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December 8, 2009

Via Electronic Mail

Kristi Izzo, Secretary
Board of Public Utilities
Two Gateway Center
Newark, New Jersey 07102

Re: In The Matter Of Comprehensive Energy Efficiency and
Renewable Energy Resource Analysis for the 2009 - 2012
2010 Programs and Budgets: Compliance Filings
BPU Docket No. EO07030203

Dear Secretary Izzo:

Pursuant to the Board of Public Utilities' directives in the above-referenced matter, enclosed for filing please find an original and ten copies of the 2010 Program Plan Filing regarding the Residential Low-Income Comfort Partners Program ("Comfort Partners") and the Clean Power Choice Program ("CPC Program"). Atlantic City Electric Company, Elizabethtown Gas Company, Jersey Central Power and Light Company, New Jersey Natural Gas Company, Public Service Electric and Gas Company, and South Jersey Gas Company are managing the Comfort Partners Program. The four electric utilities (Atlantic City Electric, JCP&L, PSE&G, and Rockland Electric Company) are supporting the CPC Program.

Respectfully submitted,

Gregory Eisenstark

Gregory Eisenstark
Attorney for Public Service Electric and Gas
Company, and on behalf of Jersey Central Power
and Light Company, Atlantic City Electric
Company, Rockland Electric Company, New Jersey
Natural Gas Company, South Jersey Gas Company,
and Elizabethtown Gas Company

Enclosure
cc: Service List

**Comprehensive Energy Efficiency and Renewable Energy Resource
Analysis for the 2009-2012 Clean Energy Program
BPU Docket No. EO07030203**

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**New Jersey's Clean Energy Program
2010 Program Descriptions and Budget**

**Utility Residential Low Income
Comfort Partners Program**

&

**Utility Support for the
New Jersey Clean Energy Campaign:
Clean Power Choice Program**

**Program Description and Budget
December 7, 2009**

Residential Low Income Program “New Jersey Comfort Partners”

Description

The Residential Low Income Program known as Comfort Partners, managed by Atlantic City Electric, JCP&L, New Jersey Natural Gas, Elizabethtown Gas, PSE&G and South Jersey Gas is designed to improve energy affordability for low-income households through energy conservation. To achieve this objective, several market barriers must be overcome. Key among these are: (1) lack of information on either how to improve efficiency or the benefits of efficiency; (2) low income customers do not have the capital necessary to upgrade efficiency or even, in many cases, keep up with regular bills; (3) low income customers are the least likely target of market-based residential service providers due to perceptions of less capital, credit risk and/or high transaction costs; and (4) split incentives between renters and landlords. The Program addresses these barriers through:

- Direct installation of all cost-effective energy efficiency measures.
- Comprehensive, personalized customer energy education and counseling.
- Installation of health and safety measures as appropriate.

Target Market and Eligibility

The Program is targeted at participants in the Universal Service Fund. By definition this target population is characterized by high-energy burdens based on their income. Program participation will be prioritized by energy use with the highest energy users being served first.

The Program is available to any household with income at or below 225% of the federal poverty guidelines. Customers who receive Federal Supplemental Security Income (SSI), Home Energy Assistance (HEAP), Universal Service Fund (USF), Lifeline, Pharmaceutical Assistance to the Aged and Disabled (PAAD), Temporary Assistance to Needy Families (TANF), or Section 8 Housing also may be eligible.

A participant must be a customer of record with a separately metered electric or gas account, and live in a building with 1-14 units; the residence must be their primary home. Customers who heat with fuel oil are eligible for Comfort Partners; however, they will be referred to the Department of Community Affairs' Weatherization Assistance Program (WAP) for services in conjunction with a verbal agreement between Comfort Partners and WAP. In addition, customers who receive natural gas service from an investor-owned natural gas NJ utility, and who receive electric service from a municipal electric company will also be eligible for Comfort Partners services. Ineligible customers will be referred to WAP or Home Performance with Energy Star (HPwES) for services.

Referrals will be made between Comfort Partners and WAP for measures not performed by either entity, i.e. WAP may refer customers to Comfort Partners for evaluation of central air conditioning, room and window/wall air conditioners and freezer replacements.

Offerings and Customer Incentives

Among the measures to be considered for each home are efficient lighting products; hot water conservation measures (water heater replacement and tank temperature turn-down); replacement

of inefficient refrigerators and freezers; energy saving thermostats; insulation up-grades (attic, wall, basement, etc.); blower-door guided air sealing; duct sealing and repair; heating/cooling equipment maintenance, repair and/or replacement; and other “custom” measures.

Failed or failing heating or cooling systems can be replaced for efficiency and/or health and safety reasons, on a case-by-case basis. Procedures for HVAC system replacement have been significantly refined and enhanced to provide clear direction to all contractors. Requests for replacement of oil-fired equipment will be referred to the DCA Weatherization Assistance Program (WAP).

Measure Selection

All cost-effective measures, and other reasonable repairs required to install the efficiency measures, will be installed in each home. It is the intention of the utilities to expand the program to develop deep energy savings. The program will include the repair and installation of items that in and of themselves, may not be considered energy saving technologies, but would be required in order to effectively install energy conservation measures, such as the repair of a roof prior to the installation of attic insulation. Cost-effectiveness will be assessed on a measure and site-specific basis. All measures and energy education services will be provided free of charge. The selection of measures designed to reduce heating and cooling will be guided by a spending calculation based on past energy consumption which is a guide for contractors and is not an absolute or prescriptive target or cap. If the site needs are greater than the calculated spending guideline, the contractor will confer with the appropriate utility after documenting reasons for going beyond the spending guideline. The utility will decide to what extent additional work can be performed.

Refrigerator or freezer replacement will be based on on-site monitoring of the energy use of the existing unit. Consumption thresholds for cost-effective replacement vary according to size. Any refrigerator or freezer with measured consumption above the threshold values is eligible for free replacement with a new energy-efficient model. These values and procedures will be updated periodically to reflect changes in refrigerator costs and/or efficiency.

The cost-effective installation of energy-efficient lighting products will be based upon the wattage and the estimated average daily burn time for the existing lamp.

Domestic hot water and other custom measures will be installed according to program guidelines.

The costs associated with home repairs, such as the repair of a roof, will be excluded from the cost effectiveness test used to determine measure eligibility.

Delivery Methods

Electric and gas utilities with overlapping service territories will jointly deliver efficiency, health and safety and education services so that customers receive both gas and electric efficiency measures simultaneously. Selection of program delivery contractors and program delivery costs will be shared between the participating gas and electric utilities. Implementation vendor contracts were finalized in August, 2009 with three (3) existing and three (3) new implementation contractors hired. If program expansion is needed during the contract period, the utilities may competitively bid contracts to secure additional vendors.

During 2010, the utilities will continue to pursue “Green Job” partnerships with organizations such as the Department of Labor and local job training agencies. These efforts will be contracted through and coordinated with the assistance of OCE staff, to provide the necessary funding for training for the development of additional resources of technically qualified personnel. Comfort Partners contractors will be encouraged to hire trained candidates graduating from these programs.

Pilot programs to address neighborhood canvassing, mold/moisture remediation, roof repairs, electrical repairs, lead and asbestos remediation will be continued with the implementation contractors contracting directly with organizations. The utilities will continue to pilot new measures such as, cool roofs, reflective window film, and gravity film exchange, etc. The utilities will conduct a pilot program for customers having homes with extremely high use or unexplained high use. These homes will receive deep energy reductions using a 3-4 hour comprehensive investigative audit and energy education, state of the art insulation techniques, and other custom energy saving applications and practices to radically reduce the energy use.

The utilities are using the JCP&L web-based CP System as the statewide platform to track all program participants, measures and energy savings. The system is used by all utilities, BPU Clean Energy staff, multiple program delivery vendors, inspection vendors and State WAP agencies. Maintenance and enhancements to the system will be paid by JCP&L and are incorporated in the budget in Appendix B.

The utilities will attempt to partner and educate the NJ Home Performance with Energy Star (HPwES) program contractors, and/or other local agency staff to create better awareness of the program and eligibility requirements in order to direct customers to the appropriate program (Comfort Partners or HPwES) based on income screening.

Quality Assurance Provisions

A minimum of 15 percent of randomly selected treated homes will be subject to verification and inspection by an independent contractor(s) hired by the utilities. Third-party quality assurance process enhancements may take place. For consistency of inspection practices, the existing utility quality assurance contracts will remain in place.

Budgets

A detailed budget for this program for 2010 is attached in Appendix B. Allocation of costs in different cost categories may appear to be inconsistent among utilities; for example PSE&G covers the cost of statewide printing and JCP&L covers the cost for statewide CP System administration, etc. In addition, PSE&G has included funds within the “Administration and Program Budget” category for income verification for the Residential Whole House Efficiency Sub-Program of its Carbon Abatement Program. *See* Joint Position dated November 20, 2008, BPU Docket No. EO08060426, Attachment 1, Para. 9.

Goals and Energy Savings

Goals

In order to be consistent with other low income state weatherization programs using federal

stimulus funds, deep energy savings reductions will be pursued. Therefore the goal of the Comfort Partners program will range from 5,500 to 7,800 participants, depending on average spending per home and contractor capability.

The Electric service customer goal will range from 4,725 to 7,800.

The Gas service customer goal will range from 4,647 to 7,225, which is a subset of the electric goal.

The 2006 APPRISE Inc. evaluation of the Universal Service Fund recommends “high use households should be targeted by the Comfort Partners and WAP programs to ensure that clients have affordable bills” (Executive Summary page iv). It further recommends that “The BPU should work with the utilities to standardize their system for referring USF clients to the Comfort Partners program and establish official guidelines for coordinating these two benefits” (Executive Summary page xxii).

The Comfort Partners program has served more than 50,000 homes since it began in 2001. In order to reach the above goals for 2010, the utilities again strongly recommend that in approving the Comfort Partners program, the Board also directs that participation in either the Comfort Partners or WAP be an eligibility requirement for receiving monthly USF benefit and Fresh Start arrears forgiveness program. This requirement should not, however, preclude customer eligibility for USF benefits if: 1) their landlord refuses energy conservation services or 2) there is a delay in scheduling delivery of energy conservation work under the Comfort Partners or WAP programs. As part of Comfort Partners, customers have the right to refuse any measure they do not agree to have installed in their homes. Until the USF requirement is approved, we will increase marketing efforts begun in 2009.

Utilities will provide awards and incentives to contractors who meet or exceed production goals, maintain quality standards, and achieve energy savings.

Energy Savings

Following approval of the above goals, energy savings will be calculated consistent with the goals. Energy saving estimates will be calculated using the latest protocols approved by the Board.

The utilities plan to begin the process of competitively bidding an evaluation contract to conduct an electric and gas use impact analysis of the program. They also plan to evaluate the effectiveness of individual energy conservation measures, energy education, health and safety measures, and include a field assessment of contractor work in participants’ homes.

New Jersey Clean Energy Campaign: Clean Power Choice Program

Description

Utilities will support the Clean Energy Campaign for the Clean Power Choice Program. The Clean Power Choice program will offer retail electric customers the option of selecting an energy product or products with higher levels of renewable energy than is required by the Renewable Portfolio Standards.

The program will be delivered through a collaborative utility and clean power marketer program hosted by the four investor owned electric utilities. The ‘host’ utilities will provide a delivery platform to enable enrollment and billing, with oversight by the Office of Clean Energy. The program will be offered as an add-on subscription of clean power supplied by a qualified third-party Clean Power marketer without interruption to customer’s basic electric service. The Office of Clean Energy will play a lead role in marketing the program to customers in cooperation with electric and gas utilities and Clean Power marketers.

The utilities will implement the requirements of the August 19, 2008 Board Order in Docket No. EA07110885, “In the Matter of Account Look-up for the Third Party Suppliers and Clean Power Marketers”. Program tasks include:

- Implement the pilot of a Customer Account Look-up procedure allowing the provision of EDC account numbers to requesting TPSs and CPMs for which a valid Release Form has been obtained
- Track the cost of providing the Customer Account Lookup service during the first year of implementation and file that information with the Board
- File required monthly, quarterly and annual program information with the Board

The 2010 budget for this program in Appendix B is intended to reimburse utilities for expenses necessary to:

- Make or maintain the Information Technology changes needed to support a line item on customer bills
- Develop and maintain systems to support EDI transactions with Clean Power Marketers
- Facilitate customer sign up

**Appendix A:
SALES AND MARKETING PLAN**

Low Income (Comfort Partners) Program

Statewide Marketing Activities		Estimated Cost
Telemarketing	<p>Description: Telemarketing of program</p> <p>Targeted Audience: Customers identified as high-energy use USF participants, low-income residential customers on utility databases and NJ Office of Information Technology USF lists and other lists including a list used by Isles for CP and PSE&G's Residential Whole House Carbon Abatement program.</p> <p>Expected Date of Implementation: Telemarketing will be conducted on a continual basis to meet production goals. Increased effort has been required due to USF participant high rejection rate.</p> <p>Vendor Participants: Contractors selected through competitive bid. Utilities will continue to staff & train call centers to respond to incoming telephone customer inquiries about the program.</p>	\$375,000
Marketing/ Collateral Materials	<p>Description: These materials are used at various customer-focused events, directly with customers during service delivery and included in direct mail campaigns. Estimated cost includes updating and reproducing the existing brochures and forms in both English and Spanish. Materials may include: brochure, folders, applications, landlord agreements, partnership agreements, action plan savings strategy, health and safety release form, income guidelines, energy saving tips sheets, envelopes, calendars, program signs/banners, pens, mugs and refrigerator magnets, etc.</p> <p>Targeted Audience: Low-income residential customers</p> <p>Expected Date of Implementation: Second quarter 2010</p> <p>Vendor Participants: TraynorKirk & Co, Diversified Global Graphics Group (dg3) Printers, Impact Corporate Promotions (ICP)</p>	\$190,000

<p>Direct Mail, Utility Bill Inserts, Door-to-Door Campaigns, Municipality Enrollment Partnerships, Possible Radio, TV or Newspaper Ads, Pilot to Perform Energy Ed and Marketing, & Industry Event Sponsorships.</p>	<p>Description: In addition to the contractor telemarketing, JCP&L and contractors will direct mail a cover letter, Comfort Partners application and landlord agreement to USF recipients to improve response rates. Some utilities will also include Comfort Partners articles in bill inserts. Vendors soliciting for other Clean Energy (CE) programs will perform mailings and door-to-door campaigns that result in Comfort Partners leads. Incentives may be provided to municipalities for successful Comfort Partner enrollments for completed audits. Radio, television and/or newspaper advertisements may be considered. Possible pilot with Opower or other vendor to perform energy education and marketing. Utilities may sponsor national and/or regional Affordable Comfort Inc. (ACI) or similar conferences.</p> <p>Targeted Audience: High-use USF and HEAP recipients on the utilities' databases, and NJ Office of Information Technology USF lists.</p> <p>Expected Date of Implementation: Ongoing throughout 2010.</p> <p>Vendor Participant: Contractors selected through Competitive bid and in house for utilities.</p>	<p>\$324,000</p>
<p>Fact Sheet on Winter Shut-off</p>	<p>Description: Include in the Fact Sheet on Winter Shut-off a paragraph describing Comfort Partners with an 800# contact number.</p> <p>Targeted Audience: Residential customers receiving a shut-off notice</p> <p>Expected Date of Implementation: During the 2009 - 2010 heating season</p> <p>Vendor Participant: In house for utilities</p>	<p>\$ 0</p>

**Appendix B:
2010 Program Budget**

Comfort Partners									
	Total	Prorated Share of Dollars	Admin & Prog Developmt	Sales, marketing, call center, website	Training	Rebates, other direct incentives	Rebate Processing, inspections & QA	Evaluation & Research	Contractor Perf. Incentives
ACE	\$968,300.00	3.13%	32,300.00	11,000.00	6,350.00	825,000.00	62,000.00	25,450.00	6,200.00
JCP&L	\$3,486,672.14	11.26%	331,000.00	90,000.00	46,000.00	2,590,984.14	430,000.00	126,300.00	22,388.00
PSE&G- Elec	\$9,017,518.00	29.11%	593,339.00	383,375.00	127,860.00	6,851,478.00	742,366.00	284,100.00	35,000.00
RECO	\$0.00	0.00%						0.00	
NJNG	\$4,728,520.00	15.27%	125,000.00	70,000.00	41,000.00	4,251,420.00	175,000.00	56,100.00	10,000.00
Elizabethtown	\$2,296,302.00	7.41%	185,000.00	95,000.00	55,000.00	1,773,552.00	140,000.00	37,750.00	10,000.00
PSE&G-Gas	\$9,030,286.00	29.15%	395,559.00	255,583.00	85,240.00	7,798,994.00	494,910.00	0.00	
SJG	\$1,446,022.24	4.67%	160,800.00	21,620.24	6,900.00	1,150,222.00	73,230.00	27,050.00	6,200.00
	\$0.00	0.00%							
Pilot Grant	\$0.00	0.00%	0.00						
TOTAL	\$31,123,620.38	100.00%	1,822,998.00	926,578.24	368,350.00	25,091,650.14	2,117,506.00	556,750.00	89,788.00

Clean Energy Campaign: CLEAN POWER CHOICE

	Total	Admin & Prog Developmt	Sales, marketing, call center, website	Training	Rebates, other direct incentives	Rebate Processing, inspections & QA	Evaluation & Research	Contractor Performance Incentives
ACE	\$ 10,000	\$ 10,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
JCP&L	\$ 10,000	\$ 10,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
PSE&G- Electric	\$ 10,000	\$ 10,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
RECO	\$ 37,000	\$ 10,000	\$ 27,000	\$ -	\$ -	\$ -	\$ -	\$ -
NJN	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Elizabethtown	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
PSE&G-Gas	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
SJG	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ 67,000	\$ 40,000	\$ 27,000	\$ -	\$ -	\$ -	\$ -	\$ -