Matthew M. Weissman
Special Counsel - State Regulatory

Law Department
PSEG Services Corporation
80 Park Plaza – T20, Newark, New Jersey 07102-4194
email: matthew.weissman@pseg.com

November 18, 2024

Via Electronic Mail
Honorable Sherri L. Golden, Board Secretary
NJ Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, NJ 08625-0350

Re: In the Matter of Medium and Heavy Duty Electric Vehicle Charging Ecosystem
BPU Docket No. QO21060946

Dear Secretary Golden:

Please accept for filing Public Service Electric and Gas Company's ("PSE&G" or the "Company") opposition to the motion for reconsideration ("Motion") in the above-captioned matter filed on November 7, 2024 by the New Jersey Division of Rate Counsel ("Rate Counsel") with the New Jersey Board of Public Utilities (the "Board" or "BPU").

Consistent with 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 document is being filed electronically with the Secretary of the Board and the New Jersey Division of Rate Counsel. No paper copies will follow.

Very truly yours,

Matthew M. Weissman

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PRELIMINARY STATEMENT

Public Service Electric and Gas Company ("PSE&G" or the "Company") hereby submits its opposition to the motion for reconsideration ("Motion") in the above-captioned matter filed on November 7, 2024 by the New Jersey Division of Rate Counsel ("Rate Counsel") with the New Jersey Board of Public Utilities (the "Board" or "BPU"). Rate Counsel requests reconsideration of the Board's "framework order" in In the Matter of Medium and Heavy Duty Electric Vehicle Charging Ecosystem, Dkt. No. QO2160946 (October 23, 2024) ("MHD Order"). In that Order, the Board directed the state's investor owned electric distribution companies ("EDCs") to propose medium and heavy duty electric vehicle ("EV") programs pursuant to enumerated minimum filing requirements.

Rate Counsel seeks reconsideration of the Board's finding that in those future EV programs, when a utility is preparing a site to install an EV charger (that is, when the utility is investing in "Make Ready" equipment) "at the request of an unaffiliated [Electric Vehicle Service Equipment ("EVSE")] Infrastructure Company, that infrastructure shall be deemed 'used and useful,' even if the Make Ready is not immediately used," subject to normal review of the prudence of the investment. Rate Counsel's request for reconsideration has no merit and should be rejected on either or both procedural and substantive grounds.

First, this same issue – whether Make Ready investment supporting a transition to electric vehicles should be considered used and useful -- was expressly considered and determined in the affirmative by the Board in 2020, following a robust stakeholder process in which the Rate Counsel actively participated, regarding the light duty electric vehicle ecosystem. Rate Counsel did not seek reconsideration of that finding (the Motion does not even mention that relevant finding), and offers no basis for distinguishing the MHD EV ecosystem from the light duty EV ecosystem that

has been in place for approximately four years. Indeed, Rate Counsel executed a series of stipulations beginning in January 2021 agreeing that New Jersey's electric distribution companies ("EDCs"), including PSE&G, would make substantial investments in Make Ready facilities that would be considered used and useful when built, even if not immediately used. Rate Counsel should be barred from relitigating issues already settled, particularly where Rate Counsel has taken contrary positions in recently-executed stipulations, and the motion for reconsideration should be rejected on these procedural grounds alone.

Second, the Board's determination in 2020 that Make Ready investment can be used and useful in the public service when built was correct, and Rate Counsel's reliance on generic statements pulled out of context from inapposite cases and BPU decisions does not establish that the Board's MHD Framework is flawed as a matter of law. To the contrary, precedent, including the precedent cited by Rate Counsel, supports rather than undermines the Board's decision.

STANDARD OF REVIEW

PSE&G agrees with Rate Counsel's statement that the standard of review on a motion for reconsideration under N.J.A.C. 14:1-8.6(a)(1) requires that the moving party allege "errors oflaw or fact" that were relied upon by the Board in rendering its decision. The Company also notes that Rate Counsel seeks reconsideration only on a question of law; there are no facts in dispute. See Motion at 2 (alleging only that the Board made errors of law by failing to adhere to "well settled New Jersey case law" regarding the used and useful requirement, and to "its own regulations regarding the definition of 'in service' as it relates to rate recovery"). On questions of law, the party seeking reconsideration must show that "the court acted in an arbitrary, capricious or unreasonable manner", and that "the decision was based upon a palpably incorrect or irrational basis." Motion at 2 (citing D'Atria v. D'Atria, 242 N.J. Super. 392, 401 (Ch. Div 1990)).

In this case, the Board's decision to authorize recovery of prudently incurred Make Ready investment as used and useful is based on well-settled legal precedent and is supported by current legislative and administrative policy determinations. As Rate Counsel notes in its statement on the Standard of Review, "[a] party should not seek reconsideration merely based upon dissatisfaction with a decision." Motion, at 2 (citing D'Atria v. D'Atria, 242 N.J. Super. 392, 401 (Ch. Div 1990)). Rate Counsel's Motion should be denied on these grounds as well.

ARGUMENT

I. Whether Make Ready Investment Can Be Used And Useful Has Already Been Determined In The Affirmative; Indeed, Rate Counsel Has Executed Several Stipulations Agreeing That EV Make Ready Investment Is Used, Useful, and Recoverable In Utility Rates

On May 18, 2020, based on "the directives and authority provided by the [Global Warming Response Act], [the] 2019 [Energy Master Plan ("EMP")], and the [Plug-In Vehicle ("PIV")] Act, the Board built on its efforts to assist in electrifying the state's transportation sector when it released its Electric Vehicle Infrastructure Ecosystem 2020 Straw Proposal ("Straw Proposal") . . . ."[1] As the Board noted in the September 2020 LD Framework Order resolving the stakeholder process on the Straw Proposal, that proposal "highlighted the need to create a comprehensive EV Infrastructure Ecosystem -- that is, a network of different players who simultaneously work together towards the goal of widespread EV adoption," including "consumers, employers, property owners, electric distribution companies ("EDCs"), and investors." On June 3, 2020, Staff held a stakeholder meeting to solicit comments on the Straw Proposal, and written comments were due

[1] See I/M/O Straw Proposal on Electric Infrastructure Build Out, Dkt. No. QO20050357, Order Adopting the Minimum Filing Requirements for Light-Duty Publicly-Accessible Electric Vehicle Charging, 2020 WL 5802404 (N.J.Bd.Reg.Com. Sept. 23, 2020)("LD Framework Order").

on June 17, 2020. The Board received 34 comments from individuals, coalitions, and businesses, including Rate Counsel, and all comments were posted to the Board's website.

The treatment of Make Ready investment by EDCs was expressly addressed in the stakeholder proceeding. In the LD Framework Order the Board noted that based on the comments received, "there is almost universal support for allowing the EDCs to construct Make-Ready sites." Moreover, the Board noted that "Staff agrees with most commenters that utility investment in Make-Ready work is 'used and useful in the public service,' since Make-Ready infrastructure is specifically designed to facilitate publicly-accessible charging services."[2] For these and certain other reasons detailed in point II below, the Board made the very same determination in 2020 that Rate Counsel challenges here, specifically, that where a utility makes a site Charger-Ready "at the request of an unaffiliated EVSE Infrastructure Company," that investment "shall be deemed 'used and useful,' even if the Make-Ready site is not immediately used."[3]

Rate Counsel did not seek reconsideration of that finding and, more importantly, executed a series of stipulations beginning in January 2021 agreeing that New Jersey's electric distribution companies ("EDCs"), including PSE&G, would make substantial investments in Make Ready facilities that would be considered used and useful when built, even if not immediately used. For example, Rate Counsel stipulated, and the Board subsequently ordered, that PSE&G's initial EV investment program would be comprised almost entirely of "Make Ready -- meter to charger stub" and "Make Ready – Service Upgrade – pole to meter" investments, defined, respectively, to include "the pre-wiring of electrical infrastructure at a parking space, or set of parking spaces, to facilitate easy and cost-efficient future installation of . . . EVSE" and "activities and facilities

[2] LD Framework Order, at 18.
[3] Id.

needed to upgrade an electric service to accommodate EV service equipment."[4] The parties also agreed, and the Board ordered, that those "CEF-EV related" Make Ready capital costs "shall be deferred and placed in a regulatory asset, for recovery in the Company's next base rate case . . . ."[5]

Rate Counsel's motion for reconsideration ignores this recent, relevant history and does not suggest any basis for a different outcome in this case, or any reason for Rate Counsel's apparent repudiation of its previous position in numerous stipulations that Make Ready work can be used and useful. Therefore, the request for reconsideration is barred by both collateral estoppel, which precludes relitigation of issues previously determined, and by the doctrines of waiver and judicial estoppel, which preclude a party from taking a position in opposition to a position taken previously in a separate judicial proceeding. As the Board has itself recognized, the Supreme Court of the State of New Jersey has held that these doctrines are applicable in an administrative context. See State v. Gonzalez 142 N.J. 618, 632 (1995); Re Public Service Electric and Gas Company, Dkt. Nos. 812-76, 8012-914, 1982 WL 993180, 48 P.U.R.4th 79 ((N.J.B.P.U. 1982) (denying Rate Counsel's request for reconsideration and citing City of Hackensack v Winner, 82 NJ 1, 31 (1980)). In the latter case the Board took pains to highlight the "important goals [that]

[4] See I/M/O the Petition of Public Service Gas and Electric Co. for Approval of its Clean Energy Future – Electric Vehicle and Energy Storage ("CEF-EVES") Program on a Regulated Basis, BPU Docket No. EO18101111, Decision and Order Approving Stipulation (January 27, 2021) ("CEF-EV Order"), at ¶ 15, notes 9 and 10. See also I/M/O the Petition of Atlantic City Electric for Approval of a Voluntary Program for Plug-In Vehicle Charging, BPU Docket No. EO18020190, Order Approving Stipulation of Settlement (February 17, 2021) at 8, 10, and Stipulation Attachment A, page 2 of 13; I/M/O the Petition of Rockland Electric Company for Approval of an Electric Vehicle Program, Establishment of an Electric Vehicle Surcharge, and for other Relief, BPU Docket No. EO20110730, Decision and Order Approving Stipulation (October 12, 2022) at 4 and Stipulation, ¶¶ 3, 5; I/M/O the Verified Petition of Jersey Central Power & Light Company for Approval of an Electric Vehicle Program and an Associated Cost Recovery Mechanism, BPU Docket No. EO21030630, Decision and Order Approving Stipulation (June 8, 2022) at 5-6, Stipulation ¶¶ 15-18, 21-22.

[5] CEF-EV Order, at ¶ 22.

may be achieved from the 'prudent and selective application in administrative proceedings of" these doctrines, and quoted the state supreme court:

> Decisions have stressed that the policy considerations which support these judicial doctrines—namely, finality and repose; prevention of needless litigation; avoidance of duplication; reduction of unnecessary burdens of time and expenses; elimination of conflicts, confusion, and uncertainty; and basic fairness—have an important place in the administrative field.' (Id., 82 NJ 32, 33) (Citations omitted).

Rate Counsel's motion for reconsideration should be rejected on these procedural grounds alone.

II. The Board's Prior Determination That Make Ready EV Investment Is Used and Useful Is Consistent With Relevant Precedent And With New Jersey Energy Policy

As a preliminary matter, we note that Rate Counsel's concern that permitting utilities cost recovery on prudently incurred Make Ready investment will result in stranded assets (Motion at 5-6) is unfounded as a matter of fact. Rate Counsel ignores important elements of the proposed minimum filing requirements ("MFRs") that directly address its alleged concern. Specifically, among many other requirements, each EDC's MHD EV plan must require that chargers be operational for five years after installation, and the EDCs are required to propose "enforcement mechanisms to achieve all requirements . . ., including but not limited to, penalties, repayment of incentives, and withholding of bonds or reimbursement."[6] These safeguards will mitigate any stranded costs and thereby protect customers.

Even putting aside these facts, Rate Counsel's Motion fails as a matter of law. In its determination in the LD Framework Order that utility investment in Make-Ready work is "used and useful in the public service," the Board relied on essentially the same case law cited by Rate Counsel in its Motion.[7] However, contrary to the Rate Counsel's unsupported inference, the

[6] See MHD Order, at 48-49 (paragraphs 8(e), 9 and 10 (f)).
[7] LD Framework Order, at 18 (citing Atl. City Sewerage Co. v. Bd. of Pub. Util. Comm'rs, 128 N.J.L. 359, 365 (Sup. Ct. 1942) ("Atlantic City Sewerage"); In re the Petition of Pub. Serv. Coordinated Transp., 5 N.J. 196, 217

Board properly did not determine that that case law would limit the "used and useful" designation to investment only after there is electric power actually flowing through the equipment.[8] Rather, the Board "viewed the infrastructure as 'an integral and unitary whole, considering all the elements properly entering into the ascertainment of a reasonable return for supplying the public need.'"[9] Similarly, the Board noted that there must be "'an honest and intelligent forecast' of probable future values," considering all the circumstances relevant to the particular inquiry.[10] In considering "all the circumstances", the Board emphasized the goals of the then-recently-enacted PIV Act, the 2019 EMP, and the Board's broad statutory authority:

> The PIV Act sets forth goals which demonstrate the anticipated widespread adoption of EVs and publicly-accessible EV charging. In consideration of these goals and the comments received, Staff believes that the Make-Ready infrastructure will, in the near future, increasingly be used by EV owners. Further, the 2019 EMP indicates that this infrastructure will not only serve EV owners, but all New Jersey residents due to known benefits associated with the electrification of our transportation system. Having the EDCs conduct Make-Ready work on infrastructure, which will provide benefits to ratepayers, is consistent with the traditional utility function of ensuring adequate physical support for its customers, as well as the Board's statutory authority "to conserve and preserve the quality of the environment and prevent the pollution of the waters, land and air of this State."[11]

Finally, citing its obligation "always . . . to balance the rights of the ratepayers and the rights of regulated utilities" and the traditional application of the "used and useful" principle "to ensure that utilities only earn on investments that benefit ratepayers," the Board cited and ultimately adopted Staff's recommendation that the Board should establish:

> a clearly delineated approach where a utility making a site Charger-Ready at the request of an unaffiliated EVSE Infrastructure Company shall be deemed "used and useful," even if the Make-Ready site is not immediately used. While this does not exempt the utility from showing that it was prudent in the manner in which it made the site Charger-Ready,

(1950); In re N.J. Power & Co., 9 N.J. 498, 509 (1952); Verizon Communications v. Fed. Communications Comm'n, 535 U.S. 467, 484 (2002)).

[8] Rate Counsel does not cite, and our research has not revealed, any authority supporting the proposition that utility investment cannot be used and useful until power, gas, or water is actually flowing.

[9] LD Framework Order, at 19 (citing Atl. City Sewerage, 128 N.J.L. at 366).

[10] Id.

[11] LD Framework Order, at 19 (citing N.J.S.A. 48:2-23).

> the utility should not be at financial risk for putting in an installation that was duly authorized pursuant to this Order.[12]

This conclusion is supported not only by current state policy encouraging a transition to electric vehicles, but also by the Board's long-standing practice of recognizing in utility rate base plant projected to be in service in the future.[13]

In its Motion Rate Counsel essentially argues that the Board should ignore this recent EV precedent as well as public utility ratemaking principles, legislative mandates, and State policy, based on quotations taken from utility rate-making decisions that are inapplicable to this situation and that do not support their position. Rate Counsel cites various New Jersey Supreme Court decisions (Atlantic City Sewerage,[14] Public Service Coordinated Transport,[15] and Industrial Sands[16]) and Board decisions (I/M/O Petition of Suez Water[17] and I/M/O Parkway[18]) for the unremarkable proposition that "[t]he rate base is the fair value of the property used and useful in the public service."[19] However, none of those cases support the proposition that utility investment cannot be used and useful until power, gas, or water is actually flowing. For example, Rate Counsel cites *Petition of Suez* and *Parkway* as examples of application of the "used and useful"

[12] Id., at 19 (citing In re N.J. Power & Co., 9 N.J. 498, 508-509 (1952); Duquesne Light Co. v. Barasch, 488 U.S. 299, 307-308 (1989)(disallowing investments in a planned nuclear power plant because the plant was never used)).

[13] See, e.g., Re Environmental Disposal Corporation, 1996 WL 422661, BPU Docket No. WR94070319, OAL Docket No. PUC9730-95, 1996 WL 422661 (N.J.B.P.U. July 17, 1996)(noting that DEP regulations as well as Board policy require sufficient capacity to accommodate future needs, including that sewage treatment plants be built with capacity to serve the amount of flow projected ten years into the future); In re Rockland Elec. Co., 61 PUR 4th 480, 481 (N.J.B.P.U. 1984) and In re Atlantic City Elec. Co, 62 PUR 4th 120, 122-23 (N.J.B.P.U. 1984) *(*recognizing in rate base plant projected to be in service in the future); Re Atlantic City Electric Company Intervenors: New Jersey Energy Users Association and Port Authority Transit Corp, Docket No. 8310-883, OAL Docket No. 8543-83, 1984 WL 1028463 (N.J.B.P.U.), 62 P.U.R. 4th 120 (1984) ("[t]he board has pursued a policy of permitting the value of property purchased for future use in rate base where the purchase is reasonably made to meet anticipated future energy needs").

[14] Atlantic City Sewerage Co. v. Bd. of Pub. Util. Comm'rs, 128 N.J.L. 359 (Sup. Ct. 1942).

[15] I/M/O/ Petition of Pub. Serv. Coordinated Transp., 5 N.J. 196 at 217 (1950).

[16] In Re Proposed Increased Intrastate Industrial Sand Rates, 66 N.J. 12 (1974).

[17] I/M/O Petition of Suez Water Arlington Hills Inc. for Approval of an Increase in Rates, 2017 WL 5747744 (N.J.Bd.Reg.Com.) (Nov. 13, 2017).

[18] I/M/O Petition of Parkway Water Co. for an Increase in Rates and Charges for Water Service, 2006 WL 2715210 (N.J.B.P.U.), (Sept. 13, 2006).

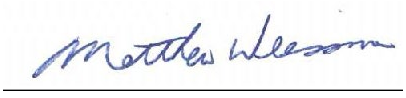
[19] Motion, at 3-4.

principal, but both of these cases involved utility assets that were once in service, but had been removed from service or were no longer operational. It is unclear how Rate Counsel draws a conclusion from these cases that "used and useful" cannot include new assets put in place to satisfy important public policy considerations and that will be supporting distribution of power to EV chargers in the near future.

Rate Counsel's reliance on the Board Infrastructure Investment Program ("IIP") regulations is similarly unavailing. Those regulations provide an avenue for accelerated cost recovery for certain enumerated investments intended to upgrade utility infrastructure serving existing customers; those regulations do not directly apply to investments, such as Make Ready EV investments, intended to serve new load pursuant to established state policy. The fact that an IIP investment must be "functioning in its intended purpose" to serve existing load and is "not under construction"[20] before cost recovery is permitted in no way precludes the Board from permitting cost recovery for Make Ready EV investment, pursuant to the precedent and policy judgements discussed above.

CONCLUSION

For all of the reasons set forth above, Rate Counsel's motion for reconsideration should be denied.

By: 

Matthew M. Weissman
Katherine E. Smith
PSEG Services Corporation
80 Park Plaza – T20
Newark, New Jersey 07102-4194
Ph: (973) 430-7052
matthew.weissman@pseg.com
katherine.smith@pseg.com

[20] N.J.A.C. 14:3-2A.6(a)

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

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

Maura Caroselli, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625
mcaroselli@rpa.nj.gov

Mamie W. Purnell, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625
mpurnell@rpa.nj.gov

Brian Weeks, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625
bweeks@rpa.nj.gov

Robert Glover, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625
rglover@rpa.nj.gov

Terrence Coleman, Paralegal
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625
tcoleman2@rpa.nj.gov

Robert Brabston, Esq.
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
robert.brabston@bpu.nj.gov

Stacy Peterson, Director
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
stacy.peterson@bpu.nj.gov

Carol Artale, Esq.
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
carol.artale@bpu.nj.gov

Colin Emerle, Esq.
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
colin.emerle@bpu.nj.gov

Michael Hunter, Esq.
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
michael.hunter@bpu.nj.gov

Steven Athanassopoulos, Esq.
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
steven.athanassopoulos@bpu.nj.gov

Kit Burnette, Esq.
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
kit.burnette@bpu.nj.gov

Benjamin Witherell, Ph.D.
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
benjamin.witherell@bpu.nj.gov

Dianne Crilly
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
dianne.crilly@bpu.nj.gov

Jackie O'Grady
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
jackie.ogrady@bpu.nj.gov

Sara Bluhm Gibson, Director
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
sara.bluhm@bpu.nj.gov

Michelle Rossi
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
michelle.rossi@bpu.nj.gov

Veronique Oomen, Director
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
veronique.oomen@bpu.nj.gov

Cathleen Lewis
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
cathleen.lewis@bpu.nj.gov

Jessica Korsch
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
jessica.korsh@bpu.nj.gov

Ruth "Aviv" Bernstein Livne
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
ruth.bernsteinlivne@bpu.nj.gov

Sonia Keating
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
sonia.keating@bpu.nj.gov

Daren Eppley, DAG
NJ Dept. of Law & Public Safety
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton NJ 08625
daren.eppley@law.njoag.gov

Pamela Owen, DAG
NJ Dept. of Law & Public Safety
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton NJ 08625
pamela.owen@law.njoag.gov

Matko Ilic, DAG
NJ Dept. of Law & Public Safety
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton NJ 08625
matko.ilic@law.njoag.gov

Steven A. Chaplar, DAG
NJ Dept. of Law & Public Safety
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton NJ 08625
steven.chaplar@law.njoag.gov

Neil Hlawatsch, Esq.
Atlantic City Electric Company
92DC42, 500 North Wakefield Drive
P.O. Box 6066
Newark, DE 19714-6066
neil.hlawatsch@exeloncorp.com

Solomon David, Esq.
Atlantic City Electric Company
92DC42, 500 North Wakefield Drive
P.O. Box 6066
Newark, DE 19714-6066
solomon.david@exeloncorp.com

Kyriakos Anastasopoulos
Atlantic City Electric Company
92DC42, 500 North Wakefield Drive
P.O. Box 6066
Newark, DE 19714-6066
kyriakos.anastasopoulos@pepcoholdings.com

Michael Martelo, Esq.
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
mmartelo@firstenergycorp.com

Mark A Mader
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
mamader@firstenergycorp.com

Joanne Negron
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
jnegron@firstenergycorp.com

Lindsey A Wilkinson
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
lawilkinson@firstenergycorp.com

Ryan L Martinez
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
rlmartinez@firstenergycorp.com

Rebecca A Harder
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
rharder@firstenergycorp.com

Andrew D Hendry
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
ahendry@firstenergycorp.com

Erica A Haberny
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962 -1911
ehaberny@firstenergycorp.com

Christopher D Wehr
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962 -1911
cwehr@firstenergycorp.com

Harry Papademas
Jersey Central Power & Light Company
300 Madison Avenue ,
P.O. Box 1911
Morristown, NJ 07962 -1911
hpapademas@firstenergycorp.com

Mark J Decaroli
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
mdecaroli@firstenergycorp.com

James S Tobia
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
jtobia@firstenergycorp.com

Douglas P Stone
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
dpstone@firstenergycorp.com

George F Salazar
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962 -1911
gsalazar@firstenergycorp.com

James E O'Toole
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962 -1911
jotoole@firstenergycorp.com

Kevin Kavali
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962 -1911
kavalik@firstenergycorp.com

Stacey Mickles, Esq.
PSEG Services Corporation
80 Park Plaza – T10
Newark, NJ 07102 -4194
stacey.mickles@pseg.com

Dawn Neville
PSEG Services Corporation
80 Park Plaza – T10
Newark, NJ 07102 -4194
dawn.neville@pseg.com

Vito S Viscomi
PSEG Services Corporation
80 Park Plaza – T10
Newark, NJ 07102 -4194
vito.viscomi@pseg.com

Brian Kirk
PSEG Services Corporation
80 Park Plaza – T10
Newark, NJ 07102 -4194
brian.kirk@pseg.com

Todd Hrancika
PSEG Services Corporation
80 Park Plaza – T10
Newark, NJ 07102 -4194
todd.hranicka@pseg.com

Jonce Dimoski
PSEG Services Corporation
80 Park Plaza – T10
Newark, NJ 07102 -4194
jonce.dimoski@pseg.com

Noreen Giblin, Esq.
PSEG Services Corporation
80 Park Plaza – T10
Newark, NJ 07102 -4194
noreen.giblin@pseg.com

Katherine Smith, Esq.
PSEG Services Corporation
80 Park Plaza – T10
Newark, NJ 07102 -4194
katherine.smith@pseg.com

Caitlyn White
PSEG Services Corporation
80 Park Plaza – T10
Newark, NJ 07102 -4194
caitlyn.white@pseg.com

Bernard Smalls
PSEG Services Corporation
80 Park Plaza – T10
New York, NY 10003
Bernard.Smalls@pseg.com

Maria Barling
PSEG Services Corporation
80 Park Plaza – T10
New York, NY 10003
maria.barling@pseg.com

Margaret Comes, Esq.
Rockland Electric Company
4 Irving Place
New York, NY 10003
comesm@coned.com

JoAnne Seibel
Rockland Electric Company
4 Irving Place
New York, NY 10003
seibeljo@oru.com

Andrew Farrell
Rockland Electric Company
4 Irving Place
New York, NY 10003
farrella@oru.com

Dan FitzPatrick
Rockland Electric Company
4 Irving Place
New York, NY 10003
fitzpatrickda@oru.com

Jeremy Scott
Rockland Electric Company
4 Irving Place
New York, NY 10003
scottje@oru.com

Siobhan Keane-Revie
Rockland Electric Company
4 Irving Place
New York, NY 10003
revies@oru.com