

December 19, 2018

Ms. Stefanie A. Brand, Esq.  
Director  
Division of Rate Counsel  
140 East Front Street, 4<sup>th</sup> Floor  
PO Box 003  
Trenton, NJ 08625-0003

**Subject: I/M/O Morris Area Energy Cooperative Government Aggregation Program  
BPU Docket No. Pending – Energy Agent’s Response to Comment Letter  
from the Division of Rate Counsel dated November 8, 2018; Final Version of Notice to  
Residential Customers Pursuant to N.J.A.C. 14:4-6.6(s)**

Dear Director Brand:

As you know, Concord Energy Services and our partners at Commercial Utility Consultants, Inc., are the energy agents for the Morris Area Energy Cooperative (“MAEC”). As such, we recently reviewed the Division of Rate Counsel’s comments and suggestions related to the draft notice to residential customers for the MAEC program. Below are our responses to Rate Counsel’s comments and suggestions on pages 1, 2 and 3 of your letter dated November 8, 2018.

*Page 1 of Rate Counsel’s Letter*

**RC:** “There is no guarantee of savings” as compared to “anticipated energy savings”

**EA:** The sentence on the cover letter has been updated to read “We are pleased to continue to offer this program for your electric supply.”

*Page 2 of Rate Counsel’s Letter*

**RC:** Contract Summary missing certain information...

**EA:** The Contract Summary includes the price, the length and final month of the MAEC Program, the complete [www.njaggregation.us/MAEC](http://www.njaggregation.us/MAEC) website address, and opt-out postcard.

We modified the “Right to Cancel/Rescind” field of the contract summary to include the statement, “You may cancel this agreement at any time without penalty.”

With regard to your suggestions for additional language in the “Renewal Terms” field about residents automatically being returned to the Basic Generation Service, we are hesitant to do so as we don’t know that this will actually be the case at the end of this contract term: the program may be extended with the current supplier, we may go out to auction and secure savings through a different supplier with the start of the new program for MAEC which may coincide with the end of this current program, etc. In any event, we will notice residents active in the MAEC program at least 30-days prior to the end of this initial contract period regarding the next steps for program participants.

In addition, we also added footnote 1 to the “Price Structure” section of the Contract Summary, which reads -

<sup>1.</sup> “Supplier cannot adjust prices monthly for changed market conditions. Prices can only be adjusted to reflect a Change in Law affecting power prices that will also impact the JCP&L power supply tariff. You will be notified in advance of any such change, and will maintain your ability to opt out.”

We have asked IDT Energy to address your concerns about their web page and posting information related to the MAEC program.

**RC:** Discrepancy in the approximate time it takes to process an enrollment change request from a resident.

**EA:** We changed the language in footnote #3 on the dated cover letter to read, “Leaving the program is subject to the timing of meter readings and typically takes 1-2 billing cycles.”, which now matches the information provided in the Contract Summary.

**RC:** Neither the Rate Counsel or BPU “oversees” energy aggregation programs.

**EA:** We have revised the word “overseen” on the dated Cover letter to “supervised” and we revised the Frequently Asked Questions to read -

**Who supervises the Government Energy Aggregation process?**

The NJ Board of Public Utilities has enforcement authority over Aggregation programs in NJ. CUC/CES both must follow strict statutory guidelines implemented by the state agency. Key Documents are provided to Board of Public Utilities and Division of Rate Counsel staff for review and comment during the process.

**RC:** Contact Name, phone number and email for customer inquiries

**EA:** We discussed this requirement with the Board of Public Utilities previously, and they agreed that considering the number of residents – which is in the thousands in the case of the MAEC program, and reaches tens of thousands in other GEA programs – it is impractical to list one individual’s name and their telephone number and email address as the sole responsible party for all inquiries about the program. Therefore, we will continue to follow the recommendation of the BPU which is to list the name of the Energy Agent (in this case Concord Energy Services) responsible for the GEA program, our toll-free telephone number (which is answered by a pool of informed team members rather than just one individual thus eliminating long hold times and a potentially full voicemail box).

*Page 3 of Rate Counsel’s Letter*

**RC:** Posting all public documents related to the MAEC program.

**EA:** The final versions of the notice to residential customers, the outreach presentation video, and other program information will be available at [www.njaggregation.us/MAEC](http://www.njaggregation.us/MAEC).

The individual responsible for the submission of this document is:

Tara Pasca, CEP  
Concord Energy Services  
Manager, Government Programs  
(856) 427-0200, extension 171  
520 S. Burnt Mill Road  
Voorhees, NJ 08043  
[tpasca@concord-engineering.com](mailto:tpasca@concord-engineering.com)

520 South Burnt Mill Road, Voorhees, NJ 08043 P: (856) 427-0200  
3020 Market Street, Suite 103, Philadelphia, PA 19104 P: (215) 387-1011

The following individuals from each municipality have been designated by the municipality's governing body with respect to matters related to the government energy aggregation program:

Jon Rheinhardt  
Borough of Wharton (Lead Agency)  
Business Administrator, Chief Financial  
Officer, Purchasing Agent  
(973) 361-8444 x2711  
10 Robert Street  
Wharton, NJ 07885  
[jrheinhardt@whartonnj.com](mailto:jrheinhardt@whartonnj.com)

Patricia M. Applegate  
Borough of Bayhead  
Borough Clerk  
(732) 892-0636  
83 Bridge Avenue  
Bay Head, NJ 08742  
[papplegate@bayheadnj.us](mailto:papplegate@bayheadnj.us)

Sheila A. Williams, RMC  
Borough of Florham Park  
Municipal Clerk  
(973) 410-5300  
111 Ridgedale Avenue  
Florham Park, NJ 07932  
[swilliams@fpboro.net](mailto:swilliams@fpboro.net)

Cynthia L. Sloane, RMC, CMR  
Borough of Lincoln Park  
Municipal Clerk  
(973) 270-2050  
34 Chapel Hill Road  
Lincoln Park, NJ 07035  
[csloane@bolp.org](mailto:csloane@bolp.org)

Debbie Brooks  
Township of Long Hill  
Clerk and Registrar  
(908) 647-8000  
915 Valley Road  
Long Hill, NJ 07933  
[municipalclerk@longhillnj.gov](mailto:municipalclerk@longhillnj.gov)

Mimi M. Marlor, RMC  
Borough of Mendham  
Borough Clerk  
(973) 543-7152 x15  
Phoenix House  
2 West Main Street  
Mendham, NJ 07945  
[mmarlor@mendhamnj.org](mailto:mmarlor@mendhamnj.org)

Linda DeSantis  
Borough of Mt. Arlington  
Borough Clerk  
(973) 398-6832 x112  
419 Howard Boulevard  
Mount Arlington, NJ 07856  
[ldesantis@mtarlingtonboro.com](mailto:ldesantis@mtarlingtonboro.com)

Abubakar Jalloh  
Borough of Riverdale  
Municipal Clerk  
(973) 835-4060 x223  
91 Newark-Pompton Turnpike  
Riverdale, NJ 07457  
[clerk@riverdalenj.gov](mailto:clerk@riverdalenj.gov)

Sheila Seifert  
Borough of Rockaway  
Borough Clerk  
(973) 627-2000  
1 East Main Street  
Rockaway, NJ 07866  
[boroughclerk@rockawayborough.org](mailto:boroughclerk@rockawayborough.org)

Anne Marie Friscia  
Union Beach  
Municipal Clerk  
(732) 264-2277  
650 Poole Avenue  
Union Beach, NJ 07735  
[boroughclerk@unionbeachnj.gov](mailto:boroughclerk@unionbeachnj.gov)

Amanda Macchia  
Township of Mine Hill  
Municipal Clerk  
973-336-9031 x7  
10 Baker St  
Mine Hill, NJ 07803  
clerk@minehill.com

Pursuant to N.J.A.C. 14:4-6.6(s), enclosed are copies of the final versions of the notice to residential customers which will be mailed by IDT Energy, the supplier for the Program, to eligible customers in the Borough of Wharton, the Borough of Bay Head, the Borough of Florham Park, the Borough of Lincoln Park, the Township of Long Hill, the Borough of Mendham, the Borough of Mount Arlington, the Borough of Riverdale, the Borough of Rockaway, the Borough of Union Beach, and the Township of Mine Hill. This government energy aggregation program is limited to residential only for electric.

Best regards,

*Tara Pasca*

Tara Pasca, CEP  
Manager, Government Programs

Copy: Ms. Ami Morita, Esq.  
Mr. Brian Weeks, Esq.