



**STATE OF NEW JERSEY**  
**Board of Public Utilities**  
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Post Office Box 350  
Trenton, New Jersey 08625-0350  
[www.nj.gov/bpu/](http://www.nj.gov/bpu/)

CUSTOMER ASSISTANCE

IN THE MATTER OF THE PETITION OF ROCKLAND )  
ELECTRIC COMPANY REQUEST FOR AUTHORIZATION ) ORDER OF APPROVAL  
TO IMPLEMENT A PROCEDURE FOR RESIDENTIAL )  
CUSTOMERS TO EMPLOY ELECTRONIC SIGNATURE )  
FOR DEFERRED PAYMENT AGREEMENTS ) DOCKET NO. EC20120755U

**Parties of Record:**

**John L. Carley, Esq.**, for Petitioner, Rockland Electric Company  
**Stefanie A. Brand, Esq., Director**, Division of Rate Counsel

BY THE BOARD:

On September 2, 2020, Rockland Electric Company (“RECO” or “Company”) filed a petition with the Board of Public Utilities (“Board”) requesting Board authorization to implement a procedure that would allow residential customers the option of entering into deferred payment agreements (“DPA”) by way of electronic signature in lieu of a hand signature on a hard copy.

**The Petition**

In its petition, RECO asserts that the electronic DPA program (“EDPA”) allows residential customers to participate in a DPA with RECO and to review and sign their DPAs electronically. The EDPA is a voluntary program that provides residential customers with an additional, electronic option to the Company’s current method of sending customers a written, hard copy DPA for review and signature through standard mail delivery. RECO suggests that the proposed implementation of the alternative arrangement is particularly important in light of the COVID 19 pandemic.

RECO proposes that the participants in EDPA must have a valid email address and agree to the terms of the DPA. Once a customer has verbally agreed to the terms of a DPA and has provided RECO with a valid email address, RECO will send the customer an email the following business day. The email will include the electronic DPA, and invite the customer to review the DPA and provide an electronic signature affirming that the customer understands and agrees to the terms of the DPA. RECO also proposes that the DPA attached to the email sent to the customer will contain the same language as a hard copy of the DPA.

RECO further states that the customer will receive a confirmation email from RECO upon the customer's submission of an electronic signature; the RECO email will confirm that the EDPA process has been completed and reiterate the agreement terms. RECO will store the customer's electronic signature. Per RECO's agreement with customers, those who sign up for EDPA will not receive copies during the agreed defined period following the initial DPA email, which RECO anticipates will be one to three business days. RECO further proposes that, in the event a customer does not sign the DPA within this time period, RECO will mail a hard copy DPA to the address on file.

RECO also proposes to develop reporting capabilities that will track customer adoption of the EDPA process. The reporting will include the number of electronic signatures received, in total and as a percentage of all activated DPAs, the rate that DPA customers submit electronic signatures as compared to the standard mail process, and the agreement performance of EDPA participants. Once the EDPA program is operational, RECO will provide semiannual reports to the Board.

Rate Counsel, via its comments filed on December 7, 2020, indicated it does not object to RECO's proposal, but recommended various conditions be included in any Board order approving the EDPA procedures:

1. RECO shall embed a copy of the DPA into the body of its e-mail to the customer, so the customer may review the DPA itself in the event their electronic communication device cannot open an e-mail attachment.
2. To enhance security, RECO shall use two-step verification of the DPA signature, by sending a text to the customer's phone as well as the e-mail. The customer's confirmation of the text will allow the customer to open and electronically sign the DPA.
3. RECO shall ensure that its EDPA procedures are consistent with the federal "E-SIGN Act," and the New Jersey Uniform Electronic Transactions Act.
4. RECO shall notify its customers of the EDPA procedures in both English and Spanish.
5. RECO shall notify the Board and Rate Counsel if it anticipates any changes in its EDPA procedures.
6. RECO shall notify the Board and Rate Counsel if it learns of any problems implementing its EDPA procedures.
7. The rate impact and prudence of RECO's EDPA procedures and their costs will be reviewed in the Company's next base rate case or other appropriate proceeding.
8. This Order shall not affect nor in any way limit the exercise of the authority of the Board or of this State, in any future petition or in any proceeding with respect to rates, franchises, service, financing, accounting, capitalization, depreciation, or any other matter affecting the Company.

In RECO's December 23, 2020 response to Rate Counsel's comments, RECO agreed to recommendations 1, 3, 5, 6, 7 and 8 without qualification or modification. RECO agreed to recommendation 2, except proposed that its two-step verification process would require a "customer click on a button in the email and has to enter their password to view the EDPA which is in the form of a secure PDF. The password is the customer's zip code." RECO also agreed to recommendation 4, with the specification that it would send customers a semi-annual bill insert in English and Spanish and include a message on the Orange and Rockland/RECO website.

**FINDINGS AND CONCLUSIONS:**

Given the current pandemic, and in light of the fact that the proposed program does not implicate any conflict with, or changes to, BPU rules or RECO's tariff, RECO may implement the program described in the petition and as further agreed upon by RECO via its December 23, 2020 responses to Rate Counsel's comments.

After review of the entire record in this matter, including the comments filed on behalf of Rate Counsel and RECO's responses thereto, the Board **HEREBY FINDS:**

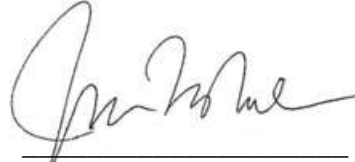
1. On September 2, 2020, RECO filed a petition, to implement an EDPA; and
2. By letter dated December 7, 2020, Rate Counsel advised Board Staff that it did not object to RECO's request for implementation of EDPA; and
3. RECO agreed on December 23, 2020 to Rate Counsel's recommendations, with limited modification, as set forth above.

Therefore, the Board **HEREBY APPROVES** RECO's implementation of the EDPA program consistent with the foregoing. This Order shall not affect nor in any way limit the exercise of the authority of the Board or of this State, in any future Petition or in any proceeding with respect to rates, franchises, service, financing, accounting, capitalization, depreciation, or any other matter affecting the Petitioner.

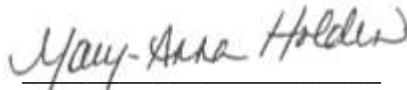
The Order shall become effective on February 6, 2020.

DATED: January 27, 2021

BOARD OF PUBLIC UTILITIES  
BY:



JOSEPH L. FIORDALISO  
PRESIDENT



MARY-ANNA HOLDEN  
COMMISSIONER



DIANNE SOLOMON  
COMMISSIONER

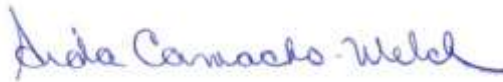


UPENDRA J. CHIVUKULA  
COMMISSIONER



ROBERT M. GORDON  
COMMISSIONER

ATTEST:



AIDA CAMACHO-WELCH  
SECRETARY

**IN THE MATTER OF THE PETITION OF ROCKLAND ELECTRIC COMPANY REQUEST FOR  
AUTHORIZATION TO IMPLEMENT A PROCEDURE FOR RESIDENTIAL CUSTOMERS TO  
EMPLOY ELECTRONIC SIGNATURE FOR DEFERRED PAYMENT AGREEMENTS**

**BPU DOCKET NO. EC20120755U**

**SERVICE LIST**

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