Joseph F. Accardo Jr. Law Department Deputy General Counsel 80 Park Plaza, T5G, Newark, NJ 07102 tel: 973.430.5811 cell: 201.709.1274 h.AccardoJr@PSEG.com



September 1, 2017 OF PUBLIC UTILITIES

## VIA ELECTRONIC & OVERNIGHT MAIL.

Irene Kim Asbury, Secretary New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor P.O. Box 350 Trenton, New Jersey 08625-0350

AX17030469

Infrastructure Investment and Recovery - BPU Docket Number AX 1750469

Public Service Electric and Gas Company ("PSE&G") submits the following in support of the proposed new subchapter to New Jersey's Administrative Code, N.J.A.C. 14:3-2A, Infrastructure Investment and Recovery ("proposed IIR regulation").

PSE&G has a long history of partnership with the State and aligning its interests with those of New Jersey. With respect to infrastructure improvement, PSE&G has worked actively with the Board and its Staff, the New Jersey Division of Rate Counsel, and numerous other interested parties in developing, advocating for, and implementing several infrastructure programs accelerating investment to harden and modernize New Jersey's electric and gas distribution systems, while enhancing employment, economic development, and the environment, at the lowest possible cost to consumers.

To that end, PSE&G supports the Board's proposed IIR regulation, and joins in the August 21, 2017 written comments submitted by New Jersey Utilities Association ("NJUA").

PSE&G appreciates the Board's ongoing recognition of the need to create a more standardized process for making large scale infrastructure investments that focus on resiliency. modernization and preparedness. The proposed IIR regulation, as potentially modified consistent with the NJUA comments, provides the framework for that process, and should be adopted as a final regulation.

Respectfully submitted,

Joseph F Sun Fl

Joseph F. Accardo Jr.

Legal au