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December 3, 2018

VIA FEDERAL EXPRESS and ELECTRONIC MAIL

aida.camacho@bpu.nj.gov board.secretary@bpu.nj.gov

Aida Camacho-Welch Secretary of the Board Board of Public Utilities 44 South Clinton Avenue, 3rd Floor, Suite 314 P.O. Box 350 Trenton, New Jersey 08625-0350

RE: In the Matter of the Provision of Basic Generation Service

for the Period Beginning June 1, 2019

BPU Docket No. ER18040356

Dear Secretary Camacho-Welch:

In accordance with the terms of the Board's Decision and Order (the "Order") dated November 19, 2018, enclosed please find an original and ten (10) copies of Atlantic City Electric Company's Company-Specific Addendum (and Tables thereto) in connection with the above docketed matter. As required by the terms of the Order, proposed Tariff pages have also been provided.

Kindly accept this submission for filing and return one date-stamped copy marked "filed" in the enclosed pre-addressed, postage prepaid envelope.

Thank you for your cooperation and courtesies. Feel free to contact the undersigned with any questions.

Respectfully submitted,

Philip J. Rassanante

An Attorney at Law of the

State of New Jersey

Enclosure

cc: Service List

IN THE MATTER OF THE PROVISION OF BASIC GENERATION SERVICE FOR THE PERIOD BEGINNING JUNE 1, 2019

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

BPU DOCKET NO. ER18040356

ATLANTIC CITY ELECTRIC COMPANY

BASIC GENERATION SERVICE COMMENCING JUNE 1, 2019

COMPANY-SPECIFIC ADDENDUM COMPLIANCE FILING December 3, 2018

ATLANTIC CITY ELECTRIC COMPANY'S COMPANY-SPECIFIC ADDENDUM

The following contains the company-specific material (referred to herein as the "Addendum") of Atlantic City Electric Company ("ACE" or the "Company") for the joint compliance filing made with the New Jersey Board of Public Utilities (the "Board" or "BPU") on this date by the Electric Distribution Companies (the "EDCs") in this docket. Capitalized terms shall have the meanings defined in the joint filing.

As described in the generic section of this filing, two (2) different methods will be utilized for the pricing of Basic Generation Service ("BGS") to customers – residential and small commercial energy pricing and variable hourly energy pricing. The residential and small commercial energy pricing formerly referred to as "Basic Generation Service–Fixed Price" or "BGS-FP" now termed "Basic Generation Service–Residential Small Commercial Pricing" or "BGS-RSCP" and the hourly energy pricing service termed "Basic Generation Service – Commercial and Industrial Energy Pricing" or "BGS-CIEP". BGS-RSCP is to be available to all residential and small commercial customers, specifically those customers taking service on Rate Schedules RS, MGS (Secondary and Primary), AGS (Secondary and Primary), DDC, SPL, and CSL. These rate classes comprise the vast majority of ACE's customers and approximately 86% of the usage on the ACE electric system. As described in detail later in this filing, BGS-RSCP commercial or industrial customers can opt in to BGS-CIEP.

BGS-CIEP will continue to be the only default supply option available to customers taking service under ACE's Rate Schedule TGS (Transmission General Service). Pursuant to the Board's Decision on June 18, 2012, in BPU Docket No. ER12020150, changing the BGS-

¹ In this document, "Basic Generation Service-Fixed Price" or "BGS-FP" has the same meaning as, and is entirely interchangeable with, "Basic Generation Service-Residential Small Commercial Pricing" or "BGS-RSCP."

CIEP required customer capacity peak load share ("PLS") to 500 kW or greater effective June 1, 2013, will be the only default supply option available to customers on Rate Schedules MGS Secondary, MGS Primary, AGS Secondary or AGS Primary with an annual PLS for generation capacity equal to or greater than 500 kW as of November 1 of the year prior to the BGS auction. There are an estimated 225 eligible CIEP customers representing approximately 14% of the usage on the ACE electric system, whose only default supply option is BGS-CIEP. As described in detail later in this filing, BGS-CIEP will also be available to any commercial or industrial customer on a voluntary basis regardless of such customer's regular Rate Schedule.

Pursuant to the Board's Order dated January 20, 2009, in BPU Docket No. ER08050310, ACE will not provide to the BGS Suppliers any Pennsylvania New Jersey Maryland ("PJM") credit issued as a result of Demand Response ("DR") programs implemented after June 1, 2009. ACE currently operates a DR program known as the Residential Controllable Smart Thermostat Program, which is available to a limited number of residential customers. This program derives credits through the PJM Reliability Pricing Model Capacity Market and the PJM energy markets. PJM credits associated with this DR program or any future PJM demand side management program will be credited to the RGGI Recovery Charge delineated in Rider RGGI in the Company's Tariff for Electric Service.

A. COMMITTED SUPPLY

"Committed Supply" means power supplies to which ACE has an existing physical or financial entitlement. For ACE, Committed Supply includes its Non-Utility Generation ("NUG") contracts, including any restructured replacement power contracts, which may extend into or through the BGS bid period. ACE retains the right to negotiate changes in, and operational control over, all of its NUG contracts.

As a result of the Board's December 18, 2002 Order in BPU Docket Nos. EX01110754 and EO02070384 (the "BGS Orders"), effective August 1, 2003, ACE's NUG-related Committed Supply (capacity, energy, and ancillaries, if any) is being sold in the wholesale markets. NUG-related capacity, energy, and ancillaries (if any) will continue to be sold in the wholesale markets. These sales shall be considered prudent unless and until the Board determines that a different protocol is appropriate. Just as they are currently, ACE's actual above-market NUG contract costs will continue to be charged to the Non-Utility Generation Charge ("NGC") clause, with full and timely cost recovery assured, and subject to deferral in accordance with ACE's restructuring order. In setting the NGC, the actual NUG contract costs will be offset with revenues received from the sale of NUG power in the wholesale markets.

If ACE is required to invoke the Contingency Plan (discussed at length below), Committed Supply may be used to offset requirements associated with the Contingency Plan. Any generation from ACE's Committed Supply that qualifies as a Class I or Class II renewable resource will be used to meet the Renewable Portfolio Standards ("RPS") requirements, and, since ACE has no BGS supply requirements, it will, to the extent permitted by applicable regulatory and contractual provisions, be credited on a pro-rata basis to winning BGS-RSCP and BGS-CIEP suppliers. This will assure that these environmental benefits are retained by BGS customers in ACE's service territory. Winning BGS-RSCP and BGS-CIEP suppliers will be responsible for obtaining and providing related verification information to ACE for the minimum Class I and Class II percentages required by the RPS associated with the tranches they serve, net of renewable attributes of the Committed Supply energy proportionately applied and subject to the foregoing limitations to each supplier's tranches.

The ACE NUG-related Committed Supply subject to the foregoing limitations eligible to supply the Class II renewable energy certificate to the BGS suppliers expired on September 5, 2016.

B. <u>CONTINGENCY PLANS</u>

While not every contingency can be anticipated, ACE can differentiate four (4) areas of concern as follows:

- a) there are an insufficient number of bids to provide for a fully-subscribed Auction Volume either for the BGS-RSCP auction or the BGS-CIEP auction;
- b) a default by one of the winning bidders prior to June 2019;
- c) a default during the June 1, 2019 May 31, 2020 supply period, under the BGS-CIEP contracts entered into for 12 months; and/or
- d) a default during the June 1, 2019 May 31, 2022 supply period, under the BGS-RSCP contracts entered into for 36 months.

1. Insufficient Number of Bids in Auction

To ensure that the auction process achieves the best price for customers, the degree of competition in the auction must be sufficient. To ensure a sufficient degree of competition, the volume of BGS-RSCP and BGS-CIEP Load purchased at each auction will be finally decided after the first round of bids are received. Provided that there are sufficient bids at the starting prices, the auctions will be held for 100% of BGS-RSCP and BGS-CIEP Loads.

It is possible that the number of initial bids will not result in a competitive auction for 100 percent of the BGS-RSCP or BGS-CIEP Load. This determination will be made by the Auction Manager in consultation with the EDCs, and the Board Advisor.

In the event that the Auction Volume is reduced to less than 100% of BGS-RSCP or BGS-CIEP Load, ACE, at its option, will implement a Contingency Plan for the remaining tranches. Under the Plan, ACE will purchase necessary services (including, but not limited to,

network transmission, capacity, energy and ancillary services, and any required RPS Renewable Energy Certificate) for the remaining tranches through PJM-administered markets until May 31, 2020 and may retain Committed Supply to serve these tranches. Any unsubscribed tranches for the period after May 31, 2020, may be included in a subsequent auction or treated pursuant to the provisions of part 4 of the Contingency Plan described below. This Contingency Plan will alert bidders that, in order to secure BGS-RSCP and BGS-CIEP prices from New Jersey BGS customers for their supply, it will be necessary to bid in to the auctions.

Since the Contingency Plan calls for the purchase of BGS supply in PJM-administered markets, it is considered a prominent feature of the auction proposal because it provides bidders a strong incentive to participate in the auction process. If bidders were to believe that a less than fully subscribed auction would lead to a negotiation or a secondary market in which ACE, on behalf of its customers, would seek to acquire BGS supplies, the incentive to participate in the auctions and the incentive to offer the best deal in the auctions would be subsequently diminished.

2. Defaults Prior to June 1, 2019

If a winning bidder defaults prior to the beginning of the BGS service, then, at ACE's option, the open tranches may first be offered to the other winning bidders or will be filled as provided in part 3, below. Additional costs incurred by ACE in implementing the Contingency Plan will be assessed against the defaulting suppliers' credit security.

3. Defaults During the June 1, 2019 - May 31, 2020 Supply Period

If a default occurs during the June 1, 2019 - May 31, 2020 period, for those contracts entered into for 12 months, at ACE's option, the tranches supplied by the defaulting supplier may be offered to the other winning bidders, may be bid out or may be procured from PJM-

administered markets, and Committed Supply may be retained to serve these tranches. Additional costs incurred by ACE in implementing this part of the Contingency Plan will be assessed against the defaulting suppliers' credit security.

If circumstances are such that it is not practical to find another such supplier, ACE proposes to utilize a process similar to the "flexible portfolio approach" for BGS wholesale supply, as previously described in ACE's filing in BPU Docket No. EM00080604, as noted in the Board's November 29, 2000 Order in that docket. This approach relies on a combination of competitive sources for BGS power, including Requests for Proposal(s), broker markets, capacity costs based on the PJM Reliability Pricing Model ("RPM"), and the PJM spot energy market.

4. Defaults During the June 1, 2019 - May 31, 2022 Supply Period

If a default occurs during the June 1, 2019 - May 31, 2022 period, for those contracts entered into for 36 months, at ACE's option, the tranches supplied by the defaulting supplier may be offered to the other winning bidders, may be bid out or may be procured from PJM-administered markets, and Committed Supply may be retained to serve these tranches. Among the options for bidding out the tranches, ACE may include such tranches in the next BGS procurement. Additional costs incurred by ACE in implementing this part of the Contingency Plan will be assessed against the defaulting suppliers' credit security.

If circumstances are such that it is not practical to find another such supplier, ACE proposes to utilize a process similar to the "flexible portfolio approach" for BGS wholesale supply, as previously described in the Company's filing in BPU Docket No. EM00080604, as noted in the Board's November 29, 2000 Order in that docket. This approach relies on a combination of competitive sources for BGS power, including RFPs, broker markets, capacity

costs based on the PJM RPM, and the PJM spot energy market.

C. <u>ACCOUNTING AND COST RECOVERY</u>

The accounting and cost recovery that ACE will use for its BGS service is summarized in this Section. These provisions are intended to be applicable to ACE only. Each EDC will provide these individual BGS cost recovery methodologies.

ACE's BGS accounting will account for BGS-RSCP revenues and BGS-CIEP revenues individually as follows:

- 1. BGS-RSCP and BGS-CIEP revenues will be tracked using established accounting procedures and recorded separately as BGS-RSCP revenue and BGS-CIEP revenue. Transmission revenues from BGS-RSCP and BGS-CIEP customers are also tracked using established accounting procedures; and
- 2. as previously established for ACE, uncollectible revenues are recovered through a component of ACE's Societal Benefits Charge.

ACE will account for BGS-RSCP and BGS-CIEP costs individually as the sum of the following:

- all payments made to winning BGS bidders for the provision of BGS-RSCP and BGS CIEP service, including CIEP Standby Fee payments; and
- any administrative costs associated with the provision of BGS-RSCP and BGS-CIEP service; and
- 3. any cost for procurement of capacity, energy, ancillary service, transmission, and other expenses related to the Contingency Plan, and any payments to the winners of a subsequent bid process to cover defaults made under the Contingency Plan, less any payments recovered from defaulting bidders. In the

event that implementation of the Contingency Plan is required for BGS CIEP load, CIEP Standby Fee payments will be tracked separately.

BGS-RSCP and BGS-CIEP rates will be subject to deferred accounting since there will be differences between the BGS costs (as defined above) and BGS-related revenues (including transmission revenues). Adjustment type charges (also subject to deferred accounting) are necessary in order to balance out the difference between the amount paid to the BGS-RSCP and BGS-CIEP supplier(s) for BGS-RSCP and BGS-CIEP supply, and the revenue from customers for BGS-RSCP and BGS-CIEP services. These reconciliation charges ("RC"), including interest, will be calculated periodically for BGS-RSCP and BGS-CIEP on a cent per kWh basis, and the respective rates will be applied to all BGS-RSCP and BGS-CIEP kWh. These charges will be combined with the fixed, seasonally-differentiated BGS-RSCP and hourly BGS-CIEP charges for billing although they will be published in ACE's Rider BGS as separate BGS-RSCPRC and BGS-CIEPRC rates that will be revised periodically.

A BGS deferral/credit will be determined individually for the BGS-RSCP and BGS-CIEP rates as the difference between recorded BGS-RSCP or BGS-CIEP revenue and the total BGS-RSCP or BGS-CIEP cost. The individual BGS deferrals will be accounted for in the following manner:

- If individual BGS costs, as defined above, are higher than individual BGS recorded revenue, the difference will be charged on a monthly basis to the cost deferral to be reconciled and recovered from customers, with interest, on a periodic, basis through the BGS-RSCPRC and/or the BGS-CIEPRC.
- 2. If individual BGS costs, as defined above, are lower than individual BGS recorded revenue, the difference will be credited monthly, to the cost deferral to

be reconciled and returned to customers, with interest, on a periodic basis, through the BGS-RSCPRC and/or BGS-CIEPRC.

An additional deferred balance will be maintained individually for the BGS-RSCPRC and BGS-CIEPRC rates to ensure full recovery of all of the costs associated with the provision of BGS service.

In the event that the Contingency Plan is required to be implemented to serve BGS-CIEP load, the difference between CIEP Standby Fee revenues and CIEP Standby Fee payments made to winning BGS-CIEP auction bidders will be maintained in a separate deferred balance account. Interest on this account will be accrued monthly, using the same methodology and interest rate as used for the BGS-RSCP and BGS-CIEP deferred balances. Any debit/credit balance in this account at the end of the BGS period of June 1, 2019 through May 31, 2020 will be applied as a \$/kWh adjustment to the CIEP Standby Fee for the next BGS-CIEP annual period. In this manner, the mechanism to reconcile any CIEP Standby Fee deferred balance is applied, to the greatest extent practicable, to all BGS-CIEP eligible customers who paid the CIEP Standby Fee, and not only to those taking BGS-CIEP service.

With the exception of any adjustment to the CIEP Standby Fee which may be required, ACE will follow the following schedule for the periodic reconciliation of its BGS-RSCP and BGS-CIEP rates:

 For BGS-RSCPRC and BGS-CIEPRC rates effective June 1, the actual data for the months of August through March will be used. Projected data for April and May will be used for the amount of BGS-RSCPRC and BGS-CIEPRC to be recovered/returned in those months. 2. For BGS-RSCPRC and BGS-CIEPRC rates effective October 1, the actual data for the months of April through July will be used. Projected data for August and September will be used for the amount of BGS-RSCPRC and BGS-CIEPRC to be recovered/returned in those months.

ACE will file BGS-RSCPRC and BGS-CIEPRC rates with the Board at least 30 days in advance of the date upon which they are requested to be effective. The BGS Reconciliation Rate is capped at two cents per kWh. The filed rates will become effective 30 days after filing, absent a determination of manifest error by the Board.

D. DESCRIPTION OF BGS TARIFF SHEETS

This Section describes the proposed tariff sheets needed to implement ACE's BGS proposal. The proposed tariff sheets for Tariff Rider Basic Generation Service ("Rider BGS") are included as **Attachment 1**. Rider BGS provides the rates, terms, and conditions for customers being served under the BGS-RSCP or BGS-CIEP pricing mechanisms.

1. BGS-RSCP

BGS-RSCP is to be available to all customers served on Rate Schedules RS, DDC, SPL, and CSL. BGS-RSCP is also available to customers with a PLS of less than 500 kW who are served under Rate Schedules MGS Secondary, MGS Primary, AGS Secondary, and AGS Primary. On any meter reading date, and with prior requisite notice, a customer taking supply service under BGS-RSCP may switch to third-party supply service, and a customer taking third-party supply service may switch to BGS-RSCP supply service.

As indicated on the proposed tariff sheets, BGS-RSCP is made up of two components: BGS Supply Charges and the BGS Reconciliation Charge. Additionally, each BGS customer is subject to transmission charges as discussed below.

a. <u>BGS Supply Charges</u>

The values of the BGS Supply charges applicable to Rate Schedules RS, MGS Secondary, MGS Primary, AGS Secondary, AGS Primary, DDC, SPL, and CSL include the costs related to energy, generation capacity, RPS, ancillary services, and administration. This is a continuation of the current approved methodology for recovering all electric supply service costs in the kilowatt- hour charges for these Rate Schedules.

The generation capacity costs designed to be used in the development of the BGS-RSCP rates are the relevant current wholesale market prices for capacity based on the average, 2019/2020, 2020/2021, and 2021-2022 Base Residual Auctions ("BRA") for the PJM RPM results applicable to load served in the ACE zone.

The specific values that will be utilized for the BGS Supply Charges will be calculated as the tranche weighted average of the winning BGS-RSCP bid prices for the ACE zone, adjusted for the seasonal payment factors for ACE's Atlantic Electric zone, less transmission costs, adjusted by the appropriate factor (multiplier and constant, if applicable) as shown on Table No. 16 of the Development of Post Transition Period BGS Cost and Bid Factor Tables, included in **Attachment 2**. Transmission charges will continue to be billed under the rates currently in effect for these Rate Schedules as set forth in the ACE Tariff for Electric Service.

It is the intent of ACE that the factors in the tables will be applied to the tranche weighted average of the winning BGS-RSCP bid prices adjusted for the seasonal payment factors. For the period beginning June 1, 2019, the pricing will be based on the 36-month auction price, the 36 month price from the auction held in February 2018 and the 36 month price from the auction held in February 2017. The tables will be updated annually prior to future BGS auctions and will be utilized to develop customer charges for a related annual

period in a similar manner as described above. The updates will reflect then current factors such as updated futures prices, factors based on 12 month data, and any changes in the customer groups and load eligible for the BGS-RSCP class.

b. BGS Reconciliation Charge

This is the implementation of the BGS Reconciliation Charge for BGS-RSCP as explained in the Accounting and Cost Recovery section of this Addendum.

c. <u>Transmission Charges</u>

Transmission service will continue to be billed under the rates, terms, and conditions of the customer's applicable Rate Schedule as set forth in the ACE Tariff for Electric Service. The transmission charges applicable to ACE's BGS-RSCP customers are based on the annual transmission rate for network service for the ACE zone, as stated in PJM's Open Access Transmission Tariff ("OATT"). As part of a settlement approved by the Federal Energy Regulatory Commission ("FERC") on August 9, 2004, certain transmission owners in PJM, including ACE, agreed to re-examine their existing rates, and to propose a method (such as a formula rate) to harmonize new and existing transmission investments by January 31, 2005, with such new rate(s) (if any) to go into effect June 1, 2005. The objective of the formula rate filing is to establish a just and reasonable method for determining the transmission revenue requirements for the affected transmission pricing zones which would reflect both existing and new investment on a current basis. The formula rate tracks increases and decreases in costs such that no under- and no over- recovery of actual costs will occur. The formula rate protocols include provisions for an annual update to the rate based on current levels of costs and reconciliation of prior period costs and revenues. Pursuant to the protocols established in the settlement, the Company will file updates to the formula rate at FERC on or about May 15 of each year to be effective on June 1 of that same year. The Company will make corresponding filings with the Board each year seeking approval of the formula rates on a retail level, pursuant to the requirements of the Supplier Master Agreements.

In addition to the formula rate protocols described above, the transmission charge may change from time to time as FERC approves other changes in the PJM OATT and related charges. In compliance with the BGS-RSCP Supplier Agreements, the transmission cost component of the BGS-RSCP charges to customers will change from time to time as FERC approves changes in the Network Integration Transmission Service rates for the ACE zone in the PJM OATT, or the FERC approves other network transmission-related charges in the PJM OATT.

ACE will provide the basis for any transmission cost adjustment, and will file supporting documentation from the OATT, as well as any rate translation spreadsheets used.

2. BGS-CIEP

BGS-CIEP will be the only default supply option available to customers served on Rate Schedule TGS (Transmission General Service), and to customers served on Rate Schedules MGS Secondary, MGS Primary, AGS Secondary, and AGS Primary with a PLS of 500 kW and higher as of November 1 of the year prior to the BGS auctions. Additionally, BGS-CIEP is available on a voluntary basis to any commercial or industrial customer taking service under the MGS or AGS Rate Schedules. To be eligible for BGS-CIEP, the customer will need to notify ACE of its choice no later than the second working day of a given year and must commit to having BGS-CIEP as its default supply service option for a 12-month period commencing June 1st of that year. All commercial and industrial customers taking service under the MGS or AGS Rate Schedules will be notified of their option to switch to BGS-CIEP through the Company's website and tariffs. Customers who elected BGS-CIEP in a prior

procurement period and who are eligible to receive BGS-RSCP service may return to BGS-RSCP if they notify ACE of their intent to return to BGS-RSCP default service no later than the second working day of January. Such election will be effective on June 1st of that year.

The charges for BGS-CIEP are comprised of three segments: BGS Energy Charges, BGS Capacity Charges, and the BGS Reconciliation Charges. Transmission service will continue to be billed under the rates, terms, and conditions of the customer's applicable Rate Schedule as set forth in the ACE Tariff for Electric Service. The transmission charges applicable to ACE's BGS-CIEP customers are based on the annual transmission rate for network service for the ACE zone, as stated in PJM's OATT. As part of a settlement approved by FERC on August 9, 2004, certain transmission owners in PJM, including ACE, agreed to re-examine their existing rates and to propose a method (such as a formula rate) to harmonize new and existing transmission investments by January 31, 2005, with such new rate (if any) to go into effect June 1, 2005. The objective of the formula rate filing is to establish a just and reasonable method for determining the transmission revenue requirements for the affected transmission pricing zones which would reflect both existing and new investment on a current basis. The formula rate tracks increases and decreases in costs such that no under- and no over-recovery of actual costs will occur. The formula rate protocols include provisions for an annual update to the rate based on current levels of costs, and reconciliation of prior period costs and revenues. Pursuant to the protocols established in the settlement, the Company will file updates to the formula rate at FERC on or about May 15 of each year, to be effective on June 1 on that year. The Company will make corresponding filings with the Board each year seeking approval of the formula rates on a retail level, pursuant to the requirements of the Supplier Master Agreements.

In addition to the formula rate protocols described above, the transmission charge may change from time to time as FERC approves other changes in the PJM OATT and related charges. In compliance with the BGS-CIEP Supplier Agreements, the transmission cost component of the BGS-CIEP charges to customers will change from time to time as FERC approves changes in the Network Integration Transmission Service rates for the ACE zone in the PJM OATT or the FERC approves other network transmission-related charges in the PJM OATT.

ACE will provide the basis for any transmission cost adjustment, and will file supporting documentation from the OATT, as well as any rate translation spreadsheets used.

a. <u>BGS Energy Charge</u>

One of the primary components of this charge will be the actual real time PJM load weighted average Residual Metered Load Aggregate Locational Marginal Price ("LMP"), of energy for ACE's Atlantic Electric Transmission Zone. An estimate of the Ancillary Service cost for the ACE zone expressed on a dollar per MWh basis and administrative costs will be added to this charge. This sum will then be adjusted for losses for service according to the Rate Schedule for which this service is applicable.

b. <u>BGS Capacity Charges</u>

These charges will recover the costs associated with generation capacity. Effective with the supply period beginning June 1, 2009, the BGS Capacity Charge is based on the results of the BGS-CIEP auction process. This charge, Sales and Use Tax ("SUT"), and the Board Revenue Assessment will be applied to the customer's share of the PJM zonal capacity obligation.

c. <u>BGS Reconciliation Charge</u>

This is the BGS Reconciliation Charge for the BGS-CIEP service as explained in the Accounting and Cost Recovery section of this Addendum.

d. <u>CIEP Standby Fee</u>

For the period June 1, 2019 through May 31, 2020, the EDCs will pay each BGS-CIEP supplier a CIEP Standby Charge equal to \$0.000150 per kWh times their pro-rata share of the total energy usage measured at the meters of all of ACE's BGS-CIEP eligible customers. The CIEP Standby Fee is a delivery charge that is applicable to all customers having BGS-CIEP as their default supply service. This includes all customers served on Rate Schedules TGS, all customers served on Rate Schedules MGS Secondary, MGS Primary, AGS Secondary, and AGS Primary with a peak load share of 500 kW or greater, and all customers on Rate Schedules MGS Secondary, MGS Primary, AGS Secondary, and AGS Primary with a peak load share of less than 500 kW that have elected the BGS-CIEP default supply option. Any under- or over-recovery of the CIEP Standby Fee will continue to be subject to deferred accounting.

E. <u>BGS RATE DESIGN METHODOLOGY</u>

1. ACE BGS-RSCP Pricing Spreadsheet

The resulting charge for each BGS-RSCP rate element (i.e., Rate RS summer charge, winter charge, etc.) for the non-hourly BGS-RSCP supply service will be based on factors applied to the tranche weighted average of the BGS-RSCP winning bid prices adjusted for the seasonal payment factors. The rate class specific factors have been developed based on the ratios of the estimated underlying market costs of each rate element (for each rate class) to the overall all-in BGS-RSCP cost. The tables included in **Attachment 2** and described below present all of the input data, intermediate calculations, and the final results in the calculation of these factors.

Table No. 1 (% Usage During PJM On-Peak Period) contains the percentage of on-peak load, by month, for each applicable Rate Schedule. The on-peak period as used in this table (referred to as PJM periods) is defined as the 16-hour period from 7 A.M. to 11 P.M., Monday through Friday. All remaining weekday hours and all hours on weekends and holidays recognized by the National Electric Reliability Council ("NERC") are considered the off-peak period. This is consistent with the time periods used in the forwards market for trading of bulk power. The values in this table for each month are based on the most recent available settlement data for current ACE customers.

Table No. 2 (% Usage During ACE On-Peak Billing Period) contains the percentage of on-peak load, by month, for each applicable Rate Schedule based on the definitions of time periods as contained in ACE's delivery Rate Schedules. These percentages are based on usage history for the RS TOU BGS customers for the most recent period.

Table No. 3 (Class Usage @ Customer) contains the billing month sales forecasted for the period of June 2019 through May 2020, with migration adjustments. The values in Table No. 3 will be updated in January 2019 to better reflect forecasts for the June 1st delivery year.

Table No. 4 (Forward Prices – Energy Only @ Bulk System) contains the forward prices for energy, by time period and month, for the BGS analysis period. These values are the energy on-peak forwards as of October 26, 2018, for the PJM West trading hub for the period of June 2019 to May 2020, as utilized in BGS market-to-market calculations, and the historical ratio of actual off-peak to on-peak PJM LMPs for the prior summer and winter periods. An adjustment of the forward prices contained in Table No. 4 must be made to correct for the pricing differential between the PJM West trading hub and the ACE zone where the BGS supply will be utilized.

Table No. 5 (Zone-Hub Basis Differential) contains an estimate of the average zone-hub basis differential factors, by month and time period, which, when multiplied by the prices at the PJM West trading hub, will result in costs for power delivered into the ACE zone.

Table No. 6 (Losses) contains the factors utilized for average system losses by Rate Schedule and voltage level. Loss factors are developed by including losses at the 500kV transmission level as well as losses at lower transmission and distribution voltage levels currently approved for use by the Board.

Table No. 7 (Summary of Average BGS Energy Only Unit Costs @ Customer – PJM Time Periods) is the calculation of the energy only costs by rate, time period and season. These values are the seasonal and time period average costs per Megawatt hour ("MWh") as measured at the customer billing meter (from Table No. 3), based on the forwards prices (from Table No. 4), corrected for zone- hub basis differential (from Table No. 5), losses (from Table No. 6), and monthly time period weights (from Table No. 1). These average costs do not include the costs associated with Ancillary Services, RPS compliance, Generation Obligation or Transmission costs, which will be considered in subsequent calculations.

Table No. 8 (Summary of Average BGS Energy Only Costs @ Customer – PJM Time Periods) indicates the total value, in thousands of dollars, of the average BGS energy only costs. These are the results of the multiplication of the unit costs from Table No. 7, the monthly time period weights from Table No. 1, and the total sales to customers from Table No. 3. Since the end result of these calculations are to be utilized in the development of retail BGS rates, the rates utilizing time of day pricing must be developed based upon the time periods as defined for billing.

Table No. 9 (Summary of Average BGS Energy Only Unit Costs @ Customer – ACE Time Periods) shows the result of the corrections for the RS TOU BGS rate. These values are calculated based on the assumption that the MWhs included in the PJM on-peak time period and not included in the ACE on-peak time periods are at the average of the on- and off-peak PJM prices.

Table No. 10 (Generation & Transmission Obligations and Costs and Other Adjustments) includes the values necessary for the inclusion of the costs of the Generation Capacity and Transmission obligations. The top portion of Table No. 10 shows the total obligations with a migration adjustment, by applicable Rate Schedule, that are currently being utilized in the year 2018. Table No. 10 will be updated in January 2019, similar to Table No. 3. The middle portion of this table shows the number of summer and winter days and months that are used in this analysis. The bottom portion of this table shows the annual market price for transmission service and a seasonally differentiated market price of generation capacity. The cost of transmission service is equal to the current rate for the ACE OATT for network transmission service. The generation capacity costs used are the relevant current wholesale market prices for capacity.

Table No. 11 (Ancillary Services and RPS) contains an estimate of the effects of the costs of ancillary services and RPS. The values of \$2.00 per MWh and \$17.51 per MWh are used, respectively. Since the actual costs are a complex combination of many factors, an estimate of the overall annual average value, expressed on a dollar per MWh basis, is used as a reasonable and practical alternative.

Table No. 12 (Summary of Obligation Costs Expressed as \$/MWh @ Customer) shows the result of the allocation of both the transmission and generation costs, on a per MWh basis, to all Rate Schedules. For RS TOU BGS, the per MWh Generation Capacity Obligation Costs are based on the on-peak usage only.

Table No. 13 (Summary of BGS Unit Costs @ Customer) is the result of the inclusion of the transmission, generation capacity, Ancillary Services, and RPS costs to the energy only costs shown in Table No. 9. This table shows the total estimated all-in costs for BGS, based on the assumptions utilized in the above tables, and the average per unit cost, as measured at the customer meters or the bulk system meters.

Table No. 14 (Ratio of BGS Unit Costs @ Customer to All-In Average Cost @ Bulk System) indicates the ratio of the individual rate element costs from Table No. 13 to the overall all-in cost as measured at the bulk system, plus constants, where applicable.

Table No. 15 (Summary of BGS Unit Costs Less Transmission @ Customer) provides the BGS-RSCP unit costs as developed in Table No. 13, with the exception of transmission. The bottom portion of the table shows the total estimated costs for BGS-RSCP less transmission costs and the average unit cost as measured at the customer meters or the bulk system. ACE developed this table since retail customers will be billed for transmission service based on existing transmission rates in their applicable Rate Schedule. For that reason, the cost of transmission needs to be excluded from the calculation of the retail BGS rates. To develop retail BGS rates, a series of ratios excluding the transmission cost is developed.

Table No. 16 (Ratio of BGS Unit Costs Less Transmission to All-in Average Cost) indicates the ratio of the individual rate element costs from Table No. 15 to the overall all-in cost as measured at the bulk system. These ratios are used to establish the BGS-RSCP prices to retail

customers.

Table No. 17 (Summary of Total BGS Costs by Season) show the calculation of the total BGS Costs, utilizing the total customer usage from Table No. 3 and the all-in unit costs from Table No. 13. The lower left portion of the table indicates the relative percentage of total costs by season for all Rate Schedules, while the center shows the calculation of the overall average all-in seasonal unit costs on a dollar per MWh basis. The ratio of these overall average seasonal costs to the overall total cost, shown in the lower right-hand portion of Table No. 17, are the seasonal payment ratios upon which payments to the winning bidders are based. The final section summarizes some of the most important assumptions utilized in the above calculations.

Table No. 18 (Retail Rates Charged to BGS-RSCP Customers), shows the calculation of retail rates to be charged to the BGS-RSCP customers for their BGS services. This table utilizes the information computed in Table No. 16 (Ratio of BGS Unit Costs) and applies the applicable ratios for each rate class to the BGS average price which, in turn, is based on the weighted average winning bids less transmission charges. The upper left portion of this table provides the information on the calculation of the BGS average price.

Table No. 19 (Retail Rates Charged to BGS-RSCP Customers Including Revenue Assessment and SUT), shows the BGS-RSCP customer rates inclusive of the BPU and Division of Rate Counsel revenue assessments, as well as SUT. This table utilizes the information provided in Table No. 18 and applies the applicable revenue assessment factor and SUT rate to derive the tax effected BGS-RSCP customer's rates.

The second spreadsheet used in the calculation of the final BGS-RSCP rates is included as **Attachment 3**, and is titled "Calculation of June 2019 to May 2020 BGS-RSCP Rates."

The tables in this spreadsheet calculate the weighted average winning bid price and convert it into the final BGS-RSCP rates that are charged to customers. An explanation of each of the six tables, labeled as Tables A through F, is as follows:

Table A (Auction Results) contains the results of the prior two BGS auctions, as well as the results of the current auction. From these values, the weighted average annual bid price (shown on line 13) is calculated. All of the formulas used in this table are shown in the right-hand column of this table, under the heading "Notes."

Table B (Ratio of BGS Unit Costs @ Customer to All-In Average Cost @ Bulk System) is a repeat of the values shown in Table No. 14 from **Attachment 2**, the bid factors calculated based on current market conditions.

Table C (Preliminary Resulting BGS Rates) contains the preliminary customer BGS-RSCP rates as the product of the weighted average bid price (from Table A) and the Bid Factors from Table B.

Table D (Revenue Recovery Calculations) contains a comparison of the total anticipated rate revenue billed to customers based on the preliminary BGS-RSCP rates developed in Table C and the anticipated total season payments to BGS suppliers, based on the data in Table A. The calculation of the kWh Rate Adjustment Factors are also provided in this table, which are equal to the seasonal dollar differences between the anticipated billed revenue and supplier payments, divided by the total anticipated seasonal billed BGS-RSCP energy-related charges.

Table E (Final Resulting BGS Rates) contains the final adjusted BGS-RSCP rates, which are equal to the preliminary BGS-RSCP rates shown in Table C, times the seasonal kWh Rate Adjustment Factors that were developed in Table D.

Table F (Spreadsheet Error Checking) contains a comparison of the total anticipated rate revenue billed to customers based on the final BGS-RSCP rates developed in Table E, and the anticipated total season payments to BGS suppliers, based on the data in Table A.

Attachment 1

ATLANTIC CITY ELECTRIC COMPANY

BPU NJ No. 11 Electric Service - Section IV Revised Sheet Replaces Revised Sheet No. 60

RIDER (BGS)

Basic Generation Service (BGS)

Basic Generation Service (BGS) will be arranged for any customer taking service under Electric Rate Schedules RS, MGS Secondary, MGS Primary, AGS Secondary, AGS Primary, TGS, DDC, SPL, and CSL who has not notified the Company of an Alternative Electric Supplier choice. BGS is also available to customers whose arrangements with Alternative Electric Suppliers have terminated for any reason, including nonpayment.

BGS is offered under two different terms of service; Basic Generation Service-Residential Small Commercial Pricing (BGS-RSCP) and Basic Generation Service -Commercial and Industrial Energy Pricing (BGS-CIEP). BGS-RSCP is offered to customers on Rate Schedules RS, DDC, SPL and CSL. BGS-RSCP is also offered to customers on Rate Schedules MGS Secondary, MGS Primary, AGS Secondary, AGS Primary with an annual peak load share ("PLS") for generation capacity of less than 500 kW as of November 1 or each year. Additionally, BGS customers on Rate Schedule RS have the option of taking BGS-RSCP on a time of use basis.

BGS customers on Rate Schedule TGS and BGS customers on Rate Schedules MGS Secondary, MGS Primary, AGS Secondary or AGS Primary with a PLS for generation capacity equal to or greater than 500 kW as of November 1 of each year are required to take service under BGS-CIEP.

Customers on Rate Schedules MGS Secondary, MGS Primary, AGS Secondary or AGS Primary with a PLS of less than 500 kW, have the option of taking either BGS-RSCP or BGS-CIEP service. Customers who elect BGS-CIEP must notify the Company of their selection no later than the second working day of January of the year they wish to begin BGS-CIEP service. Such election will be effective on June 1 of that year and remain as the customer's default supply for the following twelve months. Customers electing BGS-CIEP as their default supply in a prior procurement period and who are otherwise eligible to return to BGS-RSCP may return to BGS RSCP by notifying the Company no later than the second working day of January of the year that they wish to return to BGS-RSCP service. Such election shall be effective on June 1 of that year.

BGS-RSCP Supply Charges (\$/kWh):	S	SUMMER	WINTER					
Rate Schedule RS	June Thr	ough September	October \$	Through May x.xxxxxx				
<=750 kwhs summer	\$	X.XXXXX	*	711100000				
> 750 kwh summer	\$	X.XXXXXX						
RS TOU BGS Option								
On Peak (See Note 1)	\$	X.XXXXXX	\$	X.XXXXX				
Off Peak (See Note 1)	\$	X.XXXXXX	\$	X.XXXXX				
MGS-Secondary	\$	X.XXXXXX	\$	X.XXXXX				
MGS-Primary	\$	X.XXXXXX	\$	X.XXXXX				
AGS-Secondary	\$	X.XXXXXX	\$	X.XXXXX				
AGS-Primary	\$	X.XXXXXX	\$	X.XXXXX				
DDC	\$	X.XXXXXX	\$	X.XXXXX				
SPL/CSL	\$	X.XXXXXX	\$	X.XXXXX				
RS TOU BGS Option On Peak (See Note 1) Off Peak (See Note 1) MGS-Secondary MGS-Primary AGS-Secondary AGS-Primary DDC	* * * * * * * * * * * *	X.XXXXXX X.XXXXXX X.XXXXXX X.XXXXXX X.XXXXXX	***	X.XXXXXX X.XXXXXX X.XXXXXX X.XXXXXX X.XXXXXX				

Note 1: On Peak hours are considered to be 8:00 AM to 8:00 PM, Monday through Friday.

The above Basic Generation Service Energy Charges reflect costs for Energy, Generation Capacity, Ancillary Services and Administrative Charges pursuant to N.J.S.A. 48:2-60 plus New Jersey Sales and Use Tax as set forth in Rider SUT.

Date of Issue:	Effective Date:

Issued by:

ATLANTIC CITY ELECTRIC COMPANY

BPU NJ No. 11 Electric Service - Section IV Revised Sheet Replaces Revised Sheet No. 60a

RIDER (BGS) continued Basic Generation Service (BGS)

BGS Reconciliation Charge (\$/kWh):

The above charge shall recover the difference between the monthly amount paid to Basic Generation Service (BGS) suppliers and the total revenue from customers for BGS for the preceding months for the applicable BGS supply. These charges include New Jersey Sales and Use Tax as set forth in Rider SUT and are changed on June 1 and October 1 of each year.

Rate Schedule Charge (\$ per kWh)
RS \$ 0.002766
MGS Secondary, AGS Secondary, SPL/CSL, DDC \$ 0.002766
MGS Primary, AGS Primary \$ 0.002694

BGS-CIEP

Energy Charges

BGS Energy Charges for Rate Schedule TGS, AGS and MGS customers with a Peak Load Share (PLS) of 500 kW or more, and AGS and MGS customers with a PLS of less than 500 kW who have elected BGS-CIEP are hourly and are provided at the real time PJM Load Weighted Average Residual Metered Load Aggregate Locational Marginal Prices for the Atlantic Electric Transmission Zone, adjusted for losses, plus administrative charges pursuant to N.J.S.A. 48:2-60 and New Jersey Sales and Use Tax as set forth in Rider SUT.

Generation Capacity Obligation Charge

Charge per kilowatt of Generation Obligation (\$ per kW per day)

Summer

Winter

\$x.xxxxxx

\$x.xxxxxxx

This charge is equal to the winning bid price from the BGS-CIEP default service auction plus administrative charges pursuant to N.J.S.A. 48:2-60 and New Jersey Sales and Use Tax as set forth in Rider SUT. The above charge shall be applied to each customer's annual peak load share ("PLS") for generation capacity, adjusted for the applicable PJM-determined Zonal Scaling Factor and the applicable PJM-determined capacity reserve margin factor, on a daily basis for each day in each customer's respective billing cycle.

Ancillary Service Charge

-	Charge
	(\$ per kWh)
Service taken at Secondary Voltage	\$ x.xxxxxx
Service taken at Primary Voltage	\$ x.xxxxxx
Service taken at Sub-Transmission Voltage	\$ x.xxxxxx
Service taken at Transmission Voltage	\$ x.xxxxxx

This charge represents the average annual cost of Ancillary Services in the Atlantic Electric Transmission zone adjusted for losses, plus administrative charges pursuant to N.J.S.A. 48:2-60 and New Jersey Sales and Use Tax as set forth in Rider SUT.

BGS Reconciliation Charge:

	Charge
	(\$ per kWh)
Service taken at Secondary Voltage	\$ 0.002836
Service taken at Primary Voltage	\$ 0.002762
Service taken at Sub-Transmission Voltage	\$ 0.002731
Service taken at Transmission Voltage	\$ 0.002704

The above charge shall recover the difference between the monthly amount paid to Basic Generation Service (BGS) suppliers and the total revenue from customers for BGS for the preceding months for the applicable BGS supply. These charges include administrative charges pursuant to N.J.S.A. 48:2-60 and New Jersey Sales and Use Tax as set forth in Rider SUT and are changed on June 1 and October 1 of each year.

Date of Issue:	Effective Date
Issued by:	

ATLANTIC CITY ELECTRIC COMPANY

BPU NJ No. 11 Electric Service - Section IV Revised Sheet Replaces Revised Sheet No. 60b

RIDER (BGS) continued Basic Generation Service (BGS)

CIEP Standby Fee

\$x.xxxxxx per kWh

This charge recovers the costs associated with the winning BGS-CIEP bidders maintaining the availability of the hourly priced default electric supply service plus administrative charges pursuant to N.J.S.A. 48:2-60 and New Jersey Sales and Use Tax as set forth in Rider SUT. This charge is assessed on all kWhs delivered to all CIEP- eligible customers on Rate Schedules MGS Secondary, MGS Primary, AGS Secondary, AGS Primary or TGS.

Transmission Enhancement Charge

This charge reflects Transmission Enhancement Charges ("TECs"), implemented to compensate transmission owners for the annual transmission revenue requirements for "Required Transmission Enhancements" (as defined in Schedule 12 of the PJM OATT) that are requested by PJM for reliability or economic purposes and approved by the Federal Energy Regulatory Commission (FERC). The TEC charge (in \$ per kWh by Rate Schedule), including administrative charges pursuant to N.J.S.A. 48:2-60 and New Jersey Sales and Use Tax as set forth in Rider SUT, is delineated in the following table.

		Rate Class													
		MGS	MGS	AGS	AGS		SPL/								
	<u>RS</u>	<u>Secondary</u>	<u>Primary</u>	<u>Secondary</u>	<u>Primary</u>	<u>TGS</u>	<u>CSL</u>	DDC							
VEPCo	0.000413	0.000344	0.000372	0.000228	0.000181	0.000175	-	0.000145							
TrAILCo	0.000448	0.000372	0.000368	0.000257	0.000209	0.000187	-	0.000179							
PSE&G	0.000581	0.000486	0.000525	0.000321	0.000257	0.000248	-	0.000204							
PATH	(0.000049)	(0.000042)	(0.000045)	(0.000027)	(0.000021)	(0.000021)	-	(0.000017)							
PPL	0.000213	0.000177	0.000176	0.000123	0.000100	0.000090	-	0.000085							
PECO	0.000223	0.000186	0.000183	0.000128	0.000104	0.000094	-	0.000090							
Pepco	0.000018	0.000015	0.000015	0.000011	0.000009	0.000007	-	0.000007							
MAIT	0.000031	0.000026	0.000028	0.000017	0.000014	0.000013		0.000011							
JCP&L	0.000003	0.000003	0.000003	0.000002	0.000001	0.000001	-	0.000001							
Delmarva	0.000001	0.000001	0.000001	0.000001	0.000001	0.000001	-	0.000001							
BG&E AEP -	0.000039	0.000033	0.000032	0.000022	0.000018	0.000016	-	0.000016							
East	0.000106	0.000087	0.000086	0.000061	0.000049	0.000044	-	0.000043							
Total	0.002027	0.001688	0.001744	0.001144	0.000922	0.000855	-	0.000765							

Date	of	Issi	ue
Issue	ed I	by:	

Effective Date:

Attachment 2

Table #1	% usage during PJM On-Peak period		On-Peak periods defined as the 16 hr PJM Trading period, adj for NERC holidays								
	(data rounded to nearest %)	RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC		
	January	48.54%	48.56%	53.71%	49.16%	54.29%	51.03%	34.44%	47.70%		
	February	51.97%	51.94%	56.83%	38.11%	56.65%	52.21%	33.52%	49.47%		
	March	52.53%	52.48%	56.48%	30.98%	57.78%	54.45%	30.97%	51.70%		
	April	47.39%	47.30%	53.32%	37.47%	53.54%	50.13%	23.24%	46.51%		
	May	53.12%	53.16%	58.72%	48.60%	57.29%	53.41%	20.98%	49.23%		
	June	55.98%	55.90%	58.94%	54.23%	58.71%	54.93%	20.16%	51.00%		
	July	51.03%	51.02%	52.74%	49.00%	52.48%	49.52%	17.93%	45.25%		
	August	58.62%	58.62%	58.54%	55.40%	59.61%	56.12%	23.93%	51.88%		
	September	51.54%	51.61%	54.56%	46.52%	55.18%	50.84%	26.58%	46.14%		
	October November	51.82% 49.73%	51.63% 49.71%	56.84% 56.92%	47.86% 52.18%	57.08% 55.83%	53.15% 52.97%	32.84% 35.43%	49.19% 49.07%		
	December	49.73% 46.59%	46.53%	50.37%	48.16%	50.92%	48.66%	34.16%	49.07 % 45.54%		
	December	40.59%	40.55%	50.57 %	40.10%	30.92%	46.00%	34.10%	45.54%		
Table #2	% Usage During ACECO On-Peak Billing Po	eriod									
			RS TOU - BGS								
	January		36.27%								
	February		37.94%								
	March		38.20%								
	April		34.21%								
	May		38.87%								
	June		42.87%								
	July		39.73%								
	August		45.52%								
	September		39.27%								
	October November		38.20% 36.44%								
	December		34.10%								
Table #3	Class Usage @ customer calendar month sales forecasted for period										
	in MWh	RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC	Total	
		Jan-20 335,952	370	62,326	1,171	74,708	5,261	4,273	672	484,732	
		Feb-20 308,910	346	59,852	1,609	68,969	6,201	3,828	640	450,355	
		Mar-20 282,060	309	58,026	1,207	64,215	5,336	3,682	628	415,463	
		Apr-20 244,616	262	56,795	1,004	65,969	4,040	3,295	616	376,597	
		May-20 219,729	227	58,544	1,307	63,632	4,853	3,148	634	352,074	
		Jun-19 277,794	274	68,477	1,176	72,436	4,764	3,214	747	428,882	
		Jul-19 411,005 Aug-19 469,653	399 455	80,631 83,379	1,223 1,359	91,473 92,522	5,787 5,961	3,598 3,891	888 906	595,005 658,127	
		Sep-19 414,789	400	81,198	1,248	90,093	5,723	4,081	894	598,428	
		Oct-19 254,788	250	57,596	1,285	65,386	4,971	3,839	625	388,740	
		Nov-19 231,148	243	57,155	1,312	63,964	4,901	4,161	619	363,502	
		Dec-19 277,162	299	57,958	1,384	66,343	4,984	4,178	623	412,931	
	Total	3,727,608	3,833	781,938	15,285	879,711	62,783	45,187	8,492	5,524,837	

Table #4	Forwards Prices - Energy Only @ bulk system						Table #5	Zone-Hub Basis Diff	erential	'Based on 3 Year Average	
	(\$/MWH)		0 - 0 - 1	Off/On Pk	O'' D I			O D I	O((D1		
	lan.	00	On-Peak	LMP ratio	Off-Peak			On-Peak	Off-Peak		
	Jan- Feb-		51.78 48.72	0.779 0.779	40.35 37.96			89% 89%	91% 91%		
	Mar-		38.19	0.779	29.76			89%	91%		
	Apr		34.25	0.779	26.69			89%	91%		
	May		33.16	0.779	25.84			89%	91%		
	Jun		34.13	0.651	22.21			94%	89%		
	Jul		39.56	0.651	25.75			94%	89%		
	Aug		36.56	0.651	23.79			94%	89%		
	Sep-		35.13	0.651	22.86			94%	89%		
	Oct-	19	33.98	0.779	26.48			89%	91%		
	Nov-		33.80	0.779	26.34			89%	91%		
	Dec-	19	36.00	0.779	28.05			89%	91%		
Table #6	Losses		RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	C AGS - PRI	SPL/CSL	DDC	
	Delivery Loss Factor		6.6720%	6.6720%	6.6720%		6.6720%		6.6720%		
	Loss Factors + EHV Losses =		7.0688%	7.0688%	7.0688%	4.5715%	7.0688%	4.5715%	7.0688%	7.0688%	
	Expansion Factor =		1.07606	1.07606	1.07606	1.04790	1.07606	1.04790	1.07606	1.07606	
	Marginal Loss Factor (w/ EHV Losses) =		1.7659%	1.7659%	1.7659%	1.7659%	1.7659%	1.7659%	1.7659%	1.7659%	
	Loss Factor w/o Marginal Loss =		5.3982%	5.3982%	5.3982%	2.8560%	5.3982%		5.3982%		
	Expansion Factor w/o Marginal Loss =		1.05706	1.05706	1.05706	1.02940	1.05706	1.02940	1.05706	1.05706	
Table #7	#7 Summary of Average BGS Energy Only Unit Costs @ customer - PJM Time Periods based on Forwards @ PJM West - corrected for congestion & losses in \$/MWh										
			RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC	
	Summer - all hrs	\$	30.48	\$ 30.48	\$ 30.64	\$ 29.15	\$ 30.71	\$ 29.41 \$	25.88	\$ 29.58	
	On Peak	\$	36.85			\$ 35.73	\$ 36.76	\$ 35.79 \$	36.55	\$ 36.73	
	Off Peak	\$	22.92	\$ 22.91	\$ 22.87	\$ 22.20	\$ 22.90	\$ 22.27 \$	22.81	\$ 22.86	
	Winter - all hrs	\$	34.20	\$ 34.37	\$ 33.99	\$ 32.32	\$ 34.11	\$ 33.14 \$	32.32	\$ 33.46	
	On Peak	\$	37.98	\$ 38.18	\$ 37.28	\$ 36.20	\$ 37.45	\$ 36.63 \$	37.87	\$ 37.31	
	Off Peak	\$	30.40	\$ 30.54	\$ 29.90	\$ 29.26	\$ 29.97	\$ 29.35 \$	29.80	\$ 29.83	
	Annual	\$	32.63	\$ 32.82	\$ 32.65	\$ 31.28	\$ 32.77	\$ 31.82 \$	30.21	\$ 31.89	
	System Average Cost @ customer - (limited to cla	sses sho	wn above) =				\$ 32.62				
Table #8	Summary of Average BGS Energy Only Costs of based on Forwards prices corrected for congestion			ne Periods							
	in \$1000		RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC	
	Summer - all hrs	\$	47,958						383		
	PJM on PJM off	•	31,483 16,475	·					121 262		
		ρι ψ				4 04	Ψ 0,701				
	Winter - all hrs	\$	73,681						983		
	PJM on		41,040						359		
	PJM off	pk \$	32,641	\$ 35	\$ 6,244	\$ 168	\$ 7,129	\$ 571 \$	623	\$ 78	
	Annual	\$	121,639	\$ 126	\$ 25,527	\$ 478	\$ 28,832	\$ 1,998 \$	1,365	\$ 271	
	System Total	\$	180,235								

Table #9	Summary of Average BGS E based on Forwards prices cor in \$/MWh												
			RS	RS TOU	J - BGS	MGS - SEC	MG	S - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC	
	Summer - all hrs	ACECO On pk ACECO Off pk	\$ 30.48	\$ \$ \$	30.48 \$ 38.91 24.40	30.64	\$	29.15	\$ 30.71	\$ 29.41 \$	25.88 \$	29.58	
	Winter - all hrs	ACECO On pk ACECO Off pk	\$ 34.20	\$ \$ \$	34.37 \$ 39.56 31.35	33.99	\$	32.32	\$ 34.11	\$ 33.14 \$	32.32 \$	33.46	
	Annual Average System Average		\$ 32.63 \$ 32.62	\$	32.82 \$	32.65	\$	31.28	\$ 32.77	\$ 31.82 \$	30.21 \$	31.89	
Table #10	Generation & Transmission obligations - values effective			stments									
	in MW		RS	RS TOU	J - BGS	MGS - SEC	MG	S - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC	Total
	Gen Load - MW Gen Obl - MW		1,217.6 1,449.9		0.6 0.7	211.5 251.9		4.8 5.7	177.9 211.8		0.0 0.0	1.2 1.4	1,623.9 1,933.8
	Trans Obl - MW		1,340.9		0.7	233.4		4.9	188.9	10.7	0.0	1.2	1,780.6
	# of Months and Days used in	this analysis											
					# o	summer days = f winter days =		122 243		summer months = f winter months = total # months =	4 8 12		
	Transmission Cost				\$	51,760	per MW	/-yr					
	Generation Capacity Cost		Summer Vinter			•					Summer Total \$ Winter Total \$ Annual Total \$	35,775,222 71,257,205 107,032,428	
	Residential Inversion Determi	nation											
		Block 1 (0-750 kWh/m) Block 2 (>750 kWh/m) Calculated inversion =	<u>Charges</u> 5.480200 <u>6.345400</u> 0.865200		Rate RS			<u>sage</u> 64.94% 35.06%		SUM 'First 750 KWh SUM '> 750 KWh WIN	_	1,066,109,596 575,598,373 2,246,698,892 3,888,406,860	
Table #11	Ancillary Services & Renewa Ancillary Services Renewable Power Cost Total Ancillary Services & Ren	·	asted overall an	nual average	\$ \$ \$	2.00 17.51 19.51							
Table #12	Summary of Obligation Cos	•	RS	RS TOL		MGS - SEC		SS - PRI	AGS - SEC		SPL/CSL	DDC	Total
	Trans	smission Obl - yr round	\$ 18.62	\$	23.40 \$	15.45	\$	16.64	\$ 11.11	\$ 8.79 \$	0.00 \$	7.42 \$	16.68
	Gen	eration Obl -	ф 04.50	c	07.00 f	47.00	œ	20.52	t 40.00	¢ 40.00 ¢	0.00 #	0.04	
		per annual MWh very per summer MWh covery per winter MWh	\$ 17.05	\$	27.86 \$ 21.63 \$ 32.57 \$	17.83 14.86 19.82	\$	20.52 S 20.95 S 20.32 S	\$ 11.31	\$ 10.21 \$	0.00 \$ 0.00 \$ 0.00 \$	9.31 7.69 10.41	

Table #13

Summary of BGS Unit Costs @ customer Includes energy, G&T obligations, Ancillary Services, and Renewable Power Costs

All In Average costs for rates shown (@ bulk system) =

in \$/MWh

Π΄ ΦΑΙΝΙΝΝΉ		RS	RS TOU - BGS	;	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC
Summer - all hrs		\$ 87.15	\$ 96.50	\$	81.94	\$ 87.18	\$ 74.13	\$ 68.85	\$ 46.88	\$ 65.69
	ACECO On-Peak		\$ 104.93							
	ACECO Off-Peak		\$ 45.40							
	Block 1 (0-750 kWh/m)	\$ 84.11								
	Block 2 (>750 kWh/m)	\$ 92.76								
Winter - all hrs		\$ 98.61	\$ 111.33	\$	90.26	\$ 89.73	\$ 80.86	\$ 73.53	\$ 53.32	\$ 72.29
	ACECO On-Peak		\$ 116.52							
	ACECO Off-Peak		\$ 52.34							
Annual		\$ 93.77	\$ 73.70	\$	86.92	\$ 88.90	\$ 78.21	\$ 71.87	\$ 51.21	\$ 69.62
Gra	and Total Cost in \$1000 =	\$ 495,378								
All In Average cost for rates	s shown (@ customer) =					\$ 89.66				

84.86

Table #14

Ratio of BGS Unit Costs @ customer to All In Average Cost @ bulk system (rounded to 3 decimal places)
Includes energy, G&T obligations, Ancillary Services, and Renewable Power Costs - unadjusted for billing vs. PJM time period differences

		RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC
Summer - all hrs			1.137	0.966	1.027	0.874	0.811	0.553	0.774
	On-Peak		1.237						
	Off-Peak		0.535						
	All usage Multiplier	1.027							
	Constant \$	(3.03)	fo	r Block 1 (0-750 k)	Wh/m) usage				
	Constant \$	5.62	fo	r Block 2 (>750 kV	Vh/m) usage				
Winter - all hrs		1.162	1.312	1.064	1.057	0.953	0.867	0.628	0.852
	On-Peak		1.373						
	Off-Peak		0.617						
Annual		1.105	0.869	1.024	1.048	0.922	0.847	0.604	0.820

Table #15

Summary of BGS Unit Costs Less Transmission @ customer

Includes energy, Generation capacity obligations, Ancillary Services, and Renewable Power Costs - unadjusted for billing vs. PJM time period differences. Transmission billed at retail tariff level. in \$/MWh

πι φινιννι	RS	;	RS TOU - BGS	3	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC
Summer - all hrs \$	68.53	\$	73.10	\$	66.49	\$ 70.54	\$ 63.02	\$ 60.06	\$ 46.88 \$	58.27
On-Peak		\$	81.53							
Off-Peak		\$	45.40							
Block 1 (0-750 kWh/m) \$	65.49									
Block 2 (>750 kWh/m) \$	74.15									
Winter - all hrs \$	79.99	\$	87.93	\$	74.81	\$ 73.09	\$ 69.75	\$ 64.74	\$ 53.32 \$	64.87
On-Peak		\$	93.13							
Off-Peak		\$	52.34							
Annual \$	75.15	\$	64.62	\$	71.47	\$ 72.25	\$ 67.10	\$ 63.08	\$ 51.21 \$	62.20
Grand Total Cost in \$1000 = \$	403,214									
All In (Less Transmission) Average cost for rates shown	(@ customer)	=					\$ 72.98			
All In (Less Transmission) Average costs for rates show	n (@ bulk syste	em) :	=				\$ 69.07			

Table #16

Ratio of BGS Unit Costs @ customer to All In Average Cost Less Transmission @ bulk system (rounded to 3 decimal places)
Includes energy, Generation capacity obligations, Ancillary Services, and Renewable Power Costs - unadjusted for billing vs. PJM time period differences. Transmission billed at retail tariff level.

		RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC
Summer - all hrs	On-Peak Off-Peak All usage Multiplier Constant \$ Constant \$	0.992 (3.03) 5.62		0.963 Block 1 (0-750 k) Block 2 (>750 kV	, .	0.912	0.870	0.679	0.844
Winter - all hrs	On-Peak	1.158	1.273 1.348	1.083	1.058	1.010	0.937	0.772	0.939
Annual	Off-Peak	1.088	0.758 0.936	1.035	1.046	0.971	0.913	0.741	0.901

Summary of Total BGS Costs by Season Table #17

		RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC		
Total Costs by Rate - in \$1	1000										
Sum	nmer	\$ 137,102 \$	147 \$	25,703 \$	436	\$ 25,688 \$	1,531 \$	693 \$	226		
Wir	nter	\$ 212,449 \$	257 \$	42,262 \$	922	\$ 43,114 \$	2,981 \$	1,621 \$	366		
То	otal	\$ 349,551	404 \$	67,966 \$	1,359	\$ 68,802 \$	4,512 \$	2,314 \$	591		
% of Annual Total \$ by Ra	ate										
Sum	nmer	39%	36%	38%	32%	37%	34%	30%	38%		
Wir	nter	61%	64%	62%	68%	63%	66%	70%	62%		
Total Costs - in \$1000											
Sum	nmer	\$ 191,527									
Wir	nter	\$ 303,973									
То	otal	\$ 495,500									
% of Annual Total \$			If total \$ were split	on a per MWh ba	asis (on bulk sy:	stem MWhs):					
Sum	nmer	39%	\$	79.48 pe	er MWh @ bulk	system	Ratio t	to All-In Cost	>>>	Summer	1.0000
	nter	61%	\$		er MWh @ bulk	•	(round	led to 4 decimal places)		Winter	1.0000

Assumptions:

Gen Cost =	\$151.64	per MW-day summe	r
=	\$151.64	per MW-day winter	
Trans cost =	\$ 51,760	per MW-yr	
Ancillary Services =	\$ 2.00	per MWH	
Renewable Power Cost =	\$ 17.51	per MWH	

newable Power Cost = \$ 17.51 per MWH

Energy Prices = Quotes for the period June 1, 2019 to May 31, 2020 - corrected for hub-zone basis differential.

Usage patterns = forecasted energy use by class, on/off % from class load profiles

Obligations = class totals as of June 2018

Losses = existing approved loss factors

PJM Time Periods = PJM trading time periods - 7 AM to 11 PM weekdays, local time, x NERC holidays

- New Year's, Memorial, 4th of July, Labor Day, Thanksgiving & Christmas

Table #18

Retail Rates Charged to BGS RSCP (Previously "FP") Customers
Includes energy, Generation Obligations, Ancillary Services, and Renewable Power Costs - Transmission billed at current Tariff Rates in \$/MWh

Weighted Avg. Winning Bid >>>>	\$ 79.143
Less Transmission >>>>>>>	\$ 15.508
BGS Avg. Price >>>>>>>	\$ 63.635

		RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC
Summer - all hrs			\$ 71.883	\$ 65.429	\$ 69.369	\$ 61.964	\$ 59.110	\$ 46.133	\$ 57.344
	On-Peak		\$ 80.172						
	Off-Peak		\$ 44.638						
	Block 1 (0-750 kWh/m)	\$ 64.160							
	Block 2 (>750 kWh/m)	\$ 73.398							
Winter - all hrs	,	\$ 70.534	\$ 77.539	\$ 65.966	\$ 64.443	\$ 61.519	\$ 57.073	\$ 47.023	\$ 57.195
	On-Peak		\$ 82.107						
	Off-Peak		\$ 46.170						
Annual		\$ 69.234	\$ 59.562	\$ 65.862	\$ 66.562	\$ 61.789	\$ 58.098	\$ 47.153	\$ 57.335

Table #19

Retail Rates Charged to BGS RSCP Customers including Revenue Assessment and SUT Includes energy, Generation Obligations, Ancillary Services, and Renewable Power Costs - Transmission billed at current Tariff Rates

in \$/kWh

Revenue Assessment Factor 1.002458085

(BPU, RPA Assessments)

Summer - all hrs		RS	RS TOU - BGS	\$ MGS - SEC 0.069935	\$ MGS - PRI 0.074147	AGS - SEC 0.066231	\$ AGS - PRI 0.063181	SPL/CSL 0.049310	\$ DDC 0.061293
	On-Peak		\$ 0.085694						
	Off-Peak		\$ 0.047713						
	Block 1 (0-750 kWh/m)	\$ 0.068579							
	Block 2 (>750 kWh/m)	\$ 0.078453							
Winter - all hrs		\$ 0.075392		\$ 0.070509	\$ 0.068881	\$ 0.065756	\$ 0.061004	\$ 0.050261	\$ 0.061134
	On-Peak		\$ 0.087762						
	Off-Peak		\$ 0.049350						
Annual		\$ 0.074003	\$ 0.063664	\$ 0.070398	\$ 0.071146	\$ 0.066045	\$ 0.062100	\$ 0.050401	\$ 0.061283

Attachment 3

Atlantic City Electric Company
Calculation of June 2019 to May 2020 BGS-RSCP Rates based on results of February 2019 BGS RSCP Auction

Table A	Auction Results
rabic /	Addition Researce

line #	Payment Identifier >>	poi mo	emaining ction of 36 conth bid - 17/18 filing	pc m	remaining ortion of 36 nonth bid - 118/19 filing	6 month bid - 019/20 filing	Notes:
1	Winning Bid - in \$/MWh	\$	75.49	\$	81.23	\$ 81.23	winning Bids
2	# of Traunches for Bid		8		7	7	from then current Bid
3	Total # of Traunches		22		22	22	from then current Bid
	Payment Factors						
4	Summer		1.0000		1.0000	1.0000	from then current Bid Factor Spreadsheet
5	Winter		1.0000		1.0000	1.0000	from then current Bid Factor Spreadsheet
	Applicable Customer Usage @ bulk s	ysten					
6	Summer MWh		2,409,814				from current Bid Factor Spreadsheet
7	Winter MWh		3,428,120				
	Total Payment to Suppliers - in \$1000)					
8	Summer	\$	66,152	\$	62,284	\$ •	= (1) * (2)/(3) * (4) * (6)
9	Winter	\$	94,105	\$		\$ 	= (1) * (2)/(3) * (5) * (7)
10	Total	\$	160,257	\$	150,887	\$ 150,887	
	Average Payment to Suppliers - in \$/N	ЛWh					
11	Summer	\$	79.14				= sum(line 8) / (6) - rounded to 2 decimal places
12	Winter	\$	79.14				= sum(line 9) / (7) - rounded to 2 decimal places
13	Total weighted average	\$	79.14	<-	<< used in ca Custome		= sum(line 10) / [(6) + (7)] rounded to 2 decimal places
14 15 16	Reconciliation of amounts - in \$1000 Weighted avg * Total MWh = Total Payment to Suppliers = Difference =	\$	462,032 462,030 2				= (13) * [(6)+(7)] / 1000 = sum (line 10) = line (14) - line (15)

Table C

Atlantic City Electric Company
Calculation of June 2019 to May 2020 BGS-RSCP Rates based on results of February 2019 BGS RSCP Auction

Ratio of BGS Unit Costs @ customer to All-In Average Cost @ bulk system Table B

from Table #14 of the bid factor spreadsheet ---

round to 3 decimal places

includes energy, G&T obligations, Ancillary Services, and Renewable Power Cost - adjusted to billing time periods

		RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC	Total
Summer - all hrs	On-Peak Off-Peak		1.137 1.237 0.535	0.966	1.027	0.874	0.811	0.553	0.774	
	All usage Multiplier Constant Constant	1.027 (3.033) 5.619		for Block 1 (0-75) for Block 2 (>750	, -	•				
Winter - all hrs	On-Peak Off-Peak	1.162	1.312 1.373 0.617	1.064	1.057	0.953	0.867	0.628	0.852	
Annual - all hrs		1.105	0.869	1.024	1.048	0.922	0.847	0.604	0.820	
Preliminary Resi	ulting BGS Rates (in ce ecimal places	ents per kWl	h) - equal to bid fa	actors times weig	hted average k	oid price				

includes energy, G&T obl	ligations, Ancillar	y Services,	and Renewable P	ower Cost - adju	isted to billing	time periods			
		RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC
Summer - all hrs	On-Peak Off-Peak		8.9986 9.7900 4.2342	7.6452	8.1280	6.9171	6.4185	4.3766	6.1257
for Block 1 (0-750 kWh/m for Block 2 (>750 kWh/m)	, •	7.8246 8.6898							
Winter - all hrs	On-Peak Off-Peak	9.1964	10.3836 10.8663 4.8831	8.4208	8.3654	7.5423	6.8617	4.9702	6.7430

Atlantic City Electric Company

Calculation of June 2019 to May 2020 BGS-RSCP Rates based on results of February 2019 BGS RSCP Auction

 Table D
 Revenue Recovery Calculations - Reconciliation of seasonal Customer Revenue and Supplier Payments, based on actual anticipated revenues and payments

		RS	RS T	OU - BGS	М	IGS - SEC	М	GS - PRI	AG	SS - SEC	AG	S - PRI	SF	PL/CSL		DDC
Total Rate Revenue - in \$1000																
Summer	\$	127,872	\$	111	\$	23,982	\$	407	\$	23,969	\$	1,427	\$	647	\$	210
Winter	\$	198,124	\$	182	\$	39,431	\$	860	\$	40,214	\$	2,782	\$	1,511	\$	341
Total	\$	325,996	\$	292	\$	63,412	\$	1,267	\$	64,184	\$	4,209	\$	2,158	\$	551
Total Summer	\$	178,626														
Total Winter	\$	283,445														
Grand Total	\$	462,071														
Total Supplier Payment - in \$1000																
Summer	\$	190,719														
Winter	\$	271,311														
Total	\$	462,030			k	Wh Rate									% d	ifference
	•	, , , , , , ,				djustment	rc	ounded to 5	de	cimal plac	es					6.3409%
Differences - in \$1000						Factors				,						4.4724%
Summer	\$	12,093				1.06770									-	0.0089%
Winter	\$	(12,134)				0.95719										
Total	\$	(41)]			

Note: These differences are due to rounding and seasonal differences in Bidder Payments (which are based on prior wining bids and Seasonal Payment Factors) and current Rates (based on current seasonal market differentials)

Atlantic City Electric Company

Calculation of June 2019 to May 2020 BGS-RSCP Rates based on results of February 2019 BGS RSCP Auction

Table E Final Resulting BGS Rates (in cents per kWh) - with preliminary kWh rates adjusted by the kWh Rate Adjustment Factor rounded to 4 decimal places

includes energy, G&T obligations, Ancillary Services, and Renewable Power Cost - adjusted to billing time periods

		RS	RS TOU - BGS	MGS - SEC	MGS - PRI	AGS - SEC	AGS - PRI	SPL/CSL	DDC
Summer - all hrs	On-Peak Off-Peak		9.6078 10.4528 4.5209	8.1628	8.6783	7.3854	6.8530	4.6729	6.5404
for Block 1 (0-750 kWh/m) usage for Block 2 (>750 kWh/m) usage		8.3543 9.2781							
Winter - all hrs	On-Peak Off-Peak	8.8027	9.9391 10.4011 4.6741	8.0603	8.0073	7.2194	6.5680	4.7574	6.4543

Table F Spreadsheet Error Checking - Checking of seasonal Customer Revenue and Supplier Payments, based on final actual anticipated revenues and payments

Total Data Davanua in \$1000		RS	RS TOU - BGS		MGS - SEC		MGS - PRI		AGS - SEC		AGS - PRI		SPL/CSL		DDC	
Total Rate Revenue - in \$1000 Summer Winter	\$ \$	136,529 189,642	\$ \$	118 174	\$	25,606 37,743	\$	434 823	\$	25,592 38,493	\$ \$	1,524 2,663	\$	691 1,446	\$ \$	225 326
Total Total Summer Total Winter Grand Total	\$ \$ \$	326,171 190,719 271,311 462,029	\$	292	\$	63,348	\$	1,258	\$	64,085	\$	4,187	\$	2,137	\$	551
Total Supplier Payment - in \$1000 Summer Winter Total	\$ \$	190,719 271,311 462,030														
Differences - in \$1000 Summer Winter Total	\$ \$ \$	(0) (0) (1)														

In the Matter of the Provision of Basic Generation Service for the Period Beginning June 1, 2019 BPU Docket No. ER18040356

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