

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PROVISION
OF BASIC GENERATION SERVICE FOR
THE PERIOD BEGINNING JUNE 1, 2009

Docket No. ER08050310

ROCKLAND ELECTRIC COMPANY

**PROPOSAL FOR
BASIC GENERATION SERVICE
REQUIREMENTS TO BE PROCURED EFFECTIVE
JUNE 1, 2009**

**COMPANY SPECIFIC ADDENDUM
COMPLIANCE FILING**

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July 1, 2008

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RECO's COMPANY SPECIFIC ADDENDUM

A. Introduction to RECO's Company Specific Filing

In its Decision and Order dated June 19, 2008 in Docket No. ER08050310, the New Jersey Board of Public Utilities ("Board" or "NJBPU") directed New Jersey's four investor owned electric distribution companies ("EDCs")¹ to file proposals with the Board by July 1, 2008 addressing how basic generation service ("BGS") should be procured for the period beginning June 1, 2009. This document constitutes RECO's company-specific portion of the compliance filing mandated by the Board. RECO's filing also includes and incorporates by reference the Proposal for Basic Generation Service Requirements to be Procured Effective June 1, 2009, filed by New Jersey's four EDCs on July 1, 2008 ("EDC Compliance Filing").

B. Use of Committed Supply

"Committed Supply" means any and all power supplies to which the EDCs have an existing physical or financial entitlement that may extend into or through the BGS bid period. This will include Non-Utility Generation ("NUG") contracts, including any restructured replacement power contracts; any wholesale purchases previously contracted for by the EDCs, and any generation assets, or options for/calls upon assets, still owned or under contract to the EDCs.

¹ The New Jersey EDCs are Public Service Electric and Gas Company ("PSE&G"); Jersey Central Power and Light Company ("JCP&L"); Atlantic City Electric Company ("ACE"); and Rockland Electric Company ("RECO" or the "Company").

RECO's committed supply consists of RECO's share (which amounts to less than 1 MW) as a member of the Orange and Rockland System², of one NUG contract RECO would net its share of the output from this NUG project, allocated to RECO pursuant to the terms of the FERC-approved Power Supply Agreement between RECO and Orange and Rockland, from the BGS Load of RECO's Central and Western Divisions.

None of RECO's Committed Supply will qualify as a Class I or Class II renewable resource that could be used to meet the New Jersey Renewable Portfolio Standards' requirements. Accordingly, RECO *will not* provide any renewable attributes, required to meet the Board's Renewable Portfolio Standards, to BGS Suppliers.

C. RECO Tranche Configuration

In its Decision and Order issued January 25, 2007 in Docket No. ER07060379, the Board maintained the current level for the BGS-CIEP class, beginning June 1, 2008, to include all commercial and industrial customers with a peak load share of 1,000 kW and greater.³ RECO will continue to comply with this directive and include these customers as one tranche (at 75 MW of BGS-CIEP eligible load per tranche) in the BGS-CIEP Auction. RECO will continue to assess a Retail Margin of 5 mills/kWh for all BGS-CIEP customers, as well as BGS-FP customers with a load of 750 kW or greater.

² The Orange and Rockland System is comprised of RECO, Orange and Rockland Utilities, Inc. ("Orange and Rockland"), and Pike County Light & Power Company.

³ In accordance with the Board's December 8, 2005 Decision and Order (see footnote 13, at page 16), RECO will determine all eligibility criteria by measuring when a customer's billing demand exceeds the eligibility level during any two months of a calendar year.

As to the BGS-FP Auction, RECO currently has one 36-month tranche that terminates on May 31, 2009, one 36-month tranche that terminates on May 31, 2010, and two 36-month tranches that terminate on May 31, 2011. Accordingly, since the load requirements of RECO's Eastern Division are comprised of a total of four tranches, in the BGS-FP Auction for the period commencing June 1, 2009, RECO will include one 36-month tranche (for the period June 1, 2009 through May 31, 2012).

D. Contingency Plans

While not every contingency can be anticipated, the following three contingencies are of particular concern:

- (a) The Auction Process fails to provide 100 percent of RECO's BGS Load (i.e., an insufficient number of bids to provide for a fully subscribed auction volume);
- (b) A default by one of the winning bidders prior to June 1, 2009; and
- (c) A default during the supply period.

The three contingencies are discussed further below:

(1) Insufficient Number of Bids

A viable Auction Process requires a sufficient degree of competition. To ensure a sufficient degree of competition, the volume of BGS power purchased at the Auction will be finally decided after the receipt of first round bids. Provided that there are sufficient bids at the starting price, the Auction will be held for 100 percent of the BGS Load⁴ (i.e., both BGS-FP and BGS-CIEP).

⁴ Excluding the three 36-month tranches that were auctioned off successfully in the previous two BGS-FP Auctions.

It is possible, however, that the amount of initial bids will not result in a competitive auction for 100 percent of the BGS Load. Any determination to reduce the percentage of BGS Load included in the Auction Process will be made by the Auction Manager, in consultation with the EDCs and the NJBPU advisor. It is also possible that all tranches of RECO's BGS Load will not be bid upon even at the starting price.

In the event that the Auction Volume is reduced to less than 100 percent of BGS Load, or there are unsubscribed tranches at the end of the Auction, each EDC will implement a contingency plan for the remaining tranches. Under RECO's contingency plan, RECO currently intends to purchase that percentage of BGS Load, not met through the Auction Process, in PJM administered markets.⁵ This purchase is a strong feature of the Auction proposal because it provides bidders a strong incentive to participate in the Auction Process.

During the 2006 BGS Auction, RECO did not receive any bids on its BGS-CIEP tranche. As a result, RECO was forced to purchase its BGS-CIEP supply from the PJM markets. In the event that RECO is not able to auction its BGS-CIEP tranches successfully in the 2009 BGS Auction, RECO proposes to employ the following procedures:

- RECO will not submit any day-ahead energy bids, rather the BGS-CIEP load will be filled from the PJM real time market.
- RECO will prepare a BGS-CIEP load backcast for the previous day and submit this backcast to PJM.
- RECO will purchase capacity credits from eRPM in PJM or from bilateral purchases on a monthly and daily basis.

⁵ While RECO's current intention is to purchase from PJM administered markets, RECO reserves the right to consider other alternatives. Although unlikely, in the event that purchases from New York Independent System Operator ("NYISO") administered markets provide a more cost effective alternative to PJM, RECO reserves the right to make purchases from NYISO administered markets.

- RECO will purchase ancillary services on a daily basis from the real time PJM market.
- RECO will set its CIEP Standby Fee at the level determined by the Board.
- RECO will fulfill any Class I, Class II, and Solar requirements, for its unsubscribed BGS tranches, by securing the needed PJM Generation Attributes Tracking (“GATS”) system generated renewable energy certificates (“RECs”) through any available PJM market, or bilaterally. In the event RECS are not available on the market, RECO will make the necessary Alternative Compliance Payments.
- All costs and revenue (with the exception of retail margin revenue) will flow through the reconciliation account for BGS-CIEP. Costs will include the procurement of all necessary services, including energy, capacity, ancillary services, Class I, II and Solar RECs, transmission (including SECA, transmission enhancement and RMR), and any other expenses related to the implementation of RECO’s contingency plan.

(b) Defaults prior to June 1, 2009.

If a winning bidder defaults prior to the commencement of the BGS service, then the open tranches may be offered to the other winning bidder(s) or these tranches will be bid out as quickly as possible. Additional costs will be assessed against the defaulting company's BGS credit security.

(c) Defaults during the Supply Period

If a default occurs during the supply period, then Tranches supplied by the defaulting party may be offered to other suppliers, bid out, or procured in PJM administered markets. If a default involves RECO’s 36-month BGS-FP tranches, RECO only will seek replacement supply until May 31, 2010. For the remainder of the 36-

month period, RECO will seek replacement supply through whatever process is implemented by the Board for the period commencing June 1, 2010.

Additional costs will be assessed against the defaulting company's BGS credit security.

E. Accounting and Cost Recovery

The accounting and cost recovery that RECO proposes with respect to BGS is summarized in this section.

(a) System Control Charge (“SCC”)

If applicable to RECO, the SCC will be calculated initially, and then annually on a cents per kWh basis and the charge will be applied to all of the Company’s electric distribution customers. This charge would be published in a separate SCC tariff leaf. This tariff leaf would be filed with the Board upon the Board’s issuance of the appropriate order(s). If applicable to RECO, the SCC would be applied to all distribution customers’ bills to provide recovery for appliance cycling load management costs. The charge would be set initially to recover estimated annual expenditures as approved by the Board. The SCC would be subject to deferred accounting with interest at the rate applicable to SBC deferrals.

(b) BGS-FP and BGS-CIEP Reconciliation Charges

RECO will track and defer separately for the BGS-FP and BGS-CIEP classes of customers, on a monthly basis, any differences between BGS revenue⁶ and BGS costs.

BGS costs are comprised of the following:

⁶ Retail Margin revenues and Board-approved expenses will be tracked using established accounting procedures and will be subject to deferred accounting. These revenues will be recorded separately as Retail Margin revenue and shall not be included in the calculations of reconciliation charges.

1. Payments made to BGS-FP and BGS-CIEP suppliers;
2. RECO's pro-rata share of any procurement of capacity, energy, and ancillary services, pursuant to its FERC-approved Power Supply Agreement, and other costs incurred, including hedging and costs associated with the RECO RFP;
3. The cost of any procurement of capacity, energy, ancillary services, transmission, and other costs incurred under the Contingency Plan less any payments recovered from defaulting suppliers;
4. Costs incurred by RECO to participate in the BGS Auction as well as any costs incurred to conduct the RECO RFP, including outside attorney and consultant expenses and other costs incurred by or allocated to RECO related to the conduct of the Auction; and
5. Any incremental administrative costs associated with the provision of BGS service.

Reconciliation charges are necessary to reconcile the differences between monthly BGS supply costs and BGS revenues from customers for BGS service.

Separate BGS-FP and BGS-CIEP Reconciliation Charges, applicable to all BGS-FP and BGS-CIEP customers, respectively, will be calculated and assessed each month on a cents per kWh basis. The BGS-FP and BGS-CIEP Reconciliation Charges will be published in separate BGS Reconciliation Charge tariff leaves on a monthly basis. These tariff leaves will be filed with the Board approximately two days prior to the first day of the effective month.

The BGS-FP and BGS-CIEP Reconciliation Charges will be subject to deferred accounting and will be determined individually as set forth below:

The BGS-FP and BGS-CIEP Reconciliation Charges will be used to true up the differences between BGS costs and BGS revenues from customers. Differences in costs and cost recovery for a month "x" will be computed in month x+1 and assessed

through the BGS-FP and BGS-CIEP Reconciliation Charges applied to customers' bills for month $x+2$. Two of these differences are shown below:

1. The difference between BGS Costs (as defined above; this amount is known in month $x+1$) and the month "x" BGS revenue (which is also determined in month $x+1$). This difference will be calculated in month $x+1$ for recovery in month $x+2$.
2. The difference between the total reconciliation charge revenue intended to be recovered in month "x" and the actual reconciliation charge revenue recovered in month "x". This difference will be driven by differences between actual kWh in the month in which the reconciliation charge was assessed and the kWh used to calculate the charge. This amount will be known in month $x+1$.

The reconciliation charges to be applied in month $x+2$ are calculated individually for BGS-FP and BGS-CIEP service as the net of the two differences described above for month "x" (plus or minus any cumulative under or over recovery from prior months) divided by the forecasted BGS kWh in month " $x+2$ ".⁷

F. Description of BGS Tariff Changes

Draft tariff leaves indicating "X.XXX" for the rates that will change as a result of the BGS-FP and BGS-CIEP Auctions are included in Attachment A. Final tariff leaves including the actual BGS rates and tariff provisions to become effective on

⁷ Since the BGS-FP and BGS-CIEP Reconciliation Charges are collected/refunded on a two-month lag, the Company is not seeking interest on the differences between BGS Costs and BGS revenues from customers. Should the Board order a greater time lag on the Company's disposition of these differences, the Company requests interest, at the Company's Board-approved overall rate of return, on such differences from the time they are incurred until the time they are collected/refunded.

June 1, 2009 will be filed with the Board upon its issuance of an appropriate Board order approving the BGS Auction Process.

G. RECO RFP

On January 3, 2007, RECO issued an RFP for four separate financial swaps, one pertained to the forecasted capacity requirement (i.e., 52 MW) for RECO's BGS customers located in its non-PJM areas (i.e., RECO's Central and Western Divisions). The other three financial swaps pertained to the energy requirements of RECO's BGS customers located in RECO's Central and Western Divisions for the annual periods commencing June 1, 2007, June 1, 2008, and June 1, 2009, respectively. RECO sought proposals for each of these swaps. The purpose of these swap arrangements was to secure a favorable fixed price for RECO's capacity needs over a three year term, and energy needs over separate annual terms.

RECO received responses to the RECO RFP via a web-based reverse auction held on January 23, 2007. After reviewing these responses, both RECO and Staff recommended that the Board approve energy swaps for each of the three annual terms, and a capacity swap for the entire three-year term. At its open session on January 25, 2007, the Board approved the results of the RECO RFP. Accordingly, RECO entered into energy swap agreements for the annual periods commencing June 1, 2007, June 1, 2008, and June 1, 2009, and a capacity swap agreement for the entire three-year period. As a result, there is no need for RECO to take any additional action regarding its Central and Western Divisions for the period from June 1, 2008 through May 31, 2010.

Since the auction administered by RECO involves commodity swap transactions, RECO must still purchase the physical electric supply needed to meet its

default service obligations. RECO intends to make such purchases from markets administered by the NYISO.

As approved by the Board, RECO will continue to average the RECO RFP price with the RECO BGS-FP prices to determine the rates for those customers taking BGS-FP service.

H. BGS Rate Design Methodology

RECO BGS Pricing Spreadsheet

As described in the EDC Compliance Filing, the resulting charge for each BGS rate element (e.g., Service Classification No. 1 summer charge, winter charge) for BGS supply service will be based on a factor applied to the tranche weighted average of the winning BGS-FP bid prices adjusted for the seasonal payment factors. These factors have been developed based on the ratios of the estimated underlying market costs of each rate element (for each service classification) to the overall all-in BGS cost. The tables included in Attachment B present all of the input data, intermediate calculations, and the final results in the calculation of these factors.

Table #1 (% Usage during PJM On-Peak Period) contains the percentage of on-peak load, by month, for each service classification. The on-peak period as used in this table (referred to as PJM periods) is defined as the 16-hour period from 7 AM to 11 PM, 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 the average on-peak percentages from the year 2007 based on load profile information.

Table #2 (% Usage During RECO On-Peak Billing Period) contains percentages of on-peak load, by month, for RECO BGS-FP service classifications that are billed on a time of use basis (Service Classification No. 3). These percentages are based on RECO's time periods used for customer billing.

Table #3 (Class Usage @ customer) contains monthly sales forecasted for the calendar year 2008.

Table #4 (Forwards Prices – Energy Only @ bulk system) contains the forwards prices for energy, by time period and month for the BGS analysis period. These values are a weighted average forecast of PJM and NYISO energy prices as calculated in Table #18. The PJM values are the published energy on-peak forwards for the PJM West trading hub for the period of June 2009 to May 2010, and an estimate based on off/on peak LMP ratios for the off-peak periods of each month. The NYISO values are based on a combination of forward and historical prices. An adjustment to the PJM forwards prices used to calculate the prices contained in Table #4 must be made to correct for the effects of the basis differential in the PJM system between the PJM West trading hub and the RECO zone where the BGS supply will be utilized. Table #18 contains an estimate of this basis differential, 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 RECO's PJM zone.

Table #5 (Losses) contains the factors utilized for average system losses, including PJM losses and unaccounted for supply (net of marginal losses) that are input by service classification and voltage level. Loss factors are those in RECO's current, Board approved, Third Party Supplier Agreement. PJM losses are the average percentage PJM EHV losses plus Inadvertent Energy for the period of June 2005 to May

2008, which equals 0.4906%. Marginal losses are excluded from the loss factors based on historic de-rating factors for the period July 2007 to March 2008.

Table #6 (Summary of Average BGS Energy Only Unit Costs @ customer – PJM Time Periods) is the calculation of the energy only costs by service classification, time period and season. These values are the seasonal and time period average costs per MWh as measured at the customer billing meter (from Table #3), based on the forwards prices (from Table #4) adjusted for losses (from Table #5), and monthly time period weights (from Table #1). These average costs do not include the costs associated with Ancillary Services, Generation Capacity or Transmission costs, which will be considered in subsequent calculations.

Table #7 (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 #6, the monthly time period weights from Table #1 and the total sales to customers from Table #3.

Since the end result of these calculations is to be utilized in the development of retail BGS rates, the rates utilizing time of use pricing must be developed based upon the time periods as defined for billing.

Table #8 (Summary of Average BGS Energy Only Units Costs @ customer – RECO Time Periods) shows the result of this adjustment for Service Classification No. 3 rates billed on a time of use basis. These values are calculated by starting with the values in Table #6. Because RECO bills fewer peak hours than the peak hours defined by PJM, the prices in Table #6 would result in a revenue shortfall when applied to RECO's Service Classification No. 3 peak and off-peak kWh

consumption. To correct for this difference, the shortfall is divided by the total kWh for Service Classification No. 3 and the resulting per unit shortfall is added to both the on-peak and off-peak charges in Table #6 to arrive at the prices in Table #8. The next steps set up the values necessary for the inclusion of the costs of the Generation Capacity and Transmission.

The top portion of Table #9 (Generation & Transmission Obligations and Costs and Other Adjustments) shows the total obligations, by service classification, that are currently being utilized in the year 2008. 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 price for transmission service and seasonally differentiated costs of generation capacity. The cost of transmission service is equal to the current rate for RECO's Open Access Transmission Tariff for network transmission service. The generation capacity costs are based on an estimate of the relevant current wholesale market prices in the PJM and NYISO zones as calculated in Table #19. Also shown is the level of blocking in current BGS charges for Service Classification Nos. 1 and 5, which will be utilized in the later calculations of the blocking of BGS charges for these service classifications.

An estimate of the cost of ancillary services is included in Table #10 (Ancillary Services). The Ancillary Services estimate is a weighted average of estimated Ancillary Services costs in RECO's PJM zone (i.e., \$3 per MWh) and RECO's estimate of Ancillary Services costs in RECO's NYISO zone as calculated in Table #20.

Table #11 (Summary of Obligation Costs Expressed as \$/MWh @ customer for non-demand rates only) shows the result of the allocation of both the

transmission and generation costs on a per MWh basis to those service classifications under which BGS service will be billed only on a per kWh basis.

Table #12 (Summary of BGS Unit Costs @ customer) is the result of the inclusion of the transmission, generation capacity, and Ancillary Services costs to the costs shown in Table #8. The bottom portion of this table shows the total estimated costs for BGS, based on the assumptions utilized in the above tables, and the average per unit cost, as measured at the customer meters and the bulk system meters.

Table #13 (Ratio of BGS Unit Costs @ customer to All-In Average Cost @ transmission nodes) indicates the ratio of the individual rate element costs from Table #12 to the overall all-in cost as measured at the bulk system plus constant, where applicable.

Table #14 (Summary of BGS Unit Costs Less Transmission @customer) provides the BGS unit costs as developed in Table 12, with the exception of transmission. The bottom portion of the table shows the total estimated costs for BGS less transmission costs and the average unit cost as measured at the customer meters and the bulk system.

Table #15 (Ratio of BGS Unit Costs Less Transmission @ customer to All-In Average Cost @ transmission nodes) indicates the ratio of the individual rate element costs from Table #14 to the overall all-in cost as measured at the bulk system. These ratios are used to establish the BGS prices to retail customers.

Table #16 (Summary of Total BGS Costs by Season) shows the summary of the total and percentage of costs by rate and by season. A calculation in the lower portion of this table shows the resulting average costs per MWh for the winter and

summer costs and MWhs, while the ratio of these seasonal unit costs to the all-in cost (from Table #12) is shown in the lower right hand portion of this table.

Table #17 (Summary of Total BGS Costs by Season Less Transmission) shows the summary of the total and percentage of costs by rate and by season. This is similar to the values indicated in Table #16, however this table excludes the cost for transmission. A calculation in the lower portion of this table shows the resulting average costs per MWh for the winter and summer costs and MWhs, while the ratio of these seasonal unit costs to the all-in cost (from Table #14) is shown in the lower right hand portion of this table.

Tables #18 (Forward Energy Prices), #19 (Generation Capacity Prices) and #20 (Ancillary Services) show the calculation of weighted average prices for energy, generation capacity and Ancillary Services as more fully described under “Table #4”, “Table #9” and “Table #10”.

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

Table A (Weighted Average Price Calculation) contains the results of the BGS (i.e., current and prior two) auctions adjusted to include the impacts of RECO’s RFP for the Central and Western Divisions.⁸ From these values, the weighted average

⁸ The prices shown for the tranches to be secured in the 2009 auction are for illustrative purposes only, and will be replaced with actual data in determining RECO's final June 2009 BGS-FP rates.

total price (shown on line #25) is calculated. All of the formulas used in this table are shown in the right hand column of this table, under the head of “Notes.”

Table B (Ratio of BGS Unit Costs Less Transmission @ Customer to All-In Average Cost @ transmission nodes) is a repeat of the values shown in Table #15 from Attachment B, the bid factors calculated based on current market conditions.

Table C (Determination of Preliminary Retail Rates to be Charged to BGS Customers) contains the preliminary customer BGS-FP rates as the product of the weighted average total price (from Table A), excluding the weighted average transmission rate included therein, and the Bid Factors from Table B.

Table D (Calculation of Rate Adjustment Factors) contains a comparison of the total anticipated rate revenue billed to customers based on the preliminary BGS-FP 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 Rate Adjustment Factors is also performed in this table. These factors are equal to the seasonal dollar differences between the anticipated billed revenue and supplier payments, divided by the total anticipated seasonal billed BGS-FP energy related charges.

Table E (Final Retail BGS Rates) contains the final adjusted BGS-FP rates, which are equal to the preliminary BGS –FP rates shown in Table C times the seasonal Rate Adjustment Factors that were developed in Table D. The resulting rates are then adjusted to include the New Jersey Sales and Use Tax.

Table F (Spreadsheet Error Checking) contains a comparison of the total anticipated rate revenue billed to customers based on the final BGS-FP rates developed

in Table E and the anticipated total season payments to BGS suppliers, based on the data in Table A.

I. Transmission Charges

The transmission charges applicable to RECO's BGS-FP and BGS-CIEP customers are based on the currently effective transmission rates applicable to the RECO zone, as stated in PJM's Open Access Transmission Tariff ("PJM Transmission Rates"). The PJM Transmission Rates will change from time to time as FERC approves changes in the PJM Open Access Transmission Tariff. Such changes in the PJM Transmission Rates, including but not limited to changes associated with the Seams Elimination Charge/Cost Adjustments/Assignments ("SECA"), Transmission Enhancement Charges ("TECs") and Reliability Must Run ("RMR") charges, will result in changes to RECO's transmission rates applicable to its BGS-FP and BGS-CIEP customers. RECO will review and verify the basis for any transmission cost adjustment, file supporting documentation from the PJM Transmission Rates as well as any rate translation spreadsheets used.

The Board approved RECO's recovery of SECA charges in its April 11, 2005 Decision and Order in Docket Nos. ER05010025 and EO04040288. The Board approved the recovery of RMR charges by PSE&G, JCP&L and ACE in its June 22, 2005 Decision and Order in Docket Nos. ER05040368 and EO04040288 ("June 2005 RMR Order"). By letter dated April 27, 2007 in Docket No. ER07060370, RECO filed for approval of its RMR charges similar to the June 2005 RMR Order. By Decision and Order dated August 1, 2007, the Board approved RECO's RMR cost treatment. By Decision and Order dated January 18, 2008, the Board approved the EDCs' joint

petition requesting cost recovery of TECs related to the Trans-Allegheny Interstate Line Company project.

J. Conclusion

In connection with this filing, the Company requests that the Board issue an order making the following findings and determinations:

1. The Company's proposed treatment of its Committed Supply is approved by the Board.
2. The Company's proposed accounting for BGS is approved by the Board for purposes of accounting and BGS cost recovery.
3. There will exist a presumption of prudence with respect to the BGS Auction Plan method and the costs incurred for BGS service under the Auction Plan.
4. RECO's Contingency Plan is approved by the Board, and the costs incurred as a result of this Contingency Plan are presumptively prudent, subject to deferral, and approved for full and timely recovery.
5. The RECO-specific statewide Auction results for the 90% portion of the load are approved by the Board and produce BGS supply costs that are reasonable and prudent, subject to deferral, and approved for full and timely recovery.
6. The Company's Rate Design Methodology and Tariff Sheets are approved by the Board.

GENERAL INFORMATION

No. 28 BASIC GENERATION SERVICE (“BGS”): (Continued)

(A) BASIC GENERATION SERVICE – FIXED PRICING (BGS-FP)

Applicable to Service Classification Nos. 1, 2, 3, 4, 5 and 6

Applicable to Service Classification Nos. 1, 2 (Non-Demand Billed), 3, 4, 5, and 6
Charges per kilowatthour:

<u>Service Classification</u>	<u>Summer Months*</u>	<u>Other Months</u>
1 – First 250 kWh	X.XXX ¢	X.XXX ¢
1 – Over 250 kWh	X.XXX ¢	X.XXX ¢
2 (Non-Demand Billed) – All kWh	X.XXX ¢	X.XXX ¢
3 – Peak	X.XXX ¢	X.XXX ¢
3 – Off-Peak	X.XXX ¢	X.XXX ¢
4 – All kWh	X.XXX ¢	X.XXX ¢
5 – First 250 kWh	X.XXX ¢	X.XXX ¢
5 – Next 450 kWh	X.XXX ¢	X.XXX ¢
5 – Over 700 kWh	X.XXX ¢	X.XXX ¢
6 – All kWh	X.XXX ¢	X.XXX ¢

Applicable to Service Classification No. 2 Demand Billed customers who do not take BGS-CIEP service in accordance with General Information Section No. 28(B):

	<u>Summer Months*</u>	<u>Other Months</u>
Demand Charges		
First 5 kW (\$/kW)	No Charge	No Charge
Over 5 kW (\$/kW)	X.XXX	X.XXX
Usage Charges		
All kWh (¢/kWh)	X.XXX ¢	X.XXX ¢

The above Basic Generation Service Charges reflect costs for Energy, Generation Capacity, and Ancillary Services (including ISO Administrative Charges).

* Definition of Summer Billing Months
June through September

(Continued)

ISSUED:

EFFECTIVE:

ISSUED BY: John D. McMahon, President
Saddle River, New Jersey 07458

GENERAL INFORMATION

No. 28 BASIC GENERATION SERVICE (“BGS”): (Continued)

(B) BASIC GENERATION SERVICE – COMMERCIAL AND INDUSTRIAL ENERGY PRICING (BGS-CIEP)

This service is applicable to all Service Classification No. 7 customers, and Service Classification No. 2 customers who maintain a billing demand of 1,000 kW or greater during any two months of a calendar year, taking BGS from the Company. Service Classification No. 2 metered customers who do not meet the above criteria may elect to take BGS-CIEP service on a voluntary basis. See General Information Section No. 28(A).

BGS Energy Charges:

Charges per kilowatthour:

BGS Energy Charges are hourly and are provided at the real time PJM Load Weighted Average Locational Marginal Prices for the Rockland Electric Transmission Zone, plus Ancillary Services (including PJM Administrative Charges) at the rate of \$0.00642 per kilowatthour, adjusted for losses, plus a retail margin at the rate of \$0.00535 per kilowatthour and applicable taxes.

BGS Capacity Charges:

Charges per kilowatt of Capacity Obligation as determined in accordance with General Information Section No. 28(C):

Charge applicable in Summer* months.....	\$ X.XXXX
Charge applicable in other months.....	\$ X.XXXX

The above charges shall recover each customer’s share of the overall summer peak load assigned to the Rockland Electric Transmission Zone by the PJM Interconnection, L.L.C. (“PJM”) as adjusted by PJM assigned capacity related factors.

In accordance with Rider SUT, the above charges include provision for the New Jersey Sales and Use Tax. When billed to customers exempt from this tax, as set forth in Rider SUT, such charges will be reduced by the relevant amount of such tax included therein.

* June through September

(Continued)

ISSUED:

EFFECTIVE:

ISSUED BY: John D. McMahon, President
Saddle River, New Jersey 07458

Development of BGS Cost and Bid Factors for Rates Effective June 1, 2009

Based on 2007 Load Profile Information

On-Peak periods defined as the 16 hr PJM Trading period, adj for NERC holidays

Table #1 % Usage During PJM On-Peak Period

	<i>Profile Meter Data <u>SC1</u></i>	<i>Profile Meter Data <u>SC5</u></i>	<i>Profile Meter Data <u>SC3</u></i>	<i>Profile Meter Data <u>SC2 ND</u></i>	<i>--- Other Analysis ---</i>		<i>Profile Meter Data <u>SC2 Dem</u></i>
					<u>SC4</u>	<u>SC6</u>	
January	51.94%	49.95%	47.84%	50.08%	30.27%	30.27%	57.85%
February	52.90%	49.24%	47.91%	50.33%	30.34%	30.34%	57.30%
March	48.78%	41.18%	46.92%	45.89%	27.92%	27.92%	54.47%
April	54.02%	41.12%	52.97%	49.59%	29.11%	29.11%	57.60%
May	50.80%	44.45%	49.40%	52.88%	22.30%	22.30%	53.26%
June	54.56%	61.32%	52.57%	54.95%	20.99%	20.99%	54.38%
July	56.50%	57.04%	51.97%	54.07%	20.31%	20.31%	54.32%
August	54.05%	52.51%	51.20%	51.63%	21.73%	21.73%	54.72%
September	53.48%	46.22%	51.10%	55.98%	28.08%	28.08%	57.95%
October	55.03%	42.83%	50.88%	51.23%	30.43%	30.43%	58.83%
November	46.26%	38.08%	39.86%	38.13%	26.96%	26.96%	50.84%
December	52.47%	44.50%	49.73%	45.88%	30.81%	30.81%	58.38%

Table #2 % Usage During RECO On-Peak Billing Period

On-Peak periods as defined in specified rate schedule

<i>(data rounded to nearest %)</i>	<i>N/A <u>SC1</u></i>	<i>N/A <u>SC5</u></i>	<i><u>SC3</u></i>	<i>N/A <u>SC2 ND</u></i>	<i>N/A <u>SC4</u></i>	<i>N/A <u>SC6</u></i>	<i>N/A <u>SC2 Dem</u></i>
January	----	----	35.58%	----	----	----	----
February	----	----	35.37%	----	----	----	----
March	----	----	35.56%	----	----	----	----
April	----	----	34.18%	----	----	----	----
May	----	----	35.56%	----	----	----	----
June	----	----	35.97%	----	----	----	----
July	----	----	38.83%	----	----	----	----
August	----	----	40.85%	----	----	----	----
September	----	----	34.05%	----	----	----	----
October	----	----	37.50%	----	----	----	----
November	----	----	35.50%	----	----	----	----
December	----	----	34.48%	----	----	----	----

Table #3 Class Usage @ customer

*Calendar month billed sales forecasted for 2008
in MWh*

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>	<u>Total FP</u>
January	68,272	2,119	32	5,021	709	509	55,033	131,695
February	56,795	2,201	32	4,838	610	458	52,823	117,757
March	52,554	1,907	32	4,413	577	421	49,929	109,833
April	49,214	1,476	25	3,735	515	411	48,798	104,174
May	49,348	1,257	21	2,925	470	419	50,654	105,094
June	69,147	1,432	26	3,477	426	399	57,741	132,648
July	90,007	1,819	30	3,664	448	408	62,124	158,500
August	94,589	1,989	30	3,697	522	383	63,278	164,488
September	79,833	1,850	26	3,612	537	462	62,177	148,497
October	58,755	1,431	19	3,082	645	539	55,293	119,764
November	54,424	1,456	23	3,237	662	574	51,715	112,091
December	<u>60,324</u>	<u>1,735</u>	<u>28</u>	<u>3,735</u>	<u>715</u>	<u>525</u>	<u>53,202</u>	<u>120,264</u>
Total	783,262	20,672	324	45,436	6,836	5,508	662,767	1,524,805

Table #4 Forwards Prices - Energy Only @ bulk system

in \$/MWh (See Table 18)

	<u>On-Peak</u>	<u>Off-Peak</u>
January	140.05	100.18
February	140.05	100.18
March	125.39	90.00
April	107.68	77.31
May	105.92	75.18
June	114.10	77.23
July	147.18	99.64
August	157.05	106.37
September	120.11	81.83
October	121.61	87.12
November	112.96	80.93
December	120.60	86.39

Table #5 Losses

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>
Expansion Factor =	1.08519	1.08519	1.08519	1.08519	1.08141	1.08141	1.08519
Expansion Factor (net Marginal Losses)	1.06915	1.06915	1.06915	1.06915	1.06543	1.06543	1.06915

Table #6 Summary of Average BGS Energy Only Unit Costs @ customer - PJM Time Periods

based on Forwards prices corrected for basis differential & losses in \$/MWh

		<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>
Summer - all hrs	\$	126.67	\$ 125.84	\$ 124.49	\$ 124.76	\$ 109.73	\$ 108.81	\$ 125.47
	PJM on pk	\$ 148.42	\$ 147.81	\$ 147.35	\$ 145.97	\$ 144.76	\$ 143.60	\$ 146.36
	PJM off pk	\$ 100.43	\$ 100.25	\$ 100.02	\$ 99.71	\$ 99.27	\$ 98.43	\$ 99.58
Winter - all hrs	\$	114.89	\$ 113.42	\$ 114.23	\$ 114.59	\$ 105.91	\$ 105.25	\$ 116.01
	PJM on pk	\$ 133.33	\$ 135.51	\$ 133.90	\$ 134.62	\$ 133.41	\$ 132.70	\$ 132.78
	PJM off pk	\$ 95.25	\$ 95.77	\$ 95.99	\$ 96.04	\$ 94.80	\$ 94.24	\$ 94.56
Annual	\$	119.91	\$ 117.68	\$ 117.78	\$ 117.83	\$ 106.99	\$ 106.32	\$ 119.51
System Total	\$	119.54						

Table #7 Summary of Average BGS Energy Only Costs @ customer - PJM Time Periods

based on Forwards prices corrected for basis differential & losses in \$1000

		<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>
Summer - all hrs	\$	42,254	\$ 892	\$ 14	\$ 1,803	\$ 212	\$ 180	\$ 30,781
	PJM on pk	\$ 27,072	\$ 564	\$ 9	\$ 1,142	\$ 64	\$ 55	\$ 19,877
	PJM off pk	\$ 15,182	\$ 328	\$ 5	\$ 661	\$ 148	\$ 125	\$ 10,905
Winter - all hrs	\$	51,666	\$ 1,540	\$ 24	\$ 3,551	\$ 519	\$ 406	\$ 48,428
	PJM on pk	\$ 30,927	\$ 817	\$ 14	\$ 2,006	\$ 188	\$ 147	\$ 31,106
	PJM off pk	\$ 20,738	\$ 723	\$ 11	\$ 1,545	\$ 331	\$ 259	\$ 17,322
Annual	\$	93,920	\$ 2,433	\$ 38	\$ 5,354	\$ 731	\$ 586	\$ 79,209
System Total	\$	182,270						

Table #8 Summary of Average BGS Energy Only Unit Costs @ customer - RECO Time Periods
based on Forwards prices corrected for basis differential & losses - RECO billing time periods in \$/MWh

		<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>
Summer - all hrs	\$	126.67	\$ 125.84	\$ 124.49	\$ 124.76	\$ 109.73	\$ 108.81	\$ 125.47
				\$ 154.02				
				\$ 106.69				
RECO On pk								
RECO Off pk								
Winter - all hrs	\$	114.89	\$ 113.42	\$ 114.23	\$ 114.59	\$ 105.91	\$ 105.25	\$ 116.01
				\$ 138.73				
				\$ 100.82				
RECO On pk								
RECO Off pk								
Annual Average	\$	119.91	\$ 117.68	\$ 117.78	\$ 117.83	\$ 106.99	\$ 106.32	\$ 119.51
System Average	\$	119.54						

Table #9 Generation & Transmission Obligations and Costs and Other Adjustments

Obligations - annual average forecasted for 2008; costs are market estimates in MW

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>	<u>Total FP</u>
Gen Obl - MW	296.225	4.104	0.082	11.544	0.000	0.000	157.897	469.852
Trans Obl - MW	276.317	3.840	0.075	10.438	0.000	0.000	142.888	433.558

of Months and Days used in this analysis

# of summer days =	122	# of summer months =	4
# of winter days =	243	# of winter months =	8
		total # months =	12

Transmission Cost \$ 32,114 per MW-yr

Generation Capacity cost	summer	\$179.42 \$/MW/day	Resulting avg gen cap cost =	summer >> \$	65.49 per kW/yr
(see Table 19)	winter	\$179.36 \$/MW/day		winter >> \$	65.47 per kW/yr

	<u>SC1</u>		<u>SC5</u>		
	Charges	% usage	Chgs (¢/kWh)	Differences	% usage
Block 1 (0-250 kWh/month)	12.640 ¢/kWh	18.86%	Block 1 (0-250 kWh/month)	11.979	29.94%
Block 2 (>250 kWh/m)	13.438 ¢/kWh	81.14%	Block 2 (251-700 kWh/month)	12.781	35.59%
Calculated inversion =	0.798 ¢/kWh		Block 3 (>700 kWh/month)	13.323	34.48%
				1.344	

Table #10 Ancillary Services

forecasted overall annual average \$2.93 /MWh

Table #11 Summary of Obligation Costs Expressed as \$/MWh @ customer (for non-demand rates only)

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>
Transmission Obl - all months \$	11.33 \$	5.97 \$	7.43 \$	7.38 \$	- \$	-
Generation Obl -						
per annual MWh \$	24.76 \$	13.00 \$	16.59 \$	16.63 \$	- \$	-
per summer MWh \$	19.44 \$	12.67 \$	16.05 \$	17.49 \$	- \$	-
per winter MWh \$	28.71 \$	13.17 \$	16.88 \$	16.24 \$	- \$	-

Table #12 Summary of BGS Unit Costs @ customer

NON-DEMAND RATES (includes energy, G&T obligations, and Ancillary Services - adjusted to billing time periods in \$/MWh)

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>
Summer - all hrs \$	160.37 \$	147.41 \$	150.90 \$	152.55 \$	112.66 \$	111.74
RECO On pk			\$ 207.06			
RECO Off pk			\$ 117.05			
Block 1 \$	153.89 \$	139.92				
Block 2 \$	161.87 \$	147.94				
Block 3		\$ 153.36				
Winter - all hrs \$	157.86 \$	135.48 \$	141.48 \$	141.14 \$	108.84 \$	108.18
RECO On pk			\$ 196.78			
RECO Off pk			\$ 111.18			
Annual -all hrs \$	158.93 \$	139.57 \$	144.73 \$	144.77 \$	109.92 \$	109.25

DEMAND RATES (includes energy and Ancillary Services, G&T obligations charged separately - adjusted to billing time periods in \$/MWh)

	<u>SC2 Dem</u>	PLUS:
Summer - all hrs \$	128.40	<u>Gen Cost (per kW of Billed Demand/Month)</u>
		<u>SC2 Dem</u>
Winter - all hrs \$	118.94	summer \$ 5.302
		winter \$ 6.141
		<u>Trans cost</u>
Annual - all hrs per MWh only \$	122.44	all months \$ 2.68 per kW of T obl /month

Table #12 (Continued)

<u>Including T&G Obligation \$</u>		
Summer - all hrs	\$	148.73
Winter - all hrs	\$	142.75
Annual - including T&G Obl \$	\$	144.96

ALL RATES

Grand Total Cost in \$1000 =	\$	231,423	
All-In Average cost @ customer =	\$	151.77	per MWh at customer (per customer metered MWh)
All-In Average costs @ transmission nodes =	\$	141.96	per MWh at transmission nodes (per metered MWh at transmission node)

Table #13 Ratio of BGS Unit Costs @ customer to All-In Average Cost @ transmission nodes

NON-DEMAND RATES

Includes energy, G&T obligations, and Ancillary Services - adjusted to billing time periods

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>
Summer - all hrs	1.130	1.038		1.075	0.794	0.787
RECO On pk			1.459			
RECO Off pk			0.825			
Constant Blk 1 \$	(6.47) \$	(7.49)				
Constant Blk 2 \$	1.51 \$	0.53				
Constant Blk 3	NA \$	5.95				
Winter - all hrs	1.112	0.954		0.994	0.767	0.762
RECO On pk			1.386			
RECO Off pk			0.783			
Annual - all hrs	1.120	0.983	1.020	1.020	0.774	0.770

Table #13 (Continued)

DEMAND RATES

Includes energy and Ancillary Services, G&T obligations charged separately - adjusted to billing time periods

	SC2 Dem Multiplier		SC2 Dem Constant		PLUS:	
Summer - all hrs	1.048	\$	(20.324)		Gen Cost (per kW of Billed Demand/Month)	
					SC2 Dem	
Winter - all hrs	1.006	\$	(23.813)		summer \$	5.302
					winter \$	6.141
Annual - including T&G Obl \$	1.021				Trans cost	
					all months \$	2.676 per kW of T obl /month

Table #14 Summary of BGS Unit Costs Less Transmission @ customer

NON-DEMAND RATES

Includes energy, generation capacity obligation, and Ancillary Services - adjusted to billing time periods. Transmission billed at retail tariff level. in \$/MWh

		SC1		SC5		SC3		SC2 ND		SC4		SC6
Summer - all hrs	\$	149.04	\$	141.44	\$	143.46	\$	145.17	\$	112.66	\$	111.74
RECO On pk						\$ 199.62						
RECO Off pk						\$ 109.62						
Block 1	\$	142.56	\$	133.95								
Block 2	\$	150.54	\$	141.97								
Block 3			\$	147.39								
Winter - all hrs	\$	146.53	\$	129.52	\$	134.04	\$	133.76	\$	108.84	\$	108.18
RECO On pk						\$ 189.34						
RECO Off pk						\$ 103.75						
Annual -all hrs	\$	147.60	\$	133.61	\$	137.30	\$	137.39	\$	109.92	\$	109.25

Table #14 (Continued)

DEMAND RATES

*Includes energy and Ancillary Services, generation obligation charged separately - adjusted to billing time periods.
Transmission billed at retail tariff level. In \$/MWh.*

	<u>SC2 Dem</u>	PLUS:	
Summer - all hrs	\$ 128.40		<u>Gen Cost (per kW of Billed Demand/Month)</u>
			<u>SC2 Dem</u>
Winter - all hrs	\$ 118.94	summer \$	5.302
		winter \$	6.141
Annual - all hrs per MWh only	\$ 122.44		
<u>Including Generation Obligation \$</u>			
Summer - all hrs	\$ 142.49		
Winter - all hrs	\$ 135.42		
Annual - including T&G Obl \$	\$ 138.04		

ALL RATES

Grand Total Cost in \$1000 = \$ 217,500
 All-In Average cost @ customer = \$ 142.64 per MWh at customer (per customer metered MWh)
 All-In Average costs @ transmission nodes = \$ 133.42 per MWh at transmission node system (per metered MWh at transmission node)

Table #15 Ratio of BGS Unit Costs Less Transmission @ customer to All-In Average Cost @ transmission nodes

NON-DEMAND RATES

Includes energy, G&T obligations, and Ancillary Services - adjusted to billing time periods

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>
Summer - all hrs	1.117	1.060		1.088	0.844	0.838
RECO On pk			1.496			
RECO Off pk			0.822			
Constant Blk 1 \$	(6.47) \$	(7.49)				
Constant Blk 2 \$	1.51 \$	0.53				
Constant Blk 3	NA \$	5.95				
Winter - all hrs	1.098	0.971		1.003	0.816	0.811
RECO On pk			1.419			
RECO Off pk			0.778			
Annual - all hrs	1.106	1.001	1.029	1.030	0.824	0.819

DEMAND RATES

includes energy and Ancillary Services, G&T obligations charged separately - adjusted to billing time periods

	<u>SC2 Dem Multiplier</u>	<u>SC2 Dem Constant</u>	PLUS:						
Summer - all hrs	1.068	(14.089)	<u>Gen Cost (per kW of Billed Demand/Month)</u>						
Winter - all hrs	1.015	(16.485)	<table border="0"> <tr> <td></td> <td><u>SC2 Dem</u></td> </tr> <tr> <td>summer \$</td> <td>5.302</td> </tr> <tr> <td>winter \$</td> <td>6.141</td> </tr> </table>		<u>SC2 Dem</u>	summer \$	5.302	winter \$	6.141
	<u>SC2 Dem</u>								
summer \$	5.302								
winter \$	6.141								
Annual - including T&G Obl \$	1.035								

Table #16 Summary of Total BGS Costs by Season

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>	
Total Costs by Rate - in \$1000								
Summer	\$ 53,494	\$ 1,045	\$ 17	\$ 2,204	\$ 218	\$ 185	\$ 36,486	
Winter	\$ 70,989	\$ 1,840	\$ 30	\$ 4,373	\$ 534	\$ 417	\$ 59,592	
Total	\$ 124,483	\$ 2,885	\$ 47	\$ 6,578	\$ 751	\$ 602	\$ 96,077	
% of Annual Total \$ by Rate								
Summer	43%	36%	36%	34%	29%	31%	38%	
Winter	57%	64%	64%	66%	71%	69%	62%	
Total Costs - in \$1000								
Summer	\$ 93,649							
Winter	\$ 137,775							
Total	\$ 231,424							
% of Annual Total \$			If total \$ were split on a per MWh basis (on transmission node MWhs):				<u>Ratio to All-In Cost</u>	
Summer	40%	\$ 144.99	per MWh @ transmission nodes				Summer	1.0213
Winter	60%	\$ 139.97	per MWh @ transmission nodes				Winter	0.9860

Table #17 Summary of Total BGS Costs by Season - Less Transmission

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>	
Total Costs by Rate - in \$1000								
Summer	\$ 49,715	\$ 1,003	\$ 16	\$ 2,098	\$ 218	\$ 185	\$ 34,956	
Winter	\$ 65,894	\$ 1,759	\$ 28	\$ 4,145	\$ 534	\$ 417	\$ 56,532	
Total	\$ 115,609	\$ 2,762	\$ 44	\$ 6,242	\$ 751	\$ 602	\$ 91,489	
% of Annual Total \$ by Rate								
Summer	43%	36%	36%	34%	29%	31%	38%	
Winter	57%	64%	64%	66%	71%	69%	62%	
Total Costs - in \$1000								
Summer	\$ 88,191							
Winter	\$ 129,310							
Total	\$ 217,500							
% of Annual Total \$			If total \$ were split on a per MWh basis (on transmission node MWhs):				<u>Ratio to All-In Cost</u>	
Summer	41%	\$ 136.54	per MWh @ transmission nodes				Summer	1.0234
Winter	59%	\$ 131.37	per MWh @ transmission nodes				Winter	0.9847

Table #18 Forward Energy Prices

PJM Forward Prices - Energy Only @ bulk system <i>in \$/MWh</i>	Off/On Peak		Zone to Western Hub Basis Differential <i>in \$/MWh</i>			PJM Forward Prices (incl basis differential) <i>in \$/MWh</i>	
	<u>On-Peak</u>	<u>LMP ratio</u>	<u>Off-Peak</u>	<u>On-Peak</u>	<u>Off-Peak</u>	<u>On-Peak</u>	<u>Off-Peak</u>
January	122.67	0.76	92.82	114%	108%	139.50	99.89
February	122.67	0.76	92.82	114%	108%	139.50	99.89
March	111.50	0.76	84.37	114%	108%	126.80	90.80
April	94.00	0.76	71.13	114%	108%	106.90	76.55
May	92.96	0.76	70.34	114%	108%	105.72	75.70
June	105.35	0.68	71.69	106%	106%	111.95	76.33
July	138.06	0.68	93.95	106%	106%	146.71	100.03
August	148.50	0.68	101.05	106%	106%	157.80	107.59
September	112.58	0.68	76.61	106%	106%	119.63	81.56
October	107.00	0.76	80.97	114%	108%	121.68	87.14
November	98.46	0.76	74.50	114%	108%	111.97	80.18
December	106.00	0.76	80.21	114%	108%	120.55	86.32

NYISO Forward Prices - Energy Only @ bulk system
in \$/MWh

	<u>On-Peak</u>	<u>Off-Peak</u>
January	144.50	102.50
February	144.50	102.50
March	114.00	83.50
April	114.00	83.50
May	107.50	71.00
June	131.50	84.50
July	151.00	96.50
August	151.00	96.50
September	124.00	84.00
October	121.00	87.00
November	121.00	87.00
December	121.00	87.00

Weighted Average Forward Prices - Energy Only @ bulk system (89.3% PJM - 10.7% NYISO)
in \$/MWh

	<u>On-Peak</u>	<u>Off-Peak</u>
January	140.05	100.18
February	140.05	100.18
March	125.39	90.00
April	107.68	77.31
May	105.92	75.18
June	114.10	77.23
July	147.18	99.64
August	157.05	106.37
September	120.11	81.83
October	121.61	87.12
November	112.96	80.93
December	120.60	86.39

Table #19 Generation Capacity Prices (\$/MW/Day)

	<u>PJM</u> <u>89.3%</u>	<u>NYISO</u> <u>10.7%</u>	<u>Weighted</u> <u>Average</u>
Summer	\$188.55	103.37	\$179.42
Winter	\$188.55	102.76	\$179.36

Table #20 Ancillary Services

	<u>PJM</u> <u>89.3%</u>	<u>NYISO</u> <u>10.7%</u>	<u>Weighted</u> <u>Average</u>
	\$3.00	\$2.39	\$2.93

Assumptions:

- Gen Cost = \$179.42 per MW-day in summer
\$179.36 per MW-day in winter
- Trans cost = \$ 32,114 per MW-yr
- Analysis time period = 4 summer months
8 winter months
- Ancillary Services = \$ 2.93 /MWh
- Energy Costs = Based on 6/09 to 5/10 Forwards @ PJM West as of 6/13/08
- Usage patterns = Forecasted 2008 energy use by class, PJM on/off % from 2007 class load profiles,
RECO billing on/off % from 6/07 to 5/08 actual data
- Obligations = Class totals for 2008
- Losses = Per RECO's Third Party Supplier Agreement adjusted for PJM 500kV losses and inadvertent energy.
- 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
- RECO Billing time periods = as per specific rate schedule

Table A Weighted Average Price Calculation

Line #	Specific BGS-FP Auction >>	2007 Auction 36 Month	2008 Auction 36 Month	2009 Auction 36 Month	Total	Notes:
1	Tranches	1	2	1	4	From then-current auction
2	Winning Bid Price (¢/kWh)*	10.999	12.049	12.000		Winning Bids. Note: \$12.000 for 2009 auction is simply illustrative
3	Transmission (¢/kWh)	0.854	0.854	0.854		Average transmission cost included in bid
4	BGS (¢/kWh)	10.145	11.195	11.146		= (2) - (3)
5	Weighted Avg BGS	2.536	5.597	2.786	10.920	= (1) / Total Tranches * (4)
6	Weighted Avg Trans	0.214	0.427	0.214	0.854	= (1) / Total Tranches * (3)
7	Weighted Avg Total Price (¢/kWh)				11.774	
<u>Seasonal Payment Factors</u>						
8	Summer	1.1189	1.0395	1.0213		From then-current Bid Factor Spreadsheet
9	Winter	0.9253	0.9743	0.9860		From then-current Bid Factor Spreadsheet
<u>Applicable Customer Usage @ transmission nodes</u> (Eastern Division)						
10	Summer MWh	576,694				From then-current Bid Factor Spreadsheet
11	Winter MWh	<u>878,845</u>				From then-current Bid Factor Spreadsheet
12		1,455,539				
<u>Total Cost</u>						
13	Summer	17,743,114	36,115,269	17,669,324	71,527,707	= (1) / Total Tranches * (2) / 100 * (8) * (10) * 1,000
14	Winter	<u>22,360,828</u>	<u>51,585,284</u>	<u>25,996,225</u>	<u>99,942,337</u>	= (1) / Total Tranches * (2) / 100 * (9) * (11) * 1,000
15	Total	40,103,942	87,700,553	43,665,549	171,470,044	= (13) + (14)
<u>Average Cost (NJ Statewide Auction)</u>						
16	Summer	12.403 ¢/kWh				= sum(line 13) / (10) / 1000 * 100 rounded to 3 decimal places
17	Winter	11.372 ¢/kWh				= sum(line 14) / (11) / 1000 * 100 rounded to 3 decimal places
18	Total	11.781 ¢/kWh				= sum(line 15) / (12) / 1000 * 100 rounded to 3 decimal places
<u>Average Cost (Including RECO RFP)</u>						
		BGS Auction	RECO RFP		Total	
19	Tranches	4	0.48		4.48	Includes RECO RFP equivalent tranches
20	Price ¢/kWh	11.781	9.582			BGS Auction from (18). (excludes transmission).
21	Transmission	0.854	0			
22	BGS	10.927	9.582			= (20) - (21)
23	Weighted Avg BGS	9.756	1.027		10.783	= (19) / Total Tranches * (22)
24	Weighted Avg Trans	0.763	0.000		0.763	= (19) / Total Tranches * (21)
25	Weighted Avg Total Price				11.545	= (23) + (24)

* Includes Impact of PJM Marginal Losses

Table B Ratio of BGS Unit Costs Less Transmission @ customer to All-In Average Cost @ transmission nodes
 (from Table 15 of Bid Factor Spreadsheet)

NON-DEMAND RATES

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

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>
Summer - all hrs	1.117	1.060		1.088	0.844	0.838
RECO On pk			1.496			
RECO Off pk			0.822			
Constant Blk 1 \$	(6.47) \$	(7.49)				
Constant Blk 2 \$	1.51 \$	0.53				
Constant Blk 3	NA \$	5.95				
Winter - all hrs	1.098	0.971		1.003	0.816	0.811
RECO On pk			1.419			
RECO Off pk			0.778			
Annual - all hrs	1.106	1.001	1.029	1.030	0.824	0.819

DEMAND RATES

includes energy and Ancillary Services, G&T obligations charged separately - adjusted to billing time periods

	<u>SC2 Dem Multiplier</u>	<u>SC2 Dem Constant</u>	PLUS:
Summer - all hrs	1.068	(14.089)	<u>Gen Cost (per kW of Billed Demand/Month)</u>
Winter - all hrs	1.015	(16.485)	<u>SC2 Dem</u>
Annual - including T&G Obl \$	1.035		summer \$ 5.302
			winter \$ 6.141

Table C Determination of Preliminary Retail Rates to be Charged to BGS Customers

All-In Average costs @ Trans node =	\$ 115.45 /MWh*
Less Transmission	\$ (7.62) /MWh**
BGS Cost	\$ 107.83 /MWh

* Price from Table A (which does not include transmission for the Central/Western Division).
** RECO average transmission rate of 8.54 minus Central/West transmission contribution to weighted average rate 0.480/4.480 *\$8.54 per MWh). \$0.92

Retail BGS Rates (excl SUT) (¢/kWh)

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>
<u>Summer</u>							
All kWh (¢/kWh)	12.045	11.430		11.732	9.101	9.036	10.107
Peak kWh (¢/kWh)			16.131				
Off-Peak kWh (¢/kWh)			8.864				
Block1	11.397	10.681					
Block2	12.195	11.483					
Block3	NA	12.025					
Demand Charge (\$/kW)							5.302
<u>Winter</u>							
All kWh (¢/kWh)	11.840	10.470		10.815	8.799	8.745	9.296
Peak kWh (¢/kWh)			15.301				
Off-Peak kWh (¢/kWh)			8.389				
Demand Charge (\$/kW)							6.141

Table D Calculation of Rate Adjustment Factors

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>
Total BGS Revenue (Excl SUT) - in \$1000							
Summer	\$ 40,179	\$ 810	\$ 13	\$ 1,695	\$ 176	\$ 149	\$ 28,251
Winter	\$ 53,243	\$ 1,422	\$ 23	\$ 3,351	\$ 431	\$ 337	\$ 45,687
Total	\$ 93,422	\$ 2,232	\$ 36	\$ 5,046	\$ 607	\$ 486	\$ 73,938
Total							
Summer	\$ 71,273						
Winter	\$ 104,494						
Total	\$ 175,767						

Total Supplier Payments - in \$1000

Eastern Division	<u>Total</u>	<u>Transmission</u>	<u>Net BGS</u>
Summer	\$ 71,528	\$ 4,144	\$ 67,384
Winter	\$ 99,942	\$ 8,288	\$ 91,654
Total	\$ 171,470	\$ 12,432	\$ 159,038

Central/Western Division	<u>Total</u>	<u>Transmission</u>	<u>Net BGS</u>
Summer	\$ 6,730	\$ -	\$ 6,730
Winter	\$ 10,105	\$ -	\$ 10,105
Total	\$ 16,835	\$ -	\$ 16,835

Total RECO FP	<u>Total</u>	<u>Transmission</u>	<u>Net BGS</u>
Summer	\$ 78,258	\$ 4,144	\$ 74,114
Winter	\$ 110,047	\$ 8,288	\$ 101,759
Total	\$ 188,305	\$ 12,432	\$ 175,873

Differences	<u>BGS Revenue</u>	<u>BGS Costs</u>	<u>Difference</u>
Summer	\$ 71,273	\$ 74,114	\$ 2,841
Winter	\$ 104,494	\$ 101,759	\$ (2,735)
Total	\$ 175,767	\$ 175,873	\$ 106

Rate
 Adjustment
 Factors
1.03986
0.97383

Table E Final Retail BGS Rates (¢/kWh)

Rates Excluding SUT:

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>
<u>Summer</u>							
All kWh (¢/kWh)	12.525	11.886		12.200	9.464	9.396	10.510
Peak kWh (¢/kWh)			16.774				
Off-Peak kWh (¢/kWh)			9.217				
Block1	11.851	11.107					
Block2	12.681	11.941					
Block3	NA	12.504					
Demand Charge (\$/kW)							5.513
<u>Winter</u>							
All kWh (¢/kWh)	11.53	10.196		10.532	8.569	8.516	9.053
Peak kWh (¢/kWh)			14.901				
Off-Peak kWh (¢/kWh)			8.169				
Demand Charge (\$/kW)							5.980

Rates Including SUT:

	SUT @		7.0%				
	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>
<u>Summer</u>							
All kWh (¢/kWh)				13.054	10.126	10.054	11.246
Peak kWh (¢/kWh)			17.948				
Off-Peak kWh (¢/kWh)			9.862				
Block1	12.681	11.884					
Block2	13.569	12.777					
Block3	NA	13.379					
Demand Charge (\$/kW)							5.900
<u>Winter</u>							
All kWh (¢/kWh)	12.337	10.910		11.269	9.169	9.112	9.687
Peak kWh (¢/kWh)			15.944				
Off-Peak kWh (¢/kWh)			8.741				
Demand Charge (\$/kW)							6.400

Table F Spreadsheet Error Checking

Total BGS Revenue (Excl SUT) - in \$1000

	<u>SC1</u>	<u>SC5</u>	<u>SC3</u>	<u>SC2 ND</u>	<u>SC4</u>	<u>SC6</u>	<u>SC2 Dem</u>
Summer	\$ 41,780	\$ 843	\$ 14	\$ 1,763	\$ 183	\$ 155	\$ 29,377
Winter	\$ 51,849	\$ 1,385	\$ 22	\$ 3,263	\$ 420	\$ 328	\$ 44,492
Total	\$ 93,629	\$ 2,228	\$ 36	\$ 5,026	\$ 603	\$ 483	\$ 73,869
Total							
Summer	\$ 74,115						
Winter	\$ 101,759						
Total	\$ 175,874						

Supplier Payments - in \$1000

Eastern Division

	<u>Total</u>	<u>Transmission</u>	<u>Net BGS</u>
Summer	\$ 71,528	\$ 4,144	\$ 67,384
Winter	\$ 99,942	\$ 8,288	\$ 91,654
Total	\$ 171,470	\$ 12,432	\$ 159,038

Central/Western Division

	<u>Total</u>	<u>Transmission</u>	<u>Net BGS</u>
Summer	\$ 6,730	\$ -	\$ 6,730
Winter	\$ 10,105	\$ -	\$ 10,105
Total	\$ 16,835	\$ -	\$ 16,835

Total RECO FP

	<u>Total</u>	<u>Transmission</u>	<u>Net BGS</u>
Summer	\$ 78,258	\$ 4,144	\$ 74,114
Winter	\$ 110,047	\$ 8,288	\$ 101,759
Total	\$ 188,305	\$ 12,432	\$ 175,873

Differences

	<u>BGS Revenue</u>	<u>BGS Costs</u>	<u>Difference</u>
Summer	\$ 74,115	\$ 74,114	\$ (1)
Winter	\$ 101,759	\$ 101,759	\$ 0
Total	\$ 175,874	\$ 175,873	\$ (1)