



May 10, 2018

In the Matter of the Proposed NJCEP 4th Revised FY18 Budget

VIA ELECTRONIC MAIL to publiccomments@njcleanenergy.com

Aida Camacho-Welch, Secretary Board of Public Utilities
44 South Clinton Avenue, 3rd Flr.
P.O. Box 350 Trenton, New Jersey 08625-0350

Dear Secretary Camacho-Welch:

Utility Advantage, LLC submits its comments in the above-referenced matter.

Very truly yours,

Laurie Wiegand-Jackson
President & CEO

Utility Advantage is a NJ Based energy consulting company that has operated in NJ since 2003. Utility Advantage is pleased to file these brief comments to the Proposed NJCEP 4th Revised FY18 Budget and welcomes the opportunity to discuss them further with members of the NJ Board of Public Utilities (“Board”) staff and the Governor’s energy team:

According to the “2017 Demand Response Operations Markets Activity Report: April 2018” by James McAnany PJM Demand Side Response Operations dated April 10, 2018, NJ contributed approximately 567 MW of Demand Response into the PJM market for Load Management Demand Response in the 2017/18 Delivery Year. This represents approximately 6% of the total Demand Response in Load Management while the peak demand of NJ’s 3 IOU’s alone represents approximately 18,000 MW or 12% of the 2017 total peak demand of PJM.

NJ is lagging behind its neighbors and fellow members in the PJM region in promoting Demand Response. We recommend that the Board consider providing funding to demand response initiatives to increase the level of participation – including funding for services such as demand response potential studies, metering and AutoDR technology installations (especially for the small/medium C&I and government sectors). Further, consideration should be given to incentives that would enable generator upgrades to lower emissions to the appropriate level to allow participate in demand response programs by working with the NJDEP to implement new requirements for clean generator DR participation. Lastly, we recommend that the Board consider requirements for NJ DR incentives in constrained regions of the IOU’s systems as viable alternatives to capital investment in wire-based solutions.

Technology for DER integration exists and managing the large volume of Behind-the-Meter renewable energy assets in New Jersey is already an issue of concern. Increasing the ability to modulate load (increase and decrease) will be valuable to the IOU’s and ratepayers of NJ in the resulting lower capacity and energy rates that come from an elastic demand, efficient operations and increased supply.

Our second area of concern is quite different, but equally important. We are concerned about the lack of diversity in the energy industry and specifically request that some funding in the 2018 budget be set aside for programs that will support the inclusion and advancement of women in NJ’s energy related industries. As the sector goes through a significant retirement phase of employees addressed as the “great crew change” we have an opportunity to develop and track performance of utility companies and vendors in providing opportunities and advancement of women in their companies. We strongly encourage the Board to provide funding for programs that will enable increased participation, like the Council for Women in Energy & Environmental Leadership (CWEEL) and Women in Energy local chapters in addition to the utility’s own initiatives. Further, establishing specific goals would be a great next step in driving diversity through some of the state’s largest employers.



VIA ELECTRONIC MAIL (publiccomments@njcleanenergy.com)

May 9, 2018

Honorable Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor
Suite 314
P.O. Box 350
Trenton, NJ 08625-0350

THE MATTER OF THE COMPREHENSIVE
ENERGY EFFICIENCY AND RENEWABLE ENERGY
RESOURCE ANALYSIS FOR FISCAL YEAR 2018
CLEAN ENERGY PROGRAM - DOCKET NO. QO17050465

RE: Proposed NJCEP Fourth Revised FY18 Budget

Dear Secretary Camacho-Welch:

New Jersey Natural Gas Company ("NJNG") has reviewed the Request for Comments on Proposed New Jersey's Clean Energy Program ("NJCEP") Fourth Revised Fiscal Year 2018 Budget which was released on April 26, 2018 by the Staff of the New Jersey Board of Public Utilities ("BPU" or "Board"). Through this letter, NJNG hereby provides comments related to both this proposal.

In regard to the proposed memberships for NJCEP, we strongly support NJCEP's interest in rejoining the Consortium for Energy Efficiency ("CEE"). NJNG has been a member of the organization for several years and find tremendous value in both the formal committees and initiatives of CEE, as well as the informal interactions with other program implementers. CEE's membership is limited to program administrators so it is an excellent source to:

- Help NJCEP maintain listings for qualified equipment and provide a robust resource for summaries of program design approaches in other jurisdictions;
- Learn about new technologies and the impact of code and standard changes; and

- Provide practical input about program design and delivery approaches from an implementers' perspective. Hearing the successes and missteps of other program implementers can help NJCEP with their interest in continuing to refine program approaches to improve cost effectiveness.
- Understand current trends in behavioral programs and evaluation, measurement and verification.

NJNG appreciates the opportunity to provide comment. Please feel free to contact me if you need any additional information.

Respectfully submitted,



Anne-Marie Peracchio

Director- Conservation and Clean Energy Policy

From: [Vijay Israni](#)
To: publiccomments@njcleanenergy.com
Subject: Proposed NJCEP 4th Revised FY18 Budget
Date: Thursday, April 26, 2018 8:57:34 PM

Thank you for giving us the opportunity to comment on the proposed budget. With the rise of Micro-Grid and Storage technologies that we are seeing in California, we think these initiatives are under-funded in this budget....especially for a state that is prone to natural catastrophes such as super storm Sandy and others. While a healthy 'Fuel Cells' budget encourages grid resiliency initiatives the skewing of policy towards natural gas fired fuel cells as opposed to 'clean' feed stock would drive the industry in the right direction.....away from fossil fuels and the associated environmental impact.

In addition we strongly feel that the Energy Resiliency Bank idea needs to be resurrected in order to fuel innovation and encourage smaller, more creative, new entrants to participate and help accelerate the pace of change towards cleaner more sustainable production, transportation/transmission, and storage of electricity.

In our opinion that's what we need in order to create a robust, more resilient energy eco-system that relies on cleaner more sustainable sources of energy.

Thanks and Regards,

Vijay Israni

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Request for Comments Proposed NJCEP 4th Revised FY18 Budget

The Fiscal Year 2018 (FY18) New Jersey's Clean Energy Program (NJCEP) Budget was approved through a June 30, 2017 Board Order (Docket No. QO17050465), trued up and revised through an October 20, 2017 Board Order, further revised by Board Staff on January 17, 2018 (2nd Revised FY18 Budget), and further revised through a February 28, 2018 Board Order (3rd Revised FY18 Budget). Board Staff now proposes a fourth revision to the FY18 Budget, reallocating funds between the EDA Programs and the Offshore Wind Program and between the Interim Marketing and Sponsorship budgets (Proposed 4th FY18 Budget Revision), all as described in more detail below.

Board Staff is requesting comments on the proposal prior to presenting it to the Board for consideration, the schedule and process for submitting comments is set forth at the end of this Request for Comments.

Revisions and Rationales

Since the FY18 Budget was adopted, certain commitments related to Edison Innovation Clean Energy Manufacturing Fund (CEMF) managed by the New Jersey Economic Development Authority (EDA) expired and were canceled. This resulted in \$1,010,804.35 that had been in the CEMF Program's "Rebates, Grants, and Other Direct Incentives" Cost Category becoming available to be allocated to other programs. Consistent with the Board's Order implementing Governor Murphy's Executive Order 8's Offshore Wind Initiative, I/M/O the Implementation of Executive Order No. 8 on Offshore Wind and the Initiation of an OREC Funding Mechanism and Rulemaking Process, Docket No. Q018020151 (February 28, 2018), the \$1,010,804.35 amount will be allocated to the Offshore Wind Program's "Evaluation and Related Research" Cost Category to fund the engagement of a consultant to support the development of an OSW program and for related studies.

In addition, Staff proposes that \$40,000 in funding be reallocated from the Interim Marketing budget to the Sponsorships budget for annual membership in the Clean Energy State's Alliance (CESA). CESA is a national, non-profit coalition of public agencies and organizations working together to advance clean energy and will assist Staff in the development of offshore wind and other renewable energy policy proposals. Finally, Staff has authorized TRC to become members of the Consortium for Energy Efficiency and the Design Lights Consortium, both of which will assist in the design and development of cutting edge energy efficiency programs. Annual membership fees would be charged against the Interim Marketing budget. Sufficient funds remain in the Interim Marketing Budget to cover all anticipated expenses including the above memberships through the remainder of the FY.

Budget Tables

The following tables show the NJCEP's Programs' current FY18 Budgets, the Proposed 4th FY18 Budget Revisions, and the resulting Proposed 4th Revised FY18 Budgets:

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Proposed 4th Revised FY18 Budget Modifications

<i>Program/Budget Line</i>	<i>Current Budget*</i>	<i>Proposed Changes</i>	<i>3rd Revised NJCEP FY18 Budget</i>
Total NJCEP	\$322,718,495.97	\$0.00	\$322,718,495.97
EE Programs	\$275,899,507.45	\$0.00	\$275,899,507.45
Res EE Programs	\$65,842,472.41	\$0.00	\$65,842,472.41
HVAC	\$8,500,000.00		\$8,500,000.00
RNC	\$24,267,472.41		\$24,267,472.41
EE Products	\$9,000,000.00		\$9,000,000.00
HPwES	\$24,075,000.00		\$24,075,000.00
Res Low Income	\$30,000,000.00	\$0.00	\$30,000,000.00
Comfort Partners	\$30,000,000.00		\$30,000,000.00
C&I EE Programs	\$169,457,035.04	\$0.00	\$169,457,035.04
C&I NC	\$2,961,932.04		\$2,961,932.04
C&I EB	\$49,840,263.13		\$49,840,263.13
P4P NC	\$19,112,655.81		\$19,112,655.81
P4P EB	\$33,966,790.48		\$33,966,790.48
LGEA	\$5,483,000.00		\$5,483,000.00
DI	\$43,645,462.36		\$43,645,462.36
LEUP	\$13,300,931.22		\$13,300,931.22
Customer Tailored EE Pilot	\$1,146,000.00		\$1,146,000.00
State Facilities Initiative	\$10,600,000.00	\$0.00	\$10,600,000.00
State Facilities Initiative	\$10,600,000.00		\$10,600,000.00
Distributed Energy Resources	\$34,053,844.00	\$0.00	\$34,053,844.00
CHP/Fuel Cell	\$29,872,721.32		\$29,872,721.32
RE Storage	\$2,128,642.68		\$2,128,642.68
Microgrids	\$2,052,480.00		\$2,052,480.00
RE Programs	\$2,300,000.00	\$1,010,804.35	\$3,310,804.35
Offshore Wind	\$100,000.00	\$1,010,804.35	\$1,110,804.35
SREC Registration	\$2,200,000.00		\$2,200,000.00
EDA Programs	\$1,195,166.34	(\$1,010,804.35)	\$184,361.99
CEMF	\$1,098,625.36	(\$1,010,804.35)	\$87,821.01
GGF	\$96,540.98		\$96,540.98
LSCHP Solicitation	\$0.00		\$0.00
Planning and Administration	\$9,269,978.18	\$0.00	\$9,269,978.18
BPU Program Administration	\$3,239,499.37	\$0.00	\$3,239,499.37
BPU Program Administration	\$2,566,652.15		\$2,566,652.15
Program Transition	\$672,847.22		\$672,847.22
Marketing (w/CEP website)	\$900,000.00	(\$40,000.00)	\$860,000.00
Interim Marketing	\$900,000.00	(\$40,000.00)	\$860,000.00
Program Evaluation/Analysis	\$2,042,921.81	\$0.00	\$2,042,921.81
Program Evaluation	\$1,150,000.00		\$1,150,000.00
CEEEP	\$654,027.77		\$654,027.77
Rutgers LESS	\$238,894.04		\$238,894.04
Outreach and Education	\$3,077,557.00	\$0.00	\$3,077,557.00
Sustainable Jersey	\$675,225.00		\$675,225.00
NJIT Learning Center	\$364,288.00		\$364,288.00
NJCERN	\$38,044.00		\$38,044.00
PA Outreach - Sponsorships	\$2,000,000.00		\$2,000,000.00
Sponsorships	\$10,000.00	\$40,000.00	\$50,000.00
Sponsorships	\$10,000.00	\$40,000.00	\$50,000.00

* 3rd revised FY18 budget approved by the Board at its 2/28/18 agenda meeting

Process and Schedule for Submitting Comments

Staff is requesting comments on the proposal prior to presenting it to the Board. Comments regarding the foregoing should be submitted to publiccomments@njcleanenergy.com by 5 pm on May 10, 2018 under the subject heading “Request for Comments - Proposed NJCEP 4th Revised FY18 Budget.”