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November 1, 2021

VIA ELECTRONIC MAIL
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Aida Camacho-Welch
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

RE: In the Matter of the New Jersey Board of Public Utilities' Response to the
COVID-19 Pandemic
BPU Docket No. AO20060471

Dear Secretary Camacho-Welch:

Pursuant to an Order Authorizing Establishment of a Regulatory Asset for Incremental COVID-19 Related Expenses (the "Order"), approved and issued by the New Jersey Board of Public Utilities (the "Board") on July 2, 2020, New Jersey's regulated utilities were authorized to defer COVID-19-related incremental costs and related offsets into a regulatory asset.

As stated in the Order:

the Board **HEREBY AUTHORIZES** each of the State's regulated utilities to create a COVID-19-related regulatory asset by deferring on their books and records the prudently incurred incremental costs related to COVID-19 beginning on March 9, 2020, and through September 30, 2021, or 60 days after Governor Murphy issues an order, declaration, proclamation, or similar announcement that the Public Health Emergency is no longer in effect, or in the absence of such an order, declaration, proclamation or similar announcement, 60 days from the time the Public Health Emergency automatically terminates pursuant to N.J.S.A. 26:13-3(b), whichever is later.

Aida Camacho-Welch

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In compliance with the Order and consistent with its terms, Atlantic City Electric Company (“ACE” or the “Company”) has tracked such prudently incurred incremental costs and includes the most current quarterly report as **Attachment 1**.¹ ACE will continue reporting these relevant costs on a quarterly basis.²

The COVID-19-related incremental costs included in ACE’s report include lost late payment revenues, personal protective equipment, cleaning/sanitizing costs, hospital feeder inspections, and other costs. Additionally, the attached report includes informational data regarding aging of accounts receivable balances, as well as write-off information and number of reconnected customers, and a Cost Savings (Offsets) tab. Like other uncollectible expenses, the COVID-19-related incremental uncollectible expenses will be addressed in the Company’s next Societal Benefits Charge update/reconciliation filing and not included in the COVID-19 regulatory asset. As stated in the Compliance Plan filed by the Company on October 1, 2021, the Company stopped deferring COVID-19 related expenditures to the regulatory asset on September 30, 2021.

Consistent with the Order issued by the Board in connection with *In the Matter of the New Jersey Board of Public Utilities’ Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations*, BPU Docket No. EO20030254, Order dated March 19, 2020, this letter and its attachment(s) are being electronically filed with the Secretary of the Board and the New Jersey Division of Rate Counsel. No paper copies will follow.

Should you have any questions or concerns regarding the above, please do not hesitate to contact me.

Respectfully submitted,



Cynthia L.M. Holland
An Attorney at Law of the
State of New Jersey

Enclosure

cc: Service List

¹ In light of exigencies created by the COVID-19 pandemic, **Attachment 1** is accompanied by a Certification in lieu of an Affidavit of Verification. The individual providing the Certification is a corporate officer of ACE.

² ACE has become aware of a formatting error in prior quarterly reports within this docket causing an omission of some data columns; the error has been corrected here and will be represented in all subsequent reports.

Attachment 1

Atlantic City Electric Company ("ACE")
New Jersey
COVID-19 - Incremental Costs

	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Total
Incremental Costs due to Waiver of Disconnections																				
Note 1 Lost Late Payment Revenues	3,411	11,205	9,974	12,790	17,800	29,373	19,641	9,312	9,927	11,205	15,253	14,386	9,770	11,598	(1,348)	(17,954)	(121)	8,117	(16,950)	157,391
Total Incremental Costs due to Waiver of Disconnections	\$ 3,411	\$ 11,205	\$ 9,974	\$ 12,790	\$ 17,800	\$ 29,373	\$ 19,641	\$ 9,312	\$ 9,927	\$ 11,205	\$ 15,253	\$ 14,386	\$ 9,770	\$ 11,598	\$ (1,348)	\$ (17,954)	\$ (121)	\$ 8,117	\$ (16,950)	\$ 157,391
Note 2 Cost Savings (Offsets)																				
	-	(107,793)	(192,540)	(179,378)	(131,075)	(154,807)	(157,801)	(152,193)	(164,186)	(173,271)	(176,597)	(153,700)	(189,600)	(186,774)	(195,298)	(182,713)	(185,431)	(195,233)	(165,588)	\$ (3,043,978)
Incremental PPE, Cleaning, Other																				
Personal Protective Equipment (PPE)	5,008	182,065	193,493	63,702	41,541	37,920	19,533	30,861	38,867	28,381	25,737	12,924	10,950	20,590	7,638	5,172	3,630	6,968	10,385	745,364
Cleaning	5,870	20,432	30,082	27,187	29,891	21,123	6,857	16,895	23,988	34,613	24,562	16,647	7,249	9,946	29,162	9,003	9,853	7,478	746	331,585
Hospital Feeder Inspections	-	-	39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	39
Health Screening	-	-	29,662	25,183	37,674	6,534	-	-	-	-	-	-	-	-	-	-	-	-	-	99,053
Sequestering - Hotels	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bright Horizons	-	2,591	120,350	76,723	67,379	32,908	(6,586)	15,264	-	-	-	-	-	-	-	-	-	-	-	308,629
Other	614	19,726	26,022	30,681	53,187	29,718	45,849	29,334	63,540	44,428	32,159	17,969	10,850	11,610	15,879	11,896	67,740	76,345	25,223	612,771
Total Incremental PPE, Cleaning, Other	11,492	224,813	399,648	223,476	229,672	128,202	65,653	92,354	126,395	107,423	82,457	47,540	29,049	42,146	52,679	26,071	81,223	90,790	36,354	2,097,441
New Jersey Allocation %	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Total Atlantic City Electric Company ("ACE") New Jersey Allocated	11,492	224,813	399,648	223,476	229,672	128,202	65,653	92,354	126,395	107,423	82,457	47,540	29,049	42,146	52,679	26,071	81,223	90,790	36,354	2,097,441
Total Atlantic City Electric Company ("ACE") New Jersey	\$ 14,903	\$ 128,225	\$ 217,083	\$ 56,888	\$ 116,398	\$ 2,769	\$ (72,507)	\$ (50,527)	\$ (27,863)	\$ (54,643)	\$ (78,886)	\$ (91,774)	\$ (150,782)	\$ (133,029)	\$ (143,967)	\$ (174,597)	\$ (104,329)	\$ (96,326)	\$ (146,184)	\$ (789,146)
Total Cumulative Atlantic City Electric Company ("ACE") New Jersey	\$ 14,903	\$ 143,128	\$ 360,211	\$ 417,100	\$ 533,498	\$ 536,266	\$ 463,759	\$ 413,233	\$ 385,370	\$ 330,727	\$ 251,840	\$ 160,066	\$ 9,284	\$ (123,745)	\$ (267,711)	\$ (442,308)	\$ (546,637)	\$ (642,962)	\$ (789,146)	

Footnotes:

Note 1 Refer to tab "Late Payment" for further support.

Note 2 Refer to tab "Cost Savings (Offsets)" for further support.

General As outlined in ACE's October 1 compliance plan submitted in this docket, the Company stopped deferring COVID-19 related expenditures to the established COVID-19 regulatory asset on September 30, 2021.

Atlantic City Electric Company ("ACE")
New Jersey
COVID-19 - Incremental Late Payment Fees

	Note 2																			
	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Total
Note 1 Baseline Late Payment Fees (Per Rates)	7,108	11,160	9,920	12,790	17,602	19,544	18,851	9,226	9,769	10,994	15,164	12,491	9,580	11,160	9,920	12,790	17,602	19,544	18,851	254,066
Actual Late Payment Fees (GAAP)	3,697	(45)	(54)	-	(198)	(9,830)	(791)	(86)	(159)	(210)	(89)	(1,895)	(190)	(438)	11,268	30,744	17,723	11,427	35,801	96,676
Incremental Lost Late Payment Fees	3,411	11,205	9,974	12,790	17,800	29,373	19,641	9,312	9,927	11,205	15,253	14,386	9,770	11,598	(1,348)	(17,954)	(121)	8,117	(16,950)	157,391

Footnotes:

Note 1 The amounts reflected in Line 1 represent the annual late payment fees included in ACE Y 2018 ER18080925, pro rated monthly based on the NJ monthly base distribution revenues in ACE Y 2018 ER18080925.

Note 2 Please refer to NJ Docket No. AO20060471, pages 3-4 for support regarding dates used for March 2020 pro-ration.

"In view of these extraordinary circumstances and in an effort to minimize the financial impact of COVID-19 on the State's regulated utilities, the Board hereby authorizes each of the State's regulated utilities to create a COVID-19 related regulatory asset by deferring on their books and records the prudently incurred incremental costs related to COVID-19 beginning on March 9, 2020 and through September 30, 2021, or 60 days after Governor Murphy issues an order, declaration, proclamation, or similar announcement that the Public Health Emergency is no longer in effect, or in the absence of such an order, declaration, proclamation or similar announcement, 60 days from the time the Public Health Emergency automatically terminates pursuant to N.J.S.A. 26:13-3(b), whichever is later."

Atlantic City Electric Company ("ACE")
New Jersey
COVID-19 - Offsets

	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Total	
Note 1 Baseline Travel, Meals, Entertainment (Per Rates)	-	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	218,614	3,935,049
Actual Travel Meals, Entertainment	-	110,821	26,074	39,236	87,539	63,807	60,812	66,421	54,428	45,343	42,017	64,914	29,013	31,840	23,316	35,900	33,183	23,381	53,026	891,071	
Incremental COVID-Related Savings	-	107,793	192,540	179,378	131,075	154,807	157,801	152,193	164,186	173,271	176,597	153,700	189,600	186,774	195,298	182,713	185,431	195,233	165,588	3,043,978	

Footnotes:

Note 1 Amounts represent a twelve-month average of ACE and PHISCO allocated travel and meals & entertainment costs from ACE Y 2018 ER18080925 (January 2018 - December 2018).

Atlantic City Electric Company ("ACE")
New Jersey
COVID-19 - Incremental Costs
Other Data

	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21
Receivable Aging Data (A/R \$)																				
0-30 Days	49,746,172	42,512,628	44,860,247	35,298,231	44,889,552	82,333,130	93,950,811	83,654,838	55,606,286	50,559,872	60,406,187	68,273,051	56,905,558	53,581,092	46,484,251	39,345,244	55,841,164	86,255,091	87,387,250	97,427,538
31-60 Days	12,746,794	10,884,831	12,521,984	11,749,117	8,480,397	10,110,831	17,636,353	18,770,863	17,985,726	11,865,624	9,465,393	13,898,479	14,913,497	11,102,718	11,258,516	9,983,072	7,961,430	10,948,656	15,167,067	17,045,652
61-90 Days	6,039,013	7,899,478	7,346,620	7,515,076	7,033,467	4,950,589	6,099,837	9,413,128	12,437,450	11,295,547	6,517,737	5,395,039	6,490,474	8,052,526	6,660,569	7,113,757	5,531,182	4,465,312	6,190,271	9,137,152
91-120 Days	3,186,241	4,459,105	6,503,741	5,605,073	5,773,020	5,157,274	4,190,572	4,753,974	7,073,206	9,976,143	9,032,547	4,914,671	3,773,223	4,888,796	6,532,585	5,605,387	5,788,666	4,421,585	3,822,370	5,107,653
121-150 Days	3,102,139	2,474,353	3,957,333	5,639,327	4,674,436	4,637,380	3,843,944	3,476,938	4,033,694	6,221,735	9,098,402	7,512,109	5,020,029	3,262,170	4,299,271	5,605,395	4,914,073	5,104,281	3,921,730	3,505,168
151+ Days	11,728,896	12,078,606	13,300,578	15,723,938	19,432,334	22,098,755	23,658,751	20,260,275	20,378,461	22,329,091	26,045,559	31,113,532	37,563,058	37,189,735	37,288,442	39,131,163	41,832,703	44,271,106	46,629,417	48,324,889
Total	\$ 86,549,255	\$ 80,309,001	\$ 88,490,503	\$ 81,530,762	\$ 90,283,206	\$ 129,287,959	\$ 149,380,268	\$ 140,330,015	\$ 117,514,824	\$ 112,248,012	\$ 120,565,826	\$ 131,106,881	\$ 124,665,839	\$ 118,077,038	\$ 112,523,633	\$ 106,784,018	\$ 121,869,218	\$ 155,466,031	\$ 163,118,106	\$ 180,548,051
Receivable Aging Data (Total Customers)																				
0-30 Days	286,593	262,687	271,395	277,482	269,352	282,563	281,203	291,839	277,315	286,221	298,231	302,599	293,995	278,812	282,343	292,036	282,496	286,001	444,134	299,607
31-60 Days	48,080	46,755	43,494	40,181	37,490	36,180	46,863	47,020	50,602	43,150	45,838	48,988	47,577	38,474	41,248	43,144	37,813	39,808	38,829	47,839
61-90 Days	22,545	25,864	24,637	22,213	18,049	15,247	15,787	20,838	26,144	25,522	18,267	20,907	16,723	20,283	16,976	19,370	17,977	15,551	14,972	16,876
91-120 Days	15,097	16,270	17,864	16,137	14,393	10,663	9,007	10,836	13,815	17,490	16,830	10,573	11,435	10,254	13,091	11,447	11,633	9,950	9,392	9,410
121-150 Days	12,199	10,995	13,014	13,979	11,827	9,839	7,875	6,610	7,899	10,975	14,100	12,356	8,829	8,712	7,530	9,119	7,893	8,260	6,546	6,772
151+ Days	79,691	82,013	85,163	89,819	94,067	94,986	94,438	84,100	81,884	83,284	87,211	93,251	97,303	96,608	97,859	98,887	100,085	100,488	101,056	101,249
Total	464,205	444,584	455,567	459,811	445,178	449,478	455,173	460,443	457,659	466,642	480,477	488,674	475,862	453,143	459,047	474,003	457,897	460,058	614,929	481,753
Write-Offs Data																				
Actual Write-Off	863,626	440,380	(9,359)	(31,937)	(17,390)	125,595	801,213	3,923,101	169,307	14,236	30,212	13,098	20,748	164,725	172,606	125,160	119,674	118,378	526,869	119,952
Recoveries	(161,618)	(208,462)	(159,300)	(132,771)	(99,683)	(105,571)	(90,662)	(87,441)	(133,298)	(98,779)	(81,835)	(119,094)	(99,908)	(189,163)	(140,141)	(128,479)	(83,414)	(97,725)	(82,259)	(73,128)
Net Write-Offs	702,007	231,918	(168,659)	(164,709)	(117,073)	20,024	710,551	3,835,660	36,010	(84,543)	(51,624)	(105,995)	(79,160)	(24,438)	32,465	(3,319)	36,260	20,652	444,610	46,824
Cumulative Number of Customers Reconnected		32	101	186	213	219														

Footnotes:

Note 1 Total Write-Offs includes generation.

I/M/O the New Jersey Board of Public Utilities Response to the COVID-19 Pandemic for a
Temporary Waiver of Requirements for Certain Non-Essential Obligations
BPU Docket Nos. EO20030254 and AO20060471

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