



One South Jersey Place
Atlantic City, NJ 08401

T: 609 561-9000 x4262

ddirocco@sjindustries.com

Dominick DiRocco, Esq.
Vice President, Rates & Regulatory Affairs

July 31, 2024

Electronic Filing

Sherri L. Golden, Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue
P. O. Box 350
Trenton, NJ 08625-0350

**Re: In the Matter of the Petition of Elizabethtown Gas Company to Revise The
Remediation Adjustment Clause Component Of Its Societal Benefits Charge Rate
BPU Docket No. _____**

Dear Secretary Golden:

Enclosed herewith is Elizabethtown Gas Company's Petition to Revise the Remediation Adjustment Clause Component Of Its Societal Benefits Charge Rate, which has been filed electronically today utilizing the Board's e-filing Program. In accordance with the New Jersey Board of Public Utilities ("BPU") March 19, 2020 and June 10, 2020 Orders issued in BPU Docket No. EO20030254, hard copies are not being submitted at this time, but can be provided at a later time, if needed.

Please do not hesitate to contact me with any questions you may have. Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Dominick DiRocco".

Dominick DiRocco

DD:gla

Enclosures

cc: Service list (electronically)

**IN THE MATTER OF THE PETITION OF ELIZABETHTOWN GAS COMPANY
TO REVISE THE REMEDIATION ADJUSTMENT CLAUSE COMPONENT
OF ITS SOCIETAL BENEFITS CHARGE RATE
BPU DOCKET NO.**

SERVICE LIST

Steven Cook
Elizabethtown Gas Company
520 Green Lane
Union, NJ 07083
scook@sjindustries.com

Thomas Kaufmann
Elizabethtown Gas Company
520 Green Lane
Union, NJ 07083
tkaufmann@sjindustries.com

Susan Potanovich
Elizabethtown Gas Company
520 Green Lane
Union, NJ 07083
spotanovich@sjindustries.com

Gary Akmentins
Elizabethtown Gas Company
One South Jersey Place
Atlantic City, NJ 08401
gakmentins@sjindustries.com

Dominick DiRocco, Esq.
SJI Utilities, Inc.
One South Jersey Place
Atlantic City, NJ 08401
ddirocco@sjindustries.com

Cindy Capozzoli
SJI Utilities, Inc.
One South Jersey Place
Atlantic City, NJ 08401
ccapozzoli@sjindustries.com

Sheree Kelly
SJI Utilities, Inc.
520 Green Lane
Union, NJ 07083
skelly@sjindustries.com

Andrew McNally
SJI Utilities, Inc.
520 Green Lane
Union, NJ 07083
amcnally@sjindustries.com

Jennifer Weitz
SJI Utilities, Inc.
520 Green Lane
Union, NJ 07083
jweitz@sjindustries.com

Carolyn A. Jacobs
SJI Utilities, Inc.
One South Jersey Place
Atlantic City, NJ 08401
cjacobs@sjindustries.com

Stacy Peterson
Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
Stacy.Peterson@bpu.nj.gov

Mike Kammer
Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
Mike.Kammer@bpu.nj.gov

Malike Cummings
Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
Malike.Cummings@bpu.nj.gov

Heather Weisband, Esq.
Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350
Heather.Weisband@bpu.nj.gov

Maura Caroselli, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625
mcaroselli@rpa.nj.gov

Brian Lipman, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625
blipman@rpa.nj.gov

Megan Lupo, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625
mlupo@rpa.nj.gov

Carlena Morrison, Paralegal.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625
cmorrison@rpa.nj.gov

Mamie W. Purnell, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
Post Office Box 003
Trenton, NJ 08625
mpurnell@rpa.nj.gov

Terel Klein, DAG
Dept. of Law & Public Safety
Richard J. Hughes Justice Complex
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton, NJ 08625
Terel.Klein@law.njoag.gov

Pamela Owen, DAG
Dept. of Law & Public Safety
Richard J. Hughes Justice Complex
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton, NJ 08625
Pamela.Owen@law.njoag.gov

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

IN THE MATTER OF THE PETITION OF :
ELIZABETHTOWN GAS COMPANY :
TO REVISE THE REMEDIATION : BPU DOCKET NO. _____
ADJUSTMENT CLAUSE COMPONENT OF :
ITS SOCIETAL BENEFITS CHARGE RATE :

CASE SUMMARY, VERIFIED PETITION, TESTIMONY AND SCHEDULES

July 31, 2024

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

-----X
In The Matter Of The Petition Of Elizabethtown :
Gas Company To Revise The Remediation : **Docket No. GR**
Adjustment Clause Component Of Its Societal :
Benefits Charge Rate : **CASE SUMMARY**
-----X

This Petition presents the request of Elizabethtown Gas Company (“Petitioner”) that the Board of Public Utilities (“Board”) accept the filing of Petitioner’s revised Remediation Adjustment Clause (“RAC”) component of the Societal Benefits Charge (“SBC”) rate. The Petitioner’s proposed RAC rate results in an increase from its current rate of \$0.0225 per therm, inclusive of taxes, to a rate of \$0.0303 per therm, inclusive of taxes, effective October 1, 2024. The proposed rate changes will increase the monthly bill of a residential heating customer using 100 therms by \$0.78 from \$138.93 to \$139.71, an increase of 0.6% based on rates in effect July 1, 2024.

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

-----X
In The Matter Of The Petition Of Elizabethtown :
Gas Company To Revise The Remediation : **Docket No. GR**
Adjustment Clause Component Of Its Societal :
Benefits Charge Rate : **VERIFIED PETITION**
-----X

To The Honorable Board of Public Utilities:

Petitioner, Elizabethtown Gas Company (“Petitioner” or “Company”), a public utility corporation duly organized under the laws of the State of New Jersey subject to the jurisdiction of the Board of Public Utilities (“BPU” or “Board”), respectfully states:

1. Petitioner’s principal business office is located at 520 Green Lane, Union, NJ, 07083.

2. Petitioner is engaged in the business of transmission and distribution of natural and mixed gas to approximately 316,000 customers within its service territory located principally in Hunterdon, Mercer, Middlesex, Morris, Sussex, Union and Warren Counties.

3. The purpose of this filing is to revise the rate associated with Petitioner's Remediation Adjustment Clause (“RAC”) component of the Societal Benefits Charge (“SBC”) and to reconcile costs and cost recoveries associated with the clause for the period in which the clause is applicable. All rates quoted in this Petition are inclusive of taxes.

4. Annexed hereto and made a part of this Petition is Exhibit P-1, which Petitioner suggests be marked as indicated. Exhibit P-1 is the testimony and supporting schedules of Thomas Kaufmann, Manager of Rates and Tariffs for Petitioner. The following schedules supporting the tariff sheets and the derivation of the proposed RAC rate are attached and referred to in Exhibit P-1:

- (a) Tariff Schedule TK-1;

(b) Forecast Schedule TK-1; and

(c) RAC Schedule TK-1 through RAC Schedule TK-6.

5. Also annexed hereto and made a part of this Petition is Exhibit P-2, which Petitioner suggests be marked as indicated. Exhibit P-2 is the testimony of Steven L. Cook, Environmental Specialist Lead for Petitioner. The following schedules are included with Mr. Cook's testimony:

(a) Schedule SLC-1 through Schedule SLC-2.

6. In the Board's Order dated September 22, 2011 in BPU Docket Nos. GR07080645, GR08090836 and GR09080651 concerning the reconciliation of Petitioner's SBC for the 2006-2007, 2007-2008 and 2008-2009 periods, it was agreed that Petitioner would provide information responsive to certain minimum filing requirements ("MFRs") as part of future filings to reconcile its RAC rate. An Index to the MFRs is included with this Petition and attached hereto as Exhibit A. As noted in the MFR Index, some of the MFR information being provided by the Company is deemed confidential and as such will be redacted and provided to those parties executing a mutually acceptable confidentiality agreement entered into subsequent to the filing of this Petition.

The RAC Component of the SBC Rate

7. Petitioner's current RAC rate, a component of the SBC, of \$0.0225 per therm was approved on a final basis by the Board's Order dated January 31, 2024 in BPU Docket No. GR23070477, effective February 15, 2024.

8. In the current proceeding, Petitioner has proposed a new RAC rate of \$0.0303 per therm. Petitioner's RAC-related costs reflected in the calculation of the RAC rate are based on data for the period July 1, 2023 through June 30, 2024 plus prior period true-up amounts. In this year's filing, the rate is designed to recover approximately \$15.3 million in RAC-related costs as reflected on RAC Schedule TK-1 Line 4.

9. In accordance with Petitioner's tariff, the RAC component is determined by first

calculating the sum of (a) one seventh of Petitioner's net deferred remediation costs incurred during the twelve months ended June 30th, for the periods ending 2024, 2023, 2022, 2021, 2020, 2019, and 2018, less the deferred tax benefit, as shown on RAC Schedule TK-2 pages 1 through 7. The calculation of the proposed rate of \$0.0303 per therm is described and detailed in Mr. Kaufmann's testimony. Interest accrued on RAC-related costs is calculated in the manner approved by the Board's Order dated March 30, 2001 in BPU Docket No. GX99030121, *et al.*

10. As discussed in the testimony of Mr. Cook, Petitioner owns, owned and/or operated six former Manufactured Gas Plant ("MGP") sites located at Erie Street in Elizabeth, South Street in Elizabeth, Rahway, Perth Amboy, Flemington and Newton. Petitioner's remediation costs are incurred to enable Petitioner to comply with applicable laws and regulations in a prudent manner.

11. Under the RAC, the total annual charge to Petitioner's customers during any Recovery Year may not exceed five percent (5%) of Petitioner's total revenues from sales, transportation and storage services during the annual July 1 through June 30 period. As set forth in Exhibit P-1, the application of this cap calculation does not require a reduction in the remediation costs recoverable during the twelve month period ending September 30, 2025.

12. Under the RAC, Petitioner is required to project its anticipated remediation costs for the July 1, 2024 through June 30, 2025 remediation year. As discussed by Mr. Cook, Petitioner estimates that it will incur approximately \$16.6 million of net deferred remediation costs during that period. However, this is only an estimate. Petitioner's actual costs will be determined by its need to comply with applicable environmental laws and regulations in a prudent manner.

Overall Impact

13. The overall impact of Petitioner’s proposed rate change in this proceeding is an increase in the monthly bill of a residential heating customer using 100 therms of \$0.78, from \$138.93 to \$139.71, or an increase of 0.6% as compared to the currently effective rates as of July 1, 2024.

Miscellaneous

14. Petitioner is serving notice and a copy of this Petition, together with a copy of the exhibits and schedules annexed hereto on the Director, New Jersey Division of Rate Counsel, via electronic mail in lieu of providing hard copies. In accordance with the Board’s Orders dated March 19, 2020 and June 10, 2020 in BPU Docket No. EO20030254, hard copies are not being submitted at this time, but can be provided at a later time, if needed.

15. Similarly, Petitioner is also serving this notice and a copy of this Petition on the Department of Law and Public Safety via electronic mail in lieu of submitting hard copies, but hard copies can be provided at a later time, if needed.

WHEREFORE, Petitioner respectfully requests that the Board (1) accept Petitioner’s filing, (2) allow the proposed RAC rate and associated proposal to become effective October 1, 2024; (3) grant any waivers of Petitioner’s tariff or Board regulations as may be required, and (4) grant such other relief as the Board may deem just and proper.

Respectfully submitted,



Dominick DiRocco
Vice President, Rates & Regulatory Affairs
SJI Utilities, Inc.

Date: July 31, 2024

Communications addressed to the Petitioner
in this case are to be sent to:

Dominick DiRocco
Vice President, Rates & Regulatory Affairs
SJI Utilities, Inc.
1 South Jersey Place
Atlantic City, New Jersey 08401
Tel. No. (609) 561-9000 x4262
ddirocco@sjindustries.com

Sheree Kelly
Regulatory Affairs Counsel
SJI Utilities, Inc.
520 Green Lane
Union, New Jersey 07083
Tel. No. (908) 536-0877
skelly@sjindustries.com

Cindy Capozzoli
Director, Rates
SJI Utilities, Inc.
1 South Jersey Place
Atlantic City, New Jersey 08401
Tel. No. (609) 635-7026
ccapozzoli@sjindustries.com

VERIFICATION

I, Sheree L. Kelly, Esq., of full age, being duly sworn according to law, upon my oath, depose and say:

1. I am Regulatory Affairs Counsel – Principal of SJI Utilities, Inc., the parent company to Elizabethtown Gas Company (“Company”) and I am authorized to make this verification on behalf of the Company.
2. I have reviewed the within petition and the information contained therein is true according to the best of my knowledge, information and belief.

Sheree L. Kelly

Sheree L. Kelly, Esq.
Regulatory Affairs Counsel - Principal

Sworn to and subscribed
before me this 31st day
of July 2024



Carolyn A. Jacobs
NOTARY PUBLIC
State of New Jersey
My Commission Expires
October 28, 2028



**ELIZABETHTOWN GAS COMPANY
REMEDATION ADJUSTMENT CLAUSE (“RAC”)
MINIMUM FILING REQUIREMENTS (MFR) INDEX**

Minimum Filing Requirements	Schedule
1. Please provide a vendor listing for the prior RAC period that contains information concerning vendor expenditures by MGP site, also showing a description of the services provided and the amount of each vendor invoice. The vendor list should include the monthly actual expenditures for the twelve month RAC period.	SLC-2
2. Identify the three MGP sites with the highest level of expenditures during the prior RAC period. For each identified site, provide a copy of the latest work plan, remediation report, or major work product submitted to the NJDEP. The copies should include the narrative portion of the report or work plan but need not include the technical supporting workpapers, charts and tables.	SLC-2
3. For each of the same three MGP sites, provide all correspondence between the Company and the NJDEP concerning submissions for the site, reply comments, and other major items which have a material impact on remediation activities and associated costs incurred by the Company. The correspondence should span the twelve months of the most recent RAC period.	SLC-2
4. For each of the same three MGP sites, provide expense documentation for any contractor or supplier whose invoices for the RAC period exceed \$250,000 in aggregate. The expense documentation should include descriptions of services rendered, applicable invoices, and any tracking of invoiced charges vs. budgets. The expense detail need not include expense reports or time sheets, but it should include supporting documentation for any subcontractor and third party expenses totaling \$100,000 or more for the period.	SLC-2 Confidential
5. For each of the same three MGP sites, provide a narrative description and organization chart for that site, showing the vendors and project control structure for the remediation effort. The response should show what entities supervise all significant contractors and subcontractors and which Company personnel are involved in site and remediation supervision and control.	SLC-2
6. Provide a detailed narrative describing Company activities and any reimbursements related to insurance claims or potentially responsible parties’ liabilities for all of the Company’s MGP sites. The narrative, with supporting documentation, should cover the prior RAC period. In addition, the Company should provide a listing of all insurance reimbursements received from each insurance company through the end of the year covered by the filing, but need not disclose any insurance company’s identity.	SLC-2
7. Provide copies of any RAC audit reports or related materials prepared by the Board’s Audit Staff, FERC, or the Company’s internal or external auditors during the previous twelve months. To the degree applicable, please also provide any materials prepared in response to the audits or in compliance with any audit findings.	SLC-2 Confidential
8. Provide a narrative concerning all material events, whether related to NJDEP mandates or not, which could have an impact on the Company’s ultimate MGP remediation liability, with claimed confidential information provided pursuant to a confidentiality agreement. The narrative should encompass all sites, whether or not active remediation efforts on the site are under way.	SLC-2
9. Provide schedules and supporting workpapers and documents, which show the reconciliation of the prior period RAC expenditures and recoveries as well	RAC TK-2

**ELIZABETHTOWN GAS COMPANY
REMEDATION ADJUSTMENT CLAUSE (“RAC”)
MINIMUM FILING REQUIREMENTS (MFR) INDEX**

Minimum Filing Requirements	Schedule
as the derivation of the deferred tax credit and the interest accrual on any unamortized balances.	
10. Provide the Company’s bid evaluation studies, reports, workpapers or other material related to the two largest MGP remediation contracts awarded during the previous RAC period. The response should include the criteria utilized for bid evaluation and the comparisons between the terms and conditions offered by the competitive bidders.	SLC-2 Confidential
11. Provide documentation relating to the two largest supplemental contract amendments authorized by the Company during their previous RAC period. The response should provide the contractor’s request for supplemental funding, the reasons cited for the request, and the Company’s evaluation and action taken concerning the request.	SLC-2 Confidential
12. Provide documentation relating to any instances during the previous RAC period where the Company sought to modify, change, or eliminate the NJDEP site remediation requirements for any of its MGP sites. The response should provide copies of any such Company requests, the NJDEP responses, and the ultimate outcome concerning the requests.	SLC-2
13. Provide a calculation of the carrying costs that the Company seeks to recover in its filing, including workpapers and supporting documentation.	RAC TK-3
14. The Company currently provides a schedule that summarizes the expenditures incurred by major cost category by site on a quarterly basis. These data will be reported with its annual filing.	SLC-2
15. For each of the Company’s MGP sites, provide a schedule showing the status of the remediation effort and estimated dates for the completion of remaining milestones, along with a discussion of major remediation problems. The parties understand that the timeframes to complete the remediation efforts are subject to a great deal of uncertainty due to factors beyond the Company’s control.	SLC-2
16. Provide an update concerning the status of discussions with the NJDEP concerning its NRD initiative as well as any other NRD-related activities, with claimed confidential information provided pursuant to a confidentiality agreement. Such update will include information about NRD-related expenditures during the prior RAC period and related documentation, as well as total NRD-related expenses deferred to date.	SLC-2
17. Provide information about unreasonable delays in remediation efforts caused by the inability to obtain requisite approvals, clearances or other rights from the NJDEP, local authorities or property owners, or other circumstances that are unduly impeding remediation efforts. The Company will address issues that are outside of the ordinary experience for these matters.	SLC-2
18. Provide details concerning all remediation related charges to the Company from or through the Company’s parent, SJI Utilities, and its affiliates for the past RAC period. The response should show amounts by month, by entity, and should describe the nature of services provided.	SLC-2

NOTICE OF PUBLIC HEARINGS

**IN THE MATTER OF THE PETITION OF ELIZABETHTOWN GAS COMPANY
TO REVISE THE REMEDIATION ADJUSTMENT CLAUSE COMPONENT
OF ITS SOCIETAL BENEFITS CHARGE RATE
BPU Docket No. _____**

PLEASE TAKE NOTICE that on July 31, 2024, Elizabethtown Gas Company (“Company” or “Elizabethtown”) filed a Petition with the New Jersey Board of Public Utilities (“BPU” or “Board”) in BPU Docket No. GR_____ to revise the Remediation Adjustment Clause (“RAC”) component of its Societal Benefits Charge (“SBC”) rate. The Company’s SBC rate consists of four components: (1) the New Jersey Clean Energy Program (“CEP”) component which recovers the costs of statewide energy efficiency and renewable energy programs mandated by the Board, (2) the RAC, which allows the Company to recover certain environmental remediation costs, and two statewide low-income energy bill payment assistance programs: (3) the Universal Service Fund; and (4) the Lifeline program. Specifically, the Company has petitioned the Board to establish a RAC rate of \$0.0303 per therm, inclusive of applicable taxes, to be effective October 1, 2024. A comparison of the Company’s current rate to the proposed rate is as follows:

	<u>Current Rate</u>	<u>Proposed Rate</u>
	<u>Per Therm</u>	<u>Per Therm</u>
RAC	\$0.0225	\$0.0303

The effect of the Company's filing to the monthly bill of a typical residential heating customer using an average of 100 therms, as compared to the Company’s rates in effect as of July 1, 2024, is illustrated below:

	<u>Present</u>	<u>Proposed</u>	<u>Change in</u>	<u>Percent Change</u>
<u>Consumption in</u>	<u>Monthly Bill</u>	<u>Monthly Bill</u>	<u>Monthly Bill</u>	
<u>Therms</u>	<u>July 1, 2024</u>	<u>October 1, 2024</u>		
100	\$138.93	\$139.71	\$0.78	0.6%

The Board has the statutory authority to establish Elizabethtown's rates at levels it finds just and reasonable as well as to establish the effective date of such rates. Therefore, the BPU may establish the rates at levels and/or an effective date other than those proposed by Elizabethtown.

PLEASE TAKE FURTHER NOTICE that virtual public hearings will be conducted on the following date and times so that members of the public may present their views on the Company’s Petition.

VIRTUAL PUBLIC HEARINGS
 DATE:
 HEARING TIMES: 4:30 p.m. and 5:30 p.m.

LOCATION: Microsoft Teams Meeting
 Meeting ID:
 Passcode:

(Access the Microsoft Teams App or Microsoft Teams on the web. On the left side of the screen, click the “Teams” icon. Select “Join ”and enter the Meeting ID and Passcode when prompted.)

or

Dial In: 866-984-3163

Conference ID: _____ followed by the # sign

A copy of this Notice is being served upon the clerk, executive or administrator of each municipality and county within the Company's service territory. A copy of the Petition can be viewed on the Company's website at www.elizabethtowngas.com under Regulatory Information. The Petition is also available to review online through the Board's website, <https://publicaccess.bpu.state.nj.us/> where you can search by the above-captioned docket number. The Petition and Board file may also be reviewed at the Board's office at 44 South Clinton Avenue, 1st Floor, Trenton, New Jersey, with an appointment. To make an appointment, please call (609) 913-6298.

Representatives from the Company, Board Staff and the New Jersey Division of Rate Counsel will participate in the virtual public hearings. Members of the public are invited to participate by utilizing the Microsoft Teams Meeting link or the Dial-In Number and Conference ID set forth above to express their views on this Petition. All comments will become part of the final record to be considered by the Board. To encourage full participation in this opportunity for public comment, please submit any requests for accommodations, such as interpreters or listening assistance, 48 hours prior to the above hearings to the Board Secretary at board.secretary@bpu.nj.gov.

The Board is also accepting written and electronic comments. Comments may be submitted directly to the specific docket number listed above using the "Post Comments" button on the Board's Public Document Search tool at <https://publicaccess.bpu.state.nj.us/>.

Comments are considered public documents for purposes of the State's Open Public Records Act. Only documents that are intended to be public should be submitted using the "Post Comments" button on the Board's Public Document Search tool. Any confidential information should be submitted in accordance with the procedures set forth in N.J.A.C. 14:1-12.3. In addition to hard copy submissions, confidential information may also be filed electronically via the Board's e-filing system or by email to the Secretary of the Board. Please include "Confidential Information" in the subject line of any email. Instructions for confidential e-filing are found on the Board's webpage at <https://www.nj.gov/bpu/agenda/efiling/>.

Emailed and/or written comments may also be submitted to:

Secretary of the Board
44 South Clinton Ave., 1st Floor
PO Box 350
Trenton, NJ 08625-0350
Phone: 609-913-6241
Email: board.secretary@bpu.nj.gov

Elizabethtown Gas Company

**IN THE MATTER OF THE PETITION
OF ELIZABETHTOWN GAS COMPANY TO REVISE THE
REMEDICATION ADJUSTMENT CLAUSE COMPONENT
OF ITS SOCIETAL BENEFITS CHARGE RATE**

BPU DOCKET NO. _____

DIRECT TESTIMONY

OF

THOMAS KAUFMANN

**On Behalf Of
 Elizabethtown Gas Company**

Exhibit P-1

July 31, 2024

**ELIZABETHTOWN GAS COMPANY
DIRECT TESTIMONY OF
THOMAS KAUFMANN**

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 **A.** My name is Thomas Kaufmann. My business address is 520 Green Lane, Union, New
4 Jersey 07083.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 **A.** I am employed by Elizabethtown Gas Company (“Elizabethtown” or “Company”) as
7 Manager of Rates and Tariffs.

8 **Q. WHAT IS THE SCOPE OF YOUR DUTIES AT ELIZABETHTOWN?**

9 **A.** I am responsible for designing and developing rates and rate schedules for regulatory
10 filings with the New Jersey Board of Public Utilities (“BPU” or “Board”) and internal
11 management purposes. I also oversee daily rate department functions, including tariff
12 administration, monthly parity pricing, competitive analyses and preparation of
13 management reports.

14 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL QUALIFICATIONS AND
15 BUSINESS EXPERIENCE.**

16 **A.** In June 1977, I graduated from Rutgers University, Newark, N.J. with a Bachelor of
17 Arts degree in Business Administration, majoring in accounting and economics. In
18 July 1979, I graduated from Fairleigh Dickinson University, Madison, N.J. with a
19 Master of Business Administration, majoring in finance.

20 My professional responsibilities have encompassed financial analysis,
21 accounting, planning, and pricing in manufacturing and energy services companies in

1 both regulated and unregulated industries. In 1977, I was employed by Allied
2 Chemical Corp. as a staff accountant. In 1980, I was employed by Celanese Corp. as
3 a financial analyst. In 1981, I was employed by Suburban Propane as a Strategic
4 Planning Analyst, promoted to Manager of Rates and Pricing in 1986 and to Director
5 of Acquisitions and Business Analysis in 1990. In 1993, I was employed by
6 Concurrent Computer as a Manager, Pricing Administration. In 1996, I joined NUI
7 Corporation (“NUI”) as a Rate Analyst, was promoted to Manager of Regulatory
8 Support in August 1997, Manager of Regulatory Affairs in February 1998 and named
9 Manager of Rates and Tariffs in July 1998. NUI was acquired by AGL Resources Inc.
10 (“AGL”) in November 2004. AGL was acquired by Southern Company in July 2016.
11 South Jersey Industries, Inc. acquired Elizabethtown from Southern Company in July
12 2018.

13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

14 **A.** I will discuss the derivation of the Remediation Adjustment Clause (“RAC”)
15 component of the Societal Benefits Charge (“SBC”) rate proposed to be assessed to the
16 Company’s customer classes subject to the RAC for the period October 1, 2024 through
17 September 30, 2025 (“2025 Recovery Year”).

18 **Q. WHAT EFFECTIVE DATE IS THE COMPANY PROPOSING FOR THE RAC**
19 **RATE?**

20 **A.** The Company is proposing that the proposed RAC rate take effect on October 1, 2024.

21 **Q. WHEN WAS THE COMPANY’S RAC RATE LAST REVISED?**

22 **A.** This rate was last revised effective February 15, 2024 by the Board’s Order dated
23 January 31, 2024 in BPU Docket No. GR23070477 (“January 31 Order”). The January

1 31 Order resolved the Company’s 2023 annual RAC reconciliation filing and approved
2 the Company’s RAC rate of \$0.0225 per therm, inclusive of taxes, on a final basis.

3 **Q. DOES YOUR TESTIMONY INCLUDE ANY ILLUSTRATIVE SCHEDULES?**

4 **A.** Yes. My testimony includes schedules and proposed tariff sheets that were prepared
5 under my direction and supervision. As explained in the Petition, some of these
6 schedules contain information responsive to the Minimum Filing Requirements
7 (“MFRs”) approved by the Board’s Order dated September 22, 2011 in BPU Docket
8 Nos. GR07080645, GR08090836 and GR09080651. An Index to the MFRs is included
9 with the Petition as Exhibit A. The schedules are as follows:

10 (1) **Tariff Schedule TK-1** consists of revised tariff sheets in redlined and clean
11 form which reflect the proposed RAC rate.

12 (2) **Forecast Schedule TK-1** provides the level of forecast sales and services for
13 the 2025 Recovery Year, which was utilized in the calculation of the RAC rate.

14 (3) **RAC Schedule TK-1** sets forth the calculation of the proposed RAC rate for
15 the 2025 Recovery Year.

16 (4) **RAC Schedule TK-2** consists of seven pages and presents the calculation of
17 the recoverable portion of remediation costs for the twelve months ended June
18 30, 2024, 2023, 2022, 2021, 2020, 2019, and 2018, respectively, to be recovered
19 through the RAC rate.

20 (5) **RAC Schedule TK-3** sets forth the calculation of carrying costs applied to the
21 RAC consistent with the Board’s Order dated March 30, 2001 in BPU Docket
22 No. GX99030121, *et al.*

1 **(6) RAC Schedule TK-4** sets forth the prior year reconciliation of costs to be
2 recovered versus the actual recoveries for the twelve months ended June 30,
3 2024, which is included in the calculation of the RAC rate.

4 **(7) RAC Schedule TK-5** sets forth the calculation to determine whether
5 Elizabethtown’s proposed recovery of remediation costs exceeds 5% of the
6 Company’s total revenues from sales, transportation and storage services for
7 the twelve months ended June 30, 2024.

8 **(8) RAC Schedule TK-6** sets forth the actual RAC recoveries for the twelve
9 months ended June 30, 2024.

10 **II. REVENUE FORECAST**

11 **Q. WHAT IS THE METHODOLOGY USED TO PROJECT FIRM SALES AND**
12 **SERVICES FOR THE 2025 RECOVERY YEAR IN ORDER TO DERIVE THE**
13 **COMPANY’S CALCULATED RAC RATE?**

14 **A.** The methodology used is the same as that used in the demand forecast which supports
15 Elizabethtown’s Basic Gas Supply Service (“BGSS”) rates. A summary of the forecast
16 of normalized sales and services is set forth on Forecast Schedule TK-1.

17 **Q. WHAT PERIOD IS COVERED BY THE DEMAND FORECAST?**

18 **A.** The gas sales demand forecast for the RAC as set forth on Forecast Schedule TK-1 is
19 for the 2025 Recovery Year.

20 **Q. WERE THE COMPANY'S FIRM AND NON-FIRM SALES AND**
21 **TRANSPORTATION REVENUE FORECASTS PREPARED USING THE**
22 **SAME METHODOLOGY USED BY THE COMPANY IN PREPARING LAST**
23 **YEAR'S REVENUE FORECASTS?**

1 **A.** Yes. The Company continues to use regression equations based on actual historical
2 sales demand data as well as any known customer changes to develop the forecast
3 demand.

4 **III. THE RAC RATE COMPONENT OF THE SBC**

5 **Q. PLEASE DESCRIBE THE SBC.**

6 **A.** The SBC currently consists of the following components: (1) the RAC rate, (2) the
7 Clean Energy Program (“CEP”) rate, (3) the Universal Service Fund (“USF”) rate, and
8 (4) the Lifeline rate.

9 **Q. WHAT CUSTOMERS ARE ASSESSED THE SBC?**

10 **A.** The SBC is applicable to all customers, with the exception of those exempt from the
11 charge pursuant to the Long-Term Capacity Agreement Pilot Program legislation
12 enacted on January 28, 2011.

13 **Q. IS THE COMPANY PROPOSING ANY CHANGES TO THE CEP, USF OR**
14 **LIFELINE RATES IN THIS FILING?**

15 **A.** No, the reconciliations of those rates are addressed in separate filings.

16 **Q. WHAT RAC RATE HAS THE COMPANY PROPOSED IN THIS FILING?**

17 **A.** Elizabethtown has proposed a RAC rate of \$0.0303 per therm, inclusive of taxes, which
18 is an increase of \$0.0078 per therm from its currently effective RAC rate of \$0.0225
19 per therm, inclusive of taxes.

20 **Q. PLEASE EXPLAIN HOW THIS RAC RATE WAS CALCULATED.**

21 **A.** The RAC rate is calculated on RAC Schedule TK-1 by determining the sum of one
22 seventh of the Company’s net deferred remediation costs, less the deferred tax benefit
23 associated with the unamortized balances of these costs during each of the remediation
24 years ended June 30, 2024, 2023, 2022, 2021, 2020, 2019, and 2018 respectively, as

1 shown on Pages 1-7 of RAC Schedule TK-2, and adjusted for applicable carrying costs
2 as shown on RAC Schedule TK-3, and the prior year's over or under-recovery balance
3 as shown on RAC Schedule TK-4. The net total represents the amount to be recovered
4 in the 2025 Recovery Year through the RAC component, as shown on RAC Schedule
5 TK-1. This total is then divided by the volumes projected for the 2025 Recovery Year
6 for the service classifications and customers subject to the SBC as shown on Forecast
7 Schedule TK-1, with the resulting quotient adjusted for applicable taxes to derive the
8 proposed RAC rate of \$0.0303 per therm.

9 **Q. WHAT IS THE LEVEL OF DEFERRED REMEDIATION COSTS FOR THE**
10 **YEAR ENDED JUNE 30, 2024 THAT IS ELIGIBLE FOR RECOVERY?**

11 **A.** The level of total deferred remediation costs for the twelve- month period ended June
12 30, 2024 is \$12,492,448 as discussed in the testimony and supporting schedules of
13 Company witness Steven L. Cook. The amount is then adjusted for third party
14 recoveries and deferred insurance litigation costs as shown on RAC Schedule TK-2,
15 page 1 of 7. The resulting net amortizable amount is divided by seven as set forth on
16 line 5 on RAC Schedule TK-2, page 1 of 7. This amount is further adjusted for a
17 deferred tax amount described below, yielding \$1,616,428 for the current remediation
18 year. This is the same methodology applied to the prior years that are being amortized.

19 **Q. WHAT ARE THE CURRENT REMEDIATION COSTS ELIGIBLE FOR**
20 **RECOVERY?**

21 **A.** The table below presents the eligible recoverable costs by year after adjusting for a
22 deferred tax benefit as shown on RAC Schedule TK-2, pages 1 through 7, as well as
23 each year's filing status:

24

<u>Year</u>	<u>Eligible Amount</u>	<u>Filing Status / Date Approved</u>
2024	\$1,616,428	Included in this Petition; pending BPU approval
2023	\$1,123,248	January 31, 2024 in BPU Docket No. GR23070477
2022	\$855,425	January 25, 2023 in BPU Docket No. GR22070465
2021	\$582,426	November 17, 2021 (provisional) and June 8, 2022 (final) in BPU Docket No. GR21071018
2020	(\$623,724)	March 24, 2021 in BPU Docket No. GR20070502
2019	(\$465,475)	March 9, 2020 in BPU Docket No. GR19070871
2018	\$3,803,842	May 8, 2019 in BPU Docket No. GR18080885
Total	<u>\$6,892,170</u>	

1

2 **Q. HOW IS THE DEFERRED TAX BENEFIT CALCULATED?**

3 **A.** The deferred tax benefit is calculated by multiplying the unamortized portion of the
4 Company's net deferred remediation costs by the effective statutory income tax rate
5 and the RAC interest rate. In accordance with the Board's Order dated July 8, 1999 in
6 BPU Docket No. GR98080535, *et al.*, the statutory tax rate used in the calculation of
7 the deferred tax benefit is 40.85% through December 31, 2017 and 28.11% thereafter,
8 both of which include the Corporate Business Tax. The Federal Income Tax rate
9 changed on January 1, 2018 which resulted in a combined rate of 28.11%. The
10 Company has used a weighted tax rate of 36.92% for the period July 1, 2017 through
11 June 30, 2018. The statutory tax rate used for July 1, 2018 forward is 28.11%. This
12 calculation results in a deferred tax benefit of \$168,207 for the twelve months ended
13 June 30, 2024. This calculation is presented in RAC Schedule TK-2, page 1 of 7, which
14 is the same methodology applied to the prior years that are being amortized.

15 **Q. WHAT ARE THE RESULTS OF THE PRIOR YEAR'S RECOVERY RECONCILIATION?**

16
17 **A.** RAC Schedule TK-4 provides a reconciliation of the prior year which shows an under-
18 recovery balance of \$6,986,256 as of June 30, 2024.

1 **Q. WHAT LEVEL OF COSTS IS THE PROPOSED RAC RATE DESIGNED TO**
2 **RECOVER OR REFUND?**

3 **A.** The proposed RAC rate is designed to recover an amount of \$15,304,848 as set forth
4 on RAC Schedule TK-1, Line 4.

5 **Q. PLEASE DESCRIBE THE ANNUAL CAP CALCULATION.**

6 **A.** Under the RAC, total annual remediation costs charged to the Company's customers
7 during any recovery year may not exceed five percent (5%) of the Company's total
8 revenues from sales, transportation and storage services during the preceding July 1
9 through June 30 period. For the twelve months ended June 30, 2024, total revenues
10 were \$408,941,672. RAC Schedule TK-5 illustrates that the estimated total
11 remediation costs do not exceed the five percent cap based on last year's revenues.

12 **Q. ARE CARRYING COSTS INCLUDED IN THE RAC CALCULATION?**

13 **A.** Yes. In accordance with the Board's Order dated March 30, 2001 in BPU Docket No.
14 GX99030121 *et al.*, the Company is permitted to recover carrying costs.

15 **Q. HOW ARE THE CARRYING COSTS CALCULATED?**

16 **A.** Carrying cost rates are applied to each year's net prior year balance and current year
17 expenditures and recoveries. The interest rate is based on the rate available from seven
18 year constant maturity Treasury securities established closest to August 31st of each
19 year plus 60 basis points. This interest rate, currently 4.79%, is applied to monthly net
20 RAC balances as shown on RAC Schedule TK-3. Interest on monthly balances is not
21 compounded.

1 **IV. CONCLUSION**

2 **Q. PLEASE SUMMARIZE THE PROPOSED CHANGE TO THE RAC RATE**
3 **AND THE IMPACT OF THE PROPOSED RATE CHANGE ON A**
4 **RESIDENTIAL HEATING CUSTOMER.**

5 **A.** The total impact of the proposed rate change from the current RAC rate of \$0.0225 per
6 therm, inclusive of taxes, to the proposed RAC rate of \$0.0303 per therm, inclusive of
7 taxes, on a residential heating customer using 100 therms is an increase to the
8 customer's monthly bill of \$0.78 from \$138.93 to \$139.71, or an increase of 0.6%, as
9 compared to the Company's currently effective rates as of July 1, 2024.

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 **A.** Yes, it does.

ELIZABETHTOWN GAS COMPANY
B. P. U. NO. 18 – GAS

6th REVISED SHEET NO. 115

RIDER "D"

SOCIETAL BENEFITS CHARGE ("SBC")

Applicable to all tariff Service Classifications except those Customers under special contracts that explicitly do not permit the Company to apply increased charges as filed and approved by the BPU and those customers exempted pursuant to the Long-Term Capacity Agreement Pilot Program ("LCAPP"), P.L. 2011, c.9, codified as N.J.S.A. 48:3-60.1. See the LCAPP Exemption Procedures at the end of this Rider.

The SBC is designed to recover the components listed below and any other new programs which the Board determines should be recovered through the Societal Benefits Charge.

<u>SBC Rate Components:</u>		<u>Per Therm</u>
I.	Clean Energy Program ("CEP")	\$0.0270
II.	Remediation Adjustment Charge ("RAC")	\$0.02250.0303
III.	<u>Universal Service Fund and Lifeline:</u>	
	1. Universal Service Fund ("USF")	\$0.0115
	2. Lifeline	<u>\$0.0062</u>
	TOTAL	\$0.06720.0750

The charges applicable under this Rider include provision for the New Jersey Sales and Use Tax, and when billed to customers exempt from this tax shall be reduced by the amount of such tax included therein.

I. Clean Energy Program Component ("CEP")

The Comprehensive Resource Analysis ("CRA") name was changed to the Clean Energy Program - CEP per Board Order dated January 22, 2003 in Docket No. EX99050347 *et.al*. The CEP is a mechanism that will (1) establish a rate to recover the costs of the Core and Standard Offer Programs in the Company's CEP Plan which was approved by the BPU" in Docket No. GE92020104, and (2) compensate the Company for the revenue erosion resulting from conservation savings created by the Standard Offer Program. The annual recovery period for the CEP is from October 1 through September 30. The CEP recovers program costs and revenue erosion incurred during the previous CEP year ended June 30.

1. CEP program costs include the costs of core programs, standard offer payments and any administrative costs not recovered directly from standard offer providers.

Date of Issue: ~~February 9, 2024xxx1~~

Effective: Service Rendered on and after ~~February 15, 2024xxx2~~

Issued by: Christie McMullen, President
520 Green Lane
Union, New Jersey 07083

Filed Pursuant to Orders of the Board of Public Utilities

Dated ~~January 31, 2024xxx3~~ in Docket Nos. ~~GR23070476 and GR23070477xxx4~~

CLEAN

ELIZABETHTOWN GAS COMPANY

B. P. U. NO. 18 – GAS

REVISED SHEET NO. 115

RIDER "D"

SOCIETAL BENEFITS CHARGE ("SBC")

Applicable to all tariff Service Classifications except those Customers under special contracts that explicitly do not permit the Company to apply increased charges as filed and approved by the BPU and those customers exempted pursuant to the Long-Term Capacity Agreement Pilot Program ("LCAPP"), P.L. 2011, c.9, codified as N.J.S.A. 48:3-60.1. See the LCAPP Exemption Procedures at the end of this Rider.

The SBC is designed to recover the components listed below and any other new programs which the Board determines should be recovered through the Societal Benefits Charge.

<u>SBC Rate Components:</u>		<u>Per Therm</u>
I.	Clean Energy Program ("CEP")	\$0.0270
II.	Remediation Adjustment Charge ("RAC")	\$0.0303
III.	<u>Universal Service Fund and Lifeline:</u>	
	1. Universal Service Fund ("USF")	\$0.0115
	2. Lifeline	<u>\$0.0062</u>
	TOTAL	\$0.0750

The charges applicable under this Rider include provision for the New Jersey Sales and Use Tax, and when billed to customers exempt from this tax shall be reduced by the amount of such tax included therein.

I. Clean Energy Program Component ("CEP")

The Comprehensive Resource Analysis ("CRA") name was changed to the Clean Energy Program - CEP per Board Order dated January 22, 2003 in Docket No. EX99050347 *et.al*. The CEP is a mechanism that will (1) establish a rate to recover the costs of the Core and Standard Offer Programs in the Company's CEP Plan which was approved by the BPU" in Docket No. GE92020104, and (2) compensate the Company for the revenue erosion resulting from conservation savings created by the Standard Offer Program. The annual recovery period for the CEP is from October 1 through September 30. The CEP recovers program costs and revenue erosion incurred during the previous CEP year ended June 30.

1. CEP program costs include the costs of core programs, standard offer payments and any administrative costs not recovered directly from standard offer providers.

Date of Issue: xxx1

Effective: Service Rendered
on and after xxx2

Issued by: Christie McMullen, President
520 Green Lane
Union, New Jersey 07083

Filed Pursuant to Orders of the Board of Public Utilities
Dated xxx3 in Docket Nos. xxx4

ELIZABETHTOWN GAS COMPANY
FORECASTED SALES VOLUME - THERMS
RECOVERY YEAR - 2025

		SBC (RAC) *
<hr/>		
Residential		258,560,408
Commercial		89,311,169
Industrial		12,259,712
Interruptible		-
	Total Sales	<hr/> 360,131,289 <hr/>
<hr/>		
Residential		2,898,654
Commercial		62,650,415
Industrial		54,666,045
Interruptible		57,872,585
	Total Transportation	<hr/> 178,087,699 <hr/>
	Total Sales and Transportation	<hr/> 538,218,988 <hr/>

* Excludes LCAPP therms used for wholesale electric generation.

ELIZABETHTOWN GAS COMPANY
SOCIETAL BENEFITS CHARGE (SBC)
REMEDIATION ADJUSTMENT CLAUSE (RAC)

CALCULATION OF THE RAC RATE BASED ON VOLUMES FROM
October 1, 2024 through September 30, 2025
RECOVERY YEAR - 2025

1a	Recovery Year Amortization Costs (Sch. TK-2, L5, pgs 1+2+3+4+5+6+7)	\$7,283,343
1b	Recovery Year Deferred Tax Adjustments (Sch. TK-2, L16, pgs 1+2+3+4+5+6+7)	<u>(\$391,173)</u>
1	Recovery Year Recoverable Costs (L1a +L1b)	\$6,892,170
2	Accrued Carrying Costs (Sch. TK-3)	\$1,426,422
3	Prior Year RAC Underrecovery (Sch. TK-4)	<u>\$6,986,256</u>
4	Total Recovery Year Recoverable / (Refund) Costs (L1+L2+L3)	\$15,304,848
5	Projected Normalized Sales and Services (Forecast Sch. TK-1)	538,218,988 therms
6	RAC COMPONENT, before taxes (L4/L5)	\$0.0284 /therm
7	Sales & Use Tax @ 6.625%	<u>\$0.0019</u>
8	RAC COMPONENT (L6+L7)	<u><u>\$0.0303</u></u> /therm

ELIZABETHTOWN GAS COMPANY
REMEDATION ADJUSTMENT CLAUSE

AMORTIZATION RECOVERY YEAR 2025

Y/E 6/30/24

1	Total Recoverable Costs		\$12,492,448
2	Adjustments to Recoverable Costs		\$0
2A	A. 100% of Third Party Recoveries		\$0
2B	B. 50% Deferred Ins. Litigation - Opening Balance		\$2,745
2C	C. 50% Deferred Ins. Litigation - Ending Balance		(\$2,745)
3	Less Miscellaneous Adjustments		\$0
4	Amortizable Recoverable Costs		<u>\$12,492,448</u>
5	Amortization Recoverable Cost (L4/7)		\$1,784,635
6	Deferred Tax Calculation		
7	Unamortized Recoverable Costs:		
8	Upcoming Recovery Year	2025	
9	Remediation Year	2024	
10	Difference (L8-L9)	1	
11	Unamortized Factor	$(7-(\text{difference}-1))/7$	1
12	Unamortized Recoverable Costs (L4*L11)		\$12,492,448
13	Tax Rate		28.11%
14	Deferred Taxes on Net Deferred Remediation Cost (L12*L13)		\$3,511,627
15	Interest on Deferred Taxes at the RAC interest rate set August 31st equal to the seven year constant maturity Treasuries plus 60 basis points.		4.79%
16	Deferred Tax Benefit (L14*L15)		<u>(\$168,207)</u>
17	2024 Remediation Year 2023-24 (L5+L16)		\$1,616,428

ELIZABETHTOWN GAS COMPANY
REMEDATION ADJUSTMENT CLAUSE

AMORTIZATION RECOVERY YEAR 2025

Y/E 6/30/23

1	Total Recoverable Costs		\$8,556,531
2	Adjustments to Recoverable Costs		\$0
2A	A. 100% of Third Party Recoveries		\$0
2B	B. 50% Deferred Ins. Litigation - Opening Balance		\$0
2C	C. 50% Deferred Ins. Litigation - Ending Balance		(\$2,745)
3	Less Miscellaneous Adjustments		\$0
4	Amortizable Recoverable Costs		<u>\$8,553,786</u>
5	Amortization Recoverable Cost (L4/7)		\$1,221,969
6	Deferred Tax Calculation		
7	Unamortized Recoverable Costs:		
8	Upcoming Recovery Year	2025	
9	Remediation Year	2023	
10	Difference (L8-L9)	2	
11	Unamortized Factor	$(7-(\text{difference}-1))/7$	0.857143
12	Unamortized Recoverable Costs (L4*L11)		\$7,331,817
13	Tax Rate		28.11%
14	Deferred Taxes on Net Deferred Remediation Cost (L12*L13)		\$2,060,974
15	Interest on Deferred Taxes at the RAC interest rate set August 31st equal to the seven year constant maturity Treasuries plus 60 basis points.		4.79%
16	Deferred Tax Benefit (L14*L15)		<u>(\$98,721)</u>
17	2024 Remediation Year 2022-23 (L5+L16)		\$1,123,248

ELIZABETHTOWN GAS COMPANY
REMEDIATION ADJUSTMENT CLAUSE

AMORTIZATION RECOVERY YEAR 2025

	Y/E 6/30/22
1 Total Recoverable Costs	\$10,886,014
2 Adjustments to Recoverable Costs	\$0
2A A. 100% of Third Party Recoveries	(\$4,501,758)
2B B. 50% Deferred Ins. Litigation - Opening Balance	\$35,947
2C C. 50% Deferred Ins. Litigation - Ending Balance	\$0
3 Less Miscellaneous Adjustments	\$0
4 Amortizable Recoverable Costs	<u>\$6,420,203</u>
5 Amortization Recoverable Cost (L4/7)	\$917,172
6 Deferred Tax Calculation	
7 Unamortized Recoverable Costs:	
8 Upcoming Recovery Year	2025
9 Remediation Year	2022
10 Difference (L8-L9)	3
11 Unamortized Factor $(7-(\text{difference}-1))/7$	0.714286
12 Unamortized Recoverable Costs (L4*L11)	\$4,585,859
13 Tax Rate	28.11%
14 Deferred Taxes on Net Deferred Remediation Cost (L12*L13)	\$1,289,085
15 Interest on Deferred Taxes at the RAC interest rate set August 31st equal to the seven year constant maturity Treasuries plus 60 basis points.	4.79%
16 Deferred Tax Benefit (L14*L15)	<u>(\$61,747)</u>
17 2024 Remediation Year 2021-22 (L5+L16)	\$855,425

ELIZABETHTOWN GAS COMPANY
REMEDATION ADJUSTMENT CLAUSE

AMORTIZATION RECOVERY YEAR 2025

	Y/E 6/30/21	
1 Total Recoverable Costs	\$11,137,686	
2 Adjustments to Recoverable Costs	\$0	
2A A. 100% of Third Party Recoveries	(\$6,807,500)	
2B B. 50% Deferred Ins. Litigation - Opening Balance	\$14,822	
2C C. 50% Deferred Ins. Litigation - Ending Balance	(\$35,947)	
3 Less Miscellaneous Adjustments	<u>\$0</u>	
4 Amortizable Recoverable Costs	\$4,309,061	
5 Amortization Recoverable Cost (L4/7)		\$615,580
6 Deferred Tax Calculation		
7 Unamortized Recoverable Costs:		
8 Upcoming Recovery Year	2025	
9 Remediation Year	2021	
10 Difference (L8-L9)	4	
11 Unamortized Factor $(7-(\text{difference}-1))/7$	0.571429	
12 Unamortized Recoverable Costs (L4*L11)	\$2,462,321	
13 Tax Rate	28.11%	
14 Deferred Taxes on Net Deferred Remediation Cost (L12*L13)	\$692,158	
15 Interest on Deferred Taxes at the RAC interest rate set August 31st equal to the seven year constant maturity Treasuries plus 60 basis points.	4.79%	
16 Deferred Tax Benefit (L14*L15)		<u>(\$33,154)</u>
17 2024 Remediation Year 2020-21 (L5+L16)		\$582,426

ELIZABETHTOWN GAS COMPANY
REMEDIATION ADJUSTMENT CLAUSE

AMORTIZATION RECOVERY YEAR 2025

	Y/E 6/30/20
1 Total Recoverable Costs	\$2,280,307
2 Adjustments to Recoverable Costs	\$0
2A A. 100% of Third Party Recoveries	(\$6,815,338)
2B B. 50% Deferred Ins. Litigation - Opening Balance	\$0
2C C. 50% Deferred Ins. Litigation - Ending Balance	(\$14,822)
3 Less Miscellaneous Adjustments	<u>\$0</u>
4 Amortizable Recoverable Costs	(\$4,549,853)
5 Amortization Recoverable Cost (L4/7)	(\$649,979)
6 Deferred Tax Calculation	
7 Unamortized Recoverable Costs:	
8 Upcoming Recovery Year	2025
9 Remediation Year	2020
10 Difference (L8-L9)	5
11 Unamortized Factor $(7-(\text{difference}-1))/7$	0.428571
12 Unamortized Recoverable Costs (L4*L11)	(\$1,949,937)
13 Tax Rate	28.11%
14 Deferred Taxes on Net Deferred Remediation Cost (L12*L13)	(\$548,127)
15 Interest on Deferred Taxes at the RAC interest rate set August 31st equal to the seven year constant maturity Treasuries plus 60 basis points.	4.79%
16 Deferred Tax Benefit (L14*L15)	<u>\$26,255</u>
17 2024 Remediation Year 2019-20 (L5+L16)	(\$623,724)

ELIZABETHTOWN GAS COMPANY
REMEDATION ADJUSTMENT CLAUSE

AMORTIZATION RECOVERY YEAR 2025

	Y/E 6/30/19
1 Total Recoverable Costs	\$5,239,768
2 Adjustments to Recoverable Costs	\$0
2A A. 100% of Third Party Recoveries	(\$9,334,111)
2B B. 50% Deferred Ins. Litigation - Opening Balance	\$745,845
2C C. 50% Deferred Ins. Litigation - Ending Balance	\$0
3 Less Miscellaneous Adjustments	\$0
4 Amortizable Recoverable Costs	<u>(\$3,348,498)</u>
5 Amortization Recoverable Cost (L4/7)	(\$478,357)
6 Deferred Tax Calculation	
7 Unamortized Recoverable Costs:	
8 Upcoming Recovery Year	2025
9 Remediation Year	2019
10 Difference (L8-L9)	6
11 Unamortized Factor $(7-(\text{difference}-1))/7$	0.285714
12 Unamortized Recoverable Costs (L4*L11)	(\$956,714)
13 Tax Rate	28.11%
14 Deferred Taxes on Net Deferred Remediation Cost (L12*L13)	(\$268,932)
15 Interest on Deferred Taxes at the RAC interest rate set August 31st equal to the seven year constant maturity Treasuries plus 60 basis points.	4.79%
16 Deferred Tax Benefit (L14*L15)	<u>\$12,882</u>
17 2024 Remediation Year 2018-19 (L5+L16)	(\$465,475)

ELIZABETHTOWN GAS COMPANY
REMEDATION ADJUSTMENT CLAUSE

AMORTIZATION RECOVERY YEAR 2025

	Y/E 6/30/18
1 Total Recoverable Costs	\$27,414,334
2 Adjustments to Recoverable Costs	\$0
2A A. 100% of Third Party Recoveries	\$0
2B B. 50% Deferred Ins. Litigation - Opening Balance	\$437,769
2C C. 50% Deferred Ins. Litigation - Ending Balance	(\$745,845)
3 Less Miscellaneous Adjustments	\$0
4 Amortizable Recoverable Costs	<u>\$27,106,258</u>
5 Amortization Recoverable Cost (L4/7)	\$3,872,323
6 Deferred Tax Calculation	
7 Unamortized Recoverable Costs:	
8 Upcoming Recovery Year	2025
9 Remediation Year	2018
10 Difference (L8-L9)	7
11 Unamortized Factor $(7-(\text{difference}-1))/7$	0.142857
12 Unamortized Recoverable Costs (L4*L11)	\$3,872,323
13 Tax Rate pro-rated based on Schedule TK-3 remediation costs	36.92%
14 Deferred Taxes on Net Deferred Remediation Cost (L12*L13)	\$1,429,662
15 Interest on Deferred Taxes at the RAC interest rate set August 31st equal to the seven year constant maturity Treasuries plus 60 basis points.	4.79%
16 Deferred Tax Benefit (L14*L15)	<u>(\$68,481)</u>
17 2024 Remediation Year 2017-18 (L5+L16)	\$3,803,842

ELIZABETHTOWN GAS COMPANY
SOCIETAL BENEFITS CHARGE (SBC)
REMEDIATION ADJUSTMENT CLAUSE (RAC)

RAC Schedule
TK-3

Carrying Costs

	Beginning Balance	Total Remediation Costs (2)	Third Party Recoveries at 100% (3)	Adjustments (see below)	(Recoveries) / Refunds TK-6	Credit for Deferred Tax Benefit (4)	Ending Balance	Average Balance	Interest Rate *	Carrying Costs	Ending Balance plus Cumulative Interest **
a	b	c	d	e	f	g	h=sum(b:g)	i=(b+h)/2	j	k=i*j/12	l=h+ cum of k
Beginning Balance (1)											(Over) / Under
Jul-23	\$27,199,880	\$1,905,766	\$0	\$0	(\$38,163)	(\$23,931)	\$29,043,552	\$28,121,716	3.85%	\$90,224	\$29,133,776
Aug-23	\$29,043,552	\$140,340	\$0	\$0	(\$37,295)	(\$23,931)	\$29,122,666	\$29,083,109	3.85%	\$93,308	\$29,306,198
Sep-23	\$29,122,666	\$447,302	\$0	\$0	(\$38,833)	(\$23,931)	\$29,507,204	\$29,314,935	4.79%	\$117,015	\$29,807,751
Oct-23	\$29,507,204	\$967,210	\$0	\$0	(\$45,101)	(\$23,931)	\$30,405,382	\$29,956,293	4.79%	\$119,576	\$30,825,505
Nov-23	\$30,405,382	\$769,130	\$0	\$0	(\$83,136)	(\$23,931)	\$31,067,445	\$30,736,414	4.79%	\$122,690	\$31,610,258
Dec-23	\$31,067,445	\$779,820	\$0	\$0	(\$127,469)	(\$23,931)	\$31,695,865	\$31,381,655	4.79%	\$125,265	\$32,363,943
Jan-24	\$31,695,865	\$321,685	\$0	\$0	(\$163,027)	(\$23,931)	\$31,830,592	\$31,763,229	4.79%	\$126,788	\$32,625,458
Feb-24	\$31,830,592	\$434,751	\$0	\$0	(\$431,222)	(\$23,931)	\$31,810,190	\$31,820,391	4.79%	\$127,016	\$32,732,072
Mar-24	\$31,810,190	\$483,971	\$0	\$0	(\$1,113,658)	(\$23,931)	\$31,156,572	\$31,483,381	4.79%	\$125,671	\$32,204,125
Apr-24	\$31,156,572	\$504,391	\$0	\$0	(\$1,018,508)	(\$23,931)	\$30,618,524	\$30,887,548	4.79%	\$123,293	\$31,789,370
May-24	\$30,618,524	\$1,126,148	\$0	\$0	(\$628,995)	(\$23,931)	\$31,091,746	\$30,855,135	4.79%	\$123,163	\$32,385,755
Jun-24	\$31,091,746	\$4,611,934	\$0	\$0	(\$426,831)	(\$23,932)	\$35,252,917	\$33,172,332	4.79%	\$132,413	\$36,679,339
Total		\$12,492,448	\$0	\$0	(\$4,152,238)	(\$287,173)				\$1,426,422	

Notes:

(1) Beginning Balance is the ending balance from June 2023.

(2) These costs include 100% of all expenses as such, they may vary from the amortizable recoverable costs on RAC Schedule TK-2. The primary difference would be the deferral of all NRD expenses and fifty percent of the costs incurred in pursuit of third party claims which are deferred pending a Third Party recovery.

(3) Recovery credit at 100%, as all expenses have been included, for purposes of deriving carrying costs.

(4) Reduction of the Remediation Costs to reflect a Deferred Tax Benefit on a monthly basis sourced from last year's RAC TK-2 Schedules 1-7.

* Interest Rate seven year constant maturity Treasuries closest to August 31 of each year plus 60 basis points per the Board's Order in Docket No.

GX99030121 et al. www.federalreserve.gov/releases/h15/

** Net (Over) / Under Recovery Position

ELIZABETHTOWN GAS COMPANY
SOCIETAL BENEFITS CHARGE (SBC)
REMEDATION ADJUSTMENT CLAUSE (RAC)
AMORTIZATION RECOVERY YEAR

Prior Year's Reconciliation

FOR RECOVERY YEAR 2024

1	Total to be Recovered / (Refunded), (prior year Sch TK-1)	\$11,138,494
2	Other	<u>\$0</u>
3	Adjusted Prior Year Balance (L1+L2)	\$11,138,494
4	Actual Recoveries / (Refunds) (Sch TK-6)	<u>\$4,152,238</u>
5	Prior Year Under Recovery, (L3-L4)	<u><u>\$6,986,256</u></u>

ELIZABETHTOWN GAS COMPANY
SOCIETAL BENEFITS CHARGE (SBC)
REMEDATION ADJUSTMENT CLAUSE (RAC)
Annual Cap Calculation
RECOVERY YEAR -
2025

1	Total Revenues 12 mos ended June 30, 2024	\$408,941,672
2	5% of Line 1	\$20,447,084
3	Total Remediation Costs to be Recovered/(Refunded) this Year, (Sch TK-1)	\$15,304,848
4	Excess Remediation Costs to be Deferred (L4 = If L3 < L2 then zero, else L3 - L2)	\$0

ELIZABETHTOWN GAS COMPANY
SOCIETAL BENEFITS CHARGE (SBC)
REMEDIATION ADJUSTMENT CLAUSE (RAC)

Cost Recoveries
12 Months Ended
June-24

	<u>Billed Therms</u>	<u>Rate w/o tax *</u>	<u>Recoveries / (Refunds) Net of Sales Tax</u>
Jul-23	17,784,936	\$0.0021	\$38,163
Aug-23	17,455,551	\$0.0021	\$37,295
Sep-23	17,992,565	\$0.0022	\$38,833
Oct-23	22,704,948	\$0.0020	\$45,101
Nov-23	36,999,012	\$0.0022	\$83,136
Dec-23	58,098,553	\$0.0022	\$127,469
Jan-24	74,426,315	\$0.0022	\$163,027
Feb-24	75,561,912	\$0.0057	\$431,222
Mar-24	59,447,054	\$0.0187	\$1,113,658
Apr-24	48,318,216	\$0.0211	\$1,018,508
May-24	29,920,429	\$0.0210	\$628,995
Jun-24	20,583,058	\$0.0207	\$426,831
Total	<u>479,292,549</u>		<u>\$4,152,238</u>

* Billing at the tariff rate yields the dollars recovered or disbursed, inclusive of rate proration or cancel/rebills, if any. The rate presented is derived from dividing these monthly amounts net of sales tax by billed therms for the month, as such rounding differences to the tariff billing rate may result.

**IN THE MATTER OF THE PETITION
OF ELIZABETHTOWN GAS COMPANY TO REVISE THE
REMEDICATION ADJUSTMENT CLAUSE COMPONENT
OF ITS SOCIETAL BENEFITS CHARGE RATE**

BPU DOCKET NO. _____

DIRECT TESTIMONY

OF

STEVEN L. COOK

**On Behalf Of
Elizabethtown Gas Company**

Exhibit P-2

July 31, 2024

**ELIZABETHTOWN GAS COMPANY
DIRECT TESTIMONY
OF STEVEN L. COOK**

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 **A.**My name is Steven Cook. My business address is 520 Green Lane, Union, New
4 Jersey 07083.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 **A.**I am employed by South Jersey Industries, Inc. (“SJI”), the parent of Elizabethtown
7 Gas Company (“Elizabethtown” or “Company”), as Environmental Specialist Lead.
8 As such, I am responsible for the efforts of Elizabethtown to investigate, contain, and
9 remediate its former Manufactured Gas Plant ("MGP") sites.

10 **Q. WHAT IS YOUR PROFESSIONAL AND EDUCATIONAL BACKGROUND?**

11 **A.**I am a graduate of East Texas State University where I received my BA Degree in
12 political science and of Seton Hall University School of Law where I earned a Juris
13 Doctorate degree. I am also a member of the New Jersey Bar. I have over thirty years
14 of experience in the environmental field.

15 I have been employed by SJI for approximately six years. Prior to the acquisition of
16 Elizabethtown by SJI in 2018, I was employed by Southern Company Gas, formerly
17 AGL Resources (“AGL”), since December 2004. Prior to AGL’s acquisition of NUI
18 Corporation in 2004, I worked for more than nine years in the environmental
19 department of NUI Utilities, Inc. (“NUI Utilities”), a subsidiary of NUI Corporation.
20 In this position, I managed environmental compliance and liability issues associated

1 with the operations of NUI Utilities, including Elizabethtown which was its New
2 Jersey Division. In this position, I participated in managing specific issues associated
3 with the investigation and remediation of Elizabethtown’s MGP sites. From 1990
4 to 1995, I was employed by Foster Wheeler Environmental Corporation. There, I
5 held the title of Regulatory Affairs Specialist where I was responsible for assessing
6 the impacts of federal, state and local environmental laws and regulations on various
7 environmental projects. My particular responsibilities included site remediation,
8 permitting and compliance, and environmental liability management.

9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10 **A.** The purpose of my testimony is to support Elizabethtown's Petition in this proceeding
11 to review the Remediation Adjustment Clause ("RAC") component of the Societal
12 Benefits Charge ("SBC") rate for remediation costs during the period July 1, 2023
13 through June 30, 2024 ("2024 Remediation Year"). I will discuss Elizabethtown's
14 efforts to investigate, contain and remediate its former MGP sites in a prudent manner
15 and will discuss the costs associated with the 2024 Remediation Year. I will also
16 discuss the Company's treatment of costs incurred to obtain third party and/or
17 insurance recoveries of MGP-related costs and briefly describe the MGP-related rate
18 and third party recovery that the Company has obtained during the period. Finally, I
19 will provide a projection of the MGP-related costs for the period July 1, 2024 through
20 June 30, 2025 ("2025 Remediation Year").

21 **Q. DOES YOUR TESTIMONY INCLUDE ANY ILLUSTRATIVE SCHEDULES?**

22 **A.** Yes. My testimony includes the schedules listed below that were prepared under my
23 direction and supervision. As explained in the Petition, these schedules contain
24 information responsive to the Minimum Filing Requirements ("MFRs") approved by

1 the Board’s Order dated September 22, 2011 in BPU Docket Nos. GR07080645,
2 GR08090836 and GR09080651 (“September 22 Order”). An Index to the MFRs is
3 included with the Petition as Exhibit A. The schedules are as follows:

4 **(1) Schedule SLC-1** consists of a summary of MGP-related expenses for
5 the 2024 Remediation Year. This schedule also provides information
6 concerning insurance, third party and rate recoveries of MGP-related
7 expenses, if any, associated with this period.

8 **(2) Schedule SLC-2** contains information responsive to MFRs 1 through
9 8, MFRs 10 through 12 and MFRs 14 through 18.

10 **II. FORMER MGP SITE AND COST DISCUSSIONS**

11 **Q. HOW MANY FORMER MGP SITES HAS ELIZABETHTOWN OWNED OR**
12 **OPERATED?**

13 **A.** Elizabethtown owns, owned and/or operated MGPs at six sites located within the
14 State of New Jersey. These six sites will be referred to as (1) Erie Street, Elizabeth;
15 (2) South Street, Elizabeth; (3) Rahway; (4) Perth Amboy; (5) Flemington; and (6)
16 Newton. Four of these six sites (Erie Street, South Street, Rahway, and Perth Amboy)
17 were owned and/or operated solely by Elizabethtown and/or its predecessor
18 companies. The remaining sites (Newton and Flemington) were also owned and
19 operated by a predecessor of Jersey Central Power & Light Company, which is now
20 owned by First Energy, herein referred to as “JCP&L”. Elizabethtown also has
21 responsible party liability for a site that I will refer to as the Renora Landfill
22 (“Renora”).

1 **Q. HAVE ELIZABETHTOWN'S MGP-RELATED COSTS AT ITS VARIOUS**
2 **SITES BEEN INCURRED TO COMPLY WITH APPLICABLE LAWS AND**
3 **REGULATIONS?**

4 **A.** Yes. In all instances, Elizabethtown's efforts to test, contain, and remediate its former
5 MGP sites have been directed toward complying with applicable laws and regulations
6 in a reasonable, cost prudent manner.

7 **Q. PLEASE UPDATE THE STATUS OF EACH OF ELIZABETHTOWN'S**
8 **FORMER MGP SITES.**

9 **A.** Set forth below is a discussion of the activities that were either completed or ongoing
10 at each of the Company's MGP sites. A breakdown of expenses for each of these sites
11 during the 2024 Remediation Year is included in Schedule SLC-1.

12 **Erie Street**

13 The Company continues to perform work related to the implementation of remedial
14 measures at the site and third party owned properties impacted by historic MGP
15 operations. Erie Street is comprised of eight (8) general Areas of Concern ("AOC"),
16 Areas A through H. The remediation of Areas A, B, D and G were completed in prior
17 RAC periods.

18 During the 2024 Remediation Year, the Company has completed all remedial design,
19 permitting and procurement to support the implementation of a remedial action to
20 address the remaining un-remediated on-site AOCs.

21 The Company is currently conducting a remedial action to address the remaining un-
22 remediated on-site soil AOCs. This remedial action is scheduled to be completed by
23 the end of calendar year 2024.

1 The Company is currently assessing remedial alternatives for remaining off-site
2 AOCs. These include the former Bilkay's property, South Second Street, Third
3 Avenue, 236 Erie Street and the Elizabeth River. The Company has completed initial
4 investigation of these areas. Supplemental investigation will be required to support
5 design and permitting for remedial action selection and implementation.

6 Groundwater remediation will likely be a long-term process and include a pump and
7 treat scenario. Elizabethtown has obtained an extension to the New Jersey Department
8 of Environmental Protection ("NJDEP") remedial time frames applicable to the site.

9 **South Street**

10 In accordance with applicable laws and regulations and an Administrative Consent
11 Order with the NJDEP dated April 9, 1991, Elizabethtown is continuing to conduct
12 environmental investigations and evaluate further remediation at the South Street site.
13 During the 2024 Remediation Year, a soil Remedial Action Report ("RAR") was
14 prepared and is currently being finalized to be submitted to NJDEP by the end of the
15 third quarter of 2024. A soils only Response Action Outcome ("RAO") will be
16 submitted upon receipt of the soils only Remedial Action Permit ("RAP") from the
17 NJDEP, which is anticipated to take approximately one year from submission of the
18 RAR.

19 A Remedial Action Selection process is currently underway for bedrock and
20 overburden ground water contamination and for soils beneath the Routes 1 & 9
21 viaduct. The Remedial Action Selection process is anticipated to be completed by the
22 end of the third quarter of 2024. Once a remedial action is selected, coordination with
23 the New Jersey Department of Transportation will be required to implement any
24 remedial action beneath the Routes 1 & 9 viaduct. Ground water remedial action in

1 the bedrock and overburden outside the Right-of-Way of the Routes 1 & 9 viaduct
2 can begin once any necessary permits are received and is anticipated to begin in 2025.
3 Submission of any subsequent RARs, RAP applications and RAOs is dependent on
4 the selected remedies. Elizabethtown has obtained an extension to the NJDEP
5 remedial time frames applicable to the site.

6 **Rahway**

7 In accordance with applicable laws and regulations, the Company has completed the
8 remediation of the Rahway site, including the remediation of MGP impacted
9 sediments within the Robinson's Branch of the Rahway River which is adjacent to
10 the site. The Company recorded a deed notice with environmental restrictions for this
11 property for residual MGP impacts in soil and a Classification Exemption Area for
12 naturally occurring constituents in groundwater has been issued by NJDEP. A RAO
13 has been issued by the site registered Licensed Site Remediation Professional
14 ("LSRP") and a RAP has been issued by the NJDEP.

15 The Company sold the property to the Rahway Redevelopment Authority in
16 November 2016 and the proceeds associated with that sale were addressed in the
17 Company's 2017 RAC proceeding.

18 **Perth Amboy**

19 The Perth Amboy former MGP site has been fully remediated and unrestricted use
20 RAOs have been submitted for both ground water and soil at the site. A remedial
21 action was implemented at the off-site areas to remove contamination from the Perth
22 Amboy former MGP site.

23 The remedial action could not remove tarry material surrounding a sewer line
24 underneath Sadowski Parkway; therefore, a Notice in Lieu of Deed Notice and Soil

1 RAP application were submitted to the NJDEP to establish institutional and
2 engineering controls at the site.

3 The soil RAP was approved on March 7, 2024 and a restricted use RAO was
4 submitted to the NJDEP on May 1, 2024. The first annual inspection of the engineered
5 cap will occur in February 2025 and a Biennial Certification Report will be submitted
6 in March 2026 in accordance with the RAP.

7 During the 2024 Remediation Year, the Company also concluded settlement with the
8 current third-party owner of the MGP site property, St. Demetrios Greek Orthodox
9 Church, resolving all issues for compensation for the demolition and lost use of an
10 on-site building that was required as part of the remediation.

11 **Flemington**

12 The Company and JCP&L have completed the remediation of the onsite and offsite
13 soils and offsite wetlands and stream sediment.

14 During the 2024 Remediation Year, the Company and JCP&L completed
15 administrative requirements to close out the site, including the issuance of a RAR, a
16 RAP, and deed notices for engineering controls, and are currently working to close
17 out the wetlands permit required for remediation. RAOs for soil restricted use and
18 monitoring and natural attenuation for groundwater will be issued upon receipt of the
19 RAP from NJDEP.

20 **Newton**

21 During the 2024 Remediation Year, the Company and JCP&L completed on-site soil
22 remediation as well as MGP impacts in wetlands and sediment. A soil RAR is currently being
23 prepared and is anticipated to be submitted by the end of the third quarter of 2024. A soils
24 only RAO will be submitted upon receipt of the soil RAP from the NJDEP, which is

1 anticipated to take approximately one year from submission of the RAR.

2 Replacement monitoring well installation is anticipated by the end of the third quarter
3 of 2024 and completion of a Remedial Action Work Plan for groundwater is
4 anticipated by the end of 2024.

5 Selected measures to address groundwater contamination were implemented during
6 the soil remediation, including removal of MGP product encountered at the
7 soil/bedrock interface and the installation of a network of sumps where MGP product
8 was encountered in the soil excavations. Ground water remediation can begin once
9 any necessary permits are received and is anticipated to begin in 2025. Submission
10 of any subsequent RARs, RAP applications and RAOs is dependent on the selected
11 remedy.

12 **Renora Landfill**

13 Remediation of the Renora site was completed by the Renora RD/RA trust in early
14 1996. On September 27, 1999, the United States Environmental Protection Agency
15 issued a letter constituting a Certificate of Completion of the Remedial Action for the
16 Renora site. Effective March 20, 2000, the Renora site was deleted from the National
17 Priorities List. Elizabethtown anticipates future activity, if any, for the Renora site
18 will be limited to reimbursement of a portion of site inspection and maintenance fees.

19 **Q. HAS ELIZABETHTOWN INCURRED ANY MGP-RELATED COSTS THAT**
20 **ARE NOT SPECIFICALLY RELATED TO ANY PARTICULAR MGP**
21 **SITES?**

22 **A.** Yes. In addition to the costs specifically allocated to the individual Elizabethtown
23 MGP sites, the Company has incurred additional costs related to the overall
24 investigation and remediation of the Company's MGP sites. These unallocated costs

1 are included in Schedule SLC-1, Lines 8 and 9. These unallocated costs include
2 internal labor costs in accordance with the Stipulation approved by the Board in the
3 Company's base rate case proceeding in BPU Docket No. GR09030195 and costs
4 associated with liability cost estimating in accordance with the September 22 Order.

5 **Q. HAS ELIZABETHTOWN OBTAINED BASE RATE RECOVERY OF ANY**
6 **MGP-RELATED EXPENSES?**

7 **A.** No. As a result of the Board's Order dated March 30, 2001 in BPU Docket No.
8 GX99030121 et al, Elizabethtown has, since June 1, 2001, deferred all MGP-related
9 costs for recovery through the RAC component of the SBC.

10 **Q. DO ELIZABETHTOWN'S NET DEFERRED MGP-RELATED COSTS**
11 **INCLUDE ANY COSTS ASSOCIATED WITH INSURANCE LITIGATION**
12 **AND PURSUING THIRD PARTY CLAIMS?**

13 **A.** No. As illustrated on Line 10 of Schedule SLC-1, Elizabethtown has not incurred any
14 costs during the 2024 Remediation Year associated with third party claims. If such
15 costs had been incurred, fifty percent of these costs would be deferred pending receipt
16 of third party recoveries. As shown on line 2C of RAC Schedule TK-2, page 1 of 7,
17 \$2,745 is currently being deferred pending receipt of future third party recoveries.

18 **III. CONCLUSION**

19 **Q. PLEASE SUMMARIZE THE TOTAL MGP-RELATED EXPENDITURES**
20 **THAT ELIZABETHTOWN SEEKS TO RECOVER IN THIS PROCEEDING.**

21 **A.** As set forth on Schedule SLC-1, Elizabethtown incurred remediation costs of
22 \$12,492,448. In this proceeding, there were no adjustments for the receipt of third
23 party recoveries and deferred litigation costs, and the Company is seeking to recover

1 \$12,492,448. The net costs are used to calculate the proposed RAC rate in this
2 proceeding.

3 **Q. PLEASE PROVIDE AN ESTIMATE OF THE REMEDIATION COSTS FOR**
4 **THE PERIOD JULY 1, 2024 THROUGH JUNE 30, 2025.**

5 **A.** Based on the scope of work planned during this period, I estimate that the Company
6 may incur approximately \$16.6 million of remediation costs during the 2025
7 Remediation Year. However, this is only an estimate. The Company's costs will
8 continue to be driven by its need to comply with applicable laws and regulations and
9 access to third party owned property.

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 **A.** Yes, it does.

**Elizabethtown Gas Company
Manufactured Gas Plant Remediation Program**

**Summary Statement of Site Expenses
Annual Report
July 1, 2023 through June 30, 2024**

Line No.	Description	Consulting/ Remediation	Legal	NJDEP Oversight	Natural Resource Damages (NRD)	Other	(1) Total Remediation Expenses	(2) NRD Deferral 100%	(3) Ins. Lit/ Third Party Deferral 50%	(4) Recovery of Prior Deferred Expenses	(5) Third Party Recoveries	Net Remediation Cost This Period
1	Elizabeth (Erie Street)	\$8,007,670					\$8,007,670					\$8,007,670
2	Elizabeth (South Street)	\$42,564					\$42,564					\$42,564
3	Rahway						\$0					\$0
4	Perth Amboy	\$907,483	\$6,968				\$914,451					\$914,451
5	Flemington						\$0					\$0
6	Newton	\$3,144,156					\$3,144,156					\$3,144,156
7	Renora (Erie Street)						\$0					\$0
8	Internal (6)					\$189,082	\$189,082					\$189,082
9	Misc. (7)	\$194,525					\$194,525					\$194,525
10	Insurance Litigation/ Third Party Claims						\$0					\$0
11		\$12,296,398	\$6,968	\$0	\$0	\$189,082	\$12,492,448	\$0	\$0	\$0	\$0	\$12,492,448

Notes:

- 1 Line 10 - Pursuit of Third Party Claims at 100% of expenses incurred, 50% of which is deferred pending a Third Party recovery.
- 2 100% of Natural Resource Damages deferred pending BPU resolution.
- 3 50% of the expenses incurred in the pursuit of Insurance and/or Third Party Claims.
- 4 Allowable recovery of the deferred expenses incurred in pursuit of Insurance and/or Third Party recoveries.
- 5 Credit of 100% of amounts received from Third Parties.
- 6 Costs include internal labor and labor related costs.
- 7 Costs include costs associated with liability cost estimating.

MFR-1 **Please provide a vendor listing for the prior RAC period that contains information concerning vendor expenditures by MGP site, also showing a description of the services provided and the amount of each vendor invoice. The vendor list should include the monthly actual expenditures for the twelve month RAC period.**

Please see attachment MFR-1.1 for vendor expenditures by site and MFR-1.2 for a description of the services provided by each vendor.

**Elizabethtown Gas Company
MGP Vendor Expenditures
July 2023 through June 2024**

Vendor Name	Erie St	South St	Rahway	Flemington	Perth Amboy	Newton	Internal	Misc.	Ins Litigation/ Ins Recovery	Total
AirLogics LLC	132,080.00									\$132,080.00
Creamer Environmental, Inc.	5,092,768.71									\$5,092,768.71
Eurofins Environment Testing America Holdings, Inc	75,745.90									\$75,745.90
GEI Consultants, Inc.	1,124,698.04									\$1,124,698.04
GZA Geo Environmental, Inc.	6,865.65									\$6,865.65
H & G Public Affairs LLC	15,580.72									\$15,580.72
Henkels & McCoy, Inc.		9,064.95								\$9,064.95
<i>Insurance Recovery (checks)</i>										\$0.00
Jersey Central Power & Light						3,144,155.79				\$3,144,155.79
Langan Engineering & Environmental Services, Inc.		28,651.50			5,632.86			4,842.75		\$39,127.11
Miller Environmental Group Inc.	3,823.68									\$3,823.68
NJ DEP	13,345.00	3,465.00			1,850.00					\$18,660.00
<i>Payroll</i>							189,083.22			\$189,083.22
PSC Industrial Outsourcing, LP.	9,616.09									\$9,616.09
Ramboll Americas Engineering Solutions, Inc.								189,681.44		\$189,681.44
Riker, Danzig, Scherer, Hyland					6,968.00					\$6,968.00
St. Demetrios Greek Orthodox Church *					900,000.00					\$900,000.00
Summit Drilling, LLC	21,769.25									\$21,769.25
Vargo Land Surveying, Inc.	2,400.00									\$2,400.00
Veolia ES Technical Solutions, LLC.	1,508,977.50	1,383.07								\$1,510,360.57
	\$8,007,670.54	\$42,564.52	\$0.00	\$0.00	\$914,450.86	\$3,144,155.79	\$189,083.22	\$194,524.19	\$0.00	\$12,492,449.12

Note: Creamer Environmental, Inc., GEI Consultants, Jersey Central Power & Light and Veolia ES Technical Solutions, LLC. represent the contractors or suppliers whose invoices exceeded \$250,000 in aggregate for the period for the top three sites.

* Related to reimbursement of costs and compensation during the remediation at St. Demetrios Greek Orthodox Church; does not represent a contractor or supplier.

Elizabethtown Gas Company
MGP Remediation Vendor Services*

July 2023 through June 2024

AirLogics, LLC

Erie Street MGP

- Air monitoring services

Creamer Environmental, Inc.

Erie Street MGP

- Remedial construction

Eurofins Environment Testing America Holdings, Inc.

Erie Street MGP

- Analytical testing related to the Erie Street remediation.

GEI Consultants, Inc.

Erie Street MGP

- Engineering consulting for the design and implementation of remedial investigation and remedial action activities.

GZA Geo Environmental, Inc.

Erie Street MGP

- Assist in remedy selection for the Erie Street MGP site

H&G Public Affairs LLC

Erie Street MGP

- Public relations and community outreach services

Henkels & McCoy, Inc.

South Street MGP

- Site maintenance as required by the City of Elizabeth.

Jersey Central Power & Light

Newton MGP

- Responsible party for remedial investigation and remedial action

Langan Engineering and Environmental Services, Inc.

South Street MGP

- Engineering consulting for the design and implementation of pre-design investigation activities to develop a groundwater remedial action.
- Remedial action permitting and third party owned site access.

Perth Amboy MGP

- Engineering consulting for the design and implementation of remedial investigation and remedial action
- Remedial investigation and remedial action permitting
- Implementation of remedial action on City of Perth Amboy property.
- Engineering oversight of the remediation construction contractor

All MGP Sites

- Assist in the development of environmental liability cost estimates for ETG's MGP sites.

Miller Environmental Group Inc.

Erie Street MGP

- Waste material management and maintenance.

New Jersey Dept. of Environmental Protection

Erie Street, South Street and Perth Amboy MGP

- NJDEP regulatory oversight

PSC Industrial Outsourcing, LP.

Erie Street MGP

- Waste Management

Ramboll Americas Engineering Solutions, Inc.

All MGP Sites

- ETG MGP program management assistance

Riker, Danzig, Scherer and Hyland

Perth Amboy MGP

- Legal services associated with the MGP site.

St. Demetrios Greek Orthodox Church

Perth Amboy MGP

- Compensation for building demolition and loss of use compensation.

Summit Drilling, LLC.

Erie Street MGP

- Soil borings and remedial investigation related activities associated with on site and off site

Vargo Land Surveying, Inc.

Erie Street MGP

- Surveying services.

Veolia ES Technical Solutions, LLC

Erie Street MGP

- Regulated waste disposal services for IDW and other MGP impacted material generated during operations on ETG owned MGP sites.

South Street MGP

- Regulated waste disposal services primarily for IDW

*** For a detailed description of specific services provided by a given vendor under the general categories listed above, please see description of services included with individual vendor invoices.**

MFR-2 Identify the three MGP sites with the highest level of expenditures during the prior RAC period. For each identified site, provide a copy of the latest work plan, remediation report, or major work product submitted to the NJDEP. The copies should include the narrative portion of the report or work plan but need not include the technical supporting workpapers, charts and tables.

The three MGP sites with the highest level of expenditure during the prior RAC period are the Erie Street former MGP site, the Perth Amboy former MGP site and the Newton former MGP site. See MFR-2.1 for NJDEP submissions.



Consulting
Engineers and
Scientists

**Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F**

3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684

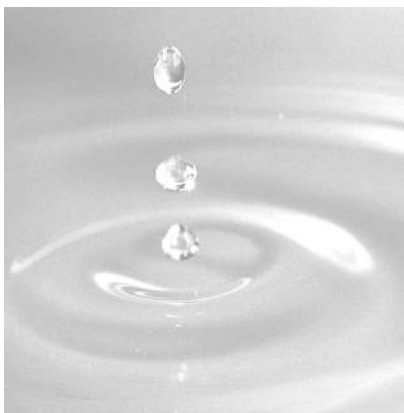
Submitted to:

Elizabethtown Gas
520 Green Lane
Union, New Jersey 07083

Submitted by:

GEI Consultants, Inc.
18000 Horizon Way, Suite 200
Mount Laurel, New Jersey 08054
856-608-6860

July 2023
Project 2300411



Brian C. Mannino

Brian C. Mannino, P.E.
Project Manager

Christopher J. Bradley

Christopher J. Bradley, P.E.
Vice President

Table of Contents

1.	Introduction	1
2.	Remedial Investigation Activities	3
2.1	Remedial Investigation Summary	3
2.2	Pre-Design Investigations	3
2.3	Site-Specific Soil Remediation Standards	4
3.	Description of the Remedial Action	6
3.1	Remedial Action Objectives	6
3.2	Remedial Action Description	6
3.2.1	Previously Completed Interim Remedial Measures	7
3.2.2	Subsurface Barrier Wall	8
3.2.3	Semi-Permeable Crushed Stone Cap	8
3.2.4	Area B Deep Holder Excavation (AOC B1a)	9
4.	Remedial Action Implementation	10
4.1	Pre-Construction Activities	11
4.1.1	Remedial Action Design	11
4.1.2	Regulatory Approvals/Permits	11
4.1.2.1	Soil Erosion and Sediment Control Plan Certification	11
4.1.2.2	Construction General Permit for Stormwater Discharge	11
4.1.2.3	Flood Hazard Area Permits	11
4.1.2.4	Permit to Discharge Pre-Treated Effluent	12
4.1.2.5	Approval for Waste Disposal and Thermal Desorption Facilities	12
4.1.2.6	Discharge to Groundwater Permit-By-Rule	12
4.1.2.7	Contractor-Procured Construction and Demolition Permits	12
4.1.3	Site Access	13
4.1.4	Public Notification	13
4.1.5	Site Survey	13
4.1.6	Health and Safety Plan	13
4.2	Remedial Action Construction Activities	13
4.2.1	Mobilization	13
4.2.2	Site Preparation	14
4.2.3	Perimeter Air Monitoring	14
4.2.4	Utility Clearance and Protection	15
4.2.5	Waste Characterization Sampling	15
4.2.6	Barrier Well Installation	16
4.2.7	Area B Deep Holder Excavation	17

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

4.2.8	Dewatering and Water Treatment	17
4.2.9	Surficial Excavation	18
4.2.10	Backfilling, Capping, Grading, and Restoration	18
4.2.11	Demobilization	18
5.	Cost Estimate	19
6.	Schedule	20

Tables

1. Contaminants of Concern and Soil Remediation Standards

Figures

1. Site Location Map
2. Tax Map

Appendices

- A. Design Drawings Set for GP-11 Permit Application
- B. Case Inventory Document
- C. Unsaturated Zone Soil Explorations in Areas C, E, and F Memorandum
- D. NJDEP Technical Consultation Email

BCM/CJB:vjb

B:\Working\ELIZABETH TOWN GAS\1905354 Erie Street MGP\4.1 RAWP\Areas CEF\Text\20230717_1905354 C E F RAWP FINAL.docx

1. Introduction

This Remedial Action Work Plan (RAWP) was prepared by GEI Consultants, Inc. (GEI) on behalf of Elizabethtown Gas (ETG) to address areas of environmental impact at the former Erie Street Manufactured Gas Plant (MGP). This RAWP was prepared in accordance with the guidelines presented in the New Jersey Department of Environmental Protection (NJDEP) Technical Requirements for Site Remediation (Technical Requirements) as amended on August 6, 2018. The NJDEP Site Remediation Program (SRP) preferred identification number for the Site is 030684.

The Erie Street Former MGP (the Site) occupies 24.19 acres of land at addresses 200 through 334 Third Avenue (near its intersection with Erie Street) in the City of Elizabeth, Union County, New Jersey. Figure 1 shows the Site on a 7.5-minute topographic quadrangle map. Figure 2 shows the Site on a City of Elizabeth tax map (the site is currently Block 743, Lot 1; it was formerly Block 5, Lot 1381). The center of the Site is at New Jersey state plane coordinates northing 660425 and easting 575347.

The Site is divided into eight Remediation Areas. Areas A, B, D, and G were previously remediated. The proposed remedial action (RA) for Remediation Areas C, E, and F (the subject of this RAWP) includes:

1. Construction of a subsurface barrier wall and engineering controls to contain impacted groundwater, saturated zone free and residual product (FRP), and soil exceedances of non-residential soil remediation standards (SRS) and/or MGW SRS or alternative remediation standards (ARS).
2. Construction of a semi-permeable crushed stone cap to address unsaturated zone exceedances of non-residential SRS and/or MGW SRS or ARS.
3. Excavation of impacted soil and debris from a derelict gas holder foundation (AOC B1a, also referred to as the “deep holder”) in Area B, which was not addressed by the previous Area B RA.

The project limits for this scope of work are shown on sheets C-01 (for Remediation Areas C, E, and F) and on D-06 (for the Area B deep holder) of the issued-for-permitting design drawing set included as Appendix A. Once implemented, this proposed RA will complete remediation of the majority of on-site soil impacts. The limited remaining non-remediated on-site soil impacts along portions of the Site property line in Areas B, C, and D will be addressed as part of future RAs for the adjacent off-site properties.

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

Current surface and subsurface features of Areas C, E, and F are shown on sheets C-01 and C-02. Surface and subsurface features in Area B near the deep holder are shown on sheet D-06. Limited facility operations and infrastructure are currently present within Areas B, C, and F. Area E contains critical infrastructure for liquefied natural gas (LNG) operations.

Former activities within the project limits of this RA included storage of MGP feed materials and byproducts. As detailed in GEI's 2019 Preliminary Assessment/Site Investigation (PA/SI) Report, seven Areas of Concern (AOCs) were identified in Area C, nine AOCs were identified in Area E, and four AOCs were identified in Area F. The deep holder in Area B is identified as AOC B1a. Further details regarding these AOCs are provided in the Case Inventory Document (CID) included as Appendix B.

Area C and Area F AOCs, plus Area B AOC B1a, will be addressed by the proposed RA described in this work plan. The Area E AOCs will be addressed via containment by the barrier wall proposed in this RA. No remedial action within Area E will be conducted at this time due to the presence of LNG operations and critical infrastructure. Variations or changes to the means and methods described in this RAWP will be identified, documented, and justified in a subsequent RAR.

2. Remedial Investigation Activities

2.1 Remedial Investigation Summary

The Remedial Investigation Report (RIR) for the Site was accepted by the NJDEP and remedial investigations were deemed complete in May 2014. Prior investigation and analytical results are discussed in the 2004 Supplemental Remedial Investigation Report (SRIS). Soil remedial investigation activities for Areas C, E, and F (and AOC B1a) consisted of the following explorations:

- **Area C:** Five test pits and three soil borings were completed by Dames & Moore from 1992 to 1993. Eight test pits and two soil borings were completed by GEI in 2000. Thirty-nine soil borings were completed by GEI from 2012 to 2013.
- **Area E:** Two soil borings were completed by Dames & Moore in 1984. Two deep test pits were completed by Dames & Moore in 1992. Four test pits and two soil borings were completed by GEI in 2000.
- **Area F:** One test pit and two soil borings were completed by Dames & Moore from 1992 to 1993. Six test pits and two soil borings were completed by GEI in 2000.
- **AOC B1a (deep holder):** Two test pits were completed by Dames & Moore in 1992. Four test pits and three soil borings were completed by GEI in 2000.

The analytical results of soil samples collected from remedial investigation soil explorations in Areas C, E, and F (and AOC B1a) indicate the presence of some volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and metals in excess of NJDEP non-residential SRS and MGW SRS. FRP also was observed in some saturated zone soils in Areas C, E, and F above and below the meadow mat, and in the rubble fill of the deep holder. FRP was not observed in unsaturated zone soils in Areas C, E, and F. The contaminants of concern (COCs) and applicable remediation standards for soils in Areas C, E, and F are summarized in Table 1.

2.2 Pre-Design Investigations

GEI performed several pre-design investigation (PDI) soil exploration events between 2018 and 2023 in Areas C, E, and F and in portions of the Conrail right-of-way adjacent to Areas C and F. The PDI events delineated the horizontal and vertical extents of MGP impacts in order to establish the horizontal and vertical extents of the RA.

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

In 2018, GEI advanced soil borings ES-C-38 through ES-C-100 in Area C, ES-E-01 through ES-E-07 and E-WALL-01 through E-WALL-04 in Area E, and ES-F-01 through ES-F-23 in Area F. Soil samples collected from these borings provided additional delineation of FRP and of non-residential SRS exceedances in saturated zone soils above and below the meadow mat.

In the fourth quarter of 2020, GEI advanced 18 soil borings on or closely adjacent to the active Conrail right-of way along the Site property line at Area F (ES-CRR-1 through ES-CRR-3) and at Area C (ES-CRR-4 through ES-CRR-15, plus ES-C-101 and ES-C-102). Several exceedances were reported in these samples. Based on the contaminants reported and the observations at the borings, these exceedances are associated with historic fill and not with prior MGP operations.

In June 2021, GEI advanced PDI soil borings ES-E-08 through ES-E-17 in the southeastern portion of Area E prior to installation of the jet grout portion of the barrier wall that was constructed later in 2021.

In 2022 and 2023, GEI advanced soil explorations ES-C-103 through ES-C-129 in Area C, ES-E-18 and ES-E-19 in Area E, and ES-F-24 through ES-F-39 in Area F. These soil explorations were performed as either hand augers or soil borings advanced using direct-push tooling. This PDI event looked for evidence of FRP in unsaturated zone soils and delineated MGW impacts in unsaturated zone soils. No evidence of FRP was observed in unsaturated zone soils in Areas C, E, and F. Concentrations of COCs in some unsaturated zone soil samples exceeded applicable SRS, including certain MGW SRS. Results of this sampling are summarized in the *Unsaturated Zone Soil Exploration in Areas C, E, and F* Memorandum provided as Appendix C.

The locations of soil explorations across Areas C, E, and F are shown on sheet C-05 of the design drawing set. Soil explorations near the deep holder in Area B area shown on sheet D-06. Cross sections depicting the PDI borings and identified impacts are provided on sheets C-06 through C-08 of the design drawing set (Appendix A).

2.3 Site-Specific Soil Remediation Standards

Samples collected as part of 2022 and 2023 PDI efforts were used to develop Site-Specific (SS) MGW SRS. For samples exceeding default MGW SRS, SPLP testing was performed for the exceeding analytes. SPLP results were evaluated in accordance with the *“Alternative Remediation Standards Technical Guidance for Soil and Soil Leachate for the Migration to Ground Water Exposure Pathway,”* Version 1.0. SS MGW SRS were then developed using the *“Soil and Soil Leachate Migration to Ground Water Exposure Pathway Calculator”* (SPLP Calculator), Version 1.1. SS MGW SRS were ultimately developed for 24 analytes.

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

Further details regarding the development and application of these standards are provided in the *Results of Unsaturated Zone Soil Explorations in Areas C, E, and F* Memorandum (Appendix C). Additionally, the NJDEP *Alternative Or Interim Remediation Standard And/Or Screening Level Application Form* has been submitted to notify NJDEP of the proposed ARS.

3. Description of the Remedial Action

3.1 Remedial Action Objectives

The objectives of the proposed RA for Areas C, E, and F (and AOC B1a) are to:

- Provide protection of human health and the environment from exposure to MGP-impacted soil.
- Remediate the property in a manner that accommodates a continuation of current use and facilitates future redevelopment.
- Minimize infiltration of precipitation and capture current and future potential discharges to ground water from soil in the unsaturated zone that exceeds MGW SRS or ARS.
- Minimize the migration of impacted ground water into and out of Areas C, E, and F.
- Improve surface runoff water quality to the municipal combined sewer system, and to the Elizabeth River.
- Remove impacted soils and debris from the Area B deep holder.

Once implemented, the proposed RA will complete remediation of the majority of on-site soil impacts. The limited remaining on-site soil impacts along portions of the Site property line in Areas B, C, and D will be addressed as part of future RAs for the adjacent off-site properties.

On-site groundwater within the subsurface barrier wall will be addressed at a later date through phased installation of a groundwater pump and treat system. Groundwater captured and treated by the system will likely be managed via permitted, post-treatment discharge to the Joint Meeting of Essex and Union County (JMEUC) publicly owned treatment works (POTW). Following subsurface barrier wall construction, a pump and treat pilot study will likely be performed to optimize system design and determine the extent of groundwater management needed to maintain the barrier wall integrity and water levels within the barrier wall.

3.2 Remedial Action Description

The proposed RA will consist of:

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

1. Construction of a subsurface barrier wall and engineering controls to contain impacted groundwater, saturated zone free and residual product (FRP), and soil exceedances of non-residential SRS and/or MGW SRS or ARS.
2. Construction of a semi-permeable crushed stone cap to address unsaturated zone exceedances of non-residential SRS and/or MGW SRS or ARS.
3. Excavation of impacted soil and debris from a derelict gas holder foundation (AOC B1a, also referred to as the “deep holder”) in Area B, which was not addressed by the previous Area B RA.

3.2.1 Previously Completed Interim Remedial Measures

A 650-linear-foot portion of the subsurface barrier wall to contain Areas C, E, and F was completed in 2021 as an interim remedial measure (IRM). This work was performed as an IRM to minimize disruptions to Site operations. The IRM barrier wall section was installed concurrently with ETG’s construction of a new LNG liquefaction unit, which allowed for access to construct the barrier wall through a congested area of the Site.

Jet grouting was selected as the technology to construct the portion of the barrier wall installed in 2021. In total, 242 jet grout columns were drilled to refusal to complete 15,000 vertical square feet (VSF) of the barrier wall. The northernmost column was tied-in to the existing Area B ISS monolith. The southern end of the alignment terminates within Area D, and will be tied-in to the barrier wall to be constructed as part of the proposed RA. The alignment of the jet grout barrier wall IRM completed in 2021 is shown on sheet C-02.

A soil excavation IRM was completed in 2022 in a portion of Areas C and E (outside the LNG operations fence line) to prepare an approximately 35,000-square foot area for ETG’s planned construction of a new LNG vaporizer system. The vaporizer soil excavation was performed as an IRM to minimize disruptions to Site operations. The vaporizer IRM consisted of excavation of unsaturated zone and saturated zone soils in Overburden A (above the meadow mat). Excavation was performed to an elevation of approximately five feet above mean sea level as referenced to the North American Vertical Datum of 1988 (NAVD 88) across approximately 17,000 square feet of the IRM footprint, and to the top of meadow mat at approximately elevation -1 to -3 feet NAVD 88 across the remaining 18,000 square feet of the IRM footprint. Excavated soils were disposed off-site by thermal desorption followed by landfilling. Following excavation, the IRM footprint was backfilled with clean fill from an approved off-site source. As-built remedial excavation contours for the vaporizer soil excavation IRM are shown on sheet C-05.

Completion of these IRMs will be documented in a future RAR.

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

3.2.2 Subsurface Barrier Wall

The subsurface barrier wall to contain Areas C, E, and F will be constructed along the approximate alignment shown on sheet C-05. The northern termination of the wall will be tied into the existing Area B ISS monolith. The southern termination of the wall will be tied into the existing jet grout barrier wall in Area D to form a continuous containment wall around Areas C, E, and F.

The wall will be advanced to refusal on weathered bedrock. Sheet C-09 shows refusal depths for soil explorations near the barrier wall alignment. Actual refusal depths for the barrier wall may be deeper or shallower than the refusal depths of prior soil explorations, due to subsurface variability and the differences in equipment and methods for soil exploration versus barrier wall construction.

GEI expects that the barrier wall will be constructed by a combination of methods. Portions may be installed as self-hardening cement-bentonite slurry-supported trenches advanced by excavator. Other portions will be installed as columns advanced by a jet grouting drill rig. Slurry-supported trench methods are appropriate for wall sections without utility conflicts and without sharp bends and corners. Jet grout methods are appropriate for utility crossings, sharp bends, and corners, and to tie-in to existing barrier wall sections. Both construction methods will generate spoils, which will be staged on-site for dewatering and amending as necessary followed by off-site thermal desorption and/or landfill disposal.

3.2.3 Semi-Permeable Crushed Stone Cap

PDI soil explorations and soil samples did not identify FRP in unsaturated zone soils in Areas C, E, or F. However, unsaturated zone soils in Areas C, E, and F have concentrations of some COCs that exceed non-residential SRS and/or MGW SRS or ARS. A semi-permeable cap of six inches of compacted thickness of dense graded aggregate (DGA) topped with two inches of gravel will be installed across Area C and Area F, and the portion of Area E outside the LNG operations fence line.

This semi-permeable cap is a variance from NJDEP guidance, which typically requires an impermeable cap to address exceedances of MGW standards. The proposed variance was communicated to NJDEP on July 18, 2022 in a Technical Consultation email from LSRP Robert Blauvelt, and accepted by NJDEP's Kevin Schick in an email dated July 20, 2022 (Appendix D). The email communication was subsequently entered into the New Jersey Environmental Management System (NJEMS). As excerpted below from the July 18, 2022 email, the semi-permeable cap meets NJDEP's protectiveness criteria for this RA as follows:

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

1. The proposed remedy minimizes removal and off-site disposal and aligns with the Department's preference for on-site management/treatment of these types of low-hazard materials;
2. Potential discharges to ground water from remaining impacted soil in the unsaturated zone will be captured by the barrier wall and future pump and treat system;
3. Infiltration of precipitation will be minimized as DGA, although not impermeable, is effective at shedding water. Surface water that does migrate through the cap over time may help flush contaminants out of the soil to be captured by the pump and treat system;
4. There will be no impacts to public or ecological receptors as a result of implementing this remedy. Ground water impacts will be controlled and managed on-site; and
5. The cap would improve surface runoff water quality to the municipal combined sewer system, and to the Elizabeth River by isolating soil containing impacts at concentrations greater than SRS and/or ARS.

The semi-permeable crushed stone cap will be installed as shown on sheets C-10 and D-01. The portion of Area E inside the LNG operations fence line is excluded from capping because LNG operations and critical infrastructure in Area E pose significant safety risks for remedy construction. The ground surface within the operations fence line of Area E already consists primarily of a combination of asphalt paving and crushed stone.

Limited excavation will be performed within Areas C and F to remove derelict subsurface utilities, shallow foundations, and appurtenances to facilitate installation of the semi-permeable crushed stone cap. Excavated soil and debris will be characterized and disposed at an approved off-site facility.

3.2.4 Area B Deep Holder Excavation (AOC B1a)

The Area B deep holder excavation area and the associated project limits for work in the vicinity of the deep holder are shown on sheets D-06 and D-07 of the design drawing set. Material within the holder walls will be excavated to the weathered bedrock interface, which is anticipated to be approximately 25 to 30 feet below the ground surface, while the brick-and-mortar holder walls will be left in place. The holder walls may be used as support of excavation (SOE) pending mortar strength testing results. If the mortar strength testing results indicate that the holder walls are insufficient for SOE, then internal bracing will be constructed to provide supplemental SOE. Excavated soil and debris from the deep holder will be temporarily staged on-site in lined spoils management areas for dewatering and amending as needed followed by off-site thermal desorption and/or landfilling.

4. Remedial Action Implementation

The major tasks necessary to implement this RA are listed below.

Pre-Construction Activities

- RA Design
- Regulatory Permits/Approvals
- Site Access
- Public Notification
- Site Survey
- Health and Safety Plan

RA Construction Activities

- Mobilization
- Site Preparation
- Perimeter Air Monitoring
- Utility Clearance and Protection
- Waste Characterization Sampling
- Barrier Wall Installation
- Area B Deep Holder Excavation
- Dewatering and Water Treatment
- Surficial Excavation
- Backfilling, Capping, Grading, and Restoration
- Demobilization

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

4.1 Pre-Construction Activities

4.1.1 Remedial Action Design

The RA design includes construction specifications and details for site clearing/demolition, soil erosion control, earthwork, barrier wall construction, excavation and backfill, excavation support, stormwater management, construction dewatering, water treatment and discharge, dust control, and site restoration. Quality assurance and quality control requirements for construction activities will also be included in the construction specifications.

4.1.2 Regulatory Approvals/Permits

Applicable permits for the RA are identified below.

4.1.2.1 Soil Erosion and Sediment Control Plan Certification

The RA area of disturbance is greater than 5,000 square feet, so a soil erosion and sediment control (SESC) plan certification will be required in accordance with the New Jersey Soil Erosion and Sediment Control Act. This permit will be obtained from the Somerset-Union Soil Conservation District.

4.1.2.2 Construction General Permit for Stormwater Discharge

During the RA, stormwater discharged from the Project Limits must be authorized under the New Jersey Pollutant Discharge Elimination System (NJPDES) Stormwater Phase II Construction General Permit (also called a 5G3 Permit). This authorization requires the development and submittal of a Request for Authorization form as well as a Stormwater Pollution Prevention Plan (SPPP). The SPPP consists of the certified SESC plan and a construction site waste control component that is set forth in Attachment B of the 5G3 permit document. A certified Soil Erosion and Sediment Control Plan is a prerequisite to the issuance of a 5G3 permit. GEI will procure this permit, and ETG and the remediation contractor will be jointly listed as co-permittees.

4.1.2.3 Flood Hazard Area Permits

This RAWP will be included in ETG's applications for a Coastal Zone Management General Permit-11 (GP-11) and Individual Flood Hazard Area Permit in order to complete the RA activities. This permit application will be procured by GEI on behalf of ETG. The NJDEP land use regulatory jurisdictional boundaries are in sheet C-01 of the design drawing set.

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

4.1.2.4 Permit to Discharge Pre-Treated Effluent

Contact water generated during the RA from storm water run-on, groundwater infiltration, and spoils management will be collected and pre-treated in an on-site water treatment system supplied and operated by the remediation contractor. Pre-treated effluent will be sampled and discharged to the City of Elizabeth combined sewer system via an on-site catch basin. The sewer flows to a secondary wastewater treatment plant operated by JMEUC. The discharge of pre-treated effluent is governed by Permit JM0194, which was approved by JMEUC on July 10, 2014.

4.1.2.5 Approval for Waste Disposal and Thermal Desorption Facilities

The disposal and thermal desorption facilities require pre-characterization of impacted soils before they will approve the soils for management at their facilities. The remediation contractor will collect and analyze the necessary waste classification soil samples and submit requests for authorization to dispose impacted soils at approved disposal facilities. If the soil is rejected for thermal desorption, then a landfill facility that meets the disposal criteria will be selected.

4.1.2.6 Discharge to Groundwater Permit-By-Rule

Barrier wall construction will require addition of solidification reagents to the Site subsurface (both unsaturated and saturated zones). This action requires a New Jersey Pollutant Discharge Elimination System – Discharge to Groundwater (DGW) permit, which is approved and administered by NJDEP through a permit-by-rule process. A DGW Permit-By-Rule Authorization Request will be submitted to NJDEP, and the required groundwater monitoring (one pre-remedy baseline event, three quarterly follow up events) will be performed to identify impacts to groundwater, if any.

4.1.2.7 Contractor-Procured Construction and Demolition Permits

These permits are the responsibility of the remediation contractor to procure either prior to or during the RA, as needed:

- Permits for temporary placement of jobsite trailers and temporary utility connections to the jobsite trailers.
- Local construction and demolition permits, including proof of termination of utility services for structures to be demolished (if applicable).
- Permits for temporary lane or road closures, if necessary.

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

4.1.3 Site Access

For Areas C, E, and F work, access to the Site will be from the existing driveway aprons on South Second Street. Access points are shown on sheet C-04 of the design drawing set. For Area B deep holder work, access to the Site will be from the existing Site entrance along 3rd Ave at the intersection of Florida Street as shown on sheet D-06. The remediation contractor is responsible to provide traffic flaggers as needed, or as required by the City of Elizabeth, to facilitate traffic control.

4.1.4 Public Notification

Public notification requirements set forth in the *Administrative Requirements for the Remediation of Contaminated Sites* (N.J.A.C. 7:26C) will be satisfied.

4.1.5 Site Survey

Prior to the start of remediation activities, a New Jersey-licensed Professional Land Surveyor (PLS) will lay out the locations of the proposed remediation activities including barrier wall alignment, excavation limits, and known utility locations. The PLS will also install and maintain reference markers and temporary benchmarks for the remediation contractor to use during the RA. The PLS will also document the final horizontal and vertical limits of remediation, and the final ground surface elevation contours.

4.1.6 Health and Safety Plan

Prior to RA mobilization, a site-specific Health and Safety Plan (HASP) will be prepared and approved by GEI's Regional Health and Safety Director. GEI oversight personnel will work under this HASP at the Site. The selected remediation contractor will prepare their own site-specific HASP in accordance with N.J.A.C. 7:26E-1.9, 29 CFR 1910.120, and 29 CFR 1926. Remediation contractor personnel will work under the remediation contractor's HASP, which may include activities not covered in the GEI HASP. GEI will provide a copy of the GEI HASP to the remediation contractor to aid them in developing their own site-specific HASP.

4.2 Remedial Action Construction Activities

The following sections present details regarding the planned implementation of remediation activities at the Site.

4.2.1 Mobilization

Site support facilities will be established in designated support areas within the Site. Construction equipment will be mobilized to the Site and staged in a designated equipment

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

staging area during the project. A decontamination area for construction vehicles and equipment will be established prior to initiating work. Vehicles and equipment that contact impacted soils will be decontaminated prior to entering non-impacted areas. Decontamination will include pressure washing and scrubbing to remove soil. Site safety and security measures will be implemented.

4.2.2 Site Preparation

Site preparation will include marking and protection of aboveground and underground utilities, installation of construction entrances, installation of the dewatering and water treatment system, installation of the barrier wall reagent batch plant, temporary relocation of existing fencing, and installation of sediment and erosion control measures.

The New Jersey One Call system will be contacted prior to site mobilization. A private utility locator will be retained to mark out utilities in the barrier wall and excavation areas. Utilities known to exist within the RA footprint include underground electric, gas, and water.

Soil erosion and sediment control measures will be implemented in accordance with the requirements of the approved SESC Plan. These will include the installation of approved sediment control devices (e.g., hay bales, silt-fence) around the perimeter of the work zone to minimize erosion due to surface runoff during the RA, installation of a decontamination pad to reduce the tracking of soils onto paved roadways, and storm inlet protection for catch basins.

The access points discussed in Section 4.1.3 will be improved as necessary to allow for entry and egress of remediation contractor personnel, equipment, and vehicles (e.g., soil haul trucks). Portions of the existing interior fencing will be temporarily relocated to access the RA work areas. Following RA completion, these removed portions of fence will be reinstalled.

4.2.3 Perimeter Air Monitoring

While the RA is performed, ETG will implement a Perimeter Air Monitoring Program (PAMP) to measure concentrations of dust and volatile compounds. The purpose of PAMP is to provide the data needed to demonstrate that the RA has not resulted in the generation of unacceptable levels of fugitive emissions, vapors, odors, and dust. The PAMP will be similar to plans implemented at the Site during earlier RA work. The PAMP will be submitted to and approved by the LSRP prior to implementation.

The PAMP will establish action levels for particulates, VOCs, and odors. Action levels will also be established for benzene, toluene, ethylbenzene, and xylene (BTEX) compounds and

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

naphthalene. Air monitoring stations will be placed along the perimeter of the Project Limits to measure ambient air concentrations and to allow for comparison of upwind and downwind concentrations.

The PAMP will specify background, periodic, and continuous monitoring and analysis methods that will be used to measure and document the concentrations of fugitive emissions (if any) from the RA. These methods include real-time screening of total VOCs and particulates smaller than 10 microns, on-site as-needed screening of grab samples for BTEX and naphthalene, regular assessments of odor intensity, and periodic collection of composite time-weighted-average samples for off-site laboratory analysis of VOCs and semi-volatile organic compounds (SVOCs). An on-site meteorological station will record atmospheric factors including wind direction, speed, relative humidity, temperature, and rainfall.

The PAMP does not address breathing zone air monitoring for workers within the Project Limits. GEI and the remediation contractor will perform their own worker-protection air monitoring in the breathing zone as needed.

4.2.4 Utility Clearance and Protection

After completing the installation of temporary facilities and controls, the remediation contractor will begin ground-intrusive work with soft-dig hydro-excavation at select locations along the barrier wall alignment to locate known and suspected utilities. The locations of known subsurface utilities and overhead utilities are depicted on sheet C-01 and C-02 of the design drawing set. When a utility is exposed, electromagnetic signal tracing and/or soft-dig potholing will be used to confirm its alignment within and adjacent to the barrier wall alignment. Encountered unknown utilities will be traced, and a qualified contractor will perform safe taps as needed to determine whether they are active or derelict. Following this determination, the utility may be removed, protected, or abandoned in place as decided by ETG and the remediation contractor.

Barrier wall construction will require crossing multiple utilities, including the 30-inch PSE&G gas line. Work around the PSE&G gas line will require hand excavation and barrier wall installation procedures will be modified as shown on sheet D-04. Work underneath overhead utility lines will require protections as shown on sheet D-05. Utility support plans (if needed) will be prepared by the remediation contractor and submitted to GEI for review, and the work will be closely coordinated with ETG operations and the utility owner.

4.2.5 Waste Characterization Sampling

The remediation contractor will perform waste characterization sampling as needed during the RA to profile materials for disposal either by thermal treatment or by direct landfilling.

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

Material that is unsuitable for thermal treatment will be sent to an approved and permitted landfill for disposal. Soils will be shipped in accordance with applicable regulations and requirements, including United States Department of Transportation (USDOT), state Department of Transportation (DOT), federal and state waste transporter regulations as well as requirements for containing, labeling, manifesting, packaging, and transporting soil. The truck haul route shown on sheet C-03 was developed in collaboration with City of Elizabeth to maintain roadway clearance and avoid residential areas, if possible.

4.2.6 Barrier Well Installation

The subsurface barrier wall is expected to consist of a combination of self-hardening cement bentonite slurry-supported trench sections and jet grout sections. The approximate alignments of these sections are shown on sheet C-09. The termination depths of soil explorations in the vicinity of the proposed barrier wall alignment are shown in profile on sheet C-09. These soil exploration termination depths show that the weathered bedrock interface varies along the proposed barrier wall alignment. Actual refusal depths for the barrier wall may be deeper or shallower than the refusal depths of prior soil explorations, due to subsurface variability and the differences in equipment and methods for soil exploration versus barrier wall construction.

For the cement bentonite slurry-supported trench sections, the slurry will be mixed at the grout plant and pumped via hose to the working trench area. Soils will be excavated from the trench as the slurry is added. Trench spoils will be transported to the spoils containment area as shown on sheet C-04 for handling and characterization prior to off-site disposal. The slurry trench depth will be advanced to the weathered bedrock as indicated by excavator refusal. Vertical extents of the completed cement bentonite barrier wall sections will be recorded by manual soundings by the remediation contractor before the trench hardens.

Prior to installation of jet grout columns, the barrier wall alignment will be pre-excavated to approximately three feet below ground surface to contain swell, and the column layout will be surveyed and marked. Grout will be mixed at the grout plant in accordance with the approved mix design and pumped via hose to the jet grout rig for column installation. At utility crossings, the column layout may be adjusted to maintain required utility clearances. To complete the wall in proximity to the PSE&G gas line, hand excavation and soil bentonite slurry panels may be required as shown on sheet D-04. Bentonite-coated gravel fill (i.e., AquaBlok) may be used around utility crossings in lieu of soil-bentonite slurry panels. Return spoils generated from jet grout column installation will be transported to the spoils containment area for handling and characterization prior to off-site disposal.

For both cement bentonite slurry-supported trench sections and jet grout sections, quality assurance / quality control (QA/QC) samples will be collected during construction in

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

accordance with project specifications. QA/QC samples will be collected and tested for unconfined compressive strength (UCS) and permeability. Samples failing to meet established UCS and/or permeability standards may result in reprocessing of associated barrier wall sections as determined by the Engineer.

4.2.7 Area B Deep Holder Excavation

Excavation within the Area B deep holder will be performed with conventional excavating equipment to the horizontal and vertical excavation limits shown on sheet D-06 of the design drawing set. The holder walls will be used for excavation support pending results of mortar strength testing. Additional internal bracing will be used if results indicate the holder walls will not provide sufficient support for the proposed excavation depth. The holder will be excavated to the weathered bedrock interface, which is anticipated to be approximately 30 feet below ground surface. The excavation will be dewatered via sump dewatering. Well point dewatering outside of the holder wall may be needed to relieve hydrostatic pressure. Excavated soils will be placed in the spoils containment area shown on sheet D-06 for handling and characterization prior to off-site disposal.

4.2.8 Dewatering and Water Treatment

Trench dewatering is not expected to be necessary for barrier wall construction but contact water will be generated in the spoils management area. Dewatering will be required during Area B deep holder excavation as described above.

Contact water will also be generated by direct precipitation and by run-on into un-remediated areas, and by vehicle and equipment decontamination.

Contact water will be pumped to frac tanks for storage and settling prior to pretreatment followed by discharge to the combined sewer system in accordance with the permitting described in Section 4.1.2.

The remediation contractor will install and operate a temporary on-site water treatment system (WTS) for contact water. The WTS unit process treatment train is likely to include the following, as necessary:

1. Influent storage tanks for gravity separation
2. Particle filtration with bag filters
3. Organo-clay filtration media to adsorb entrained NAPL
4. Granular activated carbon media to adsorb dissolved organic COCs (polishing filters)
5. Ultra-fine particle filtration (cartridge filters) to protect ion exchange resin bed

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

6. Ion-exchange resin bed
7. Effluent storage tanks

Influent contact water may contain separate-phase liquids (NAPL/DNAPL). The influent tanks may include over-under weirs to trap and contain separate-phase liquids. The influent water may have a high concentration of total suspended solids, which will be at least partially removed by gravity settling within the quiescent influent storage tanks.

4.2.9 Surficial Excavation

Approximately six to 12 inches of surface soil may be removed from Areas C and F prior to placement of the semi-permeable crushed stone cap, such that final grades are approximately equal to pre-construction grades. This is necessary to maintain flood storage capacity within the flood hazard zones. Surface soil will be characterized and properly disposed offsite.

4.2.10 Backfilling, Capping, Grading, and Restoration

Clean fill from an off-site source will be used to return the elevations within the project limits to approximately existing grade as shown on sheets C-10 and D-06. The fill material will be approved for usage with respect to environmental quality by the project LSRP prior to usage. The clean soil backfill will be placed in lifts and compacted to meet design density standards. Restoration will include installation of a semi-permeable crushed stone cap across Areas C and F. The semi-permeable cap will consist of six-inches of compacted thickness of DGA, topped by two inches of gravel as a protective surface. Clean fill documentation in accordance with the requirements of NJDEP Fill Material Guidance for SRP Sites, April 2015, will be obtained and provided in the Remedial Action Report (RAR).

4.2.11 Demobilization

Demobilization will include removal of erosion controls, decontamination facilities, temporary fencing and barriers, earthmoving equipment, and temporary office and sanitary facilities. Surplus construction materials (e.g., stockpiles of clean fill), waste materials, and rubbish will be removed from the Site and disposed in accordance with applicable laws and regulations. A topographic survey of the final grade within the RA footprint will be performed. The SESC permit will be terminated after the applicable inspections are conducted by the issuing agency.

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

5. Cost Estimate

The estimated cost to perform the RA is approximately \$15 million.

Remedial Action Work Plan
Erie Street Former MGP Site
Remediation Areas C, E, & F
3rd Avenue and South Second Street
Elizabeth, New Jersey 07206
NJDEP PI #030684
July 2023

6. Schedule

As required under N.J.A.C. 7:26E-5.5(b) 11, this work is anticipated to commence during the second half of 2023 and have a duration of approximately 12 months.

MFR-3 For each of the same three MGP sites, provide all correspondence between the Company and the NJDEP concerning submissions for the site, reply comments, and other major items which have a material impact on remediation activities and associated costs incurred by the Company. The correspondence should span the twelve months of the most recent RAC period.

During the most recent RAC period, the remediation at these sites was under the oversight of LSRPs pursuant to SRRA. There was no correspondence between the Company and NJDEP concerning submissions for the sites, reply comments, and other major items having material impacts on the remediation activities and associated costs for the sites.

MFR-4 For each of the same three MGP sites, provide expense documentation for any contractor or supplier whose invoices for the RAC period exceed \$250,000 in aggregate. The expense documentation should include descriptions of services rendered, applicable invoices, and any tracking of invoiced charges vs. budgets. The expense detail need not include expense reports or time sheets, but it should include supporting documentation for any subcontractor and third party expenses totaling \$100,000 or more for the period.

Please see attachment MFR-1.1 for the list of vendor costs by site. Attachment MFR-4.1 contains a detailed list of invoices for three contractors for Erie Street, Creamer Environmental (Creamer), GEI Consultants (GEI), and Veolia ES (Veolia) that met the \$250,000 criteria detailed above.

Summaries for the subcontractors employed by GEI, Creamer and Veolia used to determine which subcontractors met the \$100,000 threshold described above are attached. Attachment MFR-4.2 provides the summary for GEI, attachment MFR-4.3 is the summary for Creamer and MFR-4.4 is a summary for Veolia ES. Please note that MFR-4.4 as prepared by Veolia includes MGP work performed at South Street and Erie Street sites, as well as non-RAC-related work. The Veolia billing system does not track the sites or RAC-related work separately; however, the work is invoiced separately and ETG reviews and assigns specific invoices to the appropriate RAC sites and non-RAC accounts. This total also includes expenses that have not been included in this RAC filing as the invoices have not yet been paid.

Please note no subcontractor table is provided for St. Demetrios Greek Orthodox Church at the Perth Amboy site as the church does not represent a contractor or supplier. The invoice is related to reimbursement of costs and compensation during the remediation at St. Demetrios Greek Orthodox Church.

Please also note no subcontractor table is provided for JCP&L at the Newton site as the Company pays a 40% share of what is billed to JCP&L directly to JCP&L in

accordance with the remediation cost sharing agreement for the Newton site. Vendor information is included in the backup to confidential invoices for JCP&L.

The Company considers the requested invoices confidential and proprietary. Such information is competitively sensitive in that it would provide potential vendors with information that is normally not made available in negotiations. The requested information will be provided to parties executing an appropriate confidentiality agreement.

Elizabethtown Gas Company
 Vendors With Invoices Exceeding \$250,000
 July 2023 - June 2024
 Creamer - Erie St

SLC-2
 MFR-4.1
 Page 1 of 6

Site Name	Vendor	GL Status	Invoice No.	RAC Total	Account Date Approved	Acct	DeptID
Erie St	Creamer Environmental, Inc.		1395	146,565.00	Jan-24	166063	0452
Erie St	Creamer Environmental, Inc.		1408	66,937.50	Mar-24	166063	0452
Erie St	Creamer Environmental, Inc.		1418	831,708.81	May-24	166063	0452
Erie St	Creamer Environmental, Inc.		1425	523,703.06	Jun-24	166063	0452
Erie St	Creamer Environmental, Inc.		1437	1,924,690.00	Jun-24	166063	0452
Erie St	Creamer Environmental, Inc.		1444	1,599,164.34	Jun-24	166063	0452
			Total \$	5,092,768.71			

Elizabethtown Gas Company
 Vendors With Invoices Exceeding \$250,000
 July 2023 - June 2024
 GEI - Erie St

SLC-2
 MFR-4.1
 Page 2 of 6

Site Name	Vendor	GL Status	Invoice No.	RAC Total	Account Date Approved	Acct	DeptID
Erie St	GEI Consultants, Inc.		3132546	96,825.15	Jul-23	166063	0452
Erie St	GEI Consultants, Inc.		3132547	1,894.05	Jul-23	166063	0452
Erie St	GEI Consultants, Inc.		3134470	83,664.99	Aug-23	166063	0452
Erie St	GEI Consultants, Inc.		3134471	1,613.45	Aug-23	166063	0452
Erie St	GEI Consultants, Inc.		3136377	64,353.73	Sep-23	166063	0452
Erie St	GEI Consultants, Inc.		3136378	2,665.70	Sep-23	166063	0452
Erie St	GEI Consultants, Inc.		3138668	64,329.92	Oct-23	166063	0452
Erie St	GEI Consultants, Inc.		3138669	1,403.00	Oct-23	166063	0452
Erie St	GEI Consultants, Inc.		3139842	117,636.24	Dec-23	166063	0452
Erie St	GEI Consultants, Inc.		3143808	51,155.08	Jan-24	166063	0452
Erie St	GEI Consultants, Inc.		3143809	140.30	Jan-24	166063	0452
Erie St	GEI Consultants, Inc.		3141684	67,002.21	Feb-24	166063	0452
Erie St	GEI Consultants, Inc.		3141685	140.30	Feb-24	166063	0452
Erie St	GEI Consultants, Inc.		3145715	99,961.75	Feb-24	166063	0452
Erie St	GEI Consultants, Inc.		3145716	170.50	Feb-24	166063	0452
Erie St	GEI Consultants, Inc.		3145717	164.09	Feb-24	166063	0452
Erie St	GEI Consultants, Inc.		3147290	92,900.95	Mar-24	166063	0452
Erie St	GEI Consultants, Inc.		3147291	930.21	Mar-24	166063	0452
Erie St	GEI Consultants, Inc.		3149059	100,544.96	Apr-24	166063	0452
Erie St	GEI Consultants, Inc.		003153293	0.00	May-24	166063	0452
Erie St	GEI Consultants, Inc.		003153294	0.00	May-24	166063	0452
Erie St	GEI Consultants, Inc.		3149060	1,986.57	May-24	166063	0452
Erie St	GEI Consultants, Inc.		3151742	5,076.81	May-24	166063	0452
Erie St	GEI Consultants, Inc.		3151741	124,676.65	Jun-24	166063	0452
Erie St	GEI Consultants, Inc.		003153293	144,173.88	Jun-24	166063	0452
Erie St	GEI Consultants, Inc.		003153294	1,287.55	Jun-24	166063	0452
			Total \$	1,124,698.04			

Elizabethtown Gas Company
 Vendors With Invoices Exceeding \$250,000
 July 2023 - June 2024
 Veolia - Erie St

Site Name	Vendor	GL Status	Invoice No.	RAC Total	Account Date Approved	Acct	DeptID
Erie St	Veolia ES Technical Solutions, LLC.		INV-230595	5,467.15	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-230879	5,250.50	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-230903	5,263.05	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-231110	6,056.03	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-238710	5,385.51	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239145	24,432.58	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239161	25,587.44	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239184	20,670.75	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239203	35,746.48	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239231	35,832.13	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239256	25,695.52	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239308	15,357.21	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239356	35,741.17	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239367	15,460.81	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239379	25,504.87	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-239402	25,454.02	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-240324	39,982.41	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-240343	25,044.80	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-240351	10,411.16	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-240427	5,014.19	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-240485	10,394.50	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-240500	25,491.31	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-240585	5,420.31	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-240606	10,540.63	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-244864	5,093.08	Jul-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-250874	4,583.79	Aug-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-250993	4,780.69	Aug-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-264942	583.00	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-267217	19,877.48	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-267252	5,364.40	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-272711	15,950.00	Sep-23	166063	0452

Elizabethtown Gas Company
 Vendors With Invoices Exceeding \$250,000
 July 2023 - June 2024
 Veolia - Erie St

Site Name	Vendor	GL Status	Invoice No.	RAC Total	Account Date Approved	Acct	DeptID
Erie St	Veolia ES Technical Solutions, LLC.		INV-272763	10,689.21	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-272857	34,643.81	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-273019	39,577.35	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-273099	28,985.52	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-273126	4,857.59	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-273313	26,984.35	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-273348	26,984.35	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-273414	20,867.48	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-273432	26,947.15	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-273453	32,407.62	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-273495	27,074.35	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-275375	19,597.46	Sep-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-284899	16,620.90	Oct-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-284968	14,707.50	Oct-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-286038	21,955.00	Oct-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-287096	13,381.90	Oct-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-287125	17,074.65	Oct-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-289868	22,422.40	Oct-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-289889	19,075.00	Oct-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-288446	5,397.31	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-288918	33,855.00	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-289026	21,850.00	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-289033	33,855.00	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-289813	16,466.25	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-290170	27,533.75	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-291387	31,954.50	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-291880	24,150.97	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-291916	24,871.83	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-291968	20,134.99	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292027	23,270.70	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292086	4,901.16	Nov-23	166063	0452

Elizabethtown Gas Company
 Vendors With Invoices Exceeding \$250,000
 July 2023 - June 2024
 Veolia - Erie St

Site Name	Vendor	GL Status	Invoice No.	RAC Total	Account Date Approved	Acct	DeptID
Erie St	Veolia ES Technical Solutions, LLC.		INV-292133	5,087.89	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292148	5,237.06	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292160	5,803.99	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292177	5,749.26	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292269	13,937.50	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292281	3,485.55	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292302	1,305.50	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292315	1,554.00	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292489	16,529.25	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292502	22,018.00	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292603	16,856.25	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292790	16,466.25	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292858	16,556.25	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-292875	15,141.30	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-293917	328.90	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-293956	4,180.00	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-293993	10,388.54	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-294255	5,545.07	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-296454	5,872.92	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-296841	5,304.02	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-296992	5,771.41	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-297860	13,865.80	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-297891	4,352.35	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-299065	940.50	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-299191	30,188.75	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-300516	3,228.75	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-300911	4,318.35	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-301156	787.50	Nov-23	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-295454	9,065.68	Jan-24	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-352295	805.00	Mar-24	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-366799	18,685.50	Apr-24	166063	0452

Elizabethtown Gas Company
 Vendors With Invoices Exceeding \$250,000
 July 2023 - June 2024
 Veolia - Erie St

Site Name	Vendor	GL Status	Invoice No.	RAC Total	Account Date Approved	Acct	DeptID
Erie St	Veolia ES Technical Solutions, LLC.		INV-366824	14,773.50	Apr-24	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-366865	15,833.00	Apr-24	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-366916	9,253.50	Apr-24	166063	0452
Erie St	Veolia ES Technical Solutions, LLC.		INV-369042	<u>5,228.39</u>	Apr-24	166063	0452
Total \$				1,508,977.50			

GEI Consultants

Erie St MGP Site, Elizabeth NJ

Subcontractor and Vendor Expenses July 1, 2023 through June 30, 2024

Subcontractor or Vendor Name	07 2023	08 2023	09 2023	10 2023	11 2023	12 2023	01 2024	02 2024	03 2024	04 2024	05 2024	06 2024	Total
Alpha Geoscience			10,790.95			524.30			2,193.50				13,508.75
Blood Hound				551.05									551.05
Conrail			802.50					1,768.34					2,570.84
Field Environmental Instruments Inc.						5,675.91			226.58			331.81	6,234.30
Joint Meeting of Essex & Union Counties			802.50						1,605.00				2,407.50
Marsh USA										3,745.00			3,745.00
Somerset-Union Soil Conservation District	2,354.00												2,354.00
Specto Technology, LLC										7,700.99			7,700.99
Treasurer, State of NJ (NJDEP)		374.50	11,770.00	695.50		1,070.00							13,910.00
United Site Services	600.60	778.52	300.30	300.30	300.30	300.30	300.30	313.96	313.96	313.96	313.96	313.96	4,450.42
UPS	28.58	116.91	110.78	12.49	20.21	82.88	51.83	13.23	78.23	69.72	53.15	17.37	655.38
UtiliSource						15,622.00							15,622.00
Williams Scotsman	1,120.94						1,540.35	1,540.35	1,540.35	1,540.35	4,342.71	3,643.06	15,268.11
Grand Total	4,104.12	1,269.93	24,577.03	1,559.34	320.51	23,275.39	1,892.48	3,635.88	5,957.62	13,370.02	4,709.82	4,306.20	88,978.34

Notes:

1. Creamer, AirLogics, Summit, Eurofin, PSC and Vargo billed directly to Elizabethtown Gas and are not included above.
2. Equipment rentals captured using Equipment Usage Sheet are not included above.

Creamer

SJI Elizabeth Area D
SUBCONTRACTOR EXPENSES: MONTHLY AND YEAR-TO-DATE
July 1, 2023 through June 30, 2024

Subcontractor Name	July 2023	Aug 2023	Sept 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024	April 2024	May 2024	June 2024	Year To Date
ADT - Cascade (DR)						\$7,750.00		\$6,600.00		\$11,090.00			\$ 25,440.00
ANS (MT)									\$10,000.00				\$ 10,000.00
Atlas (MT)											\$846.00		\$ 846.00
Clean Earth New Castle (D)										\$113,741.00	\$765,435.00	\$111,301.00	\$ 990,477.00
Clean Earth South East PA (D)													\$ -
Cloudy2 Clear (W)										\$4,900.00			\$ 4,900.00
Consolidated Steel and Alum Fence (F)							\$3,390.00	\$84,020.00	\$96,640.00				\$ 184,050.00
Downes Tree Service (TR)									\$4,350.00				\$ 4,350.00
East Coast Geophysics (G)						\$3,200.00		\$1,600.00					\$ 4,800.00
Geo Solutions (DR)											\$416,304.00	\$536,602.00	\$ 952,906.00
Ground Water Treatment Tech (W)								\$201,692.00	\$64,122.00	\$30,422.00	\$55,823.00		\$ 352,059.00
Intergrated Geotechnical Services (G)							\$4,550.00	\$2,700.00	\$1,500.00	\$1,500.00	\$2,590.00		\$ 12,840.00
J&F Concrete Pumping											\$4,553.00	\$4,073.00	\$ 8,626.00
Reinhart Electric								\$5,600.00	\$2,140.00		\$1,440.00		\$ 9,180.00
Russel Reid (T)									\$1,997.00	\$3,982.00	\$3,796.00	\$1,999.00	\$ 11,774.00
Verum Security (SE)								\$595.00	\$3,896.00	\$5,235.00	\$3,912.00	\$3,976.00	\$ 17,614.00
Weber Survey (S)							\$3,305.00	\$7,313.00	\$13,390.00	\$3,815.00	\$3,280.00		\$ 31,103.00
TOTALS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$10,950.00	\$11,245.00	\$310,120.00	\$198,035.00	\$174,685.00	\$1,257,979.00	\$657,951.00	\$ 2,620,965.00

Codes

- | | |
|-----------------------|--------------------|
| AM = Air Monitoring | S=Surveyor |
| C= Crane Rental | SA=Safety |
| D=Disposal | SE=Security |
| DE=Demolition | W= Water Treatment |
| DR = Drilling | |
| F=Fence | |
| G=Geophysical Survey | |
| M=Masonry | |
| MT= Materials Testing | |
| T=Trucking | |
| TR=Tree Removal | |
| R=Restoration | |

Veolia ES
Subcontractor Summary

Invoice Sums by Month Serviced	Jul 23	Aug 23	Sep 23	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	Jun 24	Grand Total
MGP SOIL	\$ 50,615.40	\$ 16,082.21	\$ 4,737.70	\$ 24,963.40				\$ 805.00	\$ 5,577.00			\$ 102,780.71
WASTE WATER	\$ 112,219.20	\$ 221,532.85	\$ 34,050.80						\$ 1,410.00		\$ 1,410.00	\$ 370,622.85
Analytical	\$ 4,900.00	\$ 1,200.00	\$ 1,100.00	\$ 1,600.00		\$ 1,100.00	\$ 322.50	\$ 107.50	\$ 860.00		\$ 752.50	\$ 11,942.50
Equipment	\$ 6,104.00	\$ 10,889.25	\$ 56,067.25	\$ 1,711.50		\$ 2,816.00		\$ 1,273.89	\$ 797.17	\$ 424.63	\$ 4,472.00	\$ 84,555.69
Fees &	\$ 62,127.34	\$ 43,050.07	\$ 10,357.47	\$ 29,499.36	\$ 693.13	\$ 7,714.58	\$ 1,569.03	\$ 1,237.20	\$ 15,794.43	\$ 197.70	\$ 9,862.17	\$ 182,102.48
Labor	\$ 235.50	\$ 1,964.14	\$ 1,645.13			\$ 1,625.01		\$ 1,190.96	\$ 126.58	\$ 126.58		\$ 6,913.90
Materials	\$ 260.00	\$ 2,357.29	\$ 725.00	\$ 325.00	\$ 80.30			\$ 1,640.69	\$ 69.88	\$ 345.28		\$ 5,803.44
Services	\$ 2,025.00	\$ 7,392.50	\$ 34,437.14	\$ 2,075.00		\$ 1,690.00			\$ 537.50			\$ 48,157.14
Transportation	\$ 142,956.20	\$ 124,639.75	\$ 45,208.50	\$ 44,913.00	\$ 2,625.00	\$ 28,200.00	\$ 4,232.82	\$ 2,690.62	\$ 21,031.32	\$ 201.01	\$ 12,402.82	\$ 429,101.04
Grand Total	\$ 381,442.64	\$ 429,108.06	\$ 188,328.99	\$ 105,087.26	\$ 3,398.43	\$ 43,145.59	\$ 6,124.35	\$ 8,945.86	\$ 46,203.88	\$ 1,295.20	\$ 28,899.49	\$ 1,241,979.75

Subcontractors used: Horwith, ETGI, IWT, McVac, Reliable (used for soil, wastewater management)

MFR-5 For each of the same three MGP sites, provide a narrative description and organization chart for that site, showing the vendors and project control structure for the remediation effort. The response should show what entities supervise all significant contractors and subcontractors and which Company personnel are involved in site and remediation supervision and control.

Erie Street

The main engineering consultant utilized for investigation work at the site is GEI Consultants. GEI was contracted directly with South Jersey Industries (“SJI”). GEI reports directly to Steven Cook, SJI/ETG Environmental Specialist Lead. Steven Cook has day to day responsibility for management of ongoing remediation efforts. Steven Cook reports directly to Ken Sheppard, Director, Environmental. Ken Sheppard reports to Donna Schemp, Senior Vice President and Chief Administrative Officer of SJI.

GZA Geo Environmental provides consulting services regarding the selection of remedial action for the site. GZA reports directly to Ken Sheppard.

Creamer Environmental is the construction contractor for the remedial action. Creamer was contracted to SJI and reports directly to Steven Cook who reports through the SJI organization as described above.

Waste disposal is performed by Veolia ES. Veolia was contracted to SJI and reports directly to Steven Cook who reports through the SJI organization as described above.

H&G Public Affairs, LLC provides community outreach and public relations services regarding the site. H&G is contracted to SJI and reports directly to Steven Cook who reports through the SJI organization as described above.

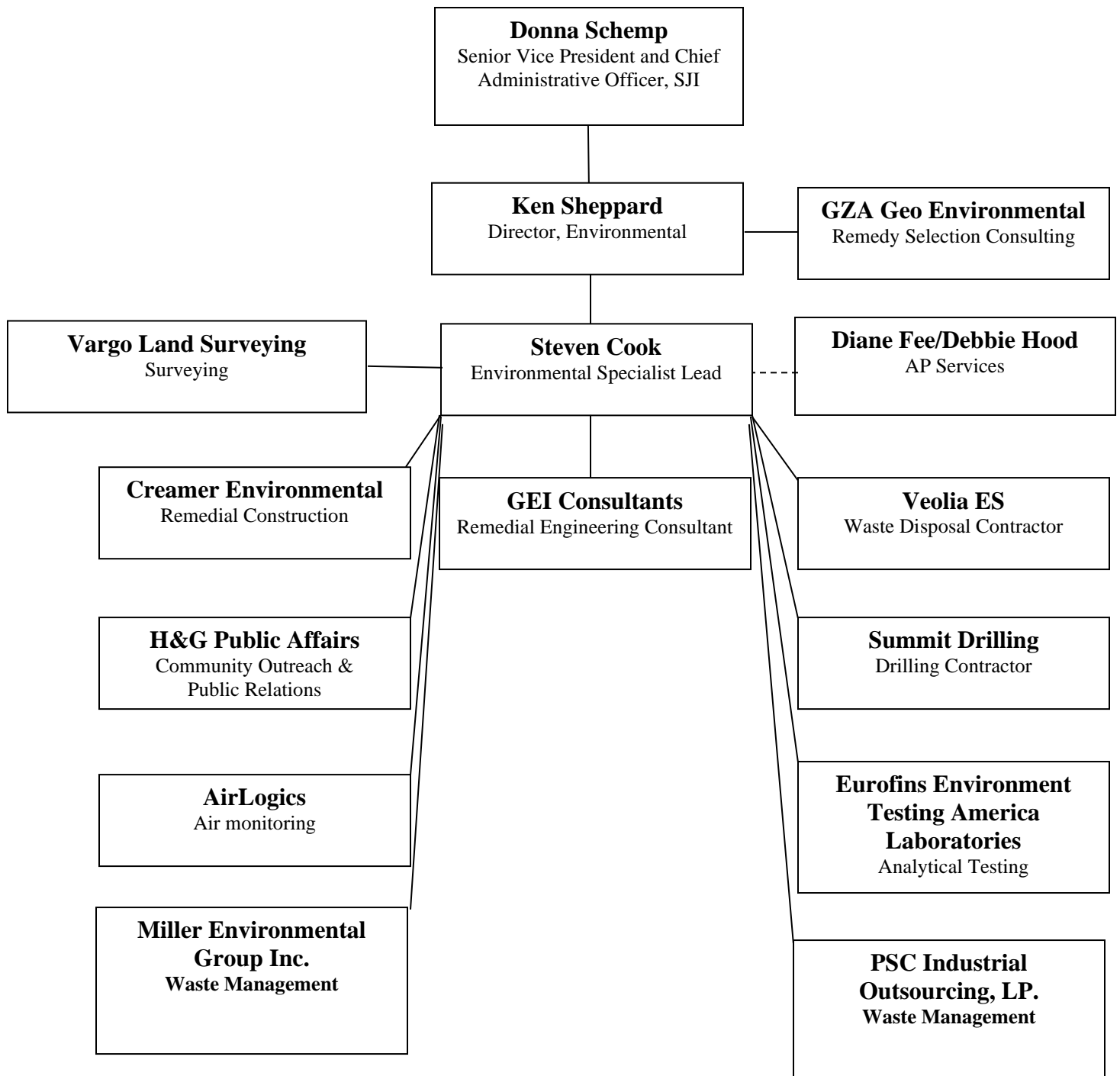
AirLogics, Summit Drilling and Eurofins Environment Testing America Laboratories are air monitoring vendor, drilling company and analytical testing provider, respectively. These vendors are contracted to SJI and report directly to Steven Cook who reports through the SJI organization as described above.

Vargo Land Surveying provides land surveying services for the remediation of the Erie Street MGP site. Vargo Land Surveying is contracted to SJI and reports directly to Steven Cook who reports through the SJI organization as described above.

Miller Environmental Group Inc. and PSC Industrial Outsourcing, LP. provide waste management services in support of investigation and remediation.

Diane Fee and Debbie Hood of SJI provided accounts payable services.

Erie Street

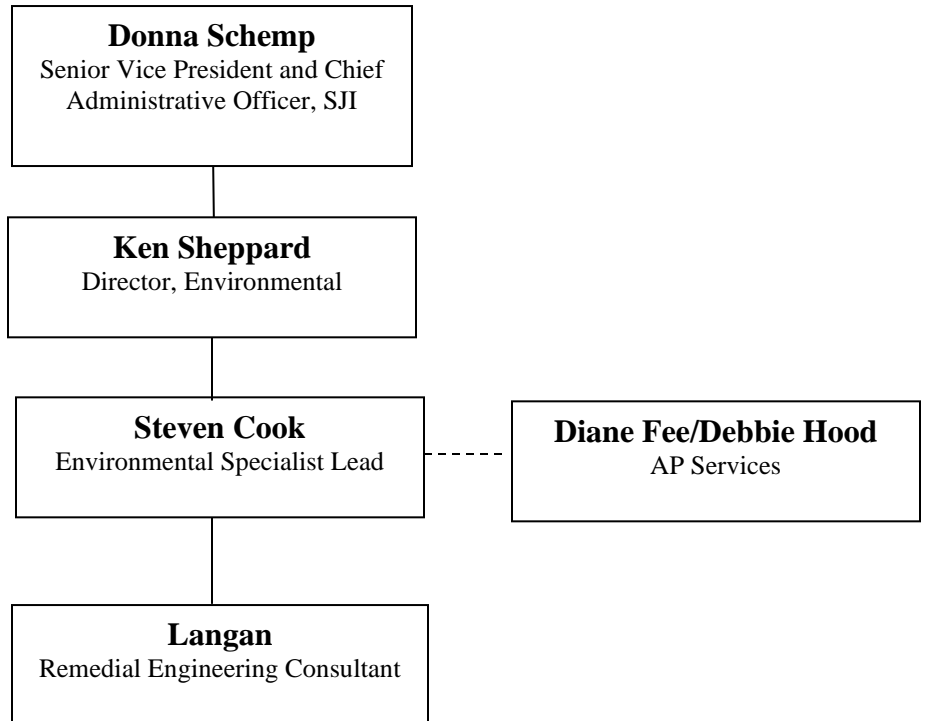


Perth Amboy

The main engineering consultant utilized for the remedial investigation work at the site is Langan Engineering and Environmental Services (“Langan”). Langan was contracted with SJI. Steven Cook has day to day responsibility for management of ongoing remediation efforts. Langan reports directly to Steven Cook, SJI/ETG Environmental Specialist Lead. Steven Cook reports through the SJI organization, as described above.

Diane Fee and Debbie Hood of SJI provided accounts payable services.

Perth Amboy



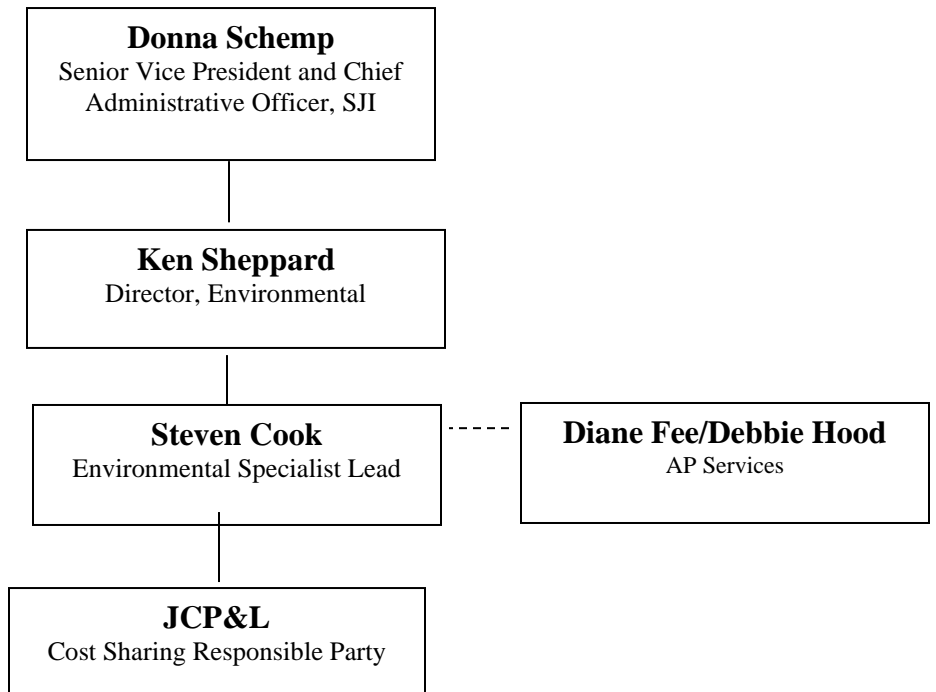
Newton

Steven Cook, SJI/ETG Environmental Specialist Lead, has day to day responsibility for management of ongoing remediation efforts. Steven Cook reports through the SJI organization as described above.

JCP&L is a cost sharing responsible party with Elizabethtown Gas pursuant to a cost sharing agreement. JCP&L is responsible for 60% of remediation costs while Elizabethtown Gas is responsible for 40% of remediation costs with equal decision making for each party.

Diane Fee and Debbie Hood of SJI provided accounts payable services.

Newton



MFR-6 Provide a detailed narrative describing Company activities and any reimbursements related to insurance claims or potentially responsible parties' liabilities for all of the Company's MGP sites. The narrative, with supporting documentation, should cover the prior RAC period. In addition, the Company should provide a listing of all insurance reimbursements received from each insurance company through the end of the year covered by the filing, but need not disclose any insurance company's identity.

During the prior RAC period, the Company continued its ongoing efforts keep its insurers periodically informed regarding the status of the MGP sites, pursue claims against insolvent insurers and seek negotiated resolutions with solvent insurers of coverage for the MGP sites.

MFR-7 Provide copies of any RAC audit reports or related materials prepared by the Board's Audit Staff, FERC, or the Company's internal or external auditors during the previous twelve months. To the degree applicable, please also provide any materials prepared in response to the audits or in compliance with any audit findings.

There have been no RAC audit reports or related materials prepared by the Board's Audit Staff or FERC during the previous twelve months that the Company is aware of. An internal audit was performed during the previous twelve months. Per the Board's Order dated November 30, 2011 in Docket No. GA10110840, the Company's Internal Audit group conducted an audit of the RAC period July 1, 2022 through June 30, 2023.

The Company considers the requested information confidential and proprietary. A copy of the audit report dated December 26, 2023 will be provided to parties executing an appropriate confidentiality agreement as confidential attachment MFR-7.1.

MFR-8 **Provide a narrative concerning all material events, whether related to NJDEP mandates or not, which could have an impact on the Company's ultimate MGP remediation liability, with claimed confidential information provided pursuant to a confidentiality agreement. The narrative should encompass all sites, whether or not active remediation efforts on the site are under way.**

No material events occurred during the RAC period from July 1, 2023 through June 30, 2024.

MFR-10 Provide the Company's bid evaluation studies, reports, workpapers or other material related to the two largest MGP remediation contracts awarded during the previous RAC period. The response should include the criteria utilized for bid evaluation and the comparisons between the terms and conditions offered by the competitive bidders.

The Company considers the requested information confidential and proprietary. Such information is competitively sensitive in that it would provide potential vendors with information that is normally not made available in negotiations. The requested information will be provided to parties executing an appropriate confidentiality agreement. Confidential attachment MFR-10.1 includes bid evaluations for awarding a remedial action contract for the Erie Street site.

MFR-11 Provide documentation relating to the two largest supplemental contract amendments authorized by the Company during their previous RAC period. The response should provide the contractor's request for supplemental funding, the reasons cited for the request, and the Company's evaluation and action taken concerning the request.

Per the Board Order in Docket No. GR13090839, the Company agrees that as part of its response to MFR-11 the Company will provide affirmative support that unit prices were maintained from the original master agreement for change orders or supplemental contracts that were not subject to competitive bidding or otherwise explain any unit price variations.

The Company considers this information confidential and proprietary. Such information is competitively sensitive in that it would provide potential vendors with information that is normally not made available in negotiations. The requested information will be provided to parties executing an appropriate confidentiality agreement as confidential attachment MFR-11.1.

Confidential attachment MFR-11.1 contains documentation regarding the largest supplemental contract amendments authorized by the Company during the most recent RAC period, including the contractor's request for supplemental funding and the reason for the request.

The Company evaluates all requests for additional funding based on whether the reason for the requested funding was known or should have been known at the time of bidding and contract award. The Company also evaluates requests for additional funding on proposed costs compared to unit costs, if available, reasonableness of the requested costs and whether the need for the requested additional funding was a result of the contractor's action or inaction.

Based on the Company's evaluation, the Company ultimately approved the attached request for additional funding.

MFR-12 Provide documentation relating to any instances during the previous RAC period where the Company sought to modify, change, or eliminate the NJDEP site remediation requirements for any of its MGP sites. The response should provide copies of any such Company requests, the NJDEP responses, and the ultimate outcome concerning the requests.

There were no instances during the previous RAC period where the Company sought to modify, change or eliminate NJDEP site remediation requirements for any of its MGP sites.

MFR-14 **The Company currently provides a schedule that summarizes the expenditures incurred by major cost category by site on a quarterly basis. These data will be reported with its annual filing.**

Please see attachment MFR-14.1 for schedules that summarize the expenditures incurred by major cost category by site on a quarterly basis.

**Elizabethtown Gas Company
Manufactured Gas Plant Remediation Program**

**Summary Statement of Site Expenses
Quarterly Report
July 2023 through September 2023**

Line No.	Description	Consulting/ Remediation	Legal	NJDEP Oversight	Natural Resource Damages (NRD)	Other	(1) Total Remediation Expenses	(2) NRD Deferral 100%	(3) Ins. Lit./ Third Party Deferral 50%	(4) Recovery of Prior Deferred Expenses	(5) Third Party Recoveries	Amortizable Recoverable Expenses This Quarter	Remediation Year To Date Recoverable Expenses
1	Elizabeth (Erie Street)	\$1,084,228					\$1,084,228					\$1,084,228	\$1,084,228
2	Elizabeth (South Street)	\$5,919					\$5,919					\$5,919	\$5,919
3	Rahway						\$0					\$0	\$0
4	Perth Amboy	\$904,782	\$6,834				\$911,616					\$911,616	\$911,616
5	Flemington						\$0					\$0	\$0
6	Newton	\$371,851					\$371,851					\$371,851	\$371,851
7	Renora (Erie Street)						\$0					\$0	\$0
8	Internal (6)					\$59,726	\$59,726					\$59,726	\$59,726
9	Misc. (7)	\$60,068					\$60,068					\$60,068	\$60,068
10	Insurance Litigation/ Third Party Claims						\$0					\$0	\$0
11		\$2,426,848	\$6,834	\$0	\$0	\$59,726	\$2,493,408	\$0	\$0	\$0	\$0	\$2,493,408	\$2,493,408

Notes:

- 1 Line 10 - Pursuit of Third Party Claims at 100% of expenses incurred, 50% of which is deferred pending a Third Party recovery.
- 2 100% of Natural Resource Damages deferred pending BPU resolution.
- 3 50% of the expenses incurred in the pursuit of Insurance and/or Third Party Claims.
- 4 Allowable recovery of the deferred expenses incurred in pursuit of Insurance and/or Third Party recoveries.
- 5 Credit of 100% of amounts received from Third Parties.
- 6 Costs include internal labor and labor related costs.
- 7 Costs include costs associated with liability cost estimating.

Elizabethtown Gas Company
Manufactured Gas Plant Remediation Program

Summary Statement of Site Expenses
Quarterly Report
October 2023 through December 2023

Line No.	Description	Consulting/ Remediation	Legal	NJDEP Oversight	Natural Resource Damages (NRD)	Other	(1) Total Remediation Expenses	(2) NRD Deferral 100%	(3) Ins. Lit./ Third Party Deferral 50%	(4) Recovery of Prior Deferred Expenses	(5) Third Party Recoveries	Amortizable Recoverable Expenses This Quarter	Remediation Year To Date Recoverable Expenses
1	Elizabeth (Erie Street)	\$883,322					\$883,322					\$883,322	\$1,967,550
2	Elizabeth (South Street)	\$1,383					\$1,383					\$1,383	\$7,302
3	Rahway						\$0					\$0	\$0
4	Perth Amboy		\$134				\$134					\$134	\$911,750
5	Flemington						\$0					\$0	\$0
6	Newton	\$1,542,313					\$1,542,313					\$1,542,313	\$1,914,164
7	Renora (Erie Street)						\$0					\$0	\$0
8	Internal (6)					\$63,237	\$63,237					\$63,237	\$122,963
9	Misc. (7)	\$25,771					\$25,771					\$25,771	\$85,839
10	Insurance Litigation/ Third Party Claims						\$0					\$0	\$0
11		\$2,452,789	\$134	\$0	\$0	\$63,237	\$2,516,160	\$0	\$0	\$0	\$0	\$2,516,160	\$5,009,568

Notes:

- 1 Line 10 - Pursuit of Third Party Claims at 100% of expenses incurred, 50% of which is deferred pending a Third Party recovery.
- 2 100% of Natural Resource Damages deferred pending BPU resolution.
- 3 50% of the expenses incurred in the pursuit of Insurance and/or Third Party Claims.
- 4 Allowable recovery of the deferred expenses incurred in pursuit of Insurance and/or Third Party recoveries.
- 5 Credit of 100% of amounts received from Third Parties.
- 6 Costs include internal labor and labor related costs.
- 7 Costs include costs associated with liability cost estimating.

Elizabethtown Gas Company
Manufactured Gas Plant Remediation Program

Summary Statement of Site Expenses
Quarterly Report
January 2024 through March 2024

Line No.	Description	Consulting/ Remediation	Legal	NJDEP Oversight	Natural Resource Damages (NRD)	Other	(1) Total Remediation Expenses	(2) NRD Deferral 100%	(3) Ins. Lit./ Third Party Deferral 50%	(4) Recovery of Prior Deferred Expenses	(5) Third Party Recoveries	Amortizable Recoverable Expenses This Quarter	Remediation Year To Date Recoverable Expenses
1	Elizabeth (Erie Street)	\$558,974					\$558,974					\$558,974	\$2,526,524
2	Elizabeth (South Street)	\$8,139					\$8,139					\$8,139	\$15,441
3	Rahway						\$0					\$0	\$0
4	Perth Amboy	\$1,850					\$1,850					\$1,850	\$913,600
5	Flemington						\$0					\$0	\$0
6	Newton	\$581,090					\$581,090					\$581,090	\$2,495,254
7	Renora (Erie Street)						\$0					\$0	\$0
8	Internal (6)					\$39,238	\$39,238					\$39,238	\$162,201
9	Misc. (7)	\$51,115					\$51,115					\$51,115	\$136,954
10	Insurance Litigation/ Third Party Claims						\$0					\$0	\$0
11		\$1,201,168	\$0	\$0	\$0	\$39,238	\$1,240,406	\$0	\$0	\$0	\$0	\$1,240,406	\$6,249,974

Notes:

- 1 Line 10 - Pursuit of Third Party Claims at 100% of expenses incurred, 50% of which is deferred pending a Third Party recovery.
- 2 100% of Natural Resource Damages deferred pending BPU resolution.
- 3 50% of the expenses incurred in the pursuit of Insurance and/or Third Party Claims.
- 4 Allowable recovery of the deferred expenses incurred in pursuit of Insurance and/or Third Party recoveries.
- 5 Credit of 100% of amounts received from Third Parties.
- 6 Costs include internal labor and labor related costs.
- 7 Costs include costs associated with liability cost estimating.

Elizabethtown Gas Company
Manufactured Gas Plant Remediation Program

Summary Statement of Site Expenses
Quarterly Report
April 2024 through June 2024

Line No.	Description	Consulting/ Remediation	Legal	NJDEP Oversight	Natural Resource Damages (NRD)	Other	(1) Total Remediation Expenses	(2) NRD Deferral 100%	(3) Ins. Lit./ Third Party Deferral 50%	(4) Recovery of Prior Deferred Expenses	(5) Third Party Recoveries	Amortizable Recoverable Expenses This Quarter	Remediation Year To Date Recoverable Expenses
1	Elizabeth (Erie Street)	\$5,481,146					\$5,481,146					\$5,481,146	\$8,007,670
2	Elizabeth (South Street)	\$27,123					\$27,123					\$27,123	\$42,564
3	Rahway						\$0					\$0	\$0
4	Perth Amboy	\$851					\$851					\$851	\$914,451
5	Flemington						\$0					\$0	\$0
6	Newton	\$648,902					\$648,902					\$648,902	\$3,144,156
7	Renora (Erie Street)						\$0					\$0	\$0
8	Internal (6)					\$26,881	\$26,881					\$26,881	\$189,082
9	Misc. (7)	\$57,571					\$57,571					\$57,571	\$194,525
10	Insurance Litigation/ Third Party Claims						\$0					\$0	\$0
11		\$6,215,593	\$0	\$0	\$0	\$26,881	\$6,242,474	\$0	\$0	\$0	\$0	\$6,242,474	\$12,492,448

Notes:

- 1 Line 10 - Pursuit of Third Party Claims at 100% of expenses incurred, 50% of which is deferred pending a Third Party recovery.
- 2 100% of Natural Resource Damages deferred pending BPU resolution.
- 3 50% of the expenses incurred in the pursuit of Insurance and/or Third Party Claims.
- 4 Allowable recovery of the deferred expenses incurred in pursuit of Insurance and/or Third Party recoveries.
- 5 Credit of 100% of amounts received from Third Parties.
- 6 Costs include internal labor and labor related costs.
- 7 Costs include costs associated with liability cost estimating.

Elizabethtown Gas Company
Manufactured Gas Plant Remediation Program

Summary Statement of Site Expenses
Annual Report
July 1, 2023 through June 30, 2024

Line No.	Description	Consulting/ Remediation	Legal	NJDEP Oversight	Natural Resource Damages (NRD)	Other	(1) Total Remediation Expenses	(2) NRD Deferral 100%	(3) Ins. Lit/ Third Party Deferral 50%	(4) Recovery of Prior Deferred Expenses	(5) Third Party Recoveries	Net Remediation Cost This Period
1	Elizabeth (Erie Street)	\$8,007,670					\$8,007,670					\$8,007,670
2	Elizabeth (South Street)	\$42,564					\$42,564					\$42,564
3	Rahway						\$0					\$0
4	Perth Amboy	\$907,483	\$6,968				\$914,451					\$914,451
5	Flemington						\$0					\$0
6	Newton	\$3,144,156					\$3,144,156					\$3,144,156
7	Renora (Erie Street)						\$0					\$0
8	Internal (6)					\$189,082	\$189,082					\$189,082
9	Misc. (7)	\$194,525					\$194,525					\$194,525
10	Insurance Litigation/ Third Party Claims						\$0					\$0
11		\$12,296,398	\$6,968	\$0	\$0	\$189,082	\$12,492,448	\$0	\$0	\$0	\$0	\$12,492,448

Notes:

- 1 Line 10 - Pursuit of Third Party Claims at 100% of expenses incurred, 50% of which is deferred pending a Third Party recovery.
- 2 100% of Natural Resource Damages deferred pending BPU resolution.
- 3 50% of the expenses incurred in the pursuit of Insurance and/or Third Party Claims.
- 4 Allowable recovery of the deferred expenses incurred in pursuit of Insurance and/or Third Party recoveries.
- 5 Credit of 100% of amounts received from Third Parties.
- 6 Costs include internal labor and labor related costs.
- 7 Costs include costs associated with liability cost estimating.

MFR-15 For each of the Company’s MGP sites, provide a schedule showing the status of the remediation effort and estimated dates for the completion of remaining milestones, along with a discussion of major remediation problems. The parties understand that the timeframes to complete the remediation efforts are subject to a great deal of uncertainty due to factors beyond the Company’s control.

The following provides the current status of remedial activities at each of the Company’s MGP sites, an estimated schedule for completion of remaining milestones and a discussion of major remediation problems. Please note that the estimated time frames are subject to a great deal of uncertainty due to factors beyond the Company’s control.

Erie Street

- The Company evaluated remedial strategies for offsite Area of Concern (“AOCs”).
- The Company initiated and continues remedial action implementation for Areas C, E and F as well as the remediation of a large subsurface gas holder in Area B of the site. The remediation of all on-site soils is expected to be completed during the fourth quarter of 2024.
- Off-site AOCs including the former Bilkay’s property, South Second Street, Third Avenue, 236 Erie Street and the Elizabeth River will be evaluated while on-site AOCs are undergoing remediation.
- Groundwater remediation will likely be a long-term process and include a pump and treat scenario.

Major remediation problems at Erie Street include offsite impacts in two city streets and four offsite properties. The site’s proximity to residential properties and the fact that the site continues to be an important operational facility to the Company may also complicate remedial activities.

South Street

- The Company completed groundwater sampling and is developing a groundwater remediation strategy in 2024.
- The Company estimates that a long-term groundwater remedy, likely including a pump and treat scenario, would be in place by 2025.

Major remediation problems include MGP related non-aqueous phase liquids (“NAPL”) within bedrock fractures beneath the location of the former large gas holder.

Perth Amboy

- The Company completed a remediation on Perth Amboy owned Sadowski Parkway and Sadowski Park. The Licensed Site Remediation Professional has issued Response Action Outcome (“RAO”) for all on-site and off-site AOCs.

Flemington

- The Company and JCP&L completed the remediation of the onsite and offsite soils and offsite wetlands and stream sediment.
- The Company and JCP&L are currently completing administrative requirements to close out the site, including the issuance of a Remedial Action Report, a Remedial Action Permit, and an RAO.
- The Company and JCP&L continue with wetlands restoration and monitoring.

Newton

- Remediation of MGP source areas on the property was completed in the second quarter of 2024.
- The Company will also implement a long-term groundwater remedy which will include a pump and treat scenario.

Potential remedial problems include off site impacts in bedrock that will require deed restrictions on third party owned property.

MFR-16 Provide an update concerning the status of discussions with the NJDEP concerning its NRD initiative as well as any other NRD-related activities, with claimed confidential information provided pursuant to a confidentiality agreement. Such update will include information about NRD-related expenditures during the prior RAC period and related documentation, as well as total NRD-related expenses deferred to date.

The Company has not had any discussions with the NJDEP concerning natural resources damages (“NRD”) issues during the prior RAC period. The Company has not incurred any NRD-related costs -- defined as compensation to the State of New Jersey for injury to its natural resources -- above and beyond costs incurred to investigate, contain or remediate former manufactured gas plant sites. NRD-related costs also include any administrative, legal or consulting costs incurred by the Company associated with NRD claims being investigated by the NJDEP, as well as any amounts paid by the Company to resolve such claims.

The Company has not deferred any NRD-related expenses to date as none were incurred.

MFR-17 **Provide information about unreasonable delays in remediation efforts caused by the inability to obtain requisite approvals, clearances or other rights from the NJDEP, local authorities or property owners, or other circumstances that are unduly impeding remediation efforts. The Company will address issues that are outside of the ordinary experience for these matters.**

Per the Board Order in Docket No. GR13090839, the Company agrees that as part of its response to MFR-17, the Company will provide a detailed explanation of the causes of any variances between budgeted and actual expenditures in the RAC period at issue in the filing.

Delays in NJDEP permitting and 3rd party property owner coordination caused discrepancies between budgeted and actual expenditures based on timing.

MFR-18 Provide details concerning all remediation related charges to the Company from or through the Company's parent, SJI Utilities, and its affiliates for the past RAC period. The response should show amounts by month, by entity, and should describe the nature of services provided.

Charges to the Company from or through SJI and its affiliates for the past RAC period are detailed in attachment MFR-18.1. Services provided include invoice processing, waste management and internal legal review as well as overall oversight of the ETG program.

**Affiliate charges included in RAC
July 2023 - June 2024**

<u>Type</u>	<u>Month</u>	<u>Amount</u>
Payroll	Jul-23	\$ 18,065.12
Payroll	Aug-23	\$ 22,637.26
Payroll	Sep-23	\$ 19,024.06
Payroll	Oct-23	\$ 24,478.80
Payroll	Nov-23	\$ 16,965.91
Payroll	Dec-23	\$ 21,792.60 *
Payroll	Jan-24	\$ 12,243.79
Payroll	Feb-24	\$ 16,378.62
Payroll	Mar-24	\$ 10,615.75
Payroll	Apr-24	\$ 9,659.17
Payroll	May-24	\$ 9,484.90
Payroll	Jun-24	\$ 7,737.24
		<u>\$ 189,083.22</u>

* Includes adjustment for November 2023.