC	271 SOMERSET ST	NORTH PLAINFIELD	NJ	07060	(908) 205-8560
ENVIWORLD LLC	76 GARDEN ST.	NEWARK	NJ	07105	(862) 237-5887
DAZA ENTERPRISES INC	4 HAMILTON STREET	BOUND BROOK	NJ	08805	(732) 469-7870
MI PAIS CARGO	272 NORTH BROAD ST	ELIZABETH	NJ	07208	(908) 352-0174
EL COLOR DE MEXICO LLC	300 MONROE ST	PASSAIC	NJ	07055	(973) 928-3376
LATIN TRAVEL GROUP LLC	64 CONGRESS ST	NEWARK	NJ	07105	(973) 878-3814
ECUADOR XPRESS MULTISERVICE LLC	730 MOUNT PROSPECT AVE	NEWARK	NJ	07104	(973) 732-0551
GL SERVICES NJ LLC	144 E FRONT ST	PLAINFIELD	NJ	07060	(908) 834-2562
UNITED CHECK CASHING	140 NORTH, ROUTE 73	WEST BERLIN	NJ	08091	(215) 360-3622
UNITED CHECK CASHING	555 EAST FIRST AVENUE	ROSELLE	NJ	07203	(917) 679-8288
MEXICO LINDO SERVICES LLC	1205 B SPRINTFIELD AVE	IRVINGTON	NJ	07111	(973) 375-7378
AGENCIA PARDOS MULTISERVICE LLC (NJ)	385 WALNUT ST	NEWARK	NJ	07105	(973) 230-2356
BUENAVISTA MULTISERVICES LLC #2 (NJ)	6603 BERGENLINE AVENUE	WEST NEW YORK	NJ	07093	(201) 751-4229
BUENAVISTA MULTISERVICES LLC #3 (NJ)	5003 BERGENLINE AVENUE	WEST NEW YORK	NJ	07093	(201) 758-7388
LA RUMBITA	6409 BERGENLINE AVE	WEST NEW YORK	NJ	07093	(201) 662-5544
RUMBALA CORP (NJ)	3227 BERGENLINE AVE	UNION CITY	NJ	07087	(201) 866-3103
SERVICIO EXPRESS (NJ)	300 MAIN ST	HACKENSACK	NJ	07601	(201) 488-5333
SERVICIO EXPRESS II (NJ)	100 W PALISADE AVE	ENGLEWOOD	NJ	07631	(201) 871-0888
RUMBA LATINA CORP DBA UNEXPRESS	1905 BERGENLINE AVE	UNION CITY	NJ	07087	(201) 214-8921
PK MULTI CARGO LLC (NJ)	1374 SPRINGFIELD AVE	IRVINGTON	NJ	07111	(973) 416-6651
LITTLE MEXICO GROCERY LLC (NJ)	2439 ROUTE 206	MOUNT HOLLY	NJ	08060	(609) 702-7485
R SALINAS LLC LOS GALLOS	281 MONROE ST	PASSAIC	NJ	07055	(862) 225-9826
TOTAL BRAZIL PRODUCTS LLC	21 NIAGRA ST	NEWARK	NJ	07105	(201) 618-7086
LINDEN CONVENIENCE & STATIONERY	638 W ST GEORGE AVENUE	LINDEN	NJ	07036	(908) 486-7825

Stores in BOLD are in ACE Service Territory

IN THE MATTER OF THE PETITION OF ATLANTIC CITY ELECTRIC COMPANY PURSUANT TO N.J.A.C. 14:3-5.1(e) FOR APPROVAL TO CLOSE ITS CUSTOMER SERVICE OFFICES LOCATED AT 5071 STATE ROUTE 42, TURNERSVILLE, NEW JERSEY AND 420 NORTH MAIN STREET, CAPE MAY COURT HOUSE, NEW JERSEY

### STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

#### **CERTIFICATION OF SERVICE**

#### **CYNTHIA L.M. HOLLAND**, of full age, certifies as follows:

- 1. I am an attorney at law of the State of New Jersey and am Assistant General Counsel to Atlantic City Electric Company, the Petitioner in the within matter, with which I am familiar.
- 2. I hereby certify that, on April 1, 2024, I caused the within Petition and exhibits to be filed with the New Jersey Board of Public Utilities (the "Board") through its eFiling Portal. I also caused an electronic copy to be sent to the Board Secretary's office at board.secretary@bpu.state.nj.us.
- 3. I further certify that, on April 1, 2024, I caused a complete copy of the Petition and exhibits to be sent by electronic mail to each of the parties listed in the attached Service List.
- 4. Pursuant to the Order issued by the Board in connection with *In the Matter of 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, only electronic copies of this Petition have been served on persons on the Service List.

5. I further and finally certify that the foregoing statements made by me are true. I am aware that, if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 1, 2024

CYNTHIA L.M. HOLLAND
An Attorney at Law of the
State of New Jersey

Atlantic City Electric Company – 92DC42 500 N. Wakefield Drive P.O. Box 6066 Newark, Delaware 19714-6066 (267) 533-1671 – Teams (609) 909-7033 – Telephone (Trenton) (302) 429-3801 – Facsimile cynthia.holland@exeloncorp.com

In the Matter of the Petition of Atlantic City Electric Company Pursuant to N.J.A.C. 14:3-5.1(e) for Approval to Close Its Customer Service Offices Located at 5071 State Route 42, Turnersville, New Jersey and 420 North Main Street, Cape May Courthouse, New Jersey

BPU Docket No.	

#### Service List

#### **BPU**

Sherri L. Golden ●
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, NJ 08625-0350
sherri.golden@bpu.nj.gov
board.secretary@bpu.nj.gov

Robert Brabston, Esq. robert.brabston@bpu.nj.gov

Michael Beck, Esq. michael.beck@bpu.nj.gov

Dean Taklif dean.taklif@bpu.nj.gov

Kyle Felton kyle.felton@bpu.nj.gov

Julie Ford-Williams
Director
Division of Customer Assistance
julie.ford@bpu.nj.gov

Eudys Toure <a href="mailto:eudys.toure@bpu.nj.gov">eudys.toure@bpu.nj.gov</a>

David Pirrong david.pirrong@bpu.nj.gov

Raymond Matos <a href="mailto:raymond.matos@bpu.nj.gov">raymond.matos@bpu.nj.gov</a>

Richard Lambert <u>richard.lambert@bpu.nj.gov</u>

#### **DAG**

Pamela L. Owen, Esq.
Deputy Attorney General
Department of Law and Public Safety
Division of Law
25 Market Street
P.O. Box 112
Trenton, NJ 08625
pamela.owen@law.njoag.gov

Steven A. Chaplar, Esq. Deputy Attorney General steven.chaplar@law.njoag.gov

#### **RATE COUNSEL**

Brian O. Lipman, Esq. Director Division of Rate Counsel 140 East Front Street, 4<sup>th</sup> Floor P.O. Box 003 Trenton, NJ 08625 blipman@rpa.nj.gov

T. David Wand, Esquire Deputy Rate Counsel dwand@rpa.nj.gov

Bethany Rocque-Romaine, Esq. Deputy Rate Counsel <a href="mailto:bromaine@rpa.nj.gov">bromaine@rpa.nj.gov</a>

Brian Weeks, Esq. Deputy Rate Counsel <a href="mailto:bweeks@rpa.nj.gov">bweeks@rpa.nj.gov</a>

Debora Layugan Division of Rate Counsel dlayugan@rpa.nj.gov

Annette Cardec Division of Rate Counsel acardec@rpa.nj.gov

#### **ACE**

Cynthia L.M. Holland, Esq.
Assistant General Counsel
Atlantic City Electric Company
150 W. State Street, Suite 5
Trenton, NJ 08608-1105
cynthia.holland@exeloncorp.com

Heather Hall <a href="heather.hall@atlanticcityelectric.com">heather.hall@atlanticcityelectric.com</a>

Carlee Harbright carlee.harbright@exeloncorp.com