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**VIA ELECTRONIC MAIL ONLY**

Board of Public Utilities
Office of Clean Energy
Anne-Marie McShea, Clean Energy Program Administrator
44 South Clinton Ave, 3rd Floor Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
OCE@bpu.nj.gov

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

Dear Ms. McShea:

I am writing on behalf of our client, Bloom Energy Corporation ("Bloom") regarding the New Jersey Office of Clean Energy's ("NJCEP's") Protocols to Measure Resource Savings ("NJCEP Protocols") circulated to the Renewable Energy and Energy Efficiency committee listservs on October 25, 2017. Bloom respectfully requests that the Board of Public Utilities ("BPU" or "Board") postpone the comment period for the NJCEP Protocols, which expires today.

Bloom had no participation in the creation of the proposed NJCEP Protocols and was not aware of any proposed changes until they were circulated on October 25. In part, the NJCEP Protocols, as indicated by the September 5, 2017 Memorandum (updated on October 11 and 18) propose changes to the measure lives of various "end use" products, from lighting to appliances to fuel cells and combined heat and power. The Memorandum indicates that some of the measure lives were updated or changed if the New Jersey technical reference manuals ("TRMs") were out of the range of TRMs used in other states and neighboring regional technical reference manuals. Curiously, the NJCEP Protocols propose to lower the measure life of a fuel cell from 20 years to

five (5) years – however, the Memorandum does not cross reference any other TRMs or provide any explanation as to this drastic reduction for the fuel cell measure life.

To be clear, there is no reason for the NJCEP Protocols to reduce the measure life of a fuel cell from 20 years to 5 years. This proposed devaluation is contrary to actions recently taken in neighboring jurisdictions, and is offered without basis or justification.

Comprehensive review of the proposed changes to the NJCEP Protocols should be discussed in a stakeholder process that includes cost benefit analysis of the implications of these proposed changes to current renewable and energy efficiency programs, as well as information from industry members who can provide crucial information as to the capabilities of available technology. At this time, there is insufficient information available to determine why some of the proposed changes were recommended, which complicates Bloom's ability to provide helpful comments.

Bloom respectfully requests that the Board initiate a comprehensive stakeholder proceeding to review and advise on the NJCEP Protocols and allow stakeholders to submit comments after additional information has been shared.

Thank you for your attention to this matter.

Respectfully submitted,

Murray E. Bevan