

December 16, 2014

VIA FEDERAL EXPRESS

Ms. Kristi Izzo, Secretary New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor P.O. Box 350 Trenton, NJ 08625-0350

Re:

IN THE MATTER OF THE PETITION OF NEW JERSEY NATURAL GAS COMPANY FOR APPROVAL OF THE EXTENSION OF **ENERGY-EFFICIENCY PROGRAMS AND** THE ASSOCIATED COST RECOVERY MECHANISM PURSUANT TO N.J.S.A. 48:3-98.1

BPU DOCKET NO. GO1412

Dear Secretary Izzo:

Enclosed herewith for filing please find an original and ten (10) copies of the Petition of New Jersey Natural Gas Company for the approval of the extension of energy-efficiency programs offered through The SAVEGREEN® Project and the associated cost recovery mechanism.

Copies of the petition, including the supporting Schedules and Testimony, are also being served upon the New Jersey Division of Rate Counsel and the Division of Law.

Kindly acknowledge receipt of this filing by date stamping the enclosed copy of this letter and returning same in the self-addressed, stamped envelope.

Very truly yours,

Andrew K. Dembia

Regulatory Affairs Counsel

AKD:fk Enclosures C: Service List

IN THE MATTER OF THE PETITION OF NEW JERSEY NATURAL GAS COMPANY FOR APPROVAL OF THE EXTENSION OF ENERGY-EFFICIENCY PROGRAMS AND THE ASSOCIATED COST RECOVERY MECHANISMS

PURSUANT TO N.J.S.A. 48:3-98.1 BPU DOCKET NO. GO1412____

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IN THE MATTER OF THE PETITION OF NEW JERSEY NATURAL GAS COMPANY FOR APPROVAL OF THE EXTENSION OF ENERGY-EFFICIENCY PROGRAMS AND THE ASSOCIATED COST RECOVERY MECHANISMS PURSUANT TO N.J.S.A. 48:3-98.1 BPU DOCKET NO. GO1412

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<u>DEPT. OF LAW & PUBLIC SAFETY – DIVISON OF LAW</u>

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STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF)	
NEW JERSEY NATURAL GAS COMPANY)	PETITION
FOR APPROVAL OF THE CONTINUATION)	
OF ENERGY-EFFICIENCY PROGRAMS)	BPU DOCKET NO. GO1412
AND THE ASSOCIATED COST)	
RECOVERY MECHANISM PURSUANT TO)	
<u>N.J.S.A.</u> 48:3-98.1)	

TO: THE HONORABLE COMMISSIONERS OF THE NEW JERSEY BOARD OF PUBLIC UTILITIES

New Jersey Natural Gas Company ("NJNG" or the "Company") respectfully petitions the New Jersey Board of Public Utilities (the "Board" or "BPU") pursuant to N.J.S.A. 48:3-98.1, et seq., as follows:

- 1. NJNG is a corporation duly organized under the laws of the State of New Jersey and is a public utility engaged in the distribution and transportation of natural gas subject to the jurisdiction of the Board. The Company's principal business office is located at 1415 Wyckoff Road, Wall Township, New Jersey 07719.
 - 2. Communications and correspondence relating to this filing should be sent to:

Mark R. Sperduto, Senior Vice President, Regulatory Affairs
Andrew K. Dembia, Esq., Regulatory Affairs Counsel
New Jersey Natural Gas Company
1415 Wyckoff Road, P.O. Box 1464
Wall, N.J. 07719
(732) 938-1214 (M. Sperduto)
(732) 938-1073 (A. Dembia)
(732) 938-2620 (fax)

- 3. Through this Petition and the accompanying schedules and testimonies, NJNG is requesting BPU approval to continue, with certain modifications, the energy-efficiency programs offered through The SAVEGREEN Project® ("SAVEGREEN"). The proposed modifications are described further herein.
- 4. This Petition is supported by the schedules and exhibits attached hereto and made a part of this Petition:

Schedule NJNG-1	Comparative Balance Sheet 2014 & 2013
Schedule NJNG-2	Comparative Income Statement 2014 & 2013
Schedule NJNG-3	Balance Sheet September 2014
Schedule NJNG-4	Statement of Revenues September 2014
Schedule NJNG-5	Pro-Forma Income Statement
Schedule NJNG-6	Payments to Affiliates
Schedule NJNG-7	Notice of Filing to Counties and Municipalities
Schedule NJNG-8	Proposed Tariff Sheets
Schedule NJNG-9	Draft Public Notice
Schedule NJNG-10	Accounting Entries
Schedule NJNG-11	Proposed Budget in New Jersey's
	Clean Energy Program Format
Schedule NJNG-12	Sample On-Bill Repayment Documents
Schedule NJNG-13	Cost Benefit Analysis
Schedule NJNG-14	Listing of Minimum Filing Requirements
Schedule NJNG-15	Jobs Created / Sustained

Exhibit P-2	Testimony of Thomas J. Massaro
Schedule TJM-1	Residential Program Paths
Schedule TJM-2	Residential Programs Description
Schedule TJM-3	Commercial Programs Description
Schedule TJM-4	NJCEP and NJNG Program Comparison
Schedule TJM-5	SAVEGREEN Marketing Overview
Schedule TJM-6	Complaint Resolution Diagram
Exhibit P-3	Testimony of Daniel P. Yardley
Schedule DPY-1	Projected Participation Rates
Schedule DPY-2	SAVEGREEN Investments
Schedule DPY-3	Cost of Capital
Schedule DPY-4	Operations and Maintenance Costs
Schedule DPY-5	Summary of Revenue Requirements and
	Projected Bill Impacts

This Petition is not requesting a change in the current recovery rate included in Rider F of the Company's Tariff.

Background

5. Pursuant to N.J.S.A. 26:2C-45 (the "Legislation"), signed into law on January 13, 2008, the New Jersey Legislature found that New Jersey can help to address the global-warming concerns through the establishment of energy-efficiency and conservation programs. An additional finding in the Legislation highlights that public utilities in New Jersey need to be involved with and participate in efforts to reduce greenhouse gas emissions, specifically through the establishment of energy-efficiency, conservation and renewable energy programs. The active

participation of New Jersey utilities provides an integral element in developing a coordinated approach to successfully reducing energy usage.

- 6. Section 13 of the Legislation, N.J.S.A. 48:3-98.1, establishes that an electric or natural gas utility can offer and invest in regulated energy-efficiency and conservation programs, and provides that the utility may file, with the BPU, for approval of the recovery of costs related to such programs. That recovery may include a return on equity, the establishment of incentives, and the development of a rate mechanism that breaks the link between utility revenues and customer usage. The eligible ratemaking treatment can provide for the inclusion of certain related investments in rate base or the recovery of such costs through another BPU-approved method.
- 7. Subsequent to the passage of the Legislation, the BPU issued an order on May 12, 2008 (the "May 2008 Order") establishing the procedures through which electric and natural gas utilities can seek approval to offer energy-efficiency and conservation programs on a regulated basis. The May 2008 Order also set out specific information that is to be provided in such filings by delineating Minimum Filing Requirements ("MFRs").
- 8. Based on the Legislation, and the May 2008 Order, NJNG has made filings in Docket Nos. EO09010056 and GO09010057, GO10030225 and GR11070425, and GO12070640 seeking approval to implement energy-efficiency programs through SAVEGREEN that complemented or supplemented existing programs offered through New Jersey's Clean Energy Program ("NJCEP"). In Orders dated July 17, 2009 (the "July 2009 Order"), September 24, 2010 (the "September 2010 Order") the January 18, 2012 (the "January 2012 Order"), and June 21,

2013 (the "June 2013 Order")¹ the BPU adopted the terms of Stipulations entered into among representatives from the BPU Staff, the New Jersey Division of Rate Counsel ("Rate Counsel") and NJNG (the "Parties") approving the implementation of energy-efficiency programs and the associated cost recovery mechanism. Recovery of the costs necessary to deliver these programs, including grants, incentives, incremental operation and maintenance ("O&M") expenses and carrying costs is provided through Rider F to the Company's Tariff.

9. In the instant proceeding, NJNG is seeking Board approval to continue offering through SAVEGREEN, the energy-efficiency programs described herein, including the on-bill repayment program ("OBRP") approved in the June 2013 Order. The NJNG SAVEGREEN programs and investments are further described in the pre-filed testimonies and exhibits of Thomas J. Massaro ("Massaro Testimony") and Daniel P. Yardley ("Yardley Testimony"), included with this Petition. NJNG is not proposing any new programs in this filing and proposes to maintain the annual investment levels approved by the Board in the June 2013 Order. The Company is seeking approval for certain modifications to a few existing customer offers to address market barriers the Company has identified through its experience with the SAVEGREEN programs since 2009 and to continue these programs over a three year period beginning July 1, 2015 or the effective date of a Board Order approving this filing.

Procedural Matters

10. The May 2008 Order established that certain information must be included in any petition for approval to offer energy-efficiency programs in order to permit a comprehensive

¹ The June 21, 2013 Order was subsequently amended by the Board to correct the amount that the Company can provide to Direct Install customers through its On Bill Repayment Program. See, <u>In The Matter Of The Petition Of New Jersey Natural Gas Company For Approval Of The Extension Of Energy Efficiency Program And The Associated Cost Recovery Mechanism Pursuant To N.J.S.A. 48:3-98.1, BPU Docket No. GO12070640 (August 21, 2013).</u>

review of these filings within the statutorily designated 180-day review period. The MFRs detail the information, analyses and data that generally must be included within such a filing. Attached hereto as Schedule NJNG-14 is a listing of the MFRs and the locations within NJNG's current filing where the respective information can be found.

- 11. NJNG requests that the BPU retain this matter at the Agency for an administrative review and issuance of a Decision and Order pursuant to the terms of the Legislation and the May 2008 Order.
- 12. The May 2008 Order also requires that a utility must meet with Board Staff and Rate Counsel at least 30 days in advance of submitting a filing to provide an overview of the elements and cost recovery mechanism proposed. Accordingly, NJNG conferred, via teleconference, with a representative of Rate Counsel on November 12, 2014 and with BPU Staff and a representative of the Division of Law within the Department of Law and Public Safety on November 14, 2014 via teleconference, to provide an overview of the program modifications and cost recovery mechanism proposed within this filing.
- 13. Attached hereto and made part of this Petition is a draft form of notice (Schedule NJNG-9) that will be published in papers of general circulation within NJNG's service territory providing notice to customers of this filing and the details about the public hearing that will be scheduled. A proposed notice to counties and municipalities within the service territory is attached as Schedule NJNG-7.
- 14. NJNG has served notice and a copy of this filing, together with a copy of the annexed exhibits and schedules and NJNG's supporting testimonies being filed herewith, upon Rate Counsel, 140 E. Front Street, Trenton, New Jersey and to those listed on the attached

Service List. Additionally, a copy will be made available at all NJNG Customer Service Centers within its Service Territory.

15. NJNG has proposed the continuation of BPU-approved energy-efficiency programs that coordinate closely with existing programs in NJCEP with the minor modifications addressed herein. The Company reserves the right to amend this filing should that be necessitated by future modifications or changes to the current NJCEP offerings, incentives, grants, program management, evaluation, statewide policies, overall budget, and/or coordination with other utilities and state agencies at any time during the review period. Since NJNG anticipates that any amendment would serve to better align its program with State policy, the Company requests that such amendment be addressed within the original 180-day period.

NJNG Proposed Programs

- 16. In this filing, NJNG proposes to continue the ongoing work of SAVEGREEN with certain modifications that are in response to market demands and customer needs experienced by NJNG over the past five years. In this way, NJNG will avoid unnecessary customer delays, start-up expenses, the loss of qualified staff, and disruptions to the trade ally businesses serving the energy efficiency and conservation marketplace. NJNG seeks approval to provide customers the proposed programs in this filing over a three-year period beginning July 1, 2015 or the effective date of a Board Order approving this filing.
- 17. NJNG proposes to continue the existing SAVEGREEN programs with the following modifications to the current SAVEGREEN offers. These modifications are discussed in greater detail in the Massaro Testimony and the supporting Schedules TJM-1, 2 and 3.

Residential Programs:

- Incentives for high efficiency equipment (outside of the HPwES Program). For customers installing a WARMAdvantage qualified high-efficiency water heater, a
 \$100 SAVEGREEN incentive will be offered to encourage customers to accept a free energy audit.
- Incentives for additional measures through HPwES Broaden the availability for Combination OBRP customers to modify their OBRP to pursue the additional upgrades through HPwES by extending the requirement for a customer to take action within 18 months of their initial OBRP (currently 6 months).

Commercial Programs

- * Direct Install Customers Continue the same structure for the NJCEP Direct Install (DI) OBRP program. In addition, modify the repayment period from 24 months to 36 months to make repayments more affordable for participating customers. NJNG is also proposing a modification to allow commercial customers to apply for OBRP related to certain energy-efficiency measures not included within the DI Program but are eligible energy saving measures in the NJCEP SmartStart Building program to address an identified barrier in the commercial marketplace in the NJNG service territory.
- 18. Within this filing, NJNG is proposing to have the OPOWER pilot program, continue through 2018. This existing program is set to terminate on June 30, 2015. OPOWER provides customers with educational and informational data on how to reduce their personal energy usage. NJNG also is proposing an expansion of the OPOWER program to test the program's ability to influence customer behavior for connections to whole house improvements and to enhance service to low income customers. The Company is seeking approval to continue

the Fostering Environmental and Economic Development ("FEED") program as currently structured, originally approved in the September 2010 Order and subsequently in the June 2013 Order. This program provides interested commercial customers with individualized opportunities to benefit from environmental and economic development projects with no direct subsidy from NJNG ratepayers.

- 19. The SAVEGREEN energy-efficiency programs proposed herein and within the supporting documents enhance and complement ongoing efforts in New Jersey that are directed toward lowering energy costs for New Jersey residents, support state policies articulated in the Energy Master Plan, and address environmental concerns while stimulating the economy through opportunities for local businesses to create and grow jobs for the residents of New Jersey. The SAVEGREEN programs address and support economic growth through increased activity specifically in the energy-efficiency industries. Increased economic activity will benefit not only developers and installers of high-efficiency equipment but also the associated businesses and service personnel in other industries and fields providing ancillary services.
- 20. In this Petition, NJNG is seeking approval to continue the SAVEGREEN programs through June 30, 2018 or for a three year period beginning with the effective date of a Board Order approving this filing. Pursuant to the structure approved by the Board in the June 2013 Order, NJNG proposes that work related to a SAVEGREEN program may continue for close-out and completion for those projects approved or committed prior to June 30, 2018.
- 21. NJNG proposes to maintain the funding flexibility as previously approved by the Board in the June 2013 Order. Based on the terms of the January 2012 and June 2013 Orders, the Company will provide written notice to the Board Staff and Rate Counsel for any changes between residential and commercial program funding or any change in incentive levels,

including a description of the proposed budget re-allocation with supporting schedules. Additionally, if funds approved for SAVEGREEN through June 30, 2015 are not fully expended or committed by June 30, 2015, NJNG will transfer those amounts to the proposed program work in future years.

22. As set forth in the June 2013 Order, NJNG agreed to arrange for an independent evaluation of the SAVEGREEN programs to be initiated after two full years of operation of the SAVEGREEN programs. Pursuant to the Board's June 2013 Order, NJNG has engaged Apprise, an independent energy consultant, to evaluate the existing SAVEGREEN programs. As further agreed to by the Company, NJNG will meet with BPU Staff and Rate Counsel to discuss the outcomes from that evaluation.

Cost Recovery Mechanism

- 23. NJNG is requesting that the BPU approve the continued use of deferred accounting for all costs associated with the SAVEGREEN Programs, including the costs of the grants, customer incentives, operations and maintenance ("O&M") expenses, amortization expense, return on investments and income taxes. Those costs shall continue to be recovered through the previously approved per-therm charge applicable to all jurisdictional volumes through NJNG's system. The investments associated with the SAVEGREEN Programs will be amortized over a three, five- or ten- year period. It is proposed that the recovery be through Rider F of the NJNG Tariff, the previously-approved mechanism now in place for the recovery of costs for SAVEGREEN. The cost recovery mechanism is discussed in further detail in the Yardley Testimony.
- 24. As with the current Board-approved SAVEGREEN cost recovery mechanism, NJNG will continue to submit, for approval by the Board, an annual June filing to establish

future rates for Rider F. In that filing, the Company will provide a reconciliation of the SAVEGREEN recoveries to the actual costs incurred. Any federal or state benefits, if applicable, received by the Company and associated with the SAVEGREEN programs will be used to reduce the revenue requirement or costs to be collected from ratepayers.

WHEREFORE, NJNG respectfully requests that the Board issue an Order finding that:

- The Board will retain this matter for review at the Agency in the manner and timeframe incorporated in the Legislation, specifically Section 13;
- 2. The SAVEGREEN Programs proposed by NJNG (Residential and Commercial) and associated cost recovery mechanism are in the public interest and NJNG is fully authorized to implement and administer these Programs on a regulated basis for a three year period beginning July 1, 2005 or the effective date of a Board Order approving this filing, under the terms and conditions set forth in this Petition, as well as the Exhibits and Schedules attached thereto;
- 3. NJNG is authorized to utilize deferred accounting and recover all reasonably incurred costs associated with the SAVEGREEN Programs herein through Rider F to the NJNG tariff. NJNG will make an annual June filing, related to Rider F, and the costs associated thereto to be submitted to the BPU;
- 4. The return on the investments related to the SAVEGREEN Programs herein will be set pursuant to NJNG's overall Weighted Average Cost of Capital as authorized by the BPU in the most recent NJNG base rate case (Docket No. GR07110889);

Exhibit P-1

5. The proposed program modifications, as set forth in this Petition

and the supporting Exhibits and Schedules, are just and reasonable;

6. In the event that modifications may be made to NJCEP programs

and policy directions, NJNG agrees to review the approved

SAVEGREEN programs in cooperation with Board Staff and Rate

Counsel to ensure alignment with NJCEP programs and

administration. If necessary, modifications will be proposed.

Additionally, if funds approved for SAVEGREEN, pursuant to

prior Board Order, are not fully expended or committed by June

30, 2015, NJNG has the authority to transfer those amounts to the

herein proposed program;

7. Projects started prior to the termination of the funding established

pursuant to this instant matter may continue for close-out and

completion activities; and

8. Granting such other relief as the Board deems just, reasonable and

necessary.

Respectfully submitted,

NEW JERSEY NATURAL GAS COMPANY

Bv:

Andrew K. Dembia, Esq.

Attorney for New Jersey Natural Gas Company

Dated: 12/16/14

STATE OF NEW JERSEY)

COUNTY OF MONMOUTH)

VERIFICATION

MARK R. SPERDUTO of full age, being duly sworn according to law, on his oath deposes and says:

- 1. I am Senior Vice President, Regulatory Affairs for New Jersey Natural Gas Company, Petitioner in the foregoing Petition.
- 2. I have read the annexed Petition, along with the Exhibits attached thereto, and the matters and things contained therein are true to the best of my knowledge, information and belief.

Mark R. Sperduto

Senior Vice-President, Regulatory Affairs

Sworn and subscribed to before me this ______ day of December, 2014





NEW JERSEY NATURAL GAS COMPANY BALANCE SHEET AS OF SEPTEMBER 30

	(\$000)	
	2014	2013
<u>ASSETS</u>		_
PROPERTY, PLANT & EQUIP		
UTILITY PLANT, AT COST	\$ 1,791,009 \$	1,681,585
CONSTRUCTION WORK IN PROGRESS	 124,785	108,919
	 1,915,794	1,790,504
ACCUMULATED DEPRECIATION AND AMORT.	(409,134)	(383,896)
PROPERTY, PLANT & EQUIPMENT, NET	 1,506,660	1,406,608
CURRENT AND ACCRUED ASSETS		
CASH AND TEMPORARY INVESTMENTS	53	908
ACCOUNTS RECEIVABLE	44,636	45,208
ACCRUED UTILITY REVENUE	7,231	7,429
ALLOWANCE FOR DOUBTFUL ACCOUNTS	(5,277)	(5,287)
GAS IN STORAGE, AT AVG COST	86,265	104,979
MATERIALS AND SUPPLIES	6,839	13,007
PREPAYMENTS	5,587	3,825
DERIVATIVE ASSETS	2,525	3,502
TOTAL CURRENT ASSETS	147,860	173,571
DEFERRED DEBITS		
UNAMORTIZED DEBT EXPENSE	7,944	7,462
REGULATORY ASSETS	412,996	421,903
ACCUMULATED DEFERRED TAXES	11,515	12,332
UNRECOVERED PURCHASED GAS COSTS	12,577	953
MISC DEFERRED DEBITS	15,977	16,547
TOTAL NONCURRENT ASSETS	461,010	459,197
TOTAL ASSETS	\$ 2,115,530 \$	2,039,376

NEW JERSEY NATURAL GAS COMPANY BALANCE SHEET AS OF SEPTEMBER 30

	(\$00	0)
	2014	2013
CAPITALIZATION AND LIABILITIES		
<u>CAPITALIZATION</u>		
COMMON STOCK EQUITY	\$ 719,224 \$	697,913
LONG-TERM DEBT	473,209	362,886
TOTAL CAPITALIZATION	1,192,433	1,060,799
OTHER NONCURRENT LIABILITIES		
CIP - REGULATORY LIABILITY	5,752	(18,933)
INCOME TAX - FAS 109	1,548	1,614
ACCUM PROV FOR INJ & DAMAGES, PENSIONS	4,443	3,598
ASSET RETIREMENT OBLIGATION	30,495	28,711
TOTAL OTHER NONCURRENT LIABILITIES	42,237	14,990
CURRENT AND ACCRUED LIABILITIES		
SHORT TERM DEBT	153,000	168,600
CURRENT PORTION OF L/T DEBT	0	60,000
CAPITAL LEASE OBLIGATIONS	9,505	8,643
ACCOUNTS PAYABLE ASSOC COMPANIES	3,599	3,728
ACCOUNTS PAYABLE AND OTHER	64,086	69,116
MISC CURRENT AND ACCRUED LIAB	26,864	23,666
CUSTOMERS DEPOSITS	7,931	7,368
ACCRUED TAXES AND INTEREST	(20,585)	(37,750)
TOTAL CURRENT LIABILITIES	244,400	303,371
NONCURRENT LIABILITIES		
DEFERRED INCOME TAXES	343,255	344,634
DEFERRED INVESTMENT TAX CREDITS	2,421	2,572
CUSTOMER ADVANCES FOR CONSTRUCTION	2,130	2,093
OTHER DEFERRED CREDITS	25	140
OTHER REGULATORY LIABILITY	288,630	310,777
TOTAL NONCURRENT LIABILITIES	636,461	660,215
TOTAL CAPITALIZATION AND LIABILITIES		
	\$ 2,115,530 \$	2,039,376

NEW JERSEY NATURAL GAS COMPANY STATEMENT OF INCOME

		(\$000)	
	Sep-14	,	Sep-13
OPERATING REVENUE	\$ 822,	709 \$	792,160
OPERATING EXPENSES			
GAS PURCHASES	405,	846	418,767
OPERATION AND MAINTENANCE	196,	828	161,056
DEPRECIATION	40,	540	37,999
TAXES - OTHER THAN INCOME	52,	013	52,410
INCOME TAXES	38,	254	34,470
TOTAL OPERATING EXPENSES	733,	482	704,702
OPERATING INCOME	89,	227	87,458
OTHER INCOME, NET	1,	660	1,383
INTEREST CHARGES, NET	16,	683	14,996
NET INCOME	\$ 74,	204 \$	73,846

NEW JERSEY NATURAL GAS COMPANY BALANCE SHEET AS OF SEPTEMBER 30, 2014

	(\$000) Sep-2014
<u>ASSETS</u>	
PROPERTY, PLANT & EQUIPMENT	
UTILITY PLANT, AT COST	\$ 1,791,009
CONSTRUCTION WORK IN PROGRESS	124,785
TOTAL UTILITY PLANT	1,915,794
ACCUMULATED DEPRECIATION AND AMORTIZATION	(409,134)
NET UTILITY PLANT	1,506,660
CURRENT AND ACCRUED ASSETS	
CASH AND TEMPORARY INVESTMENTS	53
ACCOUNTS RECEIVABLE	44,636
ACCRUED UTILITY REVENUE	7,231
ALLOWANCE FOR DOUBTFUL ACCOUNTS	(5,277)
GAS IN STORAGE, AT AVG COST	86,265
MATERIALS AND SUPPLIES	6,839
PREPAYMENTS	5,587
DERIVATIVE ASSETS	2,525
TOTAL CURRENT ASSETS	147,860
DEFERRED DEBITS	
UNAMORTIZED DEBT EXPENSE	7,944
REGULATORY ASSETS	412,996
ACCUMULATED DEFERRED TAXES	11,515
UNRECOVERED PURCHASED GAS COSTS	12,577
MISC DEFERRED DEBITS	15,977
TOTAL NONCURRENT ASSETS	461,010
TOTAL ASSETS	\$ 2,115,530

Source: NJNG Monthly Financial Report - September 2014

NEW JERSEY NATURAL GAS COMPANY BALANCE SHEET AS OF SEPTEMBER 30, 2014

		(\$000)
	S	ep-2014
CAPITALIZATION AND LIABILITIES		
CAPITALIZATION		
COMMON STOCK EQUITY	\$	719,224
LONG-TERM DEBT		473,209
TOTAL CAPITALIZATION		1,192,433
OTHER NONCURRENT LIABILITIES		
CIP - REGULATORY LIABILITY		5,752
INCOME TAX - FAS 109		1,548
ACCUM PROV FOR INJ & DAMAGES, PENSIONS		4,443
ASSET RETIREMENT OBLIGATION		30,495
TOTAL OTHER NONCURRENT LIABILITIES		42,237
CURRENT AND ACCRUED LIABILITIES		
SHORT TERM DEBT		153,000
CURRENT LEASE OBLIGATIONS		9,505
ACCOUNTS PAYABLE ASSOC COMPANIES		3,599
ACCOUNTS PAYABLE AND OTHER		64,086
MISC CURRENT AND ACCRUED LIAB		26,864
CUSTOMERS DEPOSITS		7,931
ACCRUED TAXES AND INTEREST		(20,585)
TOTAL CURRENT LIABILITIES		244,400
NONCURRENT LIABILITIES		
DEFERRED INCOME TAXES		343,255
DEFERRED INVESTMENT TAX CREDITS		2,421
CUSTOMER ADVANCES FOR CONSTRUCTION		2,130
OTHER DEFERRED CREDITS		25
OTHER REGULATORY LIABILITY		288,630
TOTAL NONCURRENT LIABILITIES		636,461
TOTAL CAPITALIZATION AND LIABILITIES	\$	2,115,530

Source: NJNG Monthly Financial Report - September 2014

NEW JERSEY NATURAL GAS COMPANY GAS REVENUE BY CLASS OF BUSINESS AS OF SEPTEMBER 2014

	(\$000)
Residential	\$ 458,718
Commercial	106,677
Industrial	762
Firm Transportation	98,206
Other Revenue	11,724
Cogeneration	-
Off-System Sales & Storage	 146,623
Total	\$ 822,709

New Jersey Natural Gas Enhanced SAVEGREEN Programs

Income Statement and Balance Sheet

<u>2026</u>			0)	00	0	(0)		,	, <u>(</u> 0)	(0)	(0)
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2024			0)	66	0	(0)	1		- (0)	(0)	0 0
8			\$	↔		s	∨	,			
2023			0)	6	0	(0)	1		. (0)	(0)	(0)
8			↔	↔		s	↔				
껢			0)	0 9	0	(0)	1		0)	(0)	0 0
2022			↔	⇔		⇔	↔				
~ I			2,525	2,443	2,487	38		_	(0)	(0)	(i) (ii) (iii) (ii
2021				& 2,	2,4	s	\$ 12,215	(12,			
			16 \$		63	153			(998)	1,445	(998) - 1,191 1,252 2,443 1,445
2020			5,216	- 4,886 105	5,063	~	24,430	(21,987)	2,443 (998)	1,4	(998) - 1,191 1,252 2,443 1,445
			€	e > -		& &	↔ Ω	9)	e (10	51953 4
2019			8,071	- 7,329 237 161	7,727	343	\$ 36,645	(29,316)	7,329 (2,994)	4,335	(2,994) - 3,573 3,756 7,329 4,335
M			↔	₩.		↔					
2018			8,565	7,329 395 269	7,993	572	36,645	(21,987	14,658 (5,988)	8,670	(5,988) - 7,147 7,511 14,658 8,670
×I			↔	€		⇔	ო ഗ	(2			
7			,190	5,542 7,329 421	13,580	610	36,645	(14,658)	21,987 (8,982)	13,005	(8,982) - 10,720 11,267 21,987 13,005
2017			\$ 14,190	\$ 22	13	⇔	\$ 38	(14	8)	13	(8) 10 10 13 13 13 13 13 13 13 13 13 13 13 13 13
				4,896 9 4,886 290 197	89	419		(7,329)	01 86)	15	(6,986) - 8,338 8,763 17,101
2016			\$ 10,688	4, 4,	10,268		24,430	(7,3	17,101 (6,986)	10,115	(6,986) - 8,338 8,763 17,101
				55 55 5		\$3	ۍ د	(2)	2,2	0	2) 17 10 10
2015			7,660	4,887 2,443 105	7,507	18	12,215	(2,443)	9,772 (3,992)	5,780	(3,992) - 4,765 5,007 9,772 5,780
NI			↔	↔		s	↔				
				_							
_				Expense Operations & Maintenance Depreciation & Amortization Income Taxes Interest Expense							es
Year				lainter Amori			ŧ		oment		Capitalization Deferred Income Taxes on: Debt Common Equity alization ties & Capitalization
		×		Expense Operations & Mai Depreciation & A Income Taxes	esue		uipme	iation	, Equi		Capitalization Deferred Income on: Common Equity alization ties & Capitaliza
		cienc	eune	Expense Operations & N Depreciation & Income Taxes	Expe		& Eq	eprec	lant 8 sset		pitaliz erred tt nmon ation & Ca
		ıy Effi	<u>ın</u> t ₃ Rev∈	Expe Ope Dep Incc	rating	ue u	Plant	Jum D	erty, F Tax A	ets	& Capii : Defer ation: Debt Comr citalizatii
	ants	Energ	<u>s <i>Statement</i></u> Operating Revenue	Operating Expense Operatio Deprecis Income	Total Operating Expense	Net Income	e <i>Sheet</i> Assets Property, Plant & Equipment	Less: Accum Depreciation	Net Property, Plant & Equipment Deferred Tax Asset	Total Assets	Liabilities & Capitalization Liabilities: Deferred Income Ta Capitalization: Debt Common Equity Total Capitalization
	tial G	ntial	<i>me St</i> Op¢	Ŏ	Tot	Net	ASS ASS Pro	Les	Net Def	Tot	Cag Tott
	Residential Grants	I. Residential Energy Efficienc <u>y</u>	A. Income Statement Operating R				B. Balance Sheet Assets Property				
	Re	<u>.</u> Я	A				<u>@</u>				

New Jersey Natural Gas Enhanced SAVEGREEN Programs

Income Statement and Balance Sheet

		122			20		20	72		,475	,475)											
		↔						&		\$ 21	(21				s							\$
		490			157	107	263	227		42,950	40,803)	2,148			2,148		,	,	1,047	1,100	2,148	2,148
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			•	•	352	240	265			64,425	(57,983	6,443	•	•			٠	•	3,141	3,301	6,443	\$ 6,443
					87	8	87				40)	82							82	03	85	
			'	'	2	4	6			\$ 64,4	(51,5	12,8	'	•	\$ 12,8			'	6,2	9,9	12,8	\$ 12,885
					322	929	381				(86)	328							124	904	328	
			·	•	ω	u,	1,3			\$ 64,4	(45,0	19,3		•	\$ 19,3		•	•	9,6	6,6	19,3	\$ 19,328
					940	732	808				355)	270							292	205		25,770
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					29	31	86				73)	23							5	39	53	
		4,2	·		1,3	o	2,2	1,9			(41,5	33,2	•	•	33,2		ľ	•	16,2	17,0	33,2	33,253
		\$					٥.	↔			<u>(</u>	10			\$				6	ω.	-0	\$
		5,306	•	•	1,697	1,155	2,852	2,457		0,025	8,250	1,77	•		11,77				398,0	1,406	1,775	41,775
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		,400		,	,046	,392	,438	,962		,025	,688)	,338			,338				,031	306	,338	51,338
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					80	66	20				25)	8							94	90	00	
		5,9		'	1,9	1,	3,2	2,7		80,0	(19,1	609	'	'	6'09		'		29,6	31,2	609	006'09
		€						↔		\$	⊙	~			\$				_	_	~	\$
		3,836	•	•	1,226	835	2,061	1,77		3,350	(9,563	13,788	٠	٠	13,788		•	٠	21,350	22,438	13,788	43,788
		↔						S		4		4			8				(1	.,	7	\$
		,339		,	428	291	719	620		9,675	,188)	,488			,488				,452	,035	,488	23,488
		~								26	(3	23			23				7	12	23	23
		↔						↔		↔					s							↔
Residential On-Bill Repayment Plan	Residential Energy Efficiency	A. Income Statement Operating Revenue	Operating Expense Operations & Maintenance	Depreciation & Amortization	Income Taxes	Interest Expense	Total Operating Expense	Net Income	B. Balance Sheet Assets	Property, Plant & Equipment	Less: Accum Depreciation	Net Property, Plant & Equipment	Deferred Tax Asset		Total Assets	Liabilities & Capitalization		Capitalization:	Debt	Common Equity	Total Capitalization	Total Liabilities & Capitalization
	Residential On-Bill Repayment Plan	Residential On-Bill Repayment Plan I. Residential Energy Efficiency	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ anitenance	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ alintenance	\$ 1,339 \$ 3,836 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,102 \$ 490 \$ alintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157 E 291 835 1,299 1,392 1,155 931 732 559 400 240 107	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ anintenance	\$ 1,339 \$ 3,836 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ aintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ aintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157 291 835 1,299 1,392 1,155 931 732 559 400 240 107 719 2,061 3,207 3,438 2,852 2,298 1,908 1,381 987 592 263 \$ 620 \$ 1,775 \$ 2,763 \$ 2,962 \$ 2,457 \$ 1,980 \$ 1,558 \$ 1,190 \$ 850 \$ 510 \$ 227 \$	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ aintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157 291 835 1,299 1,392 1,155 931 732 559 400 240 107 719 2,061 3,207 3,438 2,862 2,298 1,381 987 592 263 \$ 620 \$ 1,775 \$ 2,763 \$ 2,962 \$ 2,457 \$ 1,980 \$ 1,558 \$ 1,190 \$ 850 \$ 510 \$ 227 \$ at 1	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ aintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157 291 835 1,299 1,392 1,155 931 732 559 400 240 107 719 2,061 3,207 3,438 2,862 \$ 2,457 \$ 1,980 \$ 1,568 \$ 1,190 \$ 850 \$ 510 \$ 227 \$ \$ \$ 620 \$ 1,775 \$ 2,763 \$ 2,962 \$ 2,457 \$ 1,980 \$ 1,558 \$ 1,190 \$ 850 \$ 510 \$ 227 \$ \$ (3,188) (9,563) (19,125) (28,688) (38,250) (41,573) (43,855) (45,089) (51,540) (57,983) (40,803) (21,24)	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ aintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157 291 835 1,299 1,392 1,155 931 732 559 400 240 107 719 2,061 3,207 3,438 2,862 \$ 2,298 1,808 1,568 \$ 1,190 \$ 850 \$ 510 \$ 227 \$ \$ 8	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,276 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ sintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157 719 2,061 3,207 3,438 2,862 2,288 1,808 1,381 987 592 263 \$ 620 \$ 1,775 \$ 2,763 \$ 2,962 \$ 2,457 \$ 1,980 \$ 1,558 \$ 1,190 \$ 850 \$ 510 \$ 227 \$ \$ (3,188) (9,563) (19,125) (28,688) (38,250) (41,573) (43,855) (45,098) (57,983) (40,803) ment \$ 26,675 \$ 53,350 \$ 80,025 \$ 80,025 \$ 80,025 \$ 74,825 \$ 69,625 \$ 64,425 \$ 64,425 \$ 64,425 \$ 84,256 \$ 3,148 The statement of	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ aintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157 291 835 1,299 1,392 1,155 931 732 559 400 240 107 719 2,061 3,207 3,438 2,862 \$ 2,298 1,808 1,381 987 592 563 \$ 620 \$ 1,775 \$ 2,763 \$ 2,962 \$ 2,457 \$ 1,980 \$ 1,588 \$ 1,190 \$ 850 \$ 510 \$ 227 \$ 1	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ sintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157 291 835 1,299 1,392 1,155 931 732 559 400 240 107 719 2,061 3,207 3,438 2,852 2,298 1,808 1,868 \$ 1,190 \$ 850 \$ 510 \$ 227 \$ 8 \$ 620 \$ 1,775 \$ 2,763 \$ 2,962 \$ 2,457 \$ 1,980 \$ 1,558 \$ 1,190 \$ 860 \$ 510 \$ 227 \$ 8 11 \$ 26,675 \$ 53,350 \$ 80,025 \$ 80,025 \$ 74,825 \$ 69,625 \$ 64,425 \$ 64,425 \$ 64,425 \$ 42,950 \$ 8 12 \$ 1,189 (9,563) (19,125) (28,688) (38,250) (41,573) (43,855) (45,098) (51,540) (57,983) (40,803) (40,	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ \$ 400 \$ 400 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ \$ 400 \$ 40	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ sintenance Amortization 428 1,226 1,908 2,046 1,697 1,367 1,076 822 587 352 157 291 2,061 3,207 3,438 2,852 2,298 1,908 1,381 987 592 263 719 2,061 3,207 3,438 2,852 2,298 1,908 1,381 987 592 263 \$ 620 \$ 1,775 \$ 2,763 \$ 2,962 \$ 2,457 \$ 1,980 \$ 1,568 \$ 1,190 \$ 850 \$ 510 \$ 227 \$ \$ 11 \$ 26,675 \$ 53,350 \$ 80,025 \$ 80,025 \$ 80,025 \$ 74,825 \$ 69,625 \$ 64,425 \$ 64,425 \$ 64,425 \$ 42,950 \$ 12 3,188	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,276 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ \$ interance Amortization 428 1,226 1,289 1,392 1,165 331 732 559 400 240 107 240 107 240 107 251 251 251 251 251 251 251 251 251 251	s 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ aintenance Amoritzation 428 1,226 1,298 2,046 1,697 1,367 1,076 822 587 322 157 234 822 6,067 3,207 3,438 2,862 2,298 1,808 1,558 \$ 1,190 \$ 850 \$ 510 \$ 227 \$ 8	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ sintenance Amortization 428 1,226 1,998 2,046 1,697 1,367 1,076 822 587 352 157 221 281 1,226 1,399 1,382 1,155 931 732 569 400 240 107 719 2,061 3,207 3,488 2,862 5 2,289 1,806 1,381 967 592 263 \$ 620 \$ 1,775 \$ 2,763 \$ 2,962 \$ 2,457 \$ 1,880 \$ 1,558 \$ 1,190 \$ 860 \$ 510 \$ 2.77 \$ 1,360 \$ 1,360 \$ 1,573 \$ 1,189 \$ 1,585 \$ 1,190 \$ 860 \$ 51,38 \$ 1,189 \$ 1,573 \$ 1,185 \$ 1,18	\$ 1,339 \$ 3,836 \$ 5,969 \$ 6,400 \$ 5,309 \$ 4,278 \$ 3,365 \$ 2,571 \$ 1,837 \$ 1,102 \$ 490 \$ sintenance Amortization 428

New Jersey Natural Gas Enhanced SAVEGREEN Programs

Income Statement and Balance Sheet

Year	M	2013	2014	20	<u>2015</u>	2016	2017		<u>2018</u>	2019	2020	2021	2022	2023		2024
Commercial On-Bill Repayment Plan																
I. Commercial Energy Efficiency																
A. Income Statement Operating Revenue	6	309 \$	277	↔	734 \$	503	e €	316 \$	226 \$	185 \$	144	103	9	\$	27 \$	
Operating Expense Operations & Maintenance		- 150	156		- 161				1 1		1 1		1 1			
Depreciation & Amortization		. 4	125		. 60	- 1	' +	. 5	, 6		- 97	- 66		_		
Interest Expense		35	92		125	109	-	69	49	8 4	3 +	22 53	√	13	. 9	
Total Operating Expense		236	382		469	270	_	169	121	66	77	22	33	8	15	
Net Income	↔	74 \$		\$	265 \$	233	8	146 \$	105 \$	\$ 98	\$ 29	48	8	\$ 62	13 \$	
B. Balance Sheet A scets																
Property, Plant & Equipment	↔	3,760 \$		↔	11,280 \$	8,720	\$ 6,160	\$ 09	3,600 \$		3,600 \$		\$ 3,600	↔	2,400 \$	
Less: Accum Depreciation		(973)	(2,920)		(5,840)	(5,347)	(4,000)	(00	(1,800)	(2,160)	(2,520)	(2,880)	(3,240)		280)	
Net Property, Plant & Equipment		2,787	4,600		5,440	3,373	2,160	09	1,800	1,440	1,080	720	360	0	120	
Deferred Tax Asset							'						•			
			-		-	-			-	-	-	-	•		-	
Total Assets		2,787	4,600		5,440	3,373	2,160	09	1,800	1,440	1,080	720	360	0	120	
			•				•			•			•			
Liabilities & Capitalization		,	•				•						•			
Liabilities:		•	•			ı	'			į			•			
Deferred Income Taxes			•				•						•			
Capitalization:		,					•		,	,			•			
Debt		1,359	2,243		2,652	1,645	1,0	1,053	878	702	527	351	176	9	29	
Common Equity		1,428	2,357		2,788	1,729	1,107	20	922	738	553	369	184	4	61	
Total Capitalization		2,787	4,600		5,440	3,373	2,160	09	1,800	1,440	1,080	720	360	0	120	
Total Liabilities & Capitalization	↔	2,787 \$	4,600	\$	5,440 \$	3,373	\$ 2,160	\$ 09	1,800 \$	1,440 \$	1,080 \$	720	\$ 360	\$ 0	120 \$	ı

NEW JERSEY NATURAL GAS COMPANY PAYMENTS AND ACCRUALS TO AFFILIATE COMPANIES

THE ATTACHED WORKSHEETS INCLUDES THE PAYMENTS AND ACCRUALS TO THE FOLLOWING AFFILIATE COMPANIES OF NEW JERSEY RESOURCES (NJR):

	FISCAL YEAR	
	2014 2013 2012	
NJR SERVICE COMPANY TO NJNG	\$ 21,895,596 \$ 19,902,181 \$ 20,166,869	
NJR SERVICE COMPANY TO NJR ENERGY SERVICES, INCLUDING NJNG TO NJR ENERGY SERVICES	\$ 7,518,244 \$ 3,595,207 \$ 3,854,594	
NJR SERVICE COMPANY TO NJR HOME SERVICES, INCLUDING NJNG TO NJR HOME SERVICES	\$ 6,104,571 \$ 5,314,856 \$ 4,839,331	
NJR SERVICE COMPANY TO NJR CR&R INCLUDING NJNG TO COMMERCIAL REALITY & RESOURCES	\$ 94,077 \$ 66,800 \$ 98,452	
NJR SERVICE COMPANY TO NJR CLEAN ENERGY VENTURES INCLUDING NJNG TO NJR CLEAN ENERGY VENTURES	\$ 1,775,058 \$ 1,607,398 \$ 1,389,845	
NJR SERVICE COMPANY TO MIDSTREAM	\$ 210,450 \$ 140,497 \$ 170,680	
Total	<u>\$ 37,597,996</u> <u>\$ 30,626,939</u> <u>\$ 30,519,771</u>	

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To: County Clerks, Municipal Clerks and County Administrators

IN THE MATTER OF THE PETITION) OF NEW JERSEY NATURAL GAS)	PETITION
COMPANY FOR APPROVAL OF THE	TEITHON
EXTENSION OF ENERGY EFFICIENCY	BPU DOCKET NO. GO1412
PROGRAMS AND THE ASSOCIATED	GU1412
COST RECOVERY MECHANISM PURSUANT TO N.J.S.A. 48:3-98.1	

Pursuant to law, New Jersey Natural Gas Company (the "Company") is providing you with notice of a filing made on December 17, 2014 with the New Jersey Board of Public Utilities for approval of the extension of energy-efficiency programs and the associated cost recovery mechanisms. You can download the filing from the Company's website at http://www.njng.com/regulatory/filings.asp

Hard copies of the filing are available for review at the Company's Customer Service Offices and at the New Jersey Board of Public Utilities, 44 South Clinton Street, 9th Floor, P.O. Box 350, Trenton, New Jersey 08450-0350.

Very truly yours,

Andrew K. Dembia Regulatory Affairs Counsel

Enclosure

NEW JERSEY NATURAL GAS COMPANY

<u>Seventh Sixth</u> Revised Sheet No. 172 Superseding <u>Sixth Fifth</u> Revised Sheet No. 172

BPU No. 8 - Gas

RIDER ''F''

ENERGY EFFICIENCY - EE

AVAILABILITY

Applicable to the following service classifications:

RS	Residential Service	ED	Economic Development
DGR	Distributed Generation Residential	FC	Firm Cogeneration
GSS	General Service - Small	NGV	Natural Gas Vehicle
GSL	General Service - Large	IS	Interruptible Service
FT	Firm Transportation	IGS	Incremental Gas Service
DGC	Distributed Generation Commercial		

In accordance with P.L. 2011, c. 9, societal benefits charges pursuant to section 12 of P.L. 1999, c.23 (C.48:3-60), or any other charge designed to recover the costs for societal, energy efficiency, conservation, environmental or renewable energy programs, are not applicable to natural gas delivery service or commodity that is used to generate electricity that is sold for resale. Natural gas used to generate electricity that is sold for resale by customers served under the above Service Classifications is exempt from costs associated with the Energy Efficiency ("EE") Rider and shall not be billed for such charges. In order to qualify for this exemption, a customer who uses natural gas to generate electricity for resale must complete an Annual Certification form, provided by the Company, to certify the percentage of natural gas used at the customer's New Jersey generation facilities during the previous calendar year to generate electricity that was sold for resale. For a new customer or a customer with less than twelve months of usage history, estimates supported by engineering and operational plans may be used to determine the percentage of natural gas used to generate electricity sold for resale.

The EE rate is for recovering authorized expenditures related to the energy efficiency programs as approved in BPU Docket Nos. GO09010057, GO10030225, GR11070425, and GO12070640 and GO1412____.

DETERMINATION OF THE EE

The Company shall file an annual request with the Board for implementation of an EE charge, which shall be applicable to customers on all service classifications to which Rider "F" applies. The EE recovery year is intended to run from October 1st to September 30th of each year.

Date of Issue: June 23, 2014

Issued by: Mark R. Sperduto, Senior Vice President

Wall, NJ 07719

Effective for service rendered on and after July 1, 20154

NEW JERSEY NATURAL GAS COMPANY

<u>Seventh Sixth</u> Revised Sheet No. 173 Superseding <u>Sixth Fifth</u> Revised Sheet No. 173

BPU No. 8 - Gas

RIDER "F"

ENERGY EFFICIENCY - EE

I. Determination of the Rate

The EE rate shall be derived in the following manner:

- 1. An estimate shall be made of the total annual cost related to the programs. This rider will include only expenses for energy efficiency programs approved by the Board in BPU Docket Nos. GO09010057, GO10030225, GR11070425, and GO12070640 and GO1412 unless modified further by Board Order.
- 2. An estimate shall be made of the total annual volume of prospective jurisdictional sales of gas (in therms) to NJNG's sales and transportation customers.
- 3. The prospective costs (per paragraph (1)) shall be adjusted upward or downward to the extent of the amount of any prior under-recovery or over-recovery to determine the total costs to be recovered and then shall be divided by the estimated total volume of prospective sales (per paragraph (2)), to determine the per unit cost recovery rate.

II. Tracking the Operation of the EE

The Company shall calculate carrying costs on the average monthly balances of under-or over-recovery of deferred costs based upon the Company's monthly commercial paper rate. The carrying cost calculation shall be based on the net of tax beginning and end average monthly balance. The carrying costs shall accrue on a monthly basis and shall be rolled into the balance at the end of each EE recovery year.

In accordance with P.L., 1997 c. 162, the charges applicable under this Rider include provision for the New Jersey Sales and Use Tax ("SUT"), and when billed to customers exempt from this tax, as set forth in Rider "B", shall be reduced by the amount of such tax included therein.

The EE factor shall be credited/collected on a per therm basis within the Delivery Charge for all service classifications to which Rider "F" applies. The EE factor is as set forth below:

\$0.0327

Date of Issue: June 21, 2013

Issued by: Mark R. Sperduto, Senior Vice President

Wall, NJ 07719

Effective for service rendered on and after July 1, 20153

NOTICE TO NEW JERSEY NATURAL GAS CUSTOMERS Petition for Approval of SAVEGREEN Extension and Associated Cost Recovery Mechanisms Docket Nos. GO1412XXX

NOTICE OF FILING AND PUBLIC HEARING

TO OUR CUSTOMERS:

PLEASE TAKE NOTICE that on December 17, 2014, New Jersey Natural Gas ("NJNG" or the "Company") filed a Petition with the New Jersey Board of Public Utilities ("Board") seeking approval of an extension to the currently approved energy-efficiency programs offered through NJNG's The SAVEGEENTM Project ("SAVEGREEN") and the associated cost recovery mechanisms. The proposed programs target residential and commercial customers in the NJNG service territory and complement or supplement existing offers through New Jersey's Clean Energy Program (NJCEP). These NJNG programs will provide customers with increased incentives for participation in NJCEP programs through grants, on-bill repayment arrangements, audits and weatherization opportunities as well as expanded outreach efforts. NJNG also requested that the Board permit the Company to continue the Board-approved Energy Efficiency ("EE") Rider that has been in effect since August 1, 2009 for collection of the costs associated with these programs. Those costs include funds for grants, customer incentives and the associated incremental Operations and Maintenance expenses. NJNG has requested that the carrying costs associated with these programs be allowed. The Company is requesting to continue SAVEGREEN for a period of three years. NJNG has not requested a change to the EE rate. If these programs are approved as filed, customers will see no change in their bill before October 2015.

Pursuant to Board Orders dated July 17, 2009 (Docket Nos. EO09010056 and EO09010057), September 24, 2010 (Docket No. GO10030225) January 18, 2012 (Docket No. GR11070425) and June 21, 2013 (Docket No. GO12070640) NJNG is authorized to recover all costs associated with the SAVEGREEN Programs. NJNG also made a filing on June 2, 2014 requesting that the Board maintain the Company's current BPU approved EE rate of \$0.0327 per therm after-tax.

The EE recovery charge mechanism will operate and be applied in a manner consistent with existing components and processes of the EE Rider applicable to all jurisdictional throughput volumes. Individual customers participating in the SAVEGREEN programs are expected to achieve annual savings on their energy bills.

There is no immediate change to the EE rate or impact on customer bills from this filing. Pursuant to the EE rider, NJNG shall submit annual filings for changes to the EE rate. Additionally, the Board has the statutory authority to establish the EE rate at a level it finds just and reasonable pursuant to *N.J.S.A.* 48:2-21. Therefore, the Board may establish the EE charge at a level other than that proposed by NJNG which would have an impact on a customer's bill.

PLEASE TAKE NOTICE that a public hearing on the extension of the SAVEGREEN Programs and EE Rider has been scheduled at the following dates, times and places:

XXXXXX, 2015 at 4:30 p.m. and 5:30 p.m. Freehold Township Municipal Building One Municipal Plaza-Schanck Road Freehold, NJ 07728-2195

XXXXXXXX, 2015 at 4:30 p.m. and 5:30 p.m. Rockaway Township Municipal Building 65 Mt. Hope Road Rockaway, NJ 07866

The public is invited to attend, and interested persons will be permitted to testify and/or make a statement of their views on the proposed rate changes. In order to encourage full participation in this opportunity for public comment, please submit any requests for needed accommodations, including interpreter, listening devices or mobility assistance, 48 hours prior to this hearing to the Board Secretary at the address below. Regardless of whether they attend the hearing, members of the public may submit written comments concerning the petition to the Board by

addressing them to: Kristi Izzo, Secretary, New Jersey Board of Public Utilities, 44 South Clinton Street, 9th Floor, P.O. Box 350, Trenton, New Jersey 08625-0350. Copies of NJNG's filing can be reviewed either at the NJNG Customer Service Centers or at the New Jersey Board of Public Utilities, 44 South Clinton Street, 9th Floor, P.O. Box 350, Trenton, New Jersey 08625-0350.

Andrew K. Dembia, Esq. **New Jersey Natural Gas**



NEW JERSEY NATURAL GAS COMPANY ACCOUNTING ENTRIES

Entry	Acct.	<u>Description</u>	Debit	Credit
EE1	To defe 182 131	Accounting for NJNG SAVEGREEN Programs or program expenditures and incremental O&M Program Investment Regulatory Asset Cash	xxx	xxx
EE2	To amo 908 182	ortize direct program expenditures over years Customer Assistance Expenses Program Investment Regulatory Asset	XXX	xxx
EE3		rge incremental O&M to operating expense Customer Assistance Expenses Program Investment Regulatory Asset	xxx	XXX
EE4	131 400 400	the Regulatory asset recovery Cash Clause Revenues Clause Revenues Regulatory Asset	xxx xxx	xxx xxx
EE5	182 407.3 407.4	ord any over/ under recovery Regulatory Asset Regulatory Debits Regulatory Credits Regulatory Liability	XXX XXX	XXX XXX
EE6	Record 182 419 254	cost of capital on unrecovered balance using NJNG's WACC Regulatory Asset Other Income Regulatory Liabilities	XXX XXX	XXX XXX
EE7	908 131 182 908	the Regulatory asset recovery On Bill Financing Repayment Customer Assistance Expenses Cash Regulatory Asset Customer Assistance Expenses	xxx	XXX XXX
EE8	131 908	Recovery of On Bill Financing Repayment Cash Customer Assistance Expenses Customer Assistance Expenses Regulatory Asset	xxx xxx	xxx xxx

NJNG SAVEGREEN Program Budgets

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	D	Administration,	Color		Rebates, Grants, and		Audit and	Doctor	Evaluation
Energy Efficiency Programs	Froposea Budget	Development	Sales and Marketing	Training		Control	Control	reriormance Incentives	and Kelated Research
Residential Energy Efficiency Programs	\$43,777,004	\$522,643	\$395,829	0\$	\$38,890,000	\$597,812	\$597,812 \$2,585,720		\$785,000
Commercial Energy Efficiency Programs	\$3,910,359	\$58,071	\$45,753	\$0	\$3,760,000	\$30,591	\$15,944		
Total	\$47,687,363	\$580,714	\$441,582	80	\$0 \$42,650,000	\$628,403	\$628,403 \$2,601,664	80	\$785,000

2016 - 2017

Administration, IT and Program	Sales and		Rebates,	Rebate			
dministration, and Program	Sales and		Rebates,	Drocessing			
dministration, and Program	Sales and		Grante and	I I OCCOSIII E,			
and Program	Sales and		-	Inspections and Audit and	Audit and		Evaluation
Develonment	Monkoting			Other Quality	Quality	Performance	and Related
	Maine	Training	Incentives	Control	control	Incentives	Research
\$540,936	\$409,683	80	\$38,890,000	\$618,735	\$618,735 \$2,676,220		\$650,000
\$60,103	\$47,354	0\$	\$3,760,000	\$31,662	\$16,502		
\$601,039	\$457,037	80	\$42,650,000	\$650,397	\$2,692,722	0\$	\$650,000
98	0,730		\$47,354	\$47,354 \$0 \$457,037 \$0	\$47,354 \$0 \$3,760,000 \$457,037 \$0 \$42,650,000	\$47,354 \$0 \$3,760,000 \$31,662 \$ \$457,037 \$0 \$42,650,000 \$650,397 \$	\$47,354 \$0 \$3,760,000 \$457,037 \$0 \$42,650,000

2017 - 2018

						Kepate			
					Rebates,	Processing,			
	7	Administration,			Grants, and	Inspections and	Audit and		Evaluation
Prope	posed I	IT and Program	Sales and		Other Direct	Other Quality	Quality	Performance	
Energy Efficiency Programs Budg	ıdget	Development	Marketing Training	Training	Incentives	Control	control	Incentives	Research
Residential Energy Efficiency Programs \$44,11	110,169	\$559,868	\$424,022	80	\$38,890,000	\$640,391	\$2,769,888		\$826,000
Commercial Energy Efficiency Programs \$3,92	,921,068	\$62,207	\$49,012	80	\$3,760,000		\$17,080		
Total \$48.03	031.238	\$622.075	\$473,034	0\$	\$0 \$42,650,000	\$673.161	\$673.161 \$2.786.968		000'928\$

8 - Close-out

100-25010 - 0107									
					7 1 0	Rebate			
		Administration			Kebates, Grants and	Processing, Inspections and	Andit and		Fvaluation
	Proposed	IT and Program	Sales and		Other Direct	Other Quality	Quality	Quality Performance and Related	and Related
Energy Efficiency Programs	Budget	Development	Marketing	Training	Incentives	Control	control	Incentives	Research
Residential Energy Efficiency Programs	\$322,184	\$92,520	\$19,931	80	\$0	\$209,733	\$0	\$0	80
Commercial Energy Efficiency Programs	0\$	0\$	0\$	0\$	0\$	0\$	0\$	80	0\$
Total	\$322,184	\$92,520	\$19,931	80	80	\$209,733	80	0\$	0\$





PROMISSORY NOTE ON-BILL REPAYMENT PROGRAM – Up To \$6,500

NEW JERSEY NATURAL GAS COMPANY 1415 Wyckoff Rd P.O. Box 1464 Wall NJ, 07719	Name: Joint Name: Address:	On-Bill Repayment Number: Date:
	Borrower(s) "I", "Me", "My" includes each Borrower above, individually and together.	On-Bill Repayment Amount:

ANNUAL PERCENTAGE RATE: The cost of my credit as a yearly rate: 0%

FINANCE CHARGE: The dollar amount the credit will cost me: \$0.00

AMOUNT FINANCED: The amount of credit provided to me or on my behalf: \$

TOTAL OF PAYMENTS: The amount I will have paid after I have made all scheduled payments: \$

My payment schedule will be: as follows

Number of payments: 60

Amount of payments: 59 payments of \$. One final payment of \$

Definitions: In this Promissory Note ("Note"), the words "I," "me" and "my" mean anyone signing this Note as a Borrower(s) or in any other way. The words "you" and "your" mean New Jersey Natural Gas Company ("NJNG").

Promise to Pay: I promise to pay to your order, either in-person, during your normal business hours, at your office at 1415 Wyckoff Road, P.O. Box 1464, Wall, New Jersey 07719, or by mailing to the NJNG designated payment address that appears on my NJNG monthly natural gas account bill, the Total of Payments, by paying the following amounts:

and /100 Dollars, in 60 monthly installments as follows:

59 installments of \$ each and one final payment of \$, with each of the installments to be due the same date as my NJNG account monthly billing due date on the New Jersey Natural Gas Company Account Number set forth below.

When payments are due: Monthly, the same date as my NJNG account monthly billing due date on the New Jersey Natural Gas Company Account Number set forth below.

Prepayment: I have the right to make payments of principal at any time before they are due, which is known as a "prepayment." When I make a prepayment, I am required to tell you in writing that I am doing so by mailing a written notice of prepayment, enclosing a separate check for the prepayment, to: NJNG, Revenue Billing Department, 1415 Wyckoff Road, P.O. Box 1464, Wall, New Jersey 07719. I may not designate a payment as a prepayment if I have not made all the monthly payments due under this Note.

Notwithstanding anything herein to the contrary, the minimum amount of any prepayment shall be no less than 20% of the **AMOUNT FINANCED**. If I attempt to make a prepayment in an amount less than 20% of the **AMOUNT FINANCED**, or fail to tell you in writing, as set forth above, that I am making a prepayment, you may, at your sole discretion, either credit the attempted prepayment to my NJNG natural gas account (rather than to reduce the amount of principal that I owe under this Note), or return the attempted prepayment to me.

I may make a full prepayment or partial prepayments in the manner set forth above without paying a prepayment charge. You will use my prepayments to reduce the amount of principal that I owe under this Note. If I make a partial prepayment, there will be no changes in the due date or in the amount of my monthly payment unless you agree in writing to those changes. It is further understood and agreed that if my NJNG natural gas account is in arrears, any such prepayment shall be applied first to the overdue balance on my NJNG natural gas account, and any remaining amount to reduce the amount of principal that I owe under this Note.

Important Condition: Participation in the NJNG On-Bill Repayment Program is expressly conditioned upon NJNG's receipt of a work completion approval notification, in a form acceptable to NJNG, from the New Jersey Clean Energy Program for the energy-efficient home improvement(s) designated in my application for the On-Bill Repayment Program (the "Work Completion Approval Notification"). The Amount Financed will not be given to me unless NJNG receives an acceptable Work Completion Approval Notification. The Amount Financed will be given to me on or about ten business days after NJNG receives an acceptable Work Completion Approval Notification.

В	or	row	er((S)	Nai	me:
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Borrower(s) Address:

Date of Note:

New Jersey Natural Gas Company Account Number:





ADDITIONAL TERMS OF THE NOTE

Collection Costs: If you hire an attorney to bring a lawsuit to collect any amount owing under this Note, I will pay any reasonable attorneys' fees and any court costs you have to pay.

Waivers and Releases: You can waive or delay enforcing any of your rights without losing them. You can waive or delay enforcing a right as to one borrower without waiving it as to any other borrower. Also, you need not give anyone any notice of any waiver, delay or release of any party or any extension of time payment. You need not give notice to one of us of defaults of the other.

Continued Effectiveness: If any part of this Note is determined by a court to be invalid, the rest will remain in effect.

What Law Applies: Any legal question about this Note will be decided according to New Jersey State law.

Responsibility: I and everyone else signing this Note will be, individually and together, liable under it. You can sue me under this Note even if you do not sue anyone else.

Default: Any of the following is a default under this Note:

- 1. Any amount owing under this Note is not paid by the day it becomes due; or
- 2. I violate a provision of this Note now or in the future; or
- 3. I file for bankruptcy or become subject to a proceeding which seeks relief from debt; or
- 4. I die or become legally unable to manage my affairs; or
- 5. I terminate the NJNG account number listed in this Note; or
- 6. I sell or otherwise transfer ownership of the real property at which NJNG currently provides natural gas utility service under the NJNG account number listed in this Note; or
- 7. I have made a false or misleading statement about an important matter in connection with the transaction covered by this Note or I have made or make one in any application to you related to this Note; or
- 8. You reasonably believe that any amount owing under this Note will not be paid by the day it becomes due.

If a Default Occurs: If a default occurs, you can declare all amounts owing under this Note immediately due.

Obligations Independent: My obligation to pay the Total of Payments is independent of the obligation of any other person who has also agreed to pay it. You may, without notice, release me or any of us, extend new credit to any of us, or renew or change this Note one or more times and for any term, and I will still be obligated to pay the Total of Payments or any other amount due pursuant to this Note.

Privacy: From time to time you may receive credit information about me from others, including lenders and credit reporting agencies. You may furnish to others on a regular basis credit and experience information regarding this Note. To the extent permitted by law, I agree that you will not be liable for any claim arising from the use of information provided to you by others or for providing information to others.

Agreement: I agree to be bound by all the provisions of this Note.

Date

Copy Received: Borrower(s) acknowledges receipt of a completely filled in copy of this Note.	
<u>Signature</u> of Borrower:	<u>Signature</u> of Borrower:
Printed Name of Borrower	Printed Name of Borrower
Installation Address	



TRUTH-IN-LENDING DISCLOSURE

ANNUAL PERCENTAGE	FINANCE	AMOUNT	TOTAL OF
RATE	CHARGE	FINANCED	PAYMENTS
The cost of your credit as a	The dollar amount the credit	The amount of credit	The amount you will have
yearly rate.	will cost you.	provided to you or on your	paid after you have made all
		behalf.	payments as scheduled.
0% APR	\$0.00	\$	\$

You have the right to receive at this time an itemization of the Amount Financed:

\$ will be given to you directly.

Your payment schedule will be:

Printed Name of Joint Applicant

Number of Payments	Amount of Payments	When Payments Are Due
59	\$	Monthly, the same date as your NJNG account monthly billing due date.
One final payment	\$	

Insurance: Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided.

Security: You are not giving a security interest in the goods or property being purchased.

Filing Fees: \$0.00 Non-filing Insurance: \$0.00

Prepayment: If you pay off the On Bill repayment amount early, you will not have to pay a penalty.

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment.





PROMISSORY NOTE ON-BILL REPAYMENT PROGRAM

NEW JERSEY NATURAL GAS COMPANY 1415 Wyckoff Rd P.O. Box 1464 Wall NJ, 07719	Name: Joint Name: Address:	On-Bill Repayment Number: Date:
	Borrower(s) "I", "Me", "My" includes each Borrower above, individually and together.	On-Bill Repayment Amount:

ANNUAL PERCENTAGE RATE: The cost of my credit as a yearly rate: 0%

FINANCE CHARGE: The dollar amount the credit will cost me: \$0.00

AMOUNT FINANCED: The amount of credit provided to me or on my behalf:

TOTAL OF PAYMENTS: The amount I will have paid after I have made all scheduled payments:

My payment schedule will be: as follows

Number of payments: 120

Amount of payments: 119 payments of \$. One final payment of \$

Definitions: In this Promissory Note ("Note"), the words "I," "me" and "my" mean anyone signing this Note as a Borrower(s) or in any other way. The words "you" and "your" mean New Jersey Natural Gas Company ("NJNG").

Promise to Pay: I promise to pay to your order, either in-person, during your normal business hours, at your office at 1415 Wyckoff Road, P.O. Box 1464, Wall, New Jersey 07719, or by mailing to the NJNG designated payment address that appears on my NJNG monthly natural gas account bill, the Total of Payments, by paying the following amounts:

and /100 Dollars, in 120 monthly installments as follows:

119 installments of \$ each and one final payment of \$, with each of the installments to be due the same date as my NJNG account monthly billing due date on the New Jersey Natural Gas Company Account Number set forth below.

When payments are due: Monthly, the same date as my NJNG account monthly billing due date on the New Jersey Natural Gas Company Account Number set forth below.

Prepayment: I have the right to make payments of principal at any time before they are due, which is known as a "prepayment." When I make a prepayment, I am required to tell you in writing that I am doing so by mailing a written notice of prepayment, enclosing a separate check for the prepayment, to: NJNG, Revenue Billing Department, 1415 Wyckoff Road, P.O. Box 1464, Wall, New Jersey 07719. I may not designate a payment as a prepayment if I have not made all the monthly payments due under this Note.

Notwithstanding anything herein to the contrary, the minimum amount of any prepayment shall be no less than 20% of the **AMOUNT FINANCED**. If I attempt to make a prepayment in an amount less than 20% of the **AMOUNT FINANCED**, or fail to tell you in writing, as set forth above, that I am making a prepayment, you may, at your sole discretion, either credit the attempted prepayment to my NJNG natural gas account (rather than to reduce the amount of principal that I owe under this Note), or return the attempted prepayment to me.

I may make a full prepayment or partial prepayments in the manner set forth above without paying a prepayment charge. You will use my prepayments to reduce the amount of principal that I owe under this Note. If I make a partial prepayment, there will be no changes in the due date or in the amount of my monthly payment unless you agree in writing to those changes. It is further understood and agreed that if my NJNG natural gas account is in arrears, any such prepayment shall be applied first to the overdue balance on my NJNG natural gas account, and any remaining amount to reduce the amount of principal that I owe under this Note.

Important Condition: Participation in the NJNG On-Bill Repayment Program is expressly conditioned upon NJNG's receipt of a work completion approval notification, in a form acceptable to NJNG, from the New Jersey Clean Energy Program for the energy-efficient home improvement(s) designated in my application for the On-Bill Repayment Program (the "Work Completion Approval Notification"). The Amount Financed will not be given to me unless NJNG receives an acceptable Work Completion Approval Notification. The Amount Financed will be given to me on or about ten business days after NJNG receives an acceptable Work Completion Approval Notification.

Borrower	(s) l	Name:
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Borrower(s) Address:

Date of Note:

New Jersey Natural Gas Company Account Number:





ADDITIONAL TERMS OF THE NOTE

Collection Costs: If you hire an attorney to bring a lawsuit to collect any amount owing under this Note, I will pay any reasonable attorneys' fees and any court costs you have to pay.

Waivers and Releases: You can waive or delay enforcing any of your rights without losing them. You can waive or delay enforcing a right as to one borrower without waiving it as to any other borrower. Also, you need not give anyone any notice of any waiver, delay or release of any party or any extension of time payment. You need not give notice to one of us of defaults of the other.

Continued Effectiveness: If any part of this Note is determined by a court to be invalid, the rest will remain in effect.

What Law Applies: Any legal question about this Note will be decided according to New Jersey State law.

Responsibility: I and everyone else signing this Note will be, individually and together, liable under it. You can sue me under this Note even if you do not sue anyone else.

Default: Any of the following is a default under this Note:

- 1. Any amount owing under this Note is not paid by the day it becomes due; or
- 2. I violate a provision of this Note now or in the future; or
- 3. I file for bankruptcy or become subject to a proceeding which seeks relief from debt; or
- 4. I die or become legally unable to manage my affairs; or
- 5. I terminate the NJNG account number listed in this Note; or
- 6. I sell or otherwise transfer ownership of the real property at which NJNG currently provides natural gas utility service under the NJNG account number listed in this Note: or
- 7. I have made a false or misleading statement about an important matter in connection with the transaction covered by this Note or I have made or make one in any application to you related to this Note; or
- 8. You reasonably believe that any amount owing under this Note will not be paid by the day it becomes due.

If a Default Occurs: If a default occurs, you can declare all amounts owing under this Note immediately due.

Obligations Independent: My obligation to pay the Total of Payments is independent of the obligation of any other person who has also agreed to pay it. You may, without notice, release me or any of us, extend new credit to any of us, or renew or change this Note one or more times and for any term, and I will still be obligated to pay the Total of Payments or any other amount due pursuant to this Note.

Privacy: From time to time you may receive credit information about me from others, including lenders and credit reporting agencies. You may furnish to others on a regular basis credit and experience information regarding this Note. To the extent permitted by law, I agree that you will not be liable for any claim arising from the use of information provided to you by others or for providing information to others.

Agreement: I agree to be bound by all the provisions of this Note.

Copy Received: Borrower(s) acknowledges receipt of a completely filled in copy of	this Note.
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Signature of Borrower:	Signature of Borrower:
<u>Printed Name</u> of Borrower	<u>Printed Name</u> of Borrower
Installation Address	



TRUTH-IN-LENDING DISCLOSURE

ANNUAL PERCENTAGE	FINANCE	AMOUNT	TOTAL OF
RATE	CHARGE	FINANCED	PAYMENTS
The cost of your credit as a	The dollar amount the credit	The amount of credit	The amount you will have
yearly rate.	will cost you.	provided to you or on your	paid after you have made all
		behalf.	payments as scheduled.
0% APR	\$0.00	\$	\$

You have the right to receive at this time an itemization of the Amount Financed:

\$ will be given to you directly.

Your payment schedule will be:

Printed Name of Joint Applicant

Number of Payments	Amount of Payments	When Payments Are Due
119	\$	Monthly, the same date as your NJNG account monthly billing due date.
One final payment		

Insurance: Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided.

Security: You are not giving a security interest in the goods or property being purchased.

Filing Fees: \$0.00 Non-filing Insurance: \$0.00

I have received *and* read a copy of this disclosure:

Prepayment: If you pay off the On Bill repayment amount early, you will not have to pay a penalty.

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment.

Signature of Applicant

Printed Name of Applicant

Installation Address of Applicant

Signature of Joint Applicant

Date

		Furnace / Boiler	Wate	Water Heater Only	Furnac	Furnace/WH Combo		HPES Tier II	HPES Tier III				Total
		Grant	Ø	Grant	Ö	OBRP		OBRP	OBRP		OPOWER		<u>Residential</u>
Participant Test													
Benefits	ئ	52,634,965	\$	653,653 \$		10,052,963	ς.	3,348,727 \$	107,407,887	ب	5,766,361	\$	179,864,555
Costs		17,550,756		1,890,477		5,107,281		1,557,379	49,066,441		1		75,172,334
Net Benefits	❖	35,084,208	Ŷ	(1,236,824) \$		4,945,682	\$-	1,791,347 \$	58,341,446	s	5,766,361	٠	104,692,221
Ratio		3.00		0.35		1.97		2.15	2.19		•		2.39
Program Administrator Test													
Benefits	❖	22,238,298	Ş	254,816 \$		4,166,120	s	1,039,269 \$	37,303,638	⊹	2,878,544	s	67,880,685
Costs		17,999,983		1,382,450		3,472,486		1,877,804	47,916,072		1,861,796		74,510,591
Net Benefits	\$	4,238,314	\$	(1,127,634) \$		693,634	\$	\$ (38,535)	(10,612,434)	\$	1,016,748	\$	(6,629,907)
Ratio		1.24		0.18		1.20		0.55	0.78		1.55		0.91
Ratepayer Impact Test													
Benefits	❖	22,238,298	\$	254,816 \$		4,166,120	φ.	1,039,269 \$	37,303,638	Ş	2,878,544	ς.	67,880,685
Costs		60,087,619		1,864,709	1	11,357,177		3,503,845	108,855,659		7,628,157		193,297,166
Net Benefits	s	(37,849,321)	\$	\$ (1,609,893)		(7,191,058)	ς.	(2,464,576) \$	(71,552,021)	φ.	(4,749,613)	s	(125,416,481)
Ratio		0.37		0.14		0.37		0.30	0.34		0.38		0.35
Total Resource Cost Test													
Benefits	❖	32,083,247	Ş	367,624 \$		6,010,471	s	1,412,614 \$	51,359,737	s	4,234,580	s	95,468,274
Costs		25,003,410		3,101,533		6,411,495		1,712,498	50,514,213		1,861,796		88,604,945
Net Benefits	\$	7,079,837	\$	\$ (606,233,300)		(401,024)	\$	\$ (883)	845,524	\$	2,372,784	\$	6,863,329
Ratio		1.28		0.12		0.94		0.82	1.02		2.27		1.08
Societal Cost Test													
Benefits	❖	40,986,382	\$	\$ 049,640		7,678,383	s	1,752,785 \$	64,143,167	ş	4,234,580	\$	119,264,937
Costs		25,003,410		3,101,533		6,411,495		1,712,498	50,514,213		1,861,796		88,604,945
Net Benefits	❖	15,982,972	\$	\$ (2,631,893)		1,266,888	ş	40,288 \$	13,628,954	ᡐ	2,372,784	δ.	30,659,992
Ratio		1.64		0.15		1.20		1.02	1.27		2.27		1.35

		Direct Install	Sma	Smart Start		Total		Total
		OBRP	OI	OBRP	ŭ	<u>Commercial</u>		SAVEGEEN
Participant Test								
Benefits	\$	31,595,057	\$	1,193,773	\$	32,788,830	❖	212,653,385
Costs		17,677,324		514,182		18,191,507		93,363,841
Net Benefits	❖	13,917,732	Ŷ	679,591	\$	14,597,323	❖	119,289,544
Ratio		1.79		2.32		1.80		2.28
Program Administrator Test								
Benefits	\$	27,697,963	\$	621,168	ş	28,319,132	\$	96,199,816
Costs		1,110,099		1,217,885		2,327,983		76,838,574
Net Benefits	❖	26,587,864	φ.	(596,716)	\$	25,991,148	s	19,361,242
Ratio		24.95		0.51		12.16		1.25
Ratepayer Impact Test								
Benefits	\$	27,697,963	\$	621,168	ş	28,319,132	\$	96,199,816
Costs		31,980,843		1,217,885		33,198,727	ļ	226,495,893
Net Benefits	\$	(4,282,880)	\$	(596,716)	\$	(4,879,596)	\$	(130,296,077)
Ratio		0.87		0.51		0.85		0.42
Total Resource Cost Test								
Benefits	⋄	35,061,567	\$	753,966	\$	35,815,533	\$	131,283,806
Costs		18,063,110		538,294		18,601,404		107,206,349
Net Benefits	❖	16,998,456	\$	215,672	ψ.	17,214,128	⋄	24,077,457
Ratio		1.94		1.40		1.93		1.22
Societal Cost Test								
Benefits	❖	42,357,947	Ş	1,002,652	s	43,360,599	\$	162,625,536
Costs		18,063,110		538,294		18,601,404		107,206,349
Net Benefits	❖	24,294,837	\$	464,358	φ.	24,759,195	s	55,419,187
Ratio		2.34		1.86		2.33		1.52

		I. General Filing Requirements - N.J.S.A. 48:3-98.1	Location in NJNG's EE filing
П	в	The utility shall provide with all filings, information and data pertaining to the specific program proposed, as set forth in applicable sections of N.J.A.C. 14:1-5.11 and N.J.A.C. 14:1-5.12.	Exhibit P-1, Petition Schedule NJNG-1 Comparative Balance Sheet - 2014 & 2013 Schedule NJNG-2 Comparative Income Statement - 2014 & 2013 Schedule NJNG-3 Balance Sheet (Sept 2014) Schedule NJNG-4 Statement of Revenue (Sept 2014) Schedule NJNG-5 Pro-Forma Income Statement Schedule NJNG-6 Payments to Affiliates Schedule NJNG-7 Notice of Filing to Counties and Municipalities Schedule NJNG-9 Draft Public Notice Certification incorporated within Petition
I	Р	All filings shall contain information and financial statements for the proposed program in accordance with the applicable Uniform System of Accounts that is set forth in N.J.A.C. 14:1-5.12. The utility shall provide the Accounts and Account numbers that will be utilized in booking the revenues, costs, expenses and assets pertaining to each proposed program so that they can be properly separated and allocated from other regulated and/or other programs.	Schedule NJNG-10 Accounting Entries Schedule DPY-1 Projected Participation Rates Schedule DPY-2 SAVEGREEN Investments Schedule DPY-3 Cost of Capital Schedule DPY-4 Operations and Maintenance Costs Schedule DPY-5 Summary of Revenue Requirements & Projected Bill Impacts
I	v	The utility shall provide supporting explanations, assumptions, and work papers for each proposed program and cost recovery mechanism petition filed under N.J.S.A. 48:3-98.1 and for all qualitative and quantitative analyses therein. The utility shall provide electronic copies of all materials and supporting schedules, with all inputs and formulae intact.	Exhibit P-3, Direct Testimony of Daniel P. Yardley Schedule DPY-1 Projected Participation Rates Schedule DPY-2 SAVEGREEN Investments Schedule DPY-3 Cost of Capital Schedule DPY-4 Operations and Maintenance Costs Schedule DPY-5 Summary of Revenue Requirements & Projected Bill Impacts Exhibit P-2, Direct Testimony of Thomas J. Massaro
Ι	р	The utility shall file testimony supporting its petition.	Exhibit P-2, Direct Testimony of Thomas J. Massaro Exhibit P-3, Direct Testimony of Daniel P. Yardley
Ι	υ	For any small scale or pilot program, the utility shall only be subject to the requirements in this Section and Sections II, III, and IV. The utility shall, however, provide its estimate of costs and a list of data it intends to collect in a subsequent review of the benefits of the program. Information in Section V may be required for pilot and small programs if such programs are particularly large or complex. A "small scale" project is defined as one that would result in either a rate increase of less than a half of one percent of the average residential customer's bill or an additional annual total revenue requirement of less than \$5 million. A pilot program shall be no longer than three years, but can be extended under appropriate circumstances.	Not Applicable
П	f	If the utility is filing for an increase in rates, charges etc., or for approval of a program which may increase rates/charges to ratepayers in the future, the utility shall include a draft public notice with the petition and proposed publication dates.	Schedule NJNG-9 Draft Public Notice

		II Program Description	
п	a	The utility shall provide a detailed description of each proposed program for which the utility seeks approval. 1 \(\text{Description of Program 2} \) \(\text{Market Segment/Efficiency Targeted 3} \) \(\text{Delivery Method 4} \) \(\text{Estimated Program Participants 5} \) \(\text{Link to Existing Programs 6} \) \(\text{Existing Incentives 7} \) \(\text{Proposed Incentives 8} \) \(\text{Anticipated Job Creation 9} \) \(\text{Delivery Method 4} \) \(\text{Estimated Program Participants 6} \) \(\text{Description 10} \) \(\text{Existing Program Program 10} \) \(\text{Description 10} \) \(\text{Description 20} \) \(Descr	Exhibit P-2, Direct Testimony of Thomas J. Massaro Schedule TJM-1 Residential Program Paths Schedule TJM-2 Residential Program Schedule TJM-3 Commercial Energy Efficiency Program TJM-5 Marketing Schedule NJNG-11 Proposed Budget in NJCEP Format NJNG-15 Jobs
II	р	The utility shall provide a detailed explanation of the differences and similarities between each proposed program and existing and/or prior programs offered by the New Jersey Clean Energy Program, or the utility.	Schedule TJM-4 NJCEP and NJNG Program Comparison
II	၁	The utility shall provide a description of how the proposed program will complement, and impact existing programs being offered by the utility and the New Jersey Clean Energy Program with all supporting documentation.	Exhibit P-2, Direct Testimony of Thomas J. Massaro
II	р	The utility shall provide a detailed description of how the proposed program is consistent with and/or different from other utility programs or pilots in place or proposed with all supporting documentation.	Schedule TJM-4 Comparative Program Chart
П	υ	The utility shall provide a detailed description of how the proposed program comports with New Jersey State policy as reflected in reports, including the New Jersey Energy Master Plan, or, pending issuance of the final Energy Master Plan, the draft Energy Master Plan, and the greenhouse gas emissions reports to be issued by the New Jersey Department of Environmental Protection pursuant to N.J.S.A. 26:2C-42(b) and (c) and N.J.S.A. 26:2C-43 of the Global Warming Response Act, N.J.S.A. 26:2C-37 et seq.	Exhibit P-2, Direct Testimony of Thomas J. Massaro
Π	£	The utility shall provide the features and benefits for each proposed program including the following: i. the target market and customer eligibility if incentives are to be offered; ii. the program offering and customer incentives; iii. the quality control method including inspection; iv. program administration; and v. program delivery mechanisms.	Exhibit P-2, Direct Testimony of Thomas J. Massaro Schedule TJM-2 Residential Program Schedule TJM-3 Commercial Energy Efficiency Program
II	50	The utility shall provide the criteria upon which it chose the program.	Exhibit P-2, Direct Testimony of Thomas J. Massaro
II	Ч	The utility shall provide the estimated program costs by the following categories: administrative (all utility costs), marketing/sales, training, rebates/incentives including inspections and quality control, program implementation (all contract costs) and evaluation and other.	Exhibit P-3, Direct Testimony of Daniel P. Yardley Schedule NJNG-11 Proposed Budget in NJCEP Format
П	i	The utility shall provide the extent to which the utility intends to utilize employees, contractors or both to deliver the program and, to the extent applicable, the criteria the utility will use for contractor selection.	Exhibit P-2, Direct Testimony of Thomas J. Massaro
II	j	In the event the program contemplates an agreement between the utility and its contractors and/or the utility and its ratepayers, copies of the proposed standard contract or agreement between the ratepayer and the utility, the contractor and the utility, and/or the contractor and the ratepayer shall be provided.	Schedule NJNG-12 Sample On-Bill Repayment Documents
Π	k	The utility shall provide a detailed description of the process for resolving any customer complaints related to these programs.	Exhibit P-2, Direct Testimony of Thomas J. Massaro Schedule TJM-6 Complaint Resolution Diagram
II	1	The utility shall describe the program goals including number of participants on an annual basis and the energy savings, renewable energy generation and resource savings, both projected annually and over the life of the measures.	Schedule TJM-2 Residential Program Schedule TJM-3 Commercial Energy Efficiency Program Exhibit P-3, Direct Testimony of Daniel P. Yardley Schedule DPY-1 Projected Participation Rates
II	ш	Marketing – The utility shall provide the following: a description of where and how the proposed program/project will be marketed or promoted throughout the demographic segments of the utility's customer base including an explanation of how prices and the service for each proposed program/project will be conveyed to customers.	Exhibit P-2, Direct Testimony of Thomas J. Massaro Schedule TJM-5 Marketing Overview

		III. Additional Filing Information	
Ħ	ಡ	The utility shall describe whether the proposed programs will generate incremental activity in the energy efficiency/ conservation/ renewable energy marketplace and what, if any, impact on competition may be created, including any impact on employment, economic development and the development of new business with all supporting documentation. This shall include a breakdown of the impact on the employment within this marketplace as follows: marketing/sales, training, program implementation, installation, equipment, manufacturing and evaluation and other applicable markets. With respect to the impact on competition the analysis should include the competition between utilities and other entities already currently delivering the service in the market or new markets that may be created.	Schedule TJM-2 Residential Program Schedule TJM-3 Commercial Energy Efficiency Program Exhibit P-2, Direct Testimony of Thomas J. Massaro Schedule NJNG-15 Jobs Created/Sustained
II	q	The utility shall provide a description of any known market barriers that may impact the program and address the potential impact on such known market barriers for each proposed program with all supporting documentation. This analysis shall include barriers across the various markets including residential (both single and multi-family), commercial and industrial (both privately owned and leased buildings), as well as between small, medium and large commercial and industrial markets. This should include both new development and retrofit or replacement upgrades across the market sectors.	Exhibit P-2, Direct Testimony of Thomas J. Massaro
III	3	The utility shall provide a qualitative/quantitative description of any anticipated environmental benefits associated with the proposed program and a quantitative estimate of such benefits for the program overall and for each participant in the program with all supporting documentation. This shall include an estimate of the energy saved in kWh and/or therms and the avoided air emissions, wastewater discharges, waste generation and water use or other saved or avoided resources.	Schedule TJM-2 Residential Program Schedule TJM-3 Commercial Energy Efficiency Program Exhibit P-2, Direct Testimony of Thomas J. Massaro Schedule NJNG-15 Jobs Created/Sustained
III	р	To the extent known, the utility shall identify whether there are similar programs available in the existing marketplace and provide supporting documentation if applicable. This shall include those programs that provide other societal benefits to other under-served markets. This should include an analysis of the services already provided in the market place, and the level of competition.	Schedule TJM-4 Comparative Program Chart
III	Э	The utility shall provide an analysis of the benefits or impacts in regard to Smart Growth.	Exhibit P-2, Direct Testimony of Thomas J. Massaro
III	f	The utility shall propose the method for treatment of Renewable Energy Certificates ("REC") including solar RECs or any other certificate developed by the Board of Public Utilities, including Greenhouse Gas Emissions Portfolio and Energy Efficiency Portfolio Standards including ownership, and use of the certificate revenue stream(s).	Not Applicable
Ш	ao	The utility shall propose the method for treatment of any air emission credits and offsets, including Regional Greenhouse Gas Initiative carbon dioxide allowances and offsets including ownership, and use of the certificate revenue stream(s).	Not Applicable
III	h	The utility shall analyze the proposed quantity and expected prices for any REC, solar REC, air emission credits, offsets or allowances or other certificates to the extent possible.	Not Applicable

		IV. Cost Recovery Mechanism	
2	ಡ	The utility shall provide appropriate financial data for the proposed program, including estimated revenues, expenses and capitalized investments, for each of the first three years of operations and at the beginning and end of each year of said three-year period. The utility shall include pro forma income statements for the proposed program, for each of the first three years of operations and actual or estimated balance sheets as at the beginning and end of each years of said three year period.	Exhibit P-3, Direct Testimony of Daniel P. Yardley Schedule DPY-1 Program Unit Costs and Projected Take Rates Schedule DPY-2 SAVEGREEN Investments Schedule DPY-3 Cost of Capital Schedule DPY-4 Operations and Maintenance Costs Schedule DPY-5 Revenue Requirements Summary Schedule NJNG-5 Pro-Forma Income Statement
IV	b	The utility shall provide detailed spreadsheets of the accounting treatment of the cost recovery including describing how costs will be amortized, which accounts will be debited or credited each month, and how the costs will flow through the proposed method of recovery of program costs.	Schedule NJNG-10 Accounting Entries
IV	C	The utility shall provide a detailed explanation, with all supporting documentation, of the recovery mechanism it proposes to utilize for cost recovery of the proposed program, including proposed recovery through the Societal Benefits Charge, a separate clause established for these programs, base rate revenue requirements, government funding reimbursement, retail margin, and/or other.	Exhibit P-3, Direct Testimony of Daniel P. Yardley □
IV	р	The utility's petition for approval, including proposed tariff sheets and other required information, shall be verified as to its accuracy and shall be accompanied by a certification of service demonstrating that the petition was served on the Department of the Public Advocate, Division of Rate Counsel simultaneous to its submission to the Board.	Exhibit P-1, Petition Schedule NJNG-8 Proposed Tariff Sheets
N	υ	The utility shall provide an annual rate impact summary by year for the proposed program, and an annual cumulative rate impact summary for all approved and proposed programs showing the impact of individual programs as well as the cumulative impact of all programs upon each customer class of implementing each program and all approved and proposed programs based upon a revenue requirement analysis that identifies all estimated program costs and revenues for each proposed program on an annual basis. The utility shall also provide an annual bill impact summary by year for each program, and an annual cumulative bill impact summary by year for all approved and proposed programs showing bill impacts on a typical customer for each class.	Exhibit P-3, Direct Testimony of Daniel P. Yardley Schedule DPY-5 Summary of Revenue Requirements & Projected Bill Impacts
V	f	The utility shall provide, with supporting documentation, a detailed breakdown of the total costs for the proposed program, identified by cost segment (capitalized costs, operating expense, administrative expense, etc.). This shall also include a detailed analysis and breakdown and separation of the embedded and incremental costs that will be incurred to provide the services under the proposed program with all supporting documentation.	Exhibit P-3 Direct Testimony of Daniel P. Yardley Schedule DPY-5 Summary of Revenue Requirements & Projected Bill Impacts
IV	ъs	The utility shall provide a detailed revenue requirement analysis that clearly identifies all estimated program costs and revenues for the proposed program on an annual basis, including effects upon rate base and pro forma income calculations.	Exhibit P-3, Direct Testimony of Daniel P. Yardley Schedule DPY-5 Summary of Revenue Requirements & Projected Bill Impacts
IV	h	The utility shall provide, with supporting documentation: (i) a calculation of its current capital structure as well as its calculation of the capital structure approved by the Board in its most recent electric and/or gas base rate cases, and (ii) a statement as to its allowed overall rate of return approved by the Board in its most recent electric and/or gas base rate cases.	Exhibit P-3, Direct Testimony of Daniel P. Yardley Schedule DPY-3 Cost of Capital
IV	i	If the utility is seeking carrying costs for a proposed program, the filing shall include a description of the methodology, capital structure, and capital cost rates used by the utility.	Exhibit P-3, Direct Testimony of Daniel P. Yardley Schedule DPY-3 Cost of Capital
VI	. . .	A utility seeking incentives or rate mechanism that decouples utility revenues from sales, shall provide all supporting justification, and rationale for incentives, along with supporting documentation, assumptions and calculations.	Not Applicable

		V. Cost Benefit Analysis	
>	а	The utility shall provide a detailed analysis with supporting documentation of the net benefits associated with the proposed program, including, if appropriate, a comprehensive and detailed avoided cost savings study with supporting documentation. The value of the avoided environmental impacts and the environmental benefits and the value of any avoided or deferred energy infrastructure should be stated separately.	Schedule NJNG-13 Cost Benefit Analysis
>	٩	The utility shall calculate a cost/benefit analysis utilizing the Total Resource Cost ("TRC") test that assesses all program costs and benefits from a societal perspective. The utility may also provide any cost benefit analysis that it believes appropriate with supporting rationales and documentation.	Schedule NJNG-13 Cost Benefit Analysis
>	ပ	The utility shall quantify all direct and indirect benefits as well as provide projected costs resulting from a proposed program that is subject to a cost/benefit test.	Schedule NJNG-13 Cost Benefit Analysis
>	p	Renewable energy programs shall not be subject to a cost/benefit test but the utility must quantify all direct and indirect benefits resulting from such a proposed program as well as provide the projected costs. The utility must also demonstrate how such a proposed program will support energy and environmental statewide planning objectives, such as attainment of the Renewable Portfolio Standard and any emission requirements.	Schedule NJNG-13 Cost Benefit Analysis
Λ	e	The utility must demonstrate for the proposed program that it results in a positive benefit/cost ratio, or, if the utility cannot make such a demonstration, it must provide the rationale for why the proposed program should be approved.	Schedule NJNG-13 Cost Benefit Analysis Exhibit P-2, Direct Testimony of Thomas J. Massaro
>	f	The level of energy and capacity savings utilized in these calculations shall be based upon the most recent protocols approved by the Board of Public Utilities to measure energy savings for the New Jersey Clean Energy Program. In the event no such protocols exist, or to the extent that a protocol does not exist for a filed program, the utility must submit a measurement protocol for the program or contemplated measure for approval by the Board.	Schedule NJNG-13 Cost Benefit Analysis
Λ	50	The utility shall also quantify and deduct from the energy and capacity savings any free rider effects and the business as usual benefits from homeowners and businesses installing Energy Efficiency or Renewable Energy without the N.J.S.A. 48:3-98.1 benefits or incentives.	Schedule NJNG-13 Cost Benefit Analysis

New Jersey Natural Gas Estimate of Jobs Created/Sustained

Note: These estimates do not include any multiplier effects or any impact on job retention at commercial customers that participate in the program.

	Estimated # of Projects per year	Assumed avg # work days per project	Estimated Total Work Hours	FTEs based upon 1820 work hours
Current NJNG EE positions				29
Residential				
Gas Furnace/Boiler grants	4,000	4	128,000	70
Combination Gas Furnace/Boiler & Water Heater OBRP	800	5	32,000	18
Hot Water Heater grants	650	1	5,200	3
HPwES upgrades associated with NJNG audits	300	2	4,800	3
HPwES Projects served entirely by HPwES contractor in NJNG territory (Tier II)	125	2	2,000	1
HPwES Projects served entirely by HPwES contractor in NJNG territory (Tier III)	1,900	7	106,400	58
Estimate of J	obs Created/Sus	tained from resi	dential projects	153
Commercial				

1 2 3 4 5		NEW JERSEY NATURAL GAS COMPANY DIRECT TESTIMONY OF THOMAS J. MASSARO VICE PRESIDENT – MARKETING AND BUSINESS INTELLIGENCE
6		I. INTRODUCTION AND BACKGROUND
7	Q.	PLEASE STATE YOUR NAME, AFFILIATION AND BUSINESS ADDRESS.
8	A.	My name is Thomas J. Massaro. I am Vice President-Marketing and Business
9		Intelligence for New Jersey Natural Gas Company ("NJNG" or the "Company"). My
10		business address is 1415 Wyckoff Road, Wall, NJ 07719.
11	Q.	PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL
12		BACKGROUND.
13	A.	I attended Drexel University, receiving a Bachelor of Science degree in mechanical
14		engineering in June 1989 at which time I joined NJNG as a Management Engineer.
15		Since that time, I have held several positions in marketing, operations and customer
16		service, including serving as Vice President of Corporate Strategy from June 2005 to
17		September 2007 and Treasurer of NJNG. In my current position of Vice President of
18		Marketing and Business Intelligence, which I have held since July 2007, I am
19		responsible for all aspects of the marketing function at NJNG. That includes
20		supervision of and direct involvement with the operations of The SAVEGREEN
21		Project® ("SAVEGREEN") through which NJNG's Energy-Efficiency ("EE")
22		programs operate.
23		Presently, I serve on the Board of Directors of PlanSmartNJ and I am a
24		member of the American Gas Association ("AGA") Communications and Marketing
25		and Strategic Growth Committees. I have also participated in AGA Strategic and
26		Visionary sessions and am a past chair of the AGA Growth Task Force. I am also
27		participating at both the Executive and Working Group levels for the State and Local
28		Energy Efficiency Action Network ("SEE Action"), whose goal is to help the nation
29		achieve all cost-effective energy efficiency by 2020 through assisting state and local

governments in their implementation of energy efficiency policies and programs. I am also a member of both the Executive Committee and Board of Directors for the Energy Solutions Center, a national non-profit organization that works to bring new, energy efficient natural gas solutions to residential and commercial energy users

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Q. WHAT IS YOUR INVOLVEMENT WITH NJNG'S EXISTING ENERGY-EFFICIENCY PROGRAMS?

8 A. I have overall responsibility for the Company's current energy-efficiency programs. 9 Presently, these programs fall under SAVEGREEN, the initiative through which 10 NJNG manages the EE programs approved by the New Jersey Board of Public 11 Utilities (the "Board" or "BPU") in Docket Nos. EO09010056, GO09010057 ("July 12 2009 Order"), GO10030225 ("September 2010 Order"), GR11070425 ("January 2012 13 Order") and GR12070640 ("June 2013 Order"). SAVEGREEN currently provides on-14 bill repayment opportunities, along with grants and incentives for customer 15 participation in a variety of energy-efficiency programs designed to complement 16 those administered by the BPU through New Jersey's Clean Energy Program 17 ("NJCEP"). I am responsible for the overall management of these programs and I also 18 oversee the 29 NJNG employees currently supporting the SAVEGREEN programs. In addition, I am directly involved with the Company's ongoing strategic assessment 19 20 of opportunities that will enhance our customers' energy efficiency and conservation 21 efforts, including the use of natural gas as a source for heating, electric generation and 22 as a transportation fuel.

Q. PLEASE SUMMARIZE THE BOARD APPROVALS THAT NJNG IS SEEKING THROUGH THIS FILING?

A. NJNG is seeking Board authority to continue to offer its energy-efficiency programs to customers over a three-year period as of July 1, 2015 or the effective date of the Board Order approving this filing. The programs will continue to be delivered through SAVEGREEN and include essential program modifications that reflect what the Company has learned about customer needs, activity in the current marketplace,

and State policy directions, including those set forth in the 2011 New Jersey Energy Master Plan ("EMP"). Approval of the Company's request will ensure that participating NJNG customers continue to have access to cost-effective energy-efficiency programs that provide economic and environmental benefits to New Jersey and allow our customers to make environmentally-sound consumption decisions to meet their respective energy needs. A multi-year approach, as reflected in the Company's proposal, is an important means of enhancing the effectiveness of the types of programs NJNG is offering to customers. The proposed term ensures that the subsequent SAVEGREEN filing will be able to align with the implementation of an anticipated new Strategic Plan for NJCEP after NJCEP is successfully transitioned to its new administrative structure.

Α.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY AND THAT OF OTHER WITNESSES WHO SUPPORT THE COMPANY'S PETITION?

In this testimony, I describe how the continuation of the SAVEGREEN programs reinforces the direct link between addressing customer interests and supporting current State policy initiatives promoting economic development, job creation, energy efficiency and lower energy costs. I also explain specific program changes that improve upon the success of SAVEGREEN and position the Company to more effectively meet the energy-efficiency needs of our customers and help the state gain significant insights into market conditions and customer behaviors. Approval of NJNG's request ensures important program continuity for our customers and the many trade allies who support these activities in the marketplace in a cost-efficient manner.

NJNG is also submitting the pre-filed direct testimony of Daniel P. Yardley, Principal, Yardley Associates (Exhibit P-3) (the "Yardley Testimony"). Mr. Yardley explains the ratemaking aspects of the Company's petition, including projected revenue requirements and customer bill impacts based on the proposed recovery of the program investments and related costs. NJNG's filing also includes the information sought by the BPU for filings pursuant to the Board Order dated May 12,

2008 ("May 2008 Order") in Docket No. EO08030164 establishing Minimum Filing Requirements ("MFRs") for certain energy-efficiency proposals. Attached to and made a part of this filing is Schedule NJNG-14 that lists the MFRs and the location of the requested information within this filing.

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II. CURRENT SAVEGREEN PROGRAMS

Q. WHEN DID NJNG BEGIN OFFERING ENERGY-EFFICIENCY PROGRAMS TO CUSTOMERS?

NJNG initially offered energy-efficiency programs to its customers in September 2009 pursuant to a BPU Order dated July 17, 2009 (the "July 2009 Order") approving a Stipulation between the Company, the New Jersey Division of Rate Counsel ("Rate Counsel") and BPU Staff. The initial programs, promoted through SAVEGREEN to customers, complemented or supplemented programs offered through NJCEP and incorporated both grant and financing-based options. A major focus of these programs was the stimulation of New Jersey's economy and creation of jobs, along with the promotion of energy efficiency and conservation. The specific programs incorporated additional incentives and opportunities for customers to participate in NJCEP's residential programs Home Performance with ENERGY STAR ("HPwES") and WARMAdvantage, as well as the Direct Install ("DI") program for commercial customers. The July 2009 Order also addressed the recovery of the costs necessary to deliver SAVEGREEN programs to customers, including grants, incentives, incremental operation and maintenance ("O&M") expenses and investment-related carrying costs and income taxes. Specifically, the Company was authorized to implement the Energy-Efficiency ("EE") Rider to its Tariff, designated as Rider F, which enables the SAVEGREEN program offerings.

The initial experience under SAVEGREEN demonstrated important benefits for NJNG's customers and provided significant opportunities for acquiring direct knowledge related to customer choices regarding the utilization of energy efficiency to reduce their consumption. The Company worked alongside Rate Counsel and BPU

Staff to improve and enhance the programs offered through SAVEGREEN. Program changes were approved by the BPU in the September 2010 Order (effective in January 2011), the January 2012 Order (effective January 2012), and the June 2013 Order (effective July 2013).

Q. WHAT ARE THE GOALS THAT GUIDE THE DEVELOPMENT OF NJNG'S ENERGY EFFICIENCY PROGRAM?

7 A. The energy-efficiency programs offered by NJNG are structured with three primary 8 goals in mind. The first goal is to offer cost-effective programs that are consistent 9 with New Jersey energy policy and NJCEP offerings. The second goal is to encourage 10 customers to take into consideration energy efficiency whenever equipment is 11 purchased, both when customers proactively plan on improving the energy efficiency 12 of their home or building and when unplanned equipment replacements are needed. 13 The third goal is to provide customers with options that address various impediments 14 to the adoption of energy-efficient equipment and encourage customers to take the 15 next step(s) towards achieving higher efficiency overall.

16 Q. PLEASE DESCRIBE THE SUITE OF PROGRAMS CURRENTLY 17 AVAILABLE TO NJNG CUSTOMERS.

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NJNG's current SAVEGREEN programs incorporate the program goals by addressing various circumstances when customers consider equipment purchases, layering in NJCEP energy-efficiency programs and promoting the customers understanding of ways to improve whole-house and whole-building energy efficiency. The Company classifies the existing residential energy-efficiency program into two general categories and also offers a complementary commercial program.

The first residential category provides grants for customers who replace their heating, ventilation and air conditioning ("HVAC") equipment on a planned or unplanned basis. For this category, the grants encourage customers who replace heating equipment to invest in high-efficiency options and provide an incremental grant to customers eligible for the NJCEP WARMAdvantage Program. Customers

within the category who are installing a qualified furnace/boiler and water heater at the same time have an option to apply for the On-Bill Repayment Program ("OBRP") in lieu of the grant. All customers receiving a NJNG grant must accept a no-cost home energy audit following installation of high-efficiency equipment. Participants are then educated about and encouraged to pursue the remaining recommended energy-efficiency measures through HPwES.

The second category encompasses grants and OBRP options at zero percent interest for customers implementing a package of measures in order to achieve energy savings of 10 percent or greater for whole house energy savings by participating in HPwES. Within this category, customers are encouraged to invest in measures that reduce whole house energy consumption and SAVEGREEN provides OBRP opportunities to NJNG customers eligible for the NJCEP HPwES program. The OBRP can be combined with the prevailing HPwES grants. Audits are offered by NJNG or other Building Performance Institute certified ("BPI-certified") HPwES contractors to identify energy savings opportunities, including equipment replacement and seal-up measures.

The commercial category currently involves an OBRP option for customers participating in NJCEP's DI Program. These customers have the opportunity to apply for OBRP financing at zero percent interest for the cost of the project not covered by the NJCEP grant. Based upon the current DI incentive levels and caps, the OBRP is capped at \$53,570 and repaid by the participating customers over a 24 month term.

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Q. WHAT INCENTIVE OPTIONS DOES NJNG CURRENTLY OFFER TO THE FIRST CATEGORY OF CUSTOMERS REPLACING HVAC EQUIPMENT?

NJNG offers customers participating in the first category a \$500 grant for replacing HVAC equipment with a high-efficiency WARMAdvantage qualified furnace or boiler. Customers within the category who are installing a qualified furnace/boiler and water heater at the same time have an option to apply for a \$6,500 OBRP in lieu of the NJNG grant. To ensure that the whole-house approach continues as a focus, NJNG requires participation in an HPwES audit to qualify for either of these financial

incentives, to identify additional energy-efficiency opportunities in the home. The audit is conducted by BPI-certified SAVEGREEN employees at no cost to the customer after the installation of WARMAdvantage qualified heating equipment.

4 Q. WHAT INCENTIVE OPTIONS DOES NJNG CURRENTLY OFFER TO THE SECOND CATEGORY OF CUSTOMERS PARTICIPATING IN HPWES?

A. NJNG's HPwES customers can apply to participate in NJNG's OBRP to cover the costs of approved energy-efficiency measures. Consistent with NJCEP's incentive structure, these customers can take advantage of both the HPwES grant (currently up to \$5,000) and the NJNG OBRP (currently up to \$10,000 that can be repaid at no interest over 10 years). The grant cannot exceed 50 percent of the project costs. The grant will be approved by NJNG to customers participating in the OBRP. NJCEP will fund grants to those eligible customers not using OBRP.

14 Q. HOW DO THE CURRENT SAVEGREEN PROGRAM OFFERS 15 SUCCESSFULLY MEET CUSTOMER NEEDS?

A. SAVEGREEN provides customers with critical information to enable informed equipment purchase decisions as well as grants and OBRP benefits to promote cost-effective purchase decisions that offer long-term benefits to our customers, the environment and the New Jersey economy.

NJNG believes it is especially important to influence the customers' decision-making processes before or, at the latest, at the time they evaluate equipment options to reinforce the importance of investing in energy-efficient units. Since those decisions are only made on average every 15 to 20 years, it is crucial to influence purchase decisions for as many customers as possible. If a customer is not able to afford the necessary incremental investment in high-efficiency equipment at or before the time of purchase, that opportunity is lost for a significant time period.

Through SAVEGREEN, residential customers can participate in energyefficiency programs that provide the means of reducing their individual energy costs through the installation of high-efficiency natural gas appliances, including furnaces, boilers and water heaters. By focusing on the whole-house, participants receive the greatest benefit from higher-efficiency equipment. Additionally, some measures installed to reduce natural gas usage also reduce electricity usage at peak periods. For example, seal-up and insulation work results in energy savings for air conditioning load since the system does not have to compensate for cool air that previously would have escaped. Finally, the NJNG OBRP provides funds to homeowners who might otherwise not be able to make the necessary energy-efficiency investments. As those funds are repaid by the participating customer over the agreed upon number of years, the repayments lead to a revolving fund creating future opportunities for NJNG to offer OBRP incentives to additional customers.

11 Q. WHAT BENEFITS HAVE BEEN REALIZED THROUGH SAVEGREEN?

A.

With over five years of experience offering SAVEGREEN programs, NJNG has provided substantial benefits to participating customers, the environment and the state's economy. Between September 2009 and November 30, 2014, NJNG completed more than 29,000 audits and nearly 31,000 grants were submitted for processing. In that same time period, nearly 5,000 customers have been approved for financing associated with HPwES projects. These customers are realizing substantial ongoing annual energy cost savings and contributing to lower emissions while meeting their energy needs.

SAVEGREEN provides substantial economic benefits to New Jersey as well. NJNG has created 29 incremental direct jobs including 12 employees trained and BPI-Certified to conduct energy audits. Additionally, the program provides important benefits to contractors serving the residential high-efficiency market which leads to indirect economic benefits. An increased focus on installing high-efficiency equipment encourages increased activity in the contractor market and ancillary services, benefiting local contractors, manufacturers and distributors. New Jersey has benefited from nearly \$248 million in economic activity generated by the contractors participating in SAVEGREEN.

In addition, based on an informal survey and conversations with local contractors participating in the NJCEP programs, the SAVEGREEN programs have helped increase their activity levels. NJNG's programs also resulted in dramatic increases in contractor participation in the high efficiency marketplace. The number of contractors participating in high efficiency installations through SAVEGREEN has grown from just over 100 at the end of 2009 to more than 2,100 today. These contractors provide a great insight into marketplace conditions. In a recent survey, contractors who average one project per month affirmed how SAVEGREEN is helping advance energy efficiency:

- Nearly 91 percent of these contractors indicate that NJNG's involvement in energy efficiency has increased customer awareness of the energyefficiency programs;
- More than 95 percent believe that NJNG has increased customer awareness of the need to address inefficient HVAC and water heating equipment; and
- Approximately 66 percent indicated that SAVGREEN incentives have helped them grow their business (e.g. hired employees, increased earnings).

Lastly, the OBRP provides important benefits to customers by aligning the incremental costs associated with purchasing high-efficiency equipment with the bill savings that are achieved. NJNG's involvement in energy efficiency increases customer awareness of the various programs available and the importance of moving to energy-efficient equipment. Additionally, the opportunity to participate in the OBRP encourages customers to participate in additional energy-saving measures, increasing the economic activity of local contractors that perform the work.

1		III. SAVEGREEN APPROVALS
2	Q.	PLEASE SUMMARIZE THE APPROVALS SOUGHT BY NJNG THROUGH
3		THIS FILING.
4	A.	The Company is requesting that the BPU approve a continuation of the
5		SAVEGREEN programs and related terms for a three year period. In conjunction
6		with the proposal, NJNG is recommending minor modifications to the existing
7		programs. The specific program modifications are described later in my testimony.
8	Q.	PLEASE DESCRIBE STATE INITIATIVES AND ACTIONS THAT SHAPE
9		PUBLIC POLICY RELATED TO NJNG'S ENERGY EFFICIENCY
10		PROGRAMS.
11	A.	In December 2011, the State released the EMP reflecting the State's overall energy-
12		related policy goals formulated through extensive analysis and involvement of
13		various stakeholder groups. The goals of the EMP are:
14		1. Drive down the cost of energy for all customers.
15		2. Promote a diverse portfolio of new, clean, in-State generation.
16		3. Reward energy efficiency and energy conservation and reduce peak
17		demand.
18		4. Capitalize on emerging technologies for transportation and power
19		production.
20		5. Maintain support for the renewable energy portfolio standard of 22.5
21		percent of energy from renewable sources by 2021.
22		With respect to energy efficiency, the EMP maintains the commitment to
23		achieving cost-effective energy efficiency in order to reduce energy costs and
24		emissions. The EMP recognizes the important role that energy efficiency and
25		conservation play in fostering economic development and promoting the State's
26		environmental goals. Both energy-efficiency and conservation programs are touted as

one aspect of reducing energy costs for current residents and, importantly, to

encourage business retention and growth in New Jersey. "Reducing energy costs

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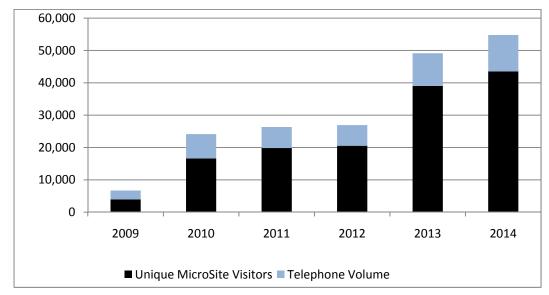
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through conservation, energy-efficiency and demand response programs lowers the cost of doing business in the State, enhances economic development, and advances the State's environmental goals." (EMP, Page 1).

SAVEGREEN supports the advancement of these objectives and has provided a significant opportunity to learn about the market. NJNG continually shares insights and outreach opportunities with the NJCEP Market Managers and Program Coordinators to ensure that the State benefits from our experience and that more customers implement energy efficiency improvements.

Q. WHY IS A THREE-YEAR CONTINUATION THE APPROPRIATE COURSE OF ACTION FOR NJNG?

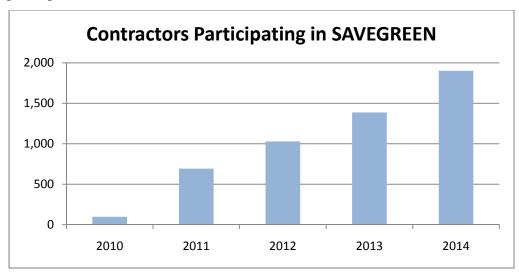
In general, multi-year planning enabled by a three-year program term offers advantages across a number of important factors that contribute to the success of the program when compared with a program of lesser duration. From the perspective of NJNG's customers, a multi-year program provides consistent messaging, supports the most cost-effective choices regarding the timing of equipment replacement, and reduces potential sources of confusion and inaction associated with programs that may appear to be ending, but are merely awaiting annual reauthorization. The following chart clearly illustrates that the extended approval period facilitated efforts that led to sustained growth in customer interest in the programs.



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A multi-year commitment provides important benefits to contractors and trade allies as it supports effective business planning including employee hiring and development, and equipment purchases through program stability. The following chart clearly shows how the multi-year term supported growth in contractor participation.



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The multi-year term will also allow NJNG to retain qualified and trained personnel supporting the programs, eliminating the ongoing employment uncertainty created by annual program approvals.

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Lastly, a multi-year term provides sufficient time for NJCEP to conclude its transition to a new Program Administrator, establish programs that align with a new NJCEP Strategic Plan, and allow NJNG to consider the most appropriate way to support and enhance the vision established by that Strategic Plan.

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Q. IS THE COMPANY SEEKING ANY CHANGE TO THE ABILITY TO SHIFT AVAILABLE FUNDING AMONG YEARS OR BETWEEN PROGRAMS?

16 A.17

No. The Company is requesting to keep the same terms established in the BPU's June 2013 Order that provide for limited flexibility to shift program funding.

1 Q. WILL AN EVALUATION OF THE SAVEGREEN PROGRAM BE PERFORMED?

- A. Yes. NJNG is undergoing an independent evaluation of the various elements of the SAVEGREEN program. Consistent with the terms of the Board's June 2013 Order, the evaluation must begin by January 1, 2015 and be completed by January 1, 2016.
- The contractor to perform the independent evaluation has been selected. When the
- 7 evaluation is completed, the Company will meet with representatives of BPU Staff
- 8 and Rate Counsel to discuss the results of the evaluation.

9 <u>IV. PROGRAMS</u>

10 Q. HOW IS THIS SECTION OF YOUR TESTIMONY ADDRESSING 11 SAVEGREEN PROGRAMS ORGANIZED?

- 12 A. The focus of this section of my testimony is on NJNG's proposed modifications to the
- existing residential programs as well as modified commercial program offerings to be
- 14 effective upon approval. I will first describe proposed modifications to the
- SAVEGREEN programs for residential customers. Then, I will address proposed
- modifications to the SAVEGREEN programs for commercial customers.

Modifications to Existing Residential Programs

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18 Q. PLEASE DESCRIBE THE PROPOSED CHANGES TO THE GRANTS 19 AVAILABLE THROUGH SAVEGREEN.

- 20 A. NJNG is not proposing any change to the grants for furnaces and boilers. The grant
- 21 would remain at \$500 and the eligibility would continue to be tied to prevailing
- NJCEP equipment minimums and a required no cost home energy audit performed by
- NJNG. However, NJNG is proposing to implement a \$100 incentive for
- WARMAdvantage eligible water heating equipment. The Company is currently
- 25 authorized to perform free home energy audits for these customers to educate them on
- additional opportunities to save energy through HPwES, but due to constraints related
- 27 to NJCEP's ability to share customer information it is difficult to reach eligible

customers. Accordingly, NJNG is proposing to offer this nominal incentive following a required no cost home energy audit since the shorter measure life for water heaters increases the potential market size for "whole-house improvements".

4 Q. WHAT CHANGES IS NJNG PROPOSING TO THE OBRP IN THIS FILING?

5 A. NJNG is not proposing modification to the OBRP that serves customers starting with 6 the HPwES program. NJNG is proposing one minor modification to the OBRP 7 program for customers that start with the \$6,500 OBRP program for combination 8 furnace/boiler and water heater installations. Currently, for customers who continue 9 with additional whole-house measures and install the available seal-up and insulation 10 measures within the first six months of their audit, they can expand their OBRP 11 financing, up to a combined maximum of \$10,000 (including the value of their 12 original OBRP) and modify the term of the initial OBRP financing from 5 years to 10 13 years. NJNG is proposing to extend the window for customer action to 18 months. 14 Our experience to date indicates that many customers need additional time to consider 15 another significant investment and also want to evaluate billing data from a full 16 heating season. The additional time will facilitate the consideration of additional 17 measures.

18 Q. IS NJNG RECOMMENDING ANY CHANGES TO THE AUDIT 19 COMPONENT OF ITS SAVEGREEN PROGRAM?

20 A. No.

Q. WHAT ARE THE ESTIMATED PARTICIPANT RATES FOR THE NJNG GRANTS AND INCENTIVES?

A. I have prepared a summary of the residential programs that incorporates the changes I outlined and shows NJNG's estimated participant rates. This summary, presented in Schedule TJM-1, provides information related to each potential path for initial participation in the Company's SAVEGREEN program. A more detailed schedule of customer participation is shown on DPY-1. Additionally, all of the paths provide opportunities for customers to benefit from achieving energy savings at levels that

qualify for HPwES either through direct participation in the HPwES program or by implementing measures identified in the no cost audits provided after installing highericiency heating and/or water heating equipment.

Estimated participant rates are based upon past experience as well as expectations related to the changes the Company is proposing in this filing. The actual participant rates will depend on many factors including general economic conditions and marketplace activity. Activity in one year may be higher than other years and some years may indicate a greater proportion of grants or OBRP than that estimated by the Company. The potential differences between actual and estimated participant levels are addressed through the funding flexibility incorporated into the overall program. The funding flexibility does not affect the investment cap that results from the Company's request, as described more fully in the Yardley Testimony.

OPOWER Pilot Program

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15 Q. PLEASE DESCRIBE THE STATUS OF OPOWER PILOT PROGRAM.

16 A. The September 2010 Order authorized NJNG to implement a three-year pilot program 17 from 2011 through 2013 providing customers with customized reports regarding their 18 energy usage, including comparisons to similar homes in their area. For this pilot, 19 NJNG contracted with OPOWER, a leading provider of this type of service for utility 20 customers. The June 2013 Order approved the extension of the pilot program through 21 June 2015. Currently more than 40,000 customers receive 4 Home Energy Reports 22 per year. The OPOWER team has presented results at previous NJCEP Energy 23 Efficiency Committee meetings. The most recent information indicates energy 24 savings of nearly 3 million therms and NJNG has been able to maintain an opt-out 25 rate of less than 0.5 percent of participating households.

26 Q. IS NJNG REQUESTING TO CONTINUE AN OPOWER PROGRAM?

27 A. Yes. NJNG is proposing to continue the existing program through June 30, 2018 and expand the program to implement additional pilots to consider ability to further

- influence customer behavior. Specifically, the expansion would establish test and control groups to assess whether working with OPOWER can enhance customers interest in energy conservation and energy efficiency investments by answering the following questions:
 - O Can we identify and encourage more low income customers to reduce their energy bills and take advantage of existing no and low-cost resources available to help?
 - o Could Home Energy Reports influence a customer's decision to pursue additional whole house upgrades?
 - O Can smart thermostats make customers more conscious of their energy usage and more likely to pursue whole house upgrades?

12 Q. HAVE YOU PREPARED A RESIDENTIAL PROGRAM DESCRIPTION 13 REFLECTING THESE PROPOSALS?

14 A. Yes. Schedule TJM-2 sets forth a description of the residential program incorporating 15 the few proposed modification to the existing SAVEGREEN offers, including the 16 OPOWER modification.

Commercial Programs

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18 Q. IS NJNG PROPOSING ANY CHANGE TO THE DI OBRP PROGRAM FOR 19 COMMERCIAL CUSTOMERS?

20 A. Yes. NJNG is proposing one minor change regarding the term. The current OBRP
21 term for commercial customers is two years. NJNG proposes extending the
22 repayment term to three years to reduce the monthly repayment burden for
23 participating customers. The Company believes this improvement to the participants
24 cash flow should expand the participation and the number of measures installed
25 which should make NJCEP's DI Program more effective at reducing energy costs for
26 small commercial customers.

Q. IS NJNG PROPOSING ANY OTHER MODIFICATIONS RELATED TO THE DI PROGRAM?

A. Yes. Through our efforts to support NJCEP's DI program with our OBRP offer, we have developed a strong understanding of some of the barriers that prevent customers from implementing all energy-efficiency upgrades recommended by their approved DI contractor. Specifically, there are instances when particular pieces of equipment fall outside of the qualified measure list for the DI program (e.g. larger size boilers). To encourage a higher installation rate for these additional measures, NJNG is proposing to offer an OBRP for measures that qualify under the SmartStart program when they are connected to a DI project. The repayment term would not exceed 10 years and the maximum OBRP amount would be \$130,000. Recognizing that some Local Government Energy Audit ("LGEA") customers may have facilities that fall outside the scope of the DI program, NJNG also proposes to allow LGEA customers to apply for this SmartStart OBRP and NJNG would work closely with the Office of Clean Energy's Energy Savings Improvement Program ("ESIP") Coordinator to ensure the customer understands ESIP opportunities. A program summary describing all aspects of the commercial program is provided as Schedule TJM-3.

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19 Q. PLEASE DESCRIBE WHY THE COMPANY BELIEVES IT IS IMPORTANT 20 TO PROVIDE OBRP OPTIONS FOR SMARTSTART EQUIPMENT ON DI 21 PROJECTS

While there are usually grants available under NJCEP's SmartStart program for energy-efficient equipment that falls outside of the DI program, these incentives are usually not compelling enough to support customers to install these additional measures. As a result, a customer who is ready to take action on the recommendations made by their DI auditor is likely to ignore any measures that fall outside of the DI eligible measure list. NJNG believes that the availability of an OBRP for these other pieces of equipment should increase the likelihood that the

customer will pursue a more comprehensive project providing a greater level of energy savings for the customer.

Other Programs

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4 Q. IS THE COMPANY SEEKING TO CONTINUE ANY OTHER PROGRAMS?

5 A. Yes. NJNG is requesting to continue the Fostering Environmental and Economic 6 Development ("FEED") Program. FEED provides financial assistance for energy-7 efficiency and economic development opportunities for commercial and industrial 8 customers with no direct rate impact on NJNG's non-participating customers. The 9 Company believes this mechanism is helpful in addressing unmet customer needs that 10 also advance state policy objectives. Since each case is reviewed by the Parties and 11 subject to BPU approval, NJNG is requesting the structure for the FEED program be 12 continued.

Consistency of SAVEGREEN Programs with NJCEP

14 Q. HOW ARE THE SAVEGREEN PROGRAMS CONSISTENT WITH 15 PROGRAMS OFFERED BY NJCEP?

A. NJNG's programs complement and enhance the NJCEP programs through integrated grants and financing opportunities. The programs seek to promote the NJCEP HPwES, WARMAdvantage, and DI programs through complementary messaging to customers and enhanced participation rates. In addition to providing customers with opportunities to take advantage of both NJCEP and NJNG offers, the NJNG programs provide important benefits to contractors and trade allies by maintaining consistency in the marketplace. The proposed programs maintain a supportive integration with ongoing NJCEP programs. Schedule TJM-4 demonstrates the alignment between NJNG programs and NJCEP programs.

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V. MARKETING

2 Q. PLEASE DESCRIBE THE MARKETING EFFORTS THAT NJNG WILL 3 EMPLOY FOR THE CONTINUATION OF SAVEGREEN.

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NJNG employs a variety of channels to educate customers on the benefits of energy efficiency, including work through the Conservation Incentive Program ("CIP") communication channels, community outreach and the promotion of the SAVEGREEN programs. To continue the education of customers on energy-efficiency benefits and foster participation in SAVEGREEN, NJNG will utilize an approach similar to our current efforts. The Company will continue the multi-channel focus for informing customers and will also target certain programs to specific sectors. Additional information is provided in Schedule TJM-5.

VI. USE OF EMPLOYEES AND CONTRACTORS

Q. WILL THE PROGRAM BENEFITS CONTINUE TO BE DELIVERED THROUGH NJNG EMPLOYEES AND OUTSIDE CONTRACTORS?

Yes. Over the past several years, the energy-efficiency programs offered by NJNG have created the opportunity for the Company to create 29 incremental positions for outreach, scheduling, promotion, audits, on-bill repayment work and oversight of energy-efficiency programs. The proposed continuation of SAVEGREEN will allow NJNG to retain these trained and effective employees.

NJNG employees do not and will not provide installation or weatherization work. Instead, for work that is already on a whole-house track, NJNG will promote its offers to BPI-certified and authorized contractors participating in NJCEP's HPwES program who will provide the necessary work in our service territory. NJNG will also continue to provide information and no-cost training on the elements of SAVEGREEN to all HVAC contractors in our service territory to ensure that the whole-house approach is emphasized to support the installation of higher efficiency equipment and the need to properly address equipment sizing and venting, as well as to support workforce retention. As mentioned in the Marketing Overview, provided

as Schedule TJM-5, there will be various approaches to promote SAVEGREEN that target customers and contractors alike to ensure the greatest exposure possible.

VII. MARKET BARRIERS

4 Q. HOW DO THE SAVEGREEN PROGRAMS ADDRESS MARKET BARRIERS 5 TO PROMOTING ENERGY EFFICIENCY?

A.

Despite the increasing focus on energy efficiency at both the national and state levels, market barriers continue to impede progress. Through the SAVEGREEN programs, NJNG is able to address the primary market barriers of program awareness and financing options. It continues to be crucial that New Jersey residents are made aware of opportunities for saving energy and that we continue to get more HVAC contractors engaged in promoting and properly installing high-efficiency equipment and other whole house measures. Through the marketing efforts incorporated within this filing and ongoing in the SAVEGREEN programs, the Company provides an active channel for promoting not only the benefits of energy efficiency but also the sources through which various programs can be obtained. This work, in conjunction with the promotional efforts of NJCEP, serves to broaden customers' awareness of viable approaches toward saving energy and, as a result, potentially saving on energy costs. And, by working closely with certified and authorized contractors, NJNG further encourages those entities to also promote and make available energy-efficient solutions to all customers.

It is also important to overcome the financial barriers that customers face when making decisions about the installation of high-efficiency HVAC equipment. Previous NJNG survey data indicates that nearly 70 percent of customers consider the upfront costs to be the biggest barrier to energy efficiency. Through the OBRP, NJNG promotes the statewide grant programs and our OBRP broadens the pool of qualifying customers. In fact, based on marketing data NJNG has obtained, the average median income for OBRP customers is approximately \$61,000 as compared to approximately \$96,000 for NJNG customers when we used the services of the out-

of-state financing company, EFS. The availability of additional incentives and the OBRP help overcome the financial barriers that deter many customers, especially moderate-income families, from taking that extra step of purchasing and installing high-efficiency equipment. At the same time, encouraging customers to also install weatherization and insulation measures increases the impact of high-efficiency equipment, furthering the whole-house approach and saving energy overall.

VIII. RESOLUTION OF CUSTOMER COMPLAINTS

8 Q. PLEASE DESCRIBE THE PROCESS NJNG INTENDS TO EMPLOY TO RESOLVE ANY POTENTIAL CUSTOMER COMPLAINTS.

NJNG will continue to utilize the dispute resolution process agreed to by Board Staff and Rate Counsel in the prior SAVEGREEN Stipulation of Settlement that was approved by the BPU in the June 2013 Order. NJNG will promptly address any customer complaints related to the programs through existing customer relations procedures within the Company. Most customer calls will come directly into the SAVEGREEN Department since that phone number is on all correspondence and promotional materials. Additionally, any calls about the programs that come into the NJNG Call Center will be transferred to SAVEGREEN employees for initial resolution. In all instances, NJNG will make every effort to resolve a complaint informally at the outset. For concerns that cannot be resolved within the Department, the matter will be moved to the NJNG Consumer Advocate for further investigation and resolution. Only if those measures fail would a complaint be resolved through the BPU Division of Customer Assistance. Attached as Schedule TJM-6 is a flow-chart depicting the process that was approved by the BPU in its prior SAVEGREEN settlement with Staff and Rate Counsel.

For disputes between NJNG and a contractor or supplier, resolution will be in accordance with the relevant contract provisions in place at that time.

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IX. IMPACT ON SMART GROWTH

Q. HAS NJNG IDENTIFIED ANY IMPACTS ON OR BENEFITS TO SMART
 GROWTH?

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4 A. NJNG has not identified any impacts on or benefits to Smart Growth from the implementation of the proposed programs.

X. PROPOSAL FOR ADDRESSING PROGRAM MODIFICATIONS

- Q. PLEASE EXPLAIN THE APPROACH NJNG IS PROPOSING FOR MAKING
 MODIFICATIONS TO EITHER THE OVERALL SAVEGREEN PROGRAM
 OR TO ANY SPECIFIC CUSTOMER OFFER.
- 10 Α. In the previous SAVEGREEN approvals, the Board agreed upon the approach to be 11 used for a shift in funding between specific approved programs and in instances 12 where modifications or changes were necessary to any program elements. NJNG is 13 proposing to retain those approved methods. NJNG is currently permitted to shift 14 participant levels between the grant and OBRP incentives. Additionally, in light of 15 the three year term, the Company can carry forward up to 15 percent of the approved 16 revenue requirement for the residential and commercial programs to the subsequent 17 year. Consistent with the terms of the June 2013 Order, the Company agrees to provide written notice to the BPU Staff and Rate Counsel for any proposed changes 18 19 between residential and commercial program funding levels or any change in 20 incentive amounts, including a description of the proposed budget re-allocation with 21 supporting schedules.

XI. COORDINATION WITH OTHER FUNDING SOURCES

- 2 Q. HOW WILL THE FUNDING FOR SAVEGREEN INTERFACE WITH ANY 3 POTENTIAL FEDERAL FUNDS MADE AVAILABLE FOR ENERGY-
- 4 EFFICIENCY PROGRAMS?

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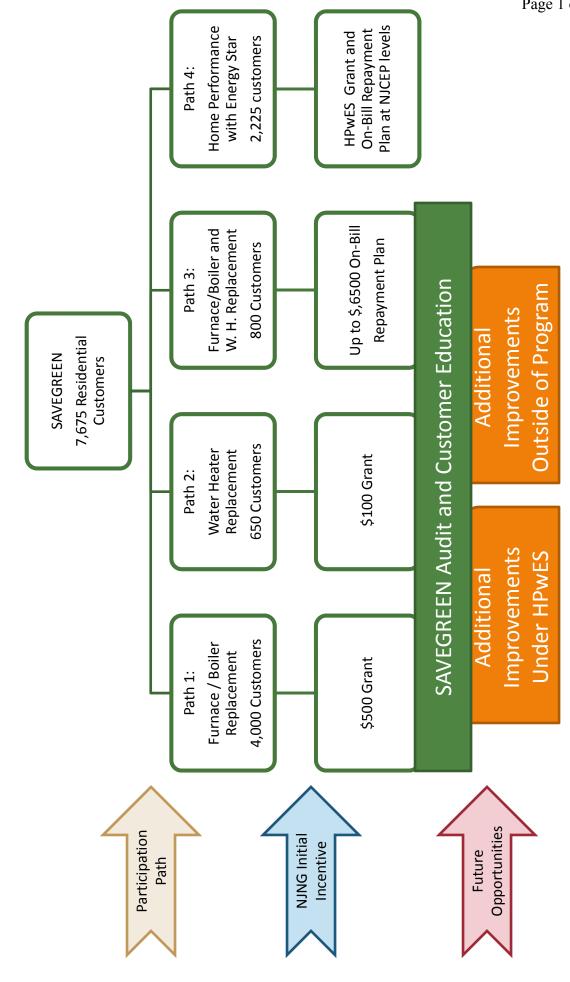
5 Α. Subject to restrictions set forth in any applicable law, NJNG will utilize any funds or 6 credits received from governmental sources that are directly related to SAVEGREEN 7 to offset the respective program costs, thus reducing the impact on customers. If 8 funding or credits from any state or federal action becomes available to NJNG 9 through the State of New Jersey, a County or Municipality for project reimbursement, 10 those funds or credits directly applicable to work related to a SAVEGREEN project 11 will be used to benefit customers by offsetting the costs for which recovery is sought, 12 to the extent permitted by law.

XII. REPORTING PROCEDURES

14 Q. HOW DOES NJNG PROPOSE TO PROVIDE INFORMATION ON THE 15 SAVEGREEN PROGRAMS?

- 16 NJNG proposes to continue the reporting and provision of program data that was A. 17 agreed to in the Stipulations approved by the BPU in the July 2009, September 2010, 18 January 2012, and June 2013 Orders. As such, the Company will submit the detailed 19 data regarding the SAVEGREEN program activity and expenses through NJCEP 20 provided formats, currently the Program Manager Data Tracking Sheet. Those reports 21 are consistent with the data and format used in reporting on the NJCEP Comfort 22 Partners and SAVEGREEN programs. NJNG has been meeting the reporting 23 obligations for submission to the NJCEP Integrated Management System on an 24 automated basis since March of 2010. Each Monthly Activity Report will be 25 submitted within 30 days of the request for the calendar month covered by the report.
- 26 Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?
- 27 A. Yes, it does.

New Jersey Natural Gas Comparative Residential Program Paths



Residential Program

Description of the Program

Segment I - Customers starting with NJCEP's WARMAdvantage Program

To encourage investment in high-efficiency equipment as well as participation in New Jersey's Clean Energy Program (NJCEP) Home Performance with Energy Star (HPwES) program (whole-house approach), NJNG will offer incentives through grants and/or on-bill-repayment plans (OBRP) that can be used toward the purchase and installation of high-efficiency gas furnaces/boilers and water heaters. Customers must participate in a no-cost HPwES audit conducted by NJNG following the installation of qualifying equipment and are expected to apply for the companion NJCEP WARMAdvantage grants. The audit identifies additional energy-saving opportunities, encouraging customers to move forward with further improvements through the HPwES program. If they move ahead with additional improvements, they can qualify for HPwES incentives available under that program for the new measures

NJNG incentives for installation of qualifying equipment:

- NJNG will continue to offer a \$500 grant for the installation of a high-efficiency gas furnace. Efficiency guidelines will follow NJCEP minimum criteria, currently established as 95 percent annual fuel utilization efficiency (AFUE).
- NJNG will continue to offer a \$500 grant for the installation of a high-efficiency gas boiler. Minimum efficiency guidelines will follow NJCEP minimum criteria, currently established at 85% AFUE for a hydronic gas boiler and 82% AFUE for a steam boiler.
- NJNG will offer a \$100 grant for the installation of a high-efficiency gas water heater. High-efficiency criteria is an Energy Factor (EF) of .67 or higher To encourage customers to replace a furnace/boiler and water heater at the same time, and to enhance contractor awareness of the need to address the integrated nature of equipment, NJNG will continue to offer customers installing qualifying high-efficiency models of both at the same time a choice of the following incentives:
 - o \$600 grant to offset the incremental costs of both units; or
 - OBRP of up to \$6,500 for a five-year term. To receive the OBRP, the contractor must perform and submit proof of an ACCA Manual J and Manual S calculations for the premise. This is currently not an NJCEP requirement for heating equipment.
- After the audit customers may qualify for additional incentives for other measures through HPwES. These customers would be eligible for any HPwES incentives offered for the other measures.

Note:

If NJCEP minimum efficiency levels change during the term of this program, NJNG's program guidelines will change to match NJCEP's new standard

Eligibility

Grants

Residential customers and small commercial customers (such as a medical or dental office) are eligible for a grant following the installation of a boiler less than 300,000 BTU or a furnace less than 225,000 BTU and for a grant for residential-sized, energy-efficient, sealed-combustion or tankless water heaters. Residential customers are required to have an HPwES audit conducted by

an NJNG auditor. There is no audit requirement for small commercial customers; however, an equipment check is performed to ensure that the installed equipment meets NJCEP and NJNG program requirements and those customers are targeted to participate in other NJCEP programs to implement additional energy saving measures.

OBRP

Customers who meet NJNG's credit review criteria are eligible to participate in the OBRP. If denied participation in the OBRP option, a customer may still be eligible for NJNG grants for WARMAdvantage-qualified equipment.

Qualifying Equipment	NJCEP Grant ¹	NJNG Grant	Total Award
Tier 1 Furnace: ≥95% AFUE	\$250	\$500	\$750
Tier 2 Furnace: 95% AFUE + 2% e motor, ENERGYSTAR qualified	\$500	\$500	\$1,000
Boiler Steam: ≥85% AFUE Boiler Hydronic: ≥82% AFUE	\$300	\$500	\$800
 High-efficiency gas water heater options Power Vent Storage: EF of ≥ .67 and ENERGY STAR qualified Thermal Efficiency (TE): ≥ 90% with sealed combustion EF of ≥ .82 or greater and ENERGY STAR qualified 	\$500	\$100	\$600
Qualifying combination of heating equipment			
 Boiler and WH Combination: Integrated WH and boiler unit (Combi Boilers) OR qualifying stand alone WH (see minimum EF above) OR an indirect WH attached to qualifying boiler Tier 1 Furnace and WH combination Furnace and WH Combination: Qualifying standalone water heater (see minimum EF for WH above) OR an indirect-fired WH attached to qualifying furnace 	\$900	\$600 or OBRP	\$1,500 Or \$900 NJCEP and NJNG OBRP
Tier 2 Furnace and WH combination • Furnace and WH Combination: Qualifying standalone water heater (see minimum EF for WH above)	\$1000	\$600 or OBRP	\$1,600 Or \$1000 NJCEP and NJNG

¹ NJNG recognizes that Fiscal 2015 incentive levels for NJCEP programs have not been determined. NJNG proposal assumes NJCEP continues its current grant levels as noted.

OR an indirect-fired WH attached to	OBRP
qualifying furnace	

Estimated Program Participants	and Annual Sav	vings	
Qualifying Equipment	Estimated Annual	Estimated Annual Savings	
	Participants		
Gas Furnace/Boiler	4,000	761,840 therms	
High-Efficiency WH	650	8,730 therms	
Combination furnace/Boiler and WH	800	142,723 therms	

Segment II - Supporting NJCEP HPwES

Customers starting with HPwES

Residential customers implementing upgrades through HPwES are eligible to participate in NJNG's OBRP with up to \$10,000 available for qualifying residential customers to be repaid over 10 years. Customers can take advantage of both the HPwES grants and the OBRP if they meet NJNG's credit review criteria. NJNG reserves the right to limit participation in OBRP to customers who utilize natural gas for heating. Customers not eligible for the NJNG OBRP may seek financing through NJCEP.

Customers starting with WARMAdvantage

To further promote whole-house upgrades through NJCEP's HPwES and encourage timely follow-up, NJNG will allow customers to expand their initial OBRP up to a total combined OBRP of \$10,000 to pursue further HPwES measures, provided such action is initiated within 18 months of the audit. The repayment term will be extended to 10 years and total repayment amount available cannot exceed \$10,000 (e.g. customers who used the full \$6,500 for the initial OBRP would be limited to an additional \$3,500). Consistent with NJCEP HPwES treatment, customers can take advantage of both the HPwES grants and the OBRP.

NJNG provides grants for Tier III HPwES work at the levels being offered by NJCEP, currently up to \$10,000, when the OBRP is used. When customers do not utilize the OBRP, the HPwES grant is paid by NJCEP.

Anticipated Number of Participants	Max. Amount available per customer/Assumed average loan amount	Estimated Annual Energy Savings	Investment Amount to be repaid by participants
2,100	\$10,000 max	410,050 therms	\$21,000,000
2,100	ψ10,000 max	1,708,110 kWh	Ψ21,000,000

NJNG provides grants for Tier II HPwES work at the levels being offered by NJCEP, currently

up to \$5,000, when the OBRP is used. When customers do not utilize the OBRP, the HPwES grant is paid by NJCEP.

Maximum Number of Participants	Max. Amount available per customer	Estimated Annual Energy Savings	Investment Amount to be Repaid by Participants
225	Up to \$5,000	18,990 therms 89,550 kWh	\$1,125,000

Independent Audits

NJNG will continue to offer an HPwES audit upon customer request at the current HPwES audit price of \$250. Funds generated from these audits are used to offset the overall NJNG energy-efficiency program costs. As noted in the Marketing Plan (Schedule TJM-5), NJNG promotes this option through multiple communication channels but also emphasizes that eligible contractors can perform the HPwES audit.

For those households with income levels that exceed eligibility for the NJCEP Comfort Partners Program but fall at or below 400 percent of federal poverty level NJNG will continue to offer a free home-energy audit provided the customer meets the eligibility for NJNG's OBRP. The customers who pursue energy-efficiency upgrades through HPwES as a result of this audit may then be eligible to take advantage of both NJNG's OBRP and the HPwES grants. The energy savings from the upgrades should be targeted to approach or exceed the value of repayments.

Independent NJNG Audits

Number of participants	Revenue generated from audit fees (to be credited against program costs)
250 audits	\$62,500
250 free audits to qualified customers	\$0

OPOWER

OPOWER is a behavioral program intended to influence customer behavior by providing timely feedback regarding energy consumption through personalized Home Energy Reports. Approximately 25,000 residential customers and a companion control group were involved in the pilot launch in 2011. By redesigning the program in 2013 to send 4 personalized HER reports per year instead of 6, NJNG and OPOWER were able to increase the pilot size to approximately 40,000 customers and increase the aggregate energy savings.

Through this filing, NJNG proposes the following:

- Continue the program for the existing pool of customers
- Expand the program to assess whether the on-going feedback from HER reports to SAVEGREEN participants can influence customer likelihood to pursue further energy-efficiency upgrades. This would include a portion of SAVEGREEN customers to date and new participants on a rolling basis. The remaining portion of SAVEGREEN customer would not participate in the expansion to allow for the

- establishment of a control group
- Expand the program to assess whether OPOWER's knowledge of customer income levels can help us target low income customers and use HER reports to reduce their energy burdens and get these customers connected with resources available to help this market
- Expand the program to assess the ability to connect structural and behavioral improvements through a connected thermostat program. To leverage the ability to get a contractor to perform the installation, NJNG would connect this pilot to the 0% APR On-Bill Repayment Program (OBRP) for the combination furnace/boiler and water heater installation. This segment of customers must reach out to NJNG for preapproval to participate in our OBRP so we could work with their implementing contractor to provide a free thermostat if they install it for the customer

Estimated OPOWER Program Participan	ts and Annua	al Savings	
Group	Est. # of Participants over 3 years	Initial Year Savings (therms)	S
Continuation of existing HER report program	40,000	658,718	
Expand HER report program for connections with SAVEGREEN programs	26,600	77,201	
Pilot low income approach	10,000	35,839	
Pilot thermostat program	2,500	48,114	

Note: The OPOWER programs also create kWh savings but there is no practical way to measure such savings due to a lack of access to the electric billing data.

Market Segment/Efficiency Targeted

Segment I Targeted to residential (and certain smaller commercial customers) with HVAC equipment needing immediate or imminent replacement. The program promotes the installation of high-efficiency equipment and other whole-house energy conservation measures through opportunities identified in the HPwES audit.

Segment II Residential homeowners not immediately needing to replace HVAC equipment are targeted since participation in the HPwES audit is mandatory at the outset. The program targets the installation of high-efficiency HVAC equipment and the installation of whole-house energy conservation measures such as weatherization improvements.

Delivery Method and Contractor Role

Segment I Roles and Responsibilities

- Any HVAC contractor can install NJCEP WARMAdvantage-qualified equipment. Effective Fiscal 2015, NJCEP is leveraging SAVEGREEN auditors inspection of equipment to reduce NJCEP inspections in our territory. NJNG performs the HPwES audits at no cost to the customer following installation of qualifying equipment and processes the NJNG grants or OBRP.
- NJNG grants can be assigned to a contractor at customer's request; however, OBRP funds must be paid directly to the customer.

 Any customers seeking to implement further energy-efficiency improvements from the HPwES audit recommendations and access HPwES incentives must use an NJCEPapproved HPwES contractor. Such contractors are subject to NJCEP HPwES quality control processes.

Segment II Roles and Responsibilities

- HPwES audits must be performed by an NJCEP-approved HPwES contractor or by NJNG staff (for the specified fee or free to qualified customers).
- Installation work must be performed by NJCEP-approved HPwES contractors. Currently, contractors must be Building Performance Institute (BPI) certified and accredited.
- NJNG grants and OBRP available if appropriate.
- Roles and responsibilities consistent with NJCEP treatment of HPwES grants.
- Work may be subject to HPwES quality control processes.

Link to existing NJCEP and federal programs

- NJCEP WARMAdvantage
- NJCEP HPWES
- ENERGY STAR
- NJCEP Comfort Partners (Opower expansion proposal may help identify eligible participants)

Estimated avoided air emissions

11,636 tons of CO₂ and 9 tons of NO_x annually (based upon estimated annual savings as noted above) for WARMAdvantage and HPwES connected programs.

Additional 4,796 tons of CO₂ and 4 tons of NO_x annually (based upon estimated initial year savings as noted above) for OPOWER programs.

Anticipated Jobs Created/Sustained

Refer to Schedule NJNG-15.

Budget information

Refer to Schedule NJNG-11 for categorization of costs.

Marketing Approach

Refer to Schedule TJM-5

Cost Recovery/ Rate design

Refer to Schedule DPY-5 and Schedule NJNG-8.

NJNG Commercial Energy Efficiency Programs

Delivery Method and Contractor Role

DI improvements are restricted to NJCEP appointed contractors. However, there is the potential for any contractor eligible to perform installations under the current NJCEP SmartStart criteria to install measures not covered under the DI program but the intention is for the projects to be implemented on a coordinated basis. There is no change to the relationship between the contractor and customer, except that the customer can assign of the NJNG rebate to the contractor.

To streamline administration, NJNG will coordinate with the NJCEP Commercial Market Manager and only an OBRP after notification that NJCEP incentives are approved. NJNG will promote the program to commercial customers, including municipalities and schools.

Estimated Program Participants and Annual Savings

Program/Qualifying Equipment	Estimated Participants	Estimated Annual Savings
OBRP for Direct Install	100	82,843 therms
Customers		2,536,800 kWh
OBRP for SmartStart measures	10	21,280 therms

Link to existing programs

- NJCEP Direct Install program
- NJCEP Smart Start
- NJCEP Local Government Energy Audit

Estimated avoided air emissions

3,273 tons of CO₂ and 3 tons of NOx annually (based upon estimated annual savings as noted above)

Anticipated Jobs Created/Sustained

Refer to Schedule NJNG-16.

Budget information

Refer to Schedule NJNG-11 for categorization of costs.

Marketing Approach

Refer to Schedule TJM-2

Cost Recovery/ Rate design

Refer to Schedule DPY-5 for information related to cumulative program costs and the proposed cost recovery schedule. These costs are to be collected through Rider "F" applicable to all jurisdictional throughputs. (See Schedule NJNG-8)

NJNG Commercial Energy Efficiency Programs

Description of the Program

Direct Install Customers

Consistent with the current program, commercial customers initially implementing upgrades through NJCEP's Direct Install (DI) program are eligible to participate in a NJNG no-interest On-Bill Repayment Plan (OBRP). Repayment of the principal will be made by participating customers. A maximum of \$53,570 will be available for each qualified project, to commercial customers. NJNG proposes to extend the repayment term to 3 years.

Additionally, to ensure that customers have adequate resources to pursue recommended energy- efficient equipment upgrades, NJNG proposes to also allow customers to apply for an OBRP to cover measures that are not included in the DI program but are incented under the NJCEP SmartStart Building program. The OBRP amount would be net of NJCEP incentives. The term for this OBRP would not exceed a 10 year payback period and the maximum amount for the OBRP would be \$130,000.

Consistent with current NJNG program terms, customers can take advantage of both the NJCEP DI and SmartStart Buildings incentives and the repayment plan. Only customers who meet NJNG's credit review criteria will be eligible to participate in the on-bill repayment option. NJNG reserves the right to limit participation in OBRP to customers who utilize natural gas as their heating source.

All projects and/or measures must conform to NJCEP requirements in order to receive take advantage of NJNG On-Bill Repayment Program.

For customers that had a Local Government Energy Audit performed, NJNG will coordinate outreach with the BPU's Energy Savings Improvement Program (ESIP) Coordinator to ensure customer understands the opportunities available under ESIP, including how this SAVEGREEN incentive may be embedded within such a program. In an effort to ensure LGEA eligible entities are investing in energy-efficient equipment, the Company is willing to allow ESIP candidates coming through the Local Government Energy Audit (LGEA) path to apply for an OBRP for SmartStart measures if the customer is not eligible for the DI program for a particular facility.

Market Segment/Efficiency Targeted

Direct Install Customers

This program targets commercial gas customers in NJNG's service territory who meet all program eligibility requirements necessary to participate in NJCEP's DI program. The DI program currently targets small to mid-sized commercial and industrial facilities with a peak electric demand that did not exceed 200kW in any of the preceding 12 months. NJNG would follow NJCEP DI eligibility criteria if it should change during the term of this program.

Only those customers (or their assignees) who are in good standing and subject to the Energy Efficiency surcharge are eligible to participate in this program.

	Residential Programs (REI NOTE: Shaded categories i	Residential Programs (REEP). Refer to TJM-2 for full descriptions NOTE: Shaded categories indicate no change from current program.
Feature	NJCEP Treatment -2014	NJNG Programs
Incentives for	Qualified furnaces and boilers are	Existing SAVEGREEN Project
high efficiency	eligible for NJCEP WARMAdvantage	Incremental \$500 grant for furnaces and boilers that meet FY 2015
equipment	rebates of \$250-\$500. When	NJCEP WARMAdvantage minimum efficiency levels. For customers
(outside of the	combined with a qualified water	installing a qualifying high-efficiency furnace/boiler AND a qualifying
HPwES	heater, the rebate is \$900. Qualified	high efficiency water heater, SAVEGREEN offers either a \$500 grant
Program)	gas water heaters are eligible for a	OR an opportunity for up to \$6,500 in the OBRP at 0% interest for 5
	\$500 rebate.	years.
		Proposed
	No financing options available.	No change from current NJNG program for boiler and furnaces or
		qualifying combination installations. For customers installing a
		WARMAdvantage qualified high-efficiency water heater, a \$100 grant
		will be offered to encourage customers to accept a free audit.
Requirements	Application submitted to NJCEP	Existing SAVEGREEN Project
to receive	includes documentation regarding the	Application submitted to NJNG and modeled on WARMAdvantage
incentives for	equipment purchased including	program terms and customers are encouraged to apply for that incentive.
high efficiency	manufacturer, model number, and	Customer must accept an HPwES Audit performed at no cost by NJNG
equipment	serial number for equipment.	to receive the NJNG grant. To participate in the \$6,500 OBRP program,
(outside of the	NJCEP does not require Manual J/S	contractors must provide Manual S and J calculations.
HPwES	calculations for heating systems.	Proposed
Program)		No change from current NJNG program.
Role of HVAC	Any HVAC contractor can participate	Existing SAVEGREEN Project
Contractors-	in WARMAdvantage. No additional	Any HVAC contractor can participate in the NJNG Enhanced Incentive
not qualified for	program certifications required.	program. No additional program certifications required. To participate in
HPwES work.	NJCEP does not require Manual J/S	the \$6,500 OBRP program, contractor must provide Manual S and J
	calculations for heating systems	calculations.
		Proposed
		No change from current NJNG program.
Role of HVAC	Opportunity to perform Tier I audits	Opportunity to perform HPwES audits and implement HPwES measures

Contractors-	and implement HPwES measures.	with access to NJNG OBRP plus NJNG supporting incremental activity
HPwES	4	in our service territory by funding some rebates.
qualified		Proposed
		No change from current NJNG program.
Performance of	Performed only by HPwES	Existing SAVEGREEN Project
HPwES Audit	contractors-must have BPI	Tier I audit performed by NJNG BPI-certified audit staff, only available
	certification.	to customers starting through WARMAdvantage. Comprehensive Tier
		III audit can be performed by either an HPwES contractor or NJNG BPI-
	No separate audit path for middle-	certified audit staff for customers interested in starting with a proactive
	income customers.	audit for a fee or at no cost to middle-income customers. All NJNG audit
		revenues are credited against overall SAVEGREEN program costs.
		Proposed
		No change from current NJNG program.
Payment of	Paid by NJCEP.	Existing SAVEGREEN Program
HPwES		No contractors payments by NJNG. NJCEP pays and processes those.
contractor		Proposed
incentives		No change from current NJNG program.
Payment of	NJCEP pays incentives for HPwES	Existing SAVEGREEN Program
HPwES	projects not associated with an OBRP.	NJNG pays HPwES customer grants for those participating in OBRP.
customer	NJNG pays incentives when project	Others covered by NJCEP.
incentives	includes an OBRP.	Proposed
		No change from current NJNG program.
Availability of	Where a utility financing option is not	Existing SAVEGREEN Project
financing	available, NJCEP provides access to	All NJNG customers who meet the credit criteria can access the 0%
	0% for loans up to \$10,000 for	OBRP; either through the HPwES program or for combination
	HPwES projects that meet Tier 3,	furnace/boiler and water heater installations.
	Level 1 or Level 2, TES thresholds	Proposed
	and up to \$5,000. For Tier 2 HPwES	No change proposed
	projects that must meet a 10% TES.	
	This financing incentive is combined	
	with the HPwES rebates and is made	
	available by a buydown of a loan from	

	an out of state entity. NJCEP does not offer any financing options for the WARMAdvantage program.	
	Commercial Ener (full descript	Commercial Energy Efficiency Program (CEEP) (full description available as T.IM- 3)
Feature	NJCEP Treatment -2014	NJNG Programs
Incentives	Direct Install (DI) NJCEP pays up to 70% of retrofit costs with a \$125,000 incentive cap on each project Smart Start Incentives vary by type and size of equipment	Existing SAVEGREEN Project Residential sized furnaces (Furnace max is 225,000 btu, boiler max is 300,000 btu) Offer same value as SAVEGREEN Project grants. NJNG to perform equipment checks but not perform full HPwES audit since they are not eligible to participate in that program Direct Install Customers Offer an On-Bill Repayment Plan (OBRP) for customers participating in NJCEP's DI Program (see below). Proposed • Continue existing program elements noted above. • Modify program to also support NJCEP Smart Start Building program. Identified barrier in the marketplace that is preventing some DI customers from implementing "whole building" efficiency improvements Specifically, NJNG is proposing to allow customers participating the Direct Install program to apply for an OBRP for efficiency measures that have been identified by that audit but are outside the scope of the current Direct Install program but are outside the scope of the current Direct Install program but are
Role of	Currently, the Direct Install program	Any HVAC contractor qualified to perform commercial installations for
Contractors	uses a defined pool of contractors under contract to the NJCEP Market	a specific NJCEP program can participate. No change proposed
	Manager.	
Payment of customer	NJCEP pays all grants.	Smart Start grants paid by NJCEP and the SAVEGREEN Project grants paid by NJNG.

incentives		No change proposed
Availability of financing	NJCEP does not offer any financing options for the Direct Install program	 Existing SAVEGREEN Project All NJNG customers participating in the NJCEP Direct Install (DI) Program who meet the credit criteria can access the 0% OBRP up to the value of DI project not covered by the NJCEP grant. Based on current DI Program grant levels and caps, NJNG could provide up to \$53,570 for OBRP. Repayment over a 24 month term. Proposed Continue the same structure for the Direct Install OBRP program but extend the repayment period from 24 months to 36 months to make repayments more affordable for participating customers. Allow OBRP for DI projects that have companion equipment upgrades that qualify under the NJCEP SmartStart participation. OBRP would remain consistent at 0%. Term would not exceed 10 years and the Maximum OBRP for these measures could be \$130,000.
Quality Control	A minimum of 10% of all applications are selected for pre-installation and/or post-installation inspection by a Market Manager inspector (or one of its subcontractors).	No incremental NJNG quality control proposed for most commercial programs performed since completed by NJCEP. Incremental quality control work for residential sized furnace track as NJNG audit team would perform a visual inspection of the unit. No change proposed.
		Other
FEED	No NJCEP Comparison	No change to structure or filing requirements. Propose to continue the program. Each filing still subject to BPU approval.
OPOWER	No NJCEP Comparison	 Existing SAVEGREEN Project Current BPU approval for program to run through June 30, 2015. Program reaches approximately 40,000 households. Proposed (more information in TJM-2) Continue existing program through June 30, 2018 Implement additional pilots to consider ability to influence

		customer behavior
		o Can we identify and encourage more low income
		customers to reduce their energy bills and take advantage
		of existing resources available to help?
		 Could Home Energy Reports influence a customer's
		decision to pursue additional whole house upgrades?
		o Can smart thermostats make customers more conscious of
		their energy usage and more likely to pursue whole house
		upgrades?
SAVEGREEN	NJCEP starting to resume evaluation	Existing SAVEGREEN Project
Project	work	An independent evaluation to be started by January 1, 2015. NJNG has
Evaluation		completed RFP process and is in final contracting stages. NJNG
		commitment to participate in an integrated evaluations initiated by
		NJCEP.
		Proposed
		No change proposed. Previous settlement requires evaluation to be
		completed by January 1, 2016.

MARKETING OVERVIEW

This document provides the approach that New Jersey Natural Gas Company (NJNG) intends to use in marketing various programs through The SAVEGREEN® Project. Please note that any final marketing plans and associated materials to be used to promote new offers are contingent on the agreements reached in resolving this proceeding and cannot be developed prior to that time. However, samples of materials in use for the current program are provided as part of this attachment as a reference point.

Residential Energy-Efficiency Programs

NJNG will promote the upgrade to high-efficiency equipment to all residential and eligible small commercial customers (installing boilers less than 300,000 BTU or furnaces less than 225,000 BTU) through a variety of communication channels. NJNG will continue to target homeowners at or close to the time they are making decisions about new heating and cooling equipment, and will continue to engage HVAC contractors in promoting the program. SAVEGREEN will continue to be marketed in a manner that encourages a change to high-efficiency equipment linked with the implementation of whole-house improvements.

The NJNG programs offered through SAVEGREEN are designed to encourage customers to take a more comprehensive look at energy efficiency throughout their residence, utilizing the "whole-house" method promoted in New Jersey's Clean Energy Program (NJCEP). NJNG will conduct various outbound campaigns targeted to homes connected to NJNG's distribution system for at least 12 years versus the previous target group of 18 years. SAVEGREEN has found that with the new efficiency requirements, even a customer with a 12 year old system may realize savings when installing a new high-efficiency system. We will work cooperatively with various entities, including community groups, our trade allies (local contractors, supply houses, and the realtor community) to coordinate with other grass roots efforts. Using information gathered over the more than five years of the SAVEGREEN operation, NJNG will promote the NJNG Grants to stimulate the purchase and installation of high-efficiency equipment when change-outs are necessary. We will also promote the available NJCEP and NJNG financial incentives available for qualified customers performing whole house energy-efficiency measures recommended through the comprehensive home energy audit. In this regard, below are three key areas for our outreach and campaign efforts:

- We will continue to emphasis the importance of addressing potential venting problems with existing equipment (e.g. water heaters) when installing high-efficiency equipment. Customers who install both a high-efficiency furnace or boiler and water heater or the recently included qualifying combination units will be provided with two options: an NJNG grant or the opportunity to use the on-bill repayment plan (OBRP) for five years to minimize out-of-pocket expenses. Replacing both at the same time not only addresses potential health and safety issues but also moves the home one step closer to whole-house measures. NJNG will continue to promote these incentives to its community of non-BPI HVAC contractors to ensure that awareness is increased.
- As in previous years, NJNG will promote the additional incentives available to customers
 who have replaced their furnace or boiler and more recently those who replaced their
 furnace or boiler and water heater with high-efficiency equipment, but did not take further
 action. NJNG will continue to focus its marketing efforts to move these customers into
 additional whole-house energy upgrades through NJCEP's HPwES program.

• The SAVEGREEN on-line contractor portal, a web-site available only to contractors, that was expanded to include audit information on customers who want to take advantage of the HPwES program. This includes customers who are beginning a whole-house upgrade (taking advantage of NJNG independent HPwES audit option) or customers receiving NJNG's post-installation audit. Each of these customers are contacted by one of SAVEGREEN's energy efficiency program consultants to see if they have any questions following their audit, discuss the benefits and incentives offered through the HPwES program and reinforce the importance of taking the next step with whole-house measures. BPI-certified contractors can view these audits and provide a bid to customers for their HPwES upgrades.

Since its inception in 2009, SAVEGREEN has realized the importance of utilizing the HVAC contractors (BPI and non-BPI) as a sales channel to reach existing and potential customers. By way of training, education and outreach, SAVEGREEN has been able to grow the number of contractors participating in the SAVEGREEN program from just over 100 at the end of 2009 to nearly 2,100 today. SAVEGREEN will continue these efforts. Programs include:

- Monthly E-Newsletters
- Program update meetings
- On-site training workshops
- Contractor on-line portal

Through information gained from the BPU-approved Conservation Incentive Program and NJNG's energy-efficiency programs marketed through SAVEGREEN, NJNG has been successful in developing a large database of customers interested in improving the energy efficiency of their homes. Therefore, additional outreach will be directed toward the following groups:

- E-tip subscribers
- CTP Dashboard participants (online energy audit)
- Heating, Ventilation and Air Conditioning (HVAC) contractors
- Equipment suppliers
- Realtors
- Municipalities, including partnering with Sustainable Jersey communities pursuing certification point for promoting the NJCEP Home Performance with ENERGYSTAR program
- Community Groups
- NJNG Facebook and Twitter followers

In addition to the above approaches, promotion will also occur through traditional utility communication channels, including the *njliving times* (NJNG's monthly newsletter that is provided to both residential and commercial customers), the SAVEGREEN Web site, NJNG's Web site, *njng.com*, on-hold messages in the Call Center, bill inserts, community outreach events, targeted direct mail campaigns and advertisements (print and banner ads). Since the launch of the SAVEGREEN Web site in 2009, more than 147,000 unique visitors have viewed the site with nearly 7,100 registering for more information. SAVEGREEN continues to re-market to these leads/customers through email and direct mail. Additionally, utilizing information obtained through the operation of SAVEGREEN, NJNG has been able to categorize almost 27,000 customers who have taken advantage of its rebates and promotions into 14 distinct demographic and behavioral

groups. By using this segmentation information, NJNG will be able to tailor promotions geared toward those customers most likely to participate.

NJNG will also market the program through direct mail to NJNG non-heat customers and residents whose homes are located on or near existing natural gas mains. NJNG will continue to promote the benefits of converting to natural gas heat (including cost savings, comfort, convenience and the positive environmental impacts) and incentives available through NJNG's SAVEGREEN program. NJNG will also promote this offer to all employees and other stakeholders, including coordination with NJCEP to ensure that NJNG customers who have received NJCEP equipment rebates are taking advantage of the HPwES audit, associated energy-efficiency opportunities and enhanced equipment rebates available through NJNG.

No-Cost Comprehensive Home Energy Audits

SAVEGREEN will continue offering comprehensive home energy audits for those customers who are interested in having an HPwES audit from an entity other than an HPwES contractor. However, NJNG recognizes that the cost associated with this audit may limit the ability of middle-income customers to take a pro-active approach to energy efficiency, therefore, NJNG will provide at no cost, a comprehensive audit to customers who meet the financial guidelines and would qualify for NJNG OBRP. Materials for this customer segment would emphasize the availability of the OBRP to ensure that customers understand that the program could help address the upfront cost barrier and seek to develop solutions where repayment obligations may match energy savings.

Information on the availability of this program will be included in all of SAVEGREEN's marketing collateral including:

- Direct mail and email campaign
- E-tip subscribers
- Community Groups
- Speakers Bureaus

In addition to the above approaches, promotion will also occur through traditional utility communication channels, including the residential issue of *njliving times*, SAVEGREEN's Web site, NJNG's Web site, bill inserts and on-hold messages in the Call Center. NJNG also has an Energy Assistance Outreach specialist who often fields inquiries from customers not eligible for the NJCEP Comfort Partners program. For such instances, these customers will be referred to SAVEGREEN team members for follow-up.

Commercial Energy Efficiency Programs

NJNG OBRP will be made available to those NJNG commercial customers taking advantage of NJCEP's Direct Install Program, small to mid-sized commercial and industrial facilities with a peak electric demand that did not exceed 200 kW in any of the preceding 12 months. NJNG will work with NJCEP program administrators, as well as approved Direct Install contractors, to promote this offering in our service territory. Because NJNG does not have access to the customers' electric usage information, the Company will also promote this program through local business groups and organizations, commercial editions of *njliving times*, and bill inserts directed to commercial customers, as well as through other direct outreach efforts to this customer group. NJNG will

continue to utilize our Conserve to Preserve Business Online service to reach current commercial customers and continue to increase enrollment.

Additionally, NJNG will work with NJCEP's administration to promote the program through various channels including:

- Local business organizations
- Chambers of Commerce
- UEZ Managers
- Municipal outreach including partnering with Sustainable Jersey communities pursuing certification point for promoting NJCEP's Direct Install program
- Town meetings

For all commercial programs, informational seminars, direct mail and commercial outreach programs will also be utilized to reach commercial customers.

Use NJBPU Division Assistance if of Customer needed **NJNG Consumer** Move Call to Advocate **Resolve to Customer** Satisfaction Informally Resolve **Customer Calls** Identify Cause Complaint & SAVEGREEN Investigate Program NJNG

Complaint Resolution Diagram

NEW JERSEY NATURAL GAS COMPANY

PREPARED DIRECT TESTIMONY OF DANIEL P. YARDLEY

1	I.	INTRODUCTION
2	Q.	Please state your name, affiliation and business address.
3	A.	My name is Daniel P. Yardley. I am Principal, Yardley Associates and my business
4		address is 2409 Providence Hills Drive, Matthews, North Carolina 28105.
5	Q.	On whose behalf are you testifying?
6	A.	I am testifying on behalf New Jersey Natural Gas Company ("NJNG" or the
7		"Company").
8	Q.	Please summarize your professional and educational background.
9	A.	I have been employed as a consultant to the natural gas industry for the past 25 years.
10		During this period, I have directed or participated in numerous consulting
11		assignments on behalf of local distribution companies ("LDCs"). A number of these
12		assignments involved the development of gas distribution company cost allocation,
13		pricing, service unbundling, revenue decoupling and other tariff analyses. In addition
14		to this work, I have performed interstate pipeline cost of service and rate design
15		analyses, gas supply planning analyses, and financial evaluation analyses. I received a
16		Bachelor of Science Degree in Electrical Engineering from the Massachusetts

Institute of Technology in 1988.

17

Q. Have you previously testified before the New Jersey Board of Public Utilities?

1

15

2 A. Yes. Over the last 15 years, I have testified before the New Jersey Board of Public 3 Utilities (the "BPU") on rate and regulatory matters including rate unbundling, cost 4 allocation, rate design, revenue decoupling and tariff design. My testimony in various 5 proceedings has been presented on behalf of NJNG as well as Elizabethtown Gas 6 Company and South Jersey Gas Company. I have also testified in proceedings before 7 the Florida Public Service Commission, the Massachusetts Department of Public 8 Utilities, the New Hampshire Public Utilities Commission, the North Carolina 9 Utilities Commission, the Rhode Island Public Utilities Commission, the Tennessee 10 Regulatory Authority, the Wisconsin Public Service Commission, the Federal Energy 11 Regulatory Commission and the National Energy Board of Canada on matters 12 pertaining to cost of service, cost allocation, rate design and capacity planning. A 13 summary of my previous expert testimony is provided as Attachment A to my direct 14 testimony.

Q. What is the purpose of your testimony in this proceeding?

A. My testimony describes the rate and revenue requirement aspects of NJNG's request to continue the energy-efficiency programs previously approved by the BPU and provided through NJNG's The SAVEGREEN®TM Project ("SAVEGREEN").¹

NJNG's proposal to continue for three-years the existing programs and recommended program updates and enhancements are described in the pre-filed testimony of Thomas J. Massaro, Exhibit P-2, submitted in support of NJNG's proposal. In

¹ The BPU approved NJNG's energy-efficiency programs in Docket Nos. EO09010056, GO09010057 (July 2009), GO10030225 (September 2010), GR11070425 (January 2012) and GR12070640 (June 2013).

1		particular, I provide estimates of the annual revenue requirements associated with the
2		energy-efficiency grant and on-bill repayment plan ("OBRP") incentives described by
3		Mr. Massaro. Lastly, I provide an assessment of the estimated bill impacts associated
4		with NJNG's proposals.
5		My testimony supports a number of the current Minimum Filing Requirements
6		("MFRs") established by the BPU in an Order dated May 12, 2008 in Docket No.
7		EO08030164 and required for energy-efficiency program proposals.
8	Q.	Are you supporting any schedules that accompany your testimony?
9	A.	Yes. I am sponsoring the following seven schedules, which will be explained later in
10		my testimony:
11		Schedule DPY-1: Projected Participation Rates
12		Schedule DPY-2: SAVEGREEN Investments
13		Schedule DPY-3: Cost of Capital
14		Schedule DPY-4: Operations and Maintenance Costs
15 16		Schedule DPY-5: Summary of Revenue Requirements & Projected Bill Impacts
17	II.	PROGRAM REVENUE REQUIREMENTS
18	Q.	What are the components included in the revenue requirements that are
19		associated with the SAVEGREEN programs proposed by the Company?
20	A.	The proposed energy-efficiency programs as described in Mr. Massaro's testimony
21		incorporate grant and OBRP incentives. The SAVEGREEN revenue requirement
22		components vary with the type of incentive provided to customers. The provision of

1 energy-efficiency grants results in rate base related revenue requirements including 2 return on net investment, income taxes and amortization expense. The applicable rate 3 base incorporates reductions for accumulated deferred income taxes attributable to 4 timing differences between the tax and book amortization expense. The provision of 5 energy-efficiency OBRPs results in revenue requirements including return on net 6 investment and income tax expense, but not amortization expense given that over 7 time customers repay 100 percent of all capital received from the Company. 8 Additionally, the Company includes operations and maintenance ("O&M") expense associated with the energy-efficiency programs in SAVEGREEN revenue 9 10 requirements. The determination of revenue requirements is consistent with previous 11 BPU approvals of NJNG SAVEGREEN programs. 12 Q. Please describe the factors that most strongly influence the level of revenue 13 requirements associated with the SAVEGREEN programs. 14 A. The unit investment costs of the individual program measures and the number of 15 participants are the two factors that most significantly affect the level of 16 SAVEGREEN revenue requirements associated with these programs. In addition, the 17 length of time over which the investments are amortized and the incremental O&M 18 costs necessary to implement the energy-efficiency programs influence total revenue

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requirements.

1	Q.	Have you prepared a summary of the number of participants you are relying
2		upon in your calculations?
3	A.	Yes. Schedule DPY-1 provides a list of energy-efficiency measures included within
4		the SAVEGREEN residential and commercial programs and the corresponding
5		expected participation rates by year. The information presented in Schedule DPY-1 is
6		segregated among residential grant, residential OBRP and commercial programs.
7	Q.	Please describe the time period for amortization of the investments in energy-
8		efficiency rate base.
9	A.	Consistent with currently-approved programs, the Company amortizes all grants
10		provided to customers over a five-year period beginning with the month that the grant
11		is provided. For tax purposes, the energy-efficiency grants will be recognized as an
12		expense. The timing difference between book and tax amortization periods is properly
13		recognized in the calculated revenue requirements through deferred tax reductions to
14		the rate base associated with the energy-efficiency grants.
15	Q.	What is the projected rate base associated with the proposed SAVEGREEN
16		extension?
17	A.	The rate base relied upon for revenue requirement purposes reflects the net
18		investment in energy-efficiency grants and the revolving fund balance associated with
19		OBRPs. The rate base by program by year is provided in Schedule DPY-2 through
20		2027, which is when the OBRP revolving fund balance is zero and which is beyond
21		the 2021 time period over which the last of the grants would be fully amortized.

Q. How are return on investment and income taxes calculated?

- 2 A. Consistent with cost recovery for current BPU-approved SAVEGREEN programs,
- 3 the Company is proposing to include a regulated rate of return on energy-efficiency
- 4 rate base as part of the proposed revenue requirements. The rate of return and
- 5 associated income tax rates are provided in Schedule DPY-3 and reflect the rates
- 6 authorized by the BPU in the Company's most recent base rate case, Docket No.
- 7 GR07110889.

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8 Q. What are the estimated O&M and Administrative costs?

- 9 A. NJNG prepared estimates of the anticipated labor and non-labor costs associated with
 10 administering the SAVEGREEN programs, consistent with prior BPU-approved cost
 11 recovery. The projections reflect the Company's experience administering the
 12 existing programs in previous years, including the incremental employees performing
 13 the required work. O&M costs associated with the proposed programs are only
 14 incurred during years that incentives are provided to customers. A summary of
 15 projected O&M and administrative costs is provided in Schedule DPY-4. The costs
- 18 Q. Have you prepared a summary of net revenue requirements associated with the

included on this schedule represent the direct labor, benefits and associated overhead

19 **SAVEGREEN Investments?**

costs.

A. Yes. Schedule DPY-5 presents a summary of the projected revenue requirements for the SAVEGREEN residential and commercial programs by year. The actual revenue requirements will depend on the level of participation by customers in each year.

1		However, Schedule DPY-5 is presented on the basis of the maximum revenue
2		requirement impact to customers for the three-year term of the program, including the
3		close-out period. Schedule DPY-5 also presents annual bill impacts, assuming full
4		participation at the proposed levels, for each year based on the projected net revenue
5		requirements presented in Schedule DPY-5. The bill impacts are provided separately
6		for various NJNG customer classes. For residential heating customers, the bill
7		impacts average \$12.54 annually over the recovery period.
8	Q.	Is NJNG proposing a change to the energy efficiency recovery rate at the present
9		time?
10	A.	No. NJNG is not proposing any change to the energy efficiency recovery rate at this
11		time. Any change to the energy efficiency cost recovery rate will be proposed in
12		conjunction with the June 2015 EE Rate Filing.

Does this conclude your testimony?

13

14

Q.

A.

Yes, it does.

Prior Testimony of Daniel P. Yardley

Florida Peoples Gas System Rederal Energy Regulatory Commission Northern Distributor Group Atlanta Gas Light, et al. New Hampshire Northern Distributor Group Atlanta Gas Light, et al. New Hampshire Northern Utilities Massachusetts Bay State Gas Bay State Gas Bay State Gas <	2008		
Northern Distributor Group Atlanta Gas Light, et al. Bay State Gas and Northern Northern Utilities Bay State Gas Alberta Gas Alberta Northeast Gas, Ltd. New Jersey Natural Gas	000	Cost Allocation and Rate Design	Docket No. 080318-GU
Northern Distributor Group Atlanta Gas Light, et al. Bay State Gas and Northern I Northern Utilities Bay State Gas Alberta Northeast Gas, Ltd.	1992	Cost of Service and Cost Allocation	RP92-1
Atlanta Gas Light, et al. Bay State Gas and Northern Northern Utilities Bay State Gas Alberta Northeast Gas, Ltd. Alberta Northeast Gas, Ltd. Alberta Northeast Gas, Ltd. Alberta Northeast Gas, Ltd. New Jersey Natural Gas	1995	Cost of Service and Rate Design	RP95-185
Bay State Gas and Northern Northern Utilities Bay State Gas Bay State Gas Bay State Gas Bay State Gas Alberta Northeast Gas, Ltd. Alberta Northeast Gas, Ltd. Alberta Northeast Gas, Ltd. Alberta Northeast Gas, Ltd.	2001	Storage Cost Allocation	RP01-245
	Utilities 2002	Rate Design	RP02-13
	2002	Jurisdictional Gas Cost Allocation	DG05-080
	1998	Capacity Assignment	D.T.E. 98-32
	2001	Contract Approval	D.T.E. 00-99
	2006	Declining Use Rate Adjustment	D.T.E. 06-77
	2007	Declining Use Rate Adjustment	D.P.U. 07-89
	5006	Revenue Decoupling	D.P.U. 09-30
	2012	TransCanada Pipeline Service Restructuring and Tolls	RH-3-2011
	2013	TransCanada Pipeline Shipper Renewal Rights	RH-1-2013
New Jersey Natural Gas	2012	TransCanada Pipeline Service Service and Toll Design	RH-1-2014
	1999	Rate Unbundling	Docket No. GO99030123
Elizabethtown Gas, <i>et al.</i>	1999	Customer Account Services	Docket No. EX99090676
Elizabethtown Gas	2002	Cost Allocation and Rate Design	Docket No. GR02040245
New Jersey South Jersey Gas Company	2003	Cost Allocation and Rate Design	Docket No. GR03080683
South Jersey Gas Company	2004	Capacity Charge	Docket No. GR04060400
New Jersey Natural Gas	2005	Revenue Decoupling	Docket No. GR0512020
South Jersey Gas Company	2005	Revenue Decoupling	Docket No. GR0512019

Prior Testimony of Daniel P. Yardley

Jurisdiction	Sponsor	Year	Topics	Docket
	South Jersey Gas Company	2007	Annual Decoupling Adjustment	Docket No. GR07060354
	New Jersey Natural Gas	2007	Cost Allocation and Rate Design	Docket No. GR07110889
	South Jersey Gas Company	2008	Annual Decoupling Adjustment	Docket No. GR08050367
	Elizabethtown Gas	2009	Revenue Decoupling, Cost Allocation and Rate Design	Docket No. GR09030195
	South Jersey Gas Company	2009	Annual Decoupling Adjustment	Docket No. GR09060340
	South Jersey Gas Company	2009	Cost Allocation and Rate Design	Docket No. GR10010035
	New Jersey Natural Gas	2010	Energy Efficiency Cost Recovery	Docket No. GR10030225
New Jersey	South Jersey Gas Company	2011	Annual Decoupling Adjustment	Docket No. GR11060337
cont.	New Jersey Natural Gas	2011	Energy Efficiency Cost Recovery	Docket No. GR11070425
	South Jersey Gas Company	2012	Annual Decoupling Adjustment	Docket No. GR12060475
	New Jersey Natural Gas	2012	Energy Efficiency Cost Recovery	Docket No. GR12070640
	New Jersey Natural Gas and South Jersey Gas Company	2013	Revenue Decoupling	Docket No. GR13030185
	South Jersey Gas Company	2013	Revenue Decoupling	Docket No. GR13050434
	South Jersey Gas Company	2013	Cost Allocation and Rate Design	Docket No. GR13111137
	South Jersey Gas Company	2014	Revenue Decoupling	Docket No. GR14050510
North Carolina	Piedmont Natural Gas Company	2011	Cost Allocation and Rate Design	Cocket No. G-9, Sub. 631
Rhode Island	Providence Gas Company	1996	Cost Allocation and Rate Design	Docket No. 2076
Tonnor	Chattanooga Gas Company	2009	Revenue Decoupling, Cost Allocation and Rate Design	Docket No. 09-00183
	Piedmont Natural Gas Company	2011	Cost Allocation and Rate Design	Docket No. 11-00144
Wisconsin	Wisconsin Power and Light	2001	Cost Allocation and Rate Design	Docket No. 6680-UR-111

New Jersey Natural Gas SAVEGREEN Program

Projected Participation Rates

						NJNG	-	Annual
	OBRP		rticipation Ra		Total	Cost	Inv	estment
	<u>Term</u>	Year 1	Year 2	Year 3				
Residential Grants								
Furnace / Boiler	5 Years	4,000	4,000	4,000	12,000	\$ 500	\$	2,000
Water Heater	5 Years	650	650	650	1,950	100		65
HP w ES Tier II	5 Years	225	225	225	675	2,000		450
Level II	5 Years	1,500	1,500	1,500	4,500	5,000		7,500
Level I	5 Years	500	500	500	1,500	4,000		2,000
Convert WA to HPWES	5 Years	100	100	100	300	2,000		200
		-	-	-	-	-		-
		-	-	-	-	-		-
	_	6,975	6,975	6,975	20,925		\$	12,215
Residential On-Bill Repayment Plans WARM Advantage OBRP								
Furnace / Boiler and Water Heater HPwES	5 Years	800	800	800	2,400	\$ 6,500	\$	5,200
Tier III Level II	10 Years	1,500	1,500	1,500	4,500	10,000		15,000
Tier III Level I	10 Years	500	500	500	1,500	10,000		5,000
Tier II	10 Years	225	225	225	675	5,000		1,125
Converted to HPWES	10 Years	100	100	100	300	3,500		350
		-	-	-	-	-		-
	_	<u> </u>	<u> </u>	<u> </u>		-		
		3,125	3,125	3,125	9,375		\$	26,675
Commercial On-Bill Repayment Plans								
Smart Start OBRP	10 Years	12	12	12	36	\$ 100,000	\$	1,200
Direct Install OBRP	3 Years	160	160	160	480	16,000	*	2,560
	_	172	172	172	516			3,760
TOTAL ALL PROGRAMS	- =	10,272	10,272	10,272	30,816		\$	42,650

New Jersey Natural Gas SAVEGREEN Program SAVEGREEN Investments

9 2027 9 (21,475)(0) 9 1,200 (1,200) \$ 21,475 2026 s S (40,803)2,400 (2,280) 9 0 \$ 42,950 120 \$ 2,148 2025 s (57,983) 9 \$ 3,600 (3,240) 360 0 \$ 64,425 \$ 6,443 6,803 2024 s s \$ 3,600 (2,880) 9 \$ 64,425 (51,540)\$ 12,885 720 \$ 13,605 2023 s S (45,098) **\$ 19,328** (2,520)9 3,600 9 \$ 64,425 \$ 1,080 \$ 20,408 2022 S s (12,215) (0) 9 \$ 25,770 3,600 (2,160) \$ 12,215 \$ 69,625 (43,855)\$ 1,440 \$ 27,210 2021 s \$ 33,253 (41,573)(21,987)3,600 (1,800) 36,498 \$ 24,430 (868)\$ 74,825 \$ 1,800 \$ 1,445 2020 S (29,316) (2,994) \$ 41,775 (38,250)2,160 6,160 (4,000)\$ 36,645 \$ 80,025 \$ 48,270 \$ 4,335 2019 s s (21,987) (5,988) (28,688) **\$ 51,338** 3,373 8,720 \$ 36,645 \$ 8,670 \$ 80,025 (5,347)\$ 63,381 2018 s (19,125) **\$ 60,900** (14,658) (8,982) 5,440 \$ 36,645 \$ 11,280 \$ 13,005 \$ 80,025 (5,840)\$ 79,345 2017 s (7,329) (6,986) (9,563)\$ 43,788 \$ 10,115 (2,920)\$ 24,430 \$ 53,350 \$ 7,520 \$ 4,600 \$ 58,503 2016 \$ 23,488 (2,443) (3,992) \$ 5,780 (3,188)3,760 (973)\$ 12,215 2,787 \$ 26,675 \$ 32,054 2015 s Year Residential Grant Investments Accumulated Amortization TOTAL NET INVESTMENT Commercial OBRP Fund OBRP Loans Residential OBRP Fund **Customer Repayments Customer Repayments Gross Investment Deferred Taxes OBRP Loans**

New Jersey Natural Gas SAVEGREEN Program

Cost of Capital

Component	<u> 4</u>	<u>Amount</u>	<u>Ratio</u>	Cost	Weighted <u>Cost</u>	Combined <u>Tax Rate</u>	Pre-Tax Cost of <u>Capital</u>
Long-Term Debt	\$	411,344	41.6%	5.44%	2.27%		2.27%
Short-Term Debt		66,000	6.7%	2.90%	0.19%		0.19%
Customer Deposits		4,447	0.5%	4.79%	0.02%		0.02%
Common Equity		506,332	<u>51.2%</u>	10.30%	5.28%	40.85%	<u>8.92%</u>
Total	\$	988,123	100.0%		7.76%		11.40%

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New Jersey Natural Gas SAVEGREEN Program

Summary of Operations and Maintenance Costs (\$000)

7	1	.		.	.
2027	↔	↔	₩	€	€
<u>5</u>			1 1		
2026	↔	\$	€9	↔	∽
2025			1 1		
δl	↔	₩	€9	•	⇔
2024			1 1		
(4)	↔	\$	↔	69	↔
2023		•			
	↔	\$	↔	∽	⇔
2022		•		'	'
	↔	₩	↔	- 	⇔
2021		•		'	
	↔	↔	↔	•	⇔
2020	40		40	<u>'</u>	ľ
ol .					,
2019	↔	\$	↔	•	↔
<u></u>					
2018	↔	\$	↔	\$	∽
2017	4,058	5,542	161	161	5,703
δl	↔	↔	↔	↔	⇔
2016	3,609	4,896	156	156	\$ 5,051
7 1	↔	\$	↔	•	↔
2015	3,487	4,887	150	150	5,037
M	↔	\$	↔	\$	⇔
Year	Residential Grant and OBRP O&M Labor Non-Labor	Total	Commercial OBRP O&M Labor Non-Labor	a	TOTAL 0&M
	R La	Tot	<u>9</u> 2 3	Total	9

New Jersey Natural Gas SAVEGREEN Program

Summary of Revenue Requirements and Projected Bill Impacts (\$000)

\$ 4,886	Year 2015 Residential SAVEGREEN Revenue Requirements	2015	<u>2016</u>	2017	2018	2019	2020	2021		<u>2022</u>	2023	ପ୍ଧା	2024	2025	roi	2026	စ္ကု
ritization 2.443 4.886 7.329 7.329 7.329 4.886 2.443 1.92 1.269	O&M Expense	\$ 4,887	↔			↔		. ↔	↔		\$,	ا د	↔	,	↔	
The proof of the p	Amortization	2,443		7,329	7,329		4,886	2,44	3								- 1
Expense S	Income Taxes Return	533 1,135		2,329 4,958	2,441 5,195		1,473	1,10	8 2	822 1,750	Ψ,	587 250	352 750		157 333		33
Expense S 150 S 156 S 161 S	Total		\$		_	↔			•	2,571			\$ 1,102	\$		\$	122
Expense S 156 S 156 S 161 S C S C S C S C S C S C S C S C S C S C S C C	Commercial SAVEGREEN Revenue !	Requiremen	t)														
Trizetion Trizet	O&M Expense		↔		- ج	٠ \$	- ج	, ⇔	↔		↔	,	ı 4	↔	1	s	
TREVENUE REQUIREMENTS	Amortization	•	•	•	i	•	•	1		ı							- 1
108 287 390 342 215 154 5 108	Income Taxes	51	135	183	161	101	72	2	6	46		33	20		6		
L REVENUE REQUIREMENTS	Return	108	287	390	342		154	12	91	86		2	42		19		
\$ 9,308 \$ 15,101 \$ 20,893 \$ 15,467 \$ 13,695 \$ 9,719 \$ 6,076 \$ 2,715 \$ 1,939 \$ 687,522 M Therms \$ 0.0015 \$ 0.0220 \$ 0.0304 \$ 0.0225 \$ 0.0199 \$ 0.0141 \$ 0.0006 \$ 0.00028 \$ 0.00028 \$ 0.0009 \$ 0.0015 \$ 0.0021 \$ 0.0021 \$ 0.0015 \$ 0.0021 \$ 0.0015 \$ 0.0021 \$ 0.0015 \$ 0.0021 \$ 0.0016 \$ 0.0001 \$ 0.0	Total		s			s				144			\$ 62	\$	27	₩	
687,522 M Therms S 0.0135 \$ 0.0220 \$ 0.0226 \$ 0.0226 \$ 0.0134 \$ 0.0141 \$ 0.0088 \$ 0.0039 \$ 0.0028 \$ 0.0028 Bill Impacts Bill Impact \$ 0.0135 \$ 0.0226 \$ 0.0224 \$ 0.0221 \$ 0.0241 \$ 0.0141 \$ 0.0088 \$ 0.0039 \$ 0.0022 \$ 0.0003 Pall Impact \$ 0.0144 \$ 0.0235 \$ 0.0241 \$ 0.0213 \$ 0.0151 \$ 0.0015 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0003 \$ 0.0002 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0002 \$ 0.0003 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$ 0.0003 \$ 0.0003 \$ 0.0003 \$ 0.0002 \$ 0.0002 \$ 0.0003 \$ 0.0002 \$ 0.0002 \$ 0.0002 \$	TOTAL REVENUE REQUIREMENTS		↔			↔				2,715			1,164	\$	517	s	129
Solution	Throughput	687,522															
Sill Impacts State	Rate per Therm SUT	\$ 0.0135	↔			↔				0.0039			\$ 0.0017	\$ 0.0 0.0	0.0008	\$ 0.0002	Ŏ,
200 Annual Therms \$ 2.89 \$ 4.69 \$ 6.50 \$ 4.82 \$ 4.26 \$ 3.03 \$ 1.89 \$ 0.85 \$ 0.60 \$ Av 1,000 Annual Therms \$ 14.44 \$ 23.46 \$ 32.49 \$ 24.10 \$ 21.32 \$ 15.14 \$ 9.44 \$ 4.25 \$ 3.02 \$ Av 1,200 Annual Therms \$ 17.33 \$ 28.16 \$ 38.99 \$ 28.92 \$ 25.58 \$ 18.16 \$ 11.32 \$ 5.10 \$ 3.63 \$ Av 15,000 Annual Therms \$ 216.58 \$ 351.96 \$ 487.32 \$ 361.46 \$ 319.80 \$ 227.05 \$ 141.55 \$ 63.74 \$ 45.31 \$		\$ 0.0144	↔	\$ 0.0325	↔	↔			↔	0.0042			\$ 0.0018	\$ 0.0		\$ 0.0002	ō
200 Annual Therms \$ 2.89 \$ 4.69 \$ 6.50 \$ 4.82 \$ 4.26 \$ 3.03 \$ 1.89 \$ 0.85 \$ 0.60 \$ Av 1,000 Annual Therms \$ 14.44 \$ 23.46 \$ 32.49 \$ 24.10 \$ 21.32 \$ 15.14 \$ 9.44 \$ 4.25 \$ 3.02 \$ Av 1,200 Annual Therms \$ 17.33 \$ 28.16 \$ 38.99 \$ 28.92 \$ 25.58 \$ 18.16 \$ 11.32 \$ 5.10 \$ 3.63 \$ Av 15,000 Annual Therms \$ 216.58 \$ 351.96 \$ 487.32 \$ 361.46 \$ 319.80 \$ 227.05 \$ 141.55 \$ 63.74 \$ 45.31 \$ Av Av	Typical Annual Bill Impacts																
4 2.00 Annual Therms \$ 14.44 \$ 23.46 \$ 32.49 \$ 24.10 \$ 21.32 \$ 15.14 \$ 9.44 \$ 4.25 \$ 3.02 \$ 1,200 Annual Therms \$ 17.33 \$ 28.16 \$ 38.99 \$ 28.92 \$ 25.58 \$ 18.16 \$ 11.32 \$ 5.10 \$ 3.63 \$ 15,000 Annual Therms \$ 216.58 \$ 351.96 \$ 487.32 \$ 361.46 \$ 319.80 \$ 227.05 \$ 141.55 \$ 63.74 \$ 45.31 \$	Residential Non-Heat		Annual The			•				0							2
1,000 Annual Therms \$ 14.44 \$ 23.46 \$ 32.49 \$ 24.10 \$ 21.32 \$ 15.14 \$ 9.44 \$ 4.25 \$ 3.02 \$ Av 1,200 Annual Therms \$ 17.33 \$ 28.16 \$ 38.99 \$ 28.92 \$ 25.58 \$ 18.16 \$ 11.32 \$ 5.10 \$ 3.63 \$ Av 15.000 Annual Therms \$ 216.58 \$ 351.96 \$ 487.32 \$ 361.46 \$ 319.80 \$ 227.05 \$ 141.55 \$ 63.74 \$ 45.31 \$ Av Av	i ypical Affilidai Bill Iffipact		p			0				0.00			Average	, 6	2.51	ر م	3
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4v 1,200 Annual Therms \$ 18.99 \$ 28.92 \$ 25.58 \$ 18.16 \$ 11.32 \$ 5.10 \$ 3.63 \$ \$ 15,000 Annual Therms \$ 216.58 \$ 351.96 \$ 487.32 \$ 361.46 \$ 319.80 \$ 227.05 \$ 141.55 \$ 63.74 \$ 45.31 \$ Av	Typical Annual Bill Impact	-				\$				4.25			1.79	\$		\$	0.19
1,200 Annual Therms \$ 17.33 \$ 28.16 \$ 38.99 \$ 28.92 \$ 25.58 \$ 18.16 \$ 11.32 \$ 5.10 \$ 3.63 \$ Av 15,000 Annual Therms \$ 216.58 \$ 351.96 \$ 487.32 \$ 361.46 \$ 319.80 \$ 227.05 \$ 141.55 \$ 63.74 \$ 45.31 \$ Av Av												٥	Average %	∨	12.54		
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Av. 15,000 Annual Therms \$ 216.58 \$ 351.96 \$ 487.32 \$ 361.46 \$ 319.80 \$ 227.05 \$ 141.55 \$ 63.74 \$ 45.31 \$ Av.	Typical Annual Bill Impact		↔			↔				5.10				↔ •	1.02	ઝ	0.23
15,000 Annual nerms \$ 216.58 \$ 351.96 \$ 487.32 \$ 361.46 \$ 319.80 \$ 227.05 \$ 141.55 \$ 63.74 \$ 45.31 \$ Av		L	į.									∢	Average %	-	1.1%		
Av.	<u>General Service Large</u> Typical Annual Bill Impact		\$ 351.96	rms \$ 487.32	\$ 361.46		↔	\$ 141.5		63.74			\$ 26.89			€	2.82
												∢	Average %	\$ 18	188.11 1.1%		