



**State of New Jersey**  
DIVISION OF RATE COUNSEL  
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*Governor*

KIM GUADAGNO  
*Lt. Governor*

STEFANIE A. BRAND  
*Director*

August 30, 2013

**By Hand Delivery and Electronic Mail**

Honorable Kristi Izzo, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, New Jersey 08625-0350

**Re: Solar Act 2012 Changes to the Energy Efficiency and  
Renewable Energy Rules (N.J.A.C. 14:8), Staff  
Memorandum Dated August 15, 2013 (Revised).**

Dear Secretary Izzo:

Please accept this original and ten copies of as Comments submitted on behalf of the New Jersey Division of Rate Counsel ("Rate Counsel") in connection with the above-captioned matter. Copies of the comments are being provided to all parties on the e-service list by electronic mail and hard copies will be provided upon request to our office.

We are enclosing one additional copy of the comments. Please stamp and date the extra copy as "filed" and return it in our self-addressed stamped envelope. Thank you for your consideration and assistance.


By e-mails circulated to Board of Public Utilities ("Board") Renewable Energy Committee, on August 15 and 16, 2013, the Staff of Board's Office of Clean Energy ("OCE"), has requested comments on a memorandum detailing changes to the Board's Energy Efficiency and Renewable Energy Rules, N.J.A.C. 14:8, that are necessitated by the enactment of the Solar

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Energy Act of 2012, P.L. 2012, c. 24. Rate Counsel has no comments at this time but reserves its right to comment on any future rulemaking proposals.

Respectfully submitted,

STEFANIE A. BRAND  
Director, Division of Rate Counsel

By:   
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Assistant Deputy Rate Counsel

Encl.

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