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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

November 1, 2018

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Via Federal Express and Electronic Mail

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

**Re: I/M/O the Petition of Pivotal Utility Holdings, Inc. d/b/a Elizabethtown Gas for the Approval of a Municipal Consent Renewing a Franchise in the Borough of Hopewell, Mercer County
BPU Docket No. GE18040363**

Dear Secretary Camacho-Welch:

On behalf of Elizabethtown Gas Company, please accept for filing, an original and ten copies of these comments in response to the October 25, 2018 comments submitted by the New Jersey Division of Rate Counsel ("Rate Counsel") concerning the above-referenced Petition seeking approval of a municipal consent renewing a franchise in the Borough of Hopewell, Mercer County.

In its comments (at 4) Rate Counsel recommends that any Board order approving the Company's Petition contain the following language:

1. As required by N.J.S.A. 48:3-15, and limited by Ordinance No. 813, the municipal consent to construct, maintain and operate gas lines in the streets and other public places in the Borough is limited to a term not exceeding twenty-five years.
2. This Order shall not be construed as directly or indirectly fixing for any purposes whatsoever any value of any tangible or intangible assets now owned or hereafter to be owned by the Petitioner.
3. This Order shall not affect, nor in any way limit, the exercise of authority of this Board or of this State, in any future Petition or in any proceedings with respect to rates, franchises, service, financing, accounting, capitalization, depreciation, or in any other matter affecting the Petitioner.

CMS
M. Supo, Esq.
A. Moreau, Esq.
S. Peterson
T. O'Sullivan

Honorable Aida Camacho-Welch, Secretary
November 1, 2018

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The Company does not object to the inclusion of this language in a Board order approving this Petition.

Thank you.

Sincerely,

Deborah M. Franco

Deborah M. Franco

Enclosure

cc: Chris Oprysk, BPU Staff
Megan Lupo, BPU Staff
Brian Weeks, Division of Rate Counsel