



State of New Jersey  
DIVISION OF RATE COUNSEL  
31 CLINTON STREET, 11<sup>TH</sup> FL  
P. O. Box 46005  
NEWARK, NEW JERSEY 07101

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

STEFANIE A. BRAND  
*Director*

September 20, 2012

**VIA E-MAIL AND REGULAR MAIL**

Kristi Izzo, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Street, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

**Re: Comment on EDCs' Storm Preparedness and Response  
(In the Matter of the Board's Review of Utilities' Response to  
Hurricane Irene)  
BPU Docket No. EO11090543**

Dear Secretary Izzo:

Please accept for filing an original and ten copies of the comments of the Division of Rate Counsel ("Rate Counsel") in connection with the "Performance Review of EDCs<sup>1</sup> in 2011 Major Storms" dated August 9, 2012, prepared for the New Jersey Board of Public Utilities ("Board") by Emergency Preparedness Partnerships ("EPP") (the "EPP 2011 Storm Report"). We enclose one additional copy. Please date stamp the copy as "filed" and return it to us in the enclosed self-addressed, stamped envelope. Thank you for your consideration and attention to this matter.

Rate Counsel would like to thank the Board for the opportunity to comment on the EPP 2011 Storm Report on the EDCs' preparedness for and responses to Hurricane Irene and the October 2011 snowstorm. Rate Counsel has reviewed the EPP 2011 Storm Report and attended

---

<sup>1</sup> Electric Distribution Companies

the Board's September 12 Special Public Meeting. We commend EPP for its thorough Report and recommendations for the EDCs.

Rate Counsel has no specific comments on those recommendations at this time. We look forward to participating in the proceeding concerning the implementation of the EPP 2011 Storm Report's recommendations. Rate Counsel is concerned with the cost-effective and efficient implementation of those recommendations, and avoiding any undue expense that may be passed along to ratepayers.

Rate Counsel requests the right to submit reply comments to any responses received from any of the EDCs on the EPP 2011 Storm Report or on any other filed comments. Rate Counsel also reserves its right to raise issues presented in the EPP 2011 Storm Report in other proceedings, and the above comments shall not operate to prejudice or limit its rights, claims or positions in those proceedings.

Respectfully submitted,

A handwritten signature in black ink that reads "Stefanie A. Brand". The signature is written in a cursive style with a large, prominent 'S' at the beginning.

Stefanie A. Brand  
Director, Division of Rate Counsel

c: Paul Flanagan  
Ami Morita  
Brian Weeks  
Lisa Gurkas