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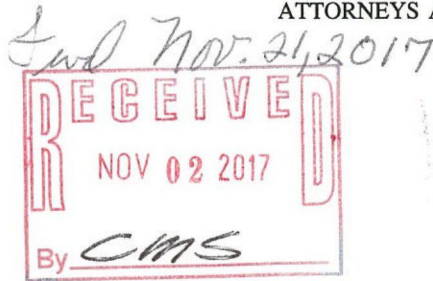
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BOARD OF PUBLIC UTILITIES  
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November 2, 2017

## VIA COURIER & EMAIL

Irene K. Asbury, Secretary  
Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Trenton, New Jersey 08625-0350  
Irene.Asbury@bpu.nj.gov

**Re: In the Matter of the Petition of Public Service Electric and Gas Company for Approval of the Next Phase of the Gas System Modernization Program and Associated Cost Recovery Mechanism (“GSMP II”)**  
**Docket No. GR17070776**

Dear Ms. Asbury,

This firm represents Movant-Intervenor Environmental Defense Fund (“EDF”) with respect to the above-referenced matter. Please find an original and ten (10) copies of the following documents enclosed for filing:

- EDF’s Motion for Admission *Pro Hac Vice*;
- Affidavit in Support of Motion; and
- Certification of Service.

Please also note that an electronic copy of these documents is simultaneously being emailed to you at Irene.Asbury@bpu.nj.gov. The original signed Affidavit in Support of Motion will follow under separate cover.

Please file the enclosed documents, and return copies stamped “filed” to this office by way of the enclosed, self-addressed envelope. Thank you for your attention to this matter.

Respectfully submitted,

Christopher D. Miller  
NJ Attorney ID 025992007

Case mgmt  
M. Supo  
J. Walker

Enclosures

C (w/encl.): All Counsel on attached Service List

## SERVICE LIST

IMO Petition of Public Service Electric and Gas Company for Approval of the Next Phase of the Gas System Modernization Program and Associated Cost Recovery Mechanism (“GSMP II”), Docket No. GR17070776

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STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of )  
Public Service Electric and Gas Company ) Docket No. GR17070776  
for Approval of the Next Phase of the Gas )  
System Modernization Program and Associated )  
Cost Recovery Mechanism ("GSMP II") )

MOTION FOR ADMISSION PRO HAC VICE

The undersigned counsel, a member in good standing of the bar of the State of New Jersey and serving as attorney of record in this proceeding, hereby moves for the admission *pro hac vice* of Holly Pearen. Ms. Pearen is a member in good standing of the bar of the State of Colorado. There is good cause for Ms. Pearen to be admitted *pro hac vice* because she has significant experience representing the interests of Movant-Intervenor Environmental Defense Fund ("EDF") and EDF's membership. As evidenced by her affidavit attached hereto, Ms. Pearen, or her employer on her behalf, will pay to the New Jersey Lawyers' Fund for Client Protection the fees required by R. 1:20-1(b).

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Dated: November 2, 2017

Respectfully submitted,

Christopher D. Miller  
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Attorneys for Movant-Intervenor,  
Environmental Defense Fund



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AFFIDAVIT IN SUPPORT OF REQUEST TO APPEAR PRO HAC VICE

Colorado )  
 ) ss.  
Boulder )

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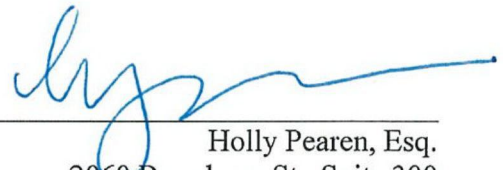
I, Holly Pearen, duly sworn and according to law, hereby certify as follows:

1. I am employed by the Environmental Defense Fund ("EDF"), a national, not-for-profit environmental organization headquartered at 257 Park Avenue South, New York, New York 10010 as an attorney.
2. I am an attorney in good standing admitted to practice in the State of Colorado. My bar number is 38957. I am not admitted to practice in New Jersey. I have no disciplinary proceedings pending against me in any jurisdiction and no discipline has been previously imposed on me in any jurisdiction.
3. I am associated in this matter with New Jersey counsel of record, Christopher D. Miller, Esq., NJ Attorney ID 025992007, who is qualified to practice pursuant to R. 1:21-1.
4. EDF has requested my representation in this matter.
5. There is good cause for my admission *pro hac vice* in that I have considerable experience representing EDF and its members in various proceedings before state public utility commissions and federal agency adjudicatory boards and am employed as an attorney by EDF.
6. I will abide by all court rules and other requirements of rule 1:21-2(c) and agree to:
  - a. Abide by the New Jersey Court Rules, including all disciplinary rules;
  - b. Consent to the appointment of the Clerk of the Supreme Court as agent upon whom service of process may be made for all actions against me or my firm that arise out of my participation in this matter;
  - c. Notify the Board of Public Utilities immediately of any matter affecting my standing at the bar of any court; and

- d. Have all pleadings, briefs, and other papers filed with the Board of Public Utilities signed by the attorney of record.
7. I will pay or EDF will pay on my behalf a fee in the amount required to the New Jersey Lawyers' Fund for Client Protection as required by R. 1:20-1(b) and 1:28-2.
8. I certify that the foregoing statements by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false I am subject to punishment.

Dated: October 26, 2017

Respectfully Submitted,



---

Holly Pearen, Esq.  
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(303) 447-7227  
hpearen@edf.org  
Attorney for Environmental Defense Fund



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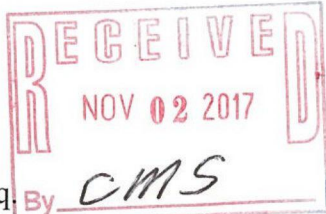
MOTION FOR ADMISSION PRO HAC VICE

The undersigned counsel, a member in good standing of the bar of the State of New Jersey and serving as attorney of record in this proceeding, hereby moves for the admission *pro hac vice* of Holly Pearen. Ms. Pearen is a member in good standing of the bar of the State of Colorado. There is good cause for Ms. Pearen to be admitted *pro hac vice* because she has significant experience representing the interests of Movant-Intervenor Environmental Defense Fund ("EDF") and EDF's membership. As evidenced by her affidavit attached hereto, Ms. Pearen, or her employer on her behalf, will pay to the New Jersey Lawyers' Fund for Client Protection the fees required by R. 1:20-1(b).

Dated: November 2, 2017

Respectfully submitted,

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Attorneys for Environmental Defense Fund

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

**In the Matter of the Petition of** )  
**Public Service Electric and Gas Company** ) **Docket No. GR17070776**  
**for Approval of the Next Phase of the Gas** )  
**System Modernization Program and Associated** )  
**Cost Recovery Mechanism ("GSMP II")** )

BOARD OF PUBLIC UTILITIES

**CERTIFICATION OF SERVICE**

NOV 02 2017

I, Elizabeth M. Andes, do state and certify as follows:

1. I am an attorney-at-law of the State of New Jersey, with the firm of Maraziti Falcon, LLP; attorneys for Movant-Intervenor Environmental Defense Fund ("EDF") in this matter. I have personal knowledge of the facts stated herein.

2. On November 2, 2017, I caused the following documents, and ten (10) copies thereof, to be filed with the Board of Public Utilities via commercial courier same-day delivery to Irene K. Asbury, Secretary, Board of Public Utilities, 44 South Clinton Avenue, 9th Floor, Trenton, New Jersey 08625-0350, and an electronic copy thereof to be filed electronically by email to [Irene.Asbury@bpu.nj.gov](mailto:Irene.Asbury@bpu.nj.gov):


- EDF's Motion for Admission *Pro Hac Vice*;
- Affidavit in Support of Motion; and this
- Certification of Service.

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3. On November 2, 2017, I caused two (2) copies of these documents to be served via FedEx overnight delivery to all counsel on the attached service list, and an electronic copy of the above-listed documents to be sent via email to all counsel on the attached service list.

4. These statements are true. I am aware that if any of these statements are willfully false, then I may be subject to punishment.

Date: November 2, 2017

  
Elizabeth M. Andes



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