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STEFANIE A. BRAND  
Director

November 15, 2017

**Via Hand Delivery and Electronic Mail**

Irene Kim Asbury, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue  
3rd Floor, Suite 314  
P.O. Box 350  
Trenton, NJ 08625-0350

**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")  
BPU Docket No.: GR17070776**

Dear Secretary Asbury:

Please accept for filing this original and ten copies of this response on behalf of the Division of Rate Counsel ("Rate Counsel") to the Motion for Admission Pro Hac Vice dated November 2, 2017 filed in the above-referenced matter on behalf of Intervenor, the Environmental Defense Fund ("EDF").

Enclosed is one additional copy. Please date stamp the copy as "filed" and return to us in the enclosed self-addressed, stamped envelope. Thank you for your consideration and attention to this matter.

*Case mgmt  
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Irene Kim Asbury, Secretary  
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In its motion, EDF seeks the admission pro hac vice of Holly Pearen, a member of the bar of the State of Colorado. The motion was filed by EDF's local counsel, Christopher D. Miller, Esq., and is supported by Ms. Pearen's affidavit. Ms. Pearen's affidavit states that she is a member in good standing of the Colorado bar, that she is employed by EDF as an attorney, that she has expertise in representing EDF before state and federal agencies, and that she will abide by all applicable court rules and other requirements.

Based on EDF's motion and the accompanying affidavit, Rate Counsel also has no objection to the admission of Ms. Pearen, pro hac vice.

Respectfully submitted,

STEFANIE A. BRAND  
Director, Division of Rate Counsel

By:

  
\_\_\_\_\_  
Sarah H. Steindel, Esq.  
Assistant Deputy Rate Counsel

c: Joseph L. Fiordaliso, Commissioner  
Service list

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")  
BPU Docket No. GR17070776

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