



State of New Jersey
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STEFANIE A. BRAND
Director

February 19, 2019

VIA ELECTRONIC MAIL
AND HAND-DELIVERY

Hon. Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 S. Clinton Avenue, 3rd Floor, Suite 314
Trenton, New Jersey 08625-0350

**Re: Proposed Revisions to FY19 NJCEP Budget
(Staff-Authorized)
BPU Docket No. QO18040393**

Dear Secretary:

Pleased accept the within comments (an original and ten copies) 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.

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.

The Division of Rate Counsel ("Rate Counsel") would like to thank the Board of Public Utilities ("BPU" or "the Board") for the opportunity to present comments on the proposed changes to the Clean Energy Program ("CEP") proposed by the Office of Clean Energy ("OCE", "Board Staff").

The OCE proposes the following FY19 CEP budget revisions:

Local Government Energy Audit (“LGEA”) Program	\$1,000,000
C&I Buildings Program	(\$1,000,000)

In support of the proposed transfer, the OCE states that the LGEA Program has experienced an “unexpected increase in participation rates” and has received requests from “numerous large facilities with multiple buildings.” Meanwhile, the OCE claims that the C&I Buildings Program has experienced lower than expected participation rates.

Under the proposed transfer, the total FY19 LGEA Program budget would increase from \$3.8 million to \$4.8 million, and the total FY19 C&I Building Program budget would decrease from \$112,445,000 to \$111,445,000. Further, the OCE states that the proposed budget increase and decrease will occur in the “Rebates, Grants and Other Direct Incentives” cost category.

It appears that the proposed budget transfer will not result in a decrease in any Program’s budget by more than 10 percent and is in the same budget category. Therefore, the proposed transfer appears to be in compliance with those terms of the Board’s Order of February 4, 2014 (BPU Dkt. No. EO13050376).

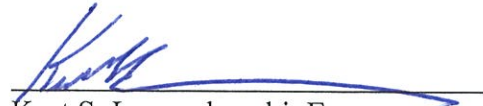
Rate Counsel does not object to the proposed budget transfer. However, in the future additional information should be provided with the notice of the proposed transfer, including participation rates, application backlogs, and other pertinent information supporting the proposed transfer.

Thank you for your consideration of the within comments.

Respectfully submitted,

STEFANIE A. BRAND
Director, Division of Rate Counsel

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