New Jersey Business & Industry Association

NJBIA

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November 9, 2017

Board of Public Utilities
NJ Office of Clean Energy
Anne-Marie McShea, Clean Energy Program Administrator
ATTN: NJCEP – Protocols to Measure Resource Savings
44 S. Clinton Ave., 7th Floor
P.O. Box 350
Trenton, NJ 08625-0350

**Re: NJCEP – Protocols to Measure Resource Savings**

Dear Ms. McShea:

On October 25, 2017, the New Jersey Board of Public Utilities, Office of Clean Energy ("OCE"), issued a request for comments regarding changes to the New Jersey's Clean Energy Program ("NJCEP"), Protocols to Measure Resource Savings, (NJCEP Protocols), with a deadline of 5 p.m. on November 9, 2017. The New Jersey Business & Industry Association (NJBIA) has been an active participant over the last two decades in energy policy development and vocal on clean energy programs. As such, at the request of our members, NJBIA respectfully asks for a postponement to the comment period.

The Association fully supports program evaluation and understanding the effectiveness of utilization of ratepayer dollars for state rebates and incentives. However, several of our members have expressed a concern with the summary of changes and proposed steep cuts in the energy savings assumed for commercial and industrial programs. The limited review time and access to data has hampered abilities to fully evaluate the material presented by the date requested. NJBIA does not want to rush to implement changes that could result in measures that really are cost effective from being eliminated because there may have not been enough data.

NJBIA looks forward to continuing to work with the Board and the Clean Energy Program to achieve the best possible programs for ratepayers and ratepayer dollars. To that end we ask that this is done right and considered within a broader review that allows for full stakeholder vetting and input.

Sincerely,

Sara Bluhm
Vice President Government Affairs - Energy & Environment