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*5/29/18*

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CASE MANAGEMENT

MAY 25 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

May 25, 2018



**In the Matter of the Petition of South Jersey Gas Company to Continue its Energy Efficiency Programs (EEP IV) and Energy Efficiency Tracker Pursuant to N.J.S.A. 48:3-98.1**

**BPU Docket No. GO18030350**

**VIA E-MAIL AND OVERNIGHT MAIL**

Commissioner Diane Solomon  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, Suite 314  
P.O. Box 350  
Trenton, New Jersey 08625-0350

RECEIVED  
MAIL ROOM  
MAY 25 2018  
BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

Dear Commissioner Solomon:

Enclosed is Public Service Electric and Gas Company's ("PSE&G") Motion to Intervene 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,

A handwritten signature in blue ink, consisting of a large, stylized initial 'J' followed by a horizontal line and a loop.

Justin B. Incardone

C Attached Service List (E-Mail Only)

*Case Mgmt*

BOARD OF PUBLIC UTILITIES

MAY 25 2018

MAIL RECEIVED

STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of	)	
South Jersey Gas Company to	)	
Continue its Energy Efficiency	)	BPU Dkt. No. GO18030350
Programs (“EEP IV”) and Energy Efficiency	)	
Tracker Pursuant to <u>N.J.A.C. 48:3-98.1</u>	)	

**PSE&G’S MOTION TO INTERVENE**

Public Service Electric and Gas Company (“PSE&G” or “Company”) hereby moves before the New Jersey Board of Public Utilities (“Board” or “BPU”) to intervene in the above-captioned proceeding pursuant to N.J.A.C. 1: 1-16.1 et seq. In support of the within motion, PSE&G respectfully submits:

1. PSE&G is a wholly owned direct subsidiary of Public Service Enterprise Group Incorporated (“PSEG”), with principal and executive offices located in Newark, New Jersey. PSEG is an exempt public utility holding company engaged in, among other things, the generation of electricity, and the transmission, distribution and sale of electricity and natural gas through its subsidiaries.

2. PSE&G is an electric and gas public utility subject to the regulatory jurisdiction of the Board. As a New Jersey public utility, PSE&G is engaged in the production, generation, purchase, transmission, distribution, and sale of electric, gas, and related utility services in the State of New Jersey. PSE&G currently serves nearly three quarters of the state’s population in a service area consisting of a 2,600-square-mile diagonal corridor across the state from Bergen to Gloucester Counties. PSE&G is the largest provider of electric and gas service in New Jersey, with over 1.7 million gas and 2.1 million electric customers in more than 300 urban, suburban and rural communities, including New Jersey’s six largest cities.

3. Copies of all correspondence and other communications relating to this proceeding and the within motion should be addressed to:

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4. South Jersey Gas (“SJG”) Petition, filed with the Board on March 29, 2018, requests that the Board issue an Order approving: (a) its currently operating Energy Efficiency Programs; and (b) six new programs including: (1) the Residential Efficiency Products Program; (2) the Residential Home Assessment with Direct Install Program; (3) the Residential Retrofit Weatherization Program; (4) the C&I engineered Solutions Program; (5) the Education Program; and (6) the Emerging Technologies & Approaches Program.

5. In determining whether to grant a motion for intervention, N.J.A.C. 1:1-16.3(a) requires that the Board consider the following: (1) the nature and extent of the movant’s interest in the outcome of the case; (2) whether the interest is sufficiently different from that of any other

party so as to add measurably and constructively to the scope of the case; (3) the prospect for confusion and delay arising from the movant's inclusion; and (4) other appropriate matters.

6. Application of the above-referenced criterion demonstrates that PSE&G's motion for intervention should be granted. As the state's largest electric and gas distribution company and its only combined electric and gas distribution utility, PSE&G has a significant interest in the outcome of the case. The Company has invested approximately \$400 million in Board-approved energy efficiency programs since 2009, and will be investing more in energy efficiency in accordance with the Clean Energy legislation Governor Phil Murphy signed on May 23, 2018. Any decision by the Board with respect to SJG's Petition could have precedential effect and other impacts on PSE&G that could directly impact the Company's energy efficiency programs.

7. Due to PSE&G's utility experience with energy efficiency programs, its intervention in this proceeding is likely to add constructively to the proceeding.

8. 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.

9. PSE&G will abide by the schedule set for this proceeding, to the extent one has been entered.

10. The granting of this motion will not cause undue delay or confusion.

11. PSE&G respectfully requests that the Board grant its motion to intervene because: (1) PSE&G's interest is sufficiently different from that of any other party so as to add measurably and constructively to the scope of the case; (2) no other party in the proceeding could adequately represent PSE&G's unique interests; (3) this motion has been timely filed in accordance with the Board's April 25, 2018 Order Designating Commissioner, Setting Manner of Service and Bar Date; and (4) the granting of this motion will not cause undue delay or confusion.

12. Accordingly, PSE&G respectfully requests that the Board grant this request for intervener status in this proceeding pursuant to N.J.A.C. 1:1-16.1 et seq.

Respectfully submitted,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

A handwritten signature in black ink, appearing to be 'Justin B. Incardone', enclosed within a rectangular dashed-line box.

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DATED: May 25, 2018

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