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CASE MANAGEMENT

Jul 3/16/18

BOARD OF PUBLIC UTILITIES
TRENTON, NJ
PSEG
Services Corporation

MAR 14 2018

BOARD OF PUBLIC UTILITIES TRENTON, NJ

March 13, 2018

# VIA E-MAIL AND OVERNIGHT MAIL

In the Matter of the Petition of Atlantic City Electric Company for Approval of an Infrastructure Investment Program and Related Cost Recovery Mechanism, Pursuant to N.J.A.C. 14:3-2A.1 et seq.

## BPU Docket No. EO18020196

Ms. Aida Camacho Secretary, Board of Public Utilities 44 South Clinton Avenue, 9<sup>th</sup> Floor P.O. Box 350 Trenton, New Jersey 08625-0350

Dear Secretary Camacho:

Enclosed is Public Service Electric and Gas Company's ("PSE&G") Motion to Participate in the above-captioned proceeding.

By copy of this letter, copies of the motion are being forwarded on this date via electronic mail to all persons whose name appears on the attached Service List.

Thank you for your anticipated courtesies.

Very truly yours,

Justin B. Incardone

C Attached Service List (E-Mail Only)

Case Mgno

# STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of	)	
Atlantic City Electric Company for Approval	)	
of an Investment Program, and Related Cost	)	BPU Dkt. No. EO18020196
Recovery Mechanism, Pursuant to	)	
N.J.A.C. 14:3-2A.1 et seq.	)	

## PSE&G'S MOTION TO PARTICIPATE

Public Service Electric and Gas Company ("PSE&G") hereby moves for an Order granting it status as a Participant in the above-referenced matter pursuant to *N.J.A.C.* 1:1-16.6. In support of this motion, PSE&G respectfully submits:

- 1. PSE&G is a New Jersey public utility as defined by N.J.S.A. 48:2-13.
- 2. PSE&G is engaged as a New Jersey public utility in the purchase, transmission, distribution, and sale of electric energy and related utility services to more than 2,200,000 residential, commercial, and industrial customers located within the State of New Jersey. PSE&G is also engaged in the purchase, distribution, and sale of natural gas for more than 1,800,000 customers located within the State of New Jersey.
- 3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

Justin B. Incardone, Esq. PSEG Services Corporation 80 Park Plaza, T5G P.O. Box 570 Newark, New Jersey 07102 Phone: (973) 430-5983

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4. The Board of Public Utility's decision in this proceeding is likely to have precedential effect and impact not only the Petitioner herein and its customers, but also New Jersey's other utilities. The issues that will be addressed in this infrastructure investment case may have an impact on PSE&G by establishing precedent. PSE&G will therefore likely be directly and specifically affected by the relief provided herein.

- 5. The service territories, customers, and the operations of PSE&G are distinct from those of other parties and participants in this case. Thus, no other party or participant will represent the interests of PSE&G in this case.
- 6. PSE&G has a history of coordinating its activities in dockets at the New Jersey Board of Public Utilities with those of other utilities where appropriate. PSE&G will coordinate its representation with other similarly-situated parties or participants in this docket to the extent appropriate.
- 7. Due to PSE&G's experience in the electric industry, its participation in this proceeding is likely to add constructively to the proceeding.
  - 8. PSE&G will abide by the schedule set for this proceeding, to the extent one

has been entered.

9. The granting of this Motion will not cause undue delay or confusion.

WHEREFORE, PSE&G respectfully requests an Order: (1) granting it rights as a Participant in this matter pursuant to *N.J.A.C.* 1:1-16.6, and (2) providing such further relief in connection therewith as is deemed reasonable, just, and consistent with the foregoing.

Respectfully submitted,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

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DATED: March 13, 2018

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# Public Service Electric and Gas Company ACE - Infrastructure - 2018 EO18020196

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