

92DC42  
PO Box 6066  
Newark, DE 19714-6066

302.429.3105 - Telephone  
302.429.3801 - Facsimile  
philip.passanante@pepcoholdings.com

500 N. Wakefield Drive  
Newark, DE 19702

atlanticcityelectric.com

June 24, 2020

**VIA ELECTRONIC MAIL**  
[aida.camcacho@bpu.nj.gov](mailto:aida.camcacho@bpu.nj.gov)  
[board.secretary@bpu.nj.gov](mailto:board.secretary@bpu.nj.gov)

Aida Camacho-Welch  
Secretary of the Board  
Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, New Jersey 08625-0350

**RE:** In the Matter of BPU Investigation of Resource Adequacy Alternatives  
BPU Docket No. EO20030203

Dear Secretary Camacho-Welch:

Atlantic City Electric Company (“ACE” or the “Company”) is in receipt of the New Jersey Board of Public Utilities’ (the “Board” or “BPU”) Request for Written Comments in connection with the above referenced matter, dated March 27, 2020, as supplemented and modified by the Supplemental Notice for Written Comments, dated April 17, 2020. Although ACE reserves the right to comment further and to participate in any technical conferences and public hearings that are called as this proceeding continues, the Company is responding directly to the comments submitted by NRG Energy Inc. (“NRG”).

In its comments, NRG submits that Third Party Suppliers (“TPS”) can make the necessary investments in clean energy to support New Jersey’s Clean Energy Plan. NRG states as follows:

The time is right for the Board to: 1) eliminate [Basic Generation Service or] BGS, 2) remove the utilities from the role of providing supply service, 3) open the New Jersey market fully to retail competition, and 4) provide New Jersey customers with full access to innovative energy options, including renewable resources that the competitive retail market can deliver.

The Company opposes any proposal to eliminate BGS. As stated in the Company’s initial comments, ACE fully supports the BGS procurement process and its potential integration with an FRR mechanism to procure clean capacity to meet New Jersey’s Energy Master Plan goals. For almost 20 years, BGS has provided ratepayers with competitive and stable electric supply rates. The rolling

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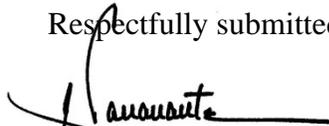
procurement process allows smaller customers to pay current market prices while avoiding short-term market volatility.

The retail structure in New Jersey should continue to maintain the ratepayers' option to stay with BGS or switch to a TPS. A customer who is willing to accept more risk should continue to have the option to choose a TPS that offers a more competitive rate. BGS provides customers the best and most meaningful basis for a TPS price comparison and the development of efficient retail markets.

ACE has no additional comments at this time and reserves the right to comment further and/or to participate in any technical conferences and public hearings that are called in the future.

The Company appreciates the opportunity to provide the benefit of its input and experience to the Board in connection with this important initiative and looks forward to providing further input as this proceeding develops.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Passanante", with a large, stylized flourish that loops back under the name.

Philip J. Passanante  
An Attorney at Law of the  
State of New Jersey