

Danielle Lopez  
Assistant General Regulatory Counsel

RECEIVED  
CASE MANAGEMENT  
JUN 25 2018  
Law Department  
80 Park Plaza, 15, Newark, New Jersey 07102-4194  
Tel: 973.430.6479 fax: 973.645.5983  
Email: Danielle.Lopez@pseg.com

*For  
June 26, 2018*

JUN 25 2018  
BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ  
 **PSEG**  
Services Corporation

June 22, 2018

**Verified Joint Petition of RPM Development, L.L.C. and Mantua Urban Renewal  
Associates, L.P. for Waiver of B.P.U.N.J. No. 15 Electric, Original Sheets Nos. 26 and 27,  
Standard Terms and Conditions No. 9.2**

**BPU Docket No. EW18050497**

***VIA E-MAIL AND OVERNIGHT MAIL***

Aida Camacho-Welch, Secretary  
Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

**Re: MOTION TO INTERVENE**

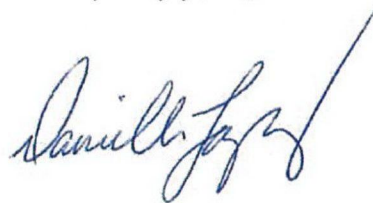
Dear Secretary Camacho-Welch:

Enclosed are an original and ten copies of Public Service Electric and Gas Company's  
("PSE&G") Motion to Intervene in the above proceeding

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

Thank you for your anticipated courtesies.

Very truly yours,



Danielle Lopez

C Attached Service List (E-Mail Only) ✓

*Case mgmt*

Public Service Electric and Gas Company  
RPM Development LLC and Mantua Urban Renewal Associates LP  
Master Metered Services  
EW18050497

**BPU**

Rachel Boylan  
Board of Public Utilities  
44 South Clinton Avenue  
3rd Floor, Suite 314  
P.O. Box 350  
Trenton NJ 08625-0350  
(609) 292-1458  
Rachel.Boylan@bpu.nj.gov

**BPU**

Stacy Peterson  
Board of Public Utilities  
44 South Clinton Avenue  
3rd Floor, Suite 314  
P.O. Box 350  
Trenton NJ 08625-0350  
(609) 292-4517  
stacy.peterson@bpu.nj.gov

**DAG**

Alex Moreau DAG  
NJ Dept. of Law & Public Safety  
Division of Law  
124 Halsey Street, 5th Flr.  
P.O. Box 45029  
Newark NJ 07101  
(973) 648-3762  
Alex.Moreau@dol.lps.state.nj.us

**PSEG**

Michele Falcao  
PSEG Services Corporation  
80 Park Plaza, T5  
P.O. Box 570  
Newark NJ 07102  
(973) 430-6119  
michele.falcao@pseg.com

**PSEG**

Caitlyn White  
PSEG Services Corporation  
80 Park Plaza, T-5  
P.O. Box 570  
Newark NJ 07102  
(973)-430-5659  
caitlyn.white@pseg.com

**Rate Counsel**

Shelly Massey  
Division of Rate Counsel  
140 East Front Street, 4th Flr.  
P.O. Box 003  
Trenton NJ 08625  
(609) 984-1460  
smassey@rpa.nj.gov

**BPU**

Aida Camacho-Welch  
Board of Public Utilities  
44 South Clinton Avenue, 3rd Floor, Suite 314  
Post Office Box 350  
Trenton NJ 08625-0350  
aida.camacho@bpu.nj.gov

**BPU**

Kenneth Sheehan Esq.  
Board of Public Utilities  
44 South Clinton Avenue  
3rd Floor, Suite 314  
P.O. Box 350  
Trenton NJ 08625-0350  
(609) 777-3303  
kenneth.sheehan@bpu.nj.gov

**DAG**

Caroline Vachier DAG  
NJ Dept. of Law & Public Safety  
Division of Law  
124 Halsey Street, 5th Flr.  
P.O. Box 45029  
Newark NJ 07101  
(973) 648-3709  
caroline.vachier@dol.lps.state.nj.us

**PSEG**

Bernard Smalls  
PSEG Services Corporation  
80 Park Plaza-T5  
Newark NJ 07102-4194  
(973) 430-5930  
bernard.smalls@pseg.com

**Rate Counsel**

Stefanie A. Brand  
Division of Rate Counsel  
140 East Front Street, 4th Flr.  
P.O. Box 003  
Trenton NJ 08625  
(609) 984-1460  
sbrand@rpa.state.nj.us

**Rate Counsel**

Sarah Steindel  
Division of Rate Counsel  
140 East Front Street, 4th Flr.  
P.O. Box 003  
Trenton NJ 08625  
(609) 984-1460  
ssteinde@rpa.state.nj.us

**BPU**

Megan Lupo  
Board of Public Utilities  
44 South Clinton Avenue  
3rd Floor, Suite 314  
P.O. Box 350  
Trenton NJ 08625-0350  
megan.lupo@bpu.nj.gov

**BPU**

Thomas Walker  
Board of Public Utilities  
44 South Clinton Avenue  
3rd Floor, Suite 314  
P.O. Box 350  
Trenton NJ 08625-0350  
thomas.walker@bpu.nj.gov

**Norris McLaughlin & Marcus, P.A**

James H. Laskey  
Norris McLaughlin & Marcus, P.A.  
400 Crossing Blvd.  
8th Floor  
Bridgewater NJ 08807-5933

**PSEG**

Matthew M. Weissman Esq.  
PSEG Services Corporation  
80 Park Plaza, T5  
P.O. Box 570  
Newark NJ 07102  
(973) 430-7052  
matthew.weissman@pseg.com

**Rate Counsel**

Brian O. Lipman  
Division of Rate Counsel  
140 East Front Street, 4th Flr.  
P.O. Box 003  
Trenton NJ 08625  
(609) 984-1460  
b lipman@rpa.nj.gov

**Rate Counsel**

Felicia Thomas-Friel  
Division of Rate Counsel  
140 East Front Street, 4th Flr.  
P.O. Box 003  
Trenton NJ 08625  
(609) 984-1460  
fthomas@rpa.nj.gov

06/18/2018

Public Service Electric and Gas Company  
RPM Development LLC and Mantua Urban Renewal Associates LP  
Master Metered Services  
EW18050497

Page 2 of 2

RPM

Frank Casciano  
RPM Development Group  
77 Park Street  
Montclair NJ 07042

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

<b>In the Matter of the Verified Petition of RPM Development, L.L.C. and Mantua Urban Renewal Associates, L.P. for Waiver of B.P.U.N.J. No. 15 Electric, Original Sheets Nos. 26 and 27, Standard Terms and Conditions No. 9.2</b>	<b>BPU DOCKET NO. EW18050497</b>
--	----------------------------------

**PSE&G MOTION TO INTERVENE**

Public Service Electric and Gas Company (“PSE&G” or the “Company”) hereby moves for an Order granting it status as an Intervenor in the above referenced matter pursuant to *N.J.A.C. 1:1-16.1 – 16.4*. 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 in the purchase, transmission, distribution and sale of electric energy and related utility services to more than 2,100,000 residential, commercial, and industrial customers located within the State of New Jersey. PSE&G is also engaged as a New Jersey public utility 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:

Danielle Lopez, Esq.  
Assistant General Regulatory Counsel  
PSEG Services Corporation  
80 Park Plaza, T5  
P. O. Box 570  
Newark, New Jersey 07102  
Phone: (973) 430-6479  
danielle.lopez@pseg.com

Matthew M. Weissman, Esq.  
General Regulatory Counsel-Rates  
PSEG Services Corporation  
80 Park Plaza, T5  
P. O. Box 570  
Newark, New Jersey 07102  
Phone: (973) 430-7052  
matthew.weissman@pseg.com

Michele Falcao  
Regulatory Filings Supervisor  
PSEG Services Corporation  
80 Park Plaza-T5  
P. O. Box 570  
Newark, New Jersey 07102  
Phone: (973) 430-6119  
michele.falcao@pseg.com

Caitlyn White  
Regulatory Case Coordinator  
PSEG Services Corporation  
80 Park Plaza, T5  
P. O. Box 570  
Newark, New Jersey 07102  
Phone: (973) 430-5659  
caitlyn.white@pseg.com

4. The Petition filed by RPM Development, L.L.C. and Mantua Urban Renewal Associates, L.P. ("Joint Petitioners") in this proceeding requests a waiver of PSE&G electric tariff provision 9.2.1 so as to permit master metering for a newly constructed affordable housing apartment building in PSE&G's territory.

5. According to the Petitioners, the residential electric usage for this building will be provided by an on-site solar array that has been sized to service the load of the building and its common facilities. According to Petitioners, requiring individual meters for each apartment unit would necessitate installation of dedicated sets of panels and inverters for each apartment, thus causing a "significant hardship."

6. PSE&G electric tariff provision 9.2.1 prohibits the type of master metering sought by Petitioners for its new residential construction project, and instead requires the service and supply of electrical energy by the Company for the use of owners, landlords, tenants or occupants of newly constructed or renovated residential units be furnished to them as customers of Public Service through Public Service individual meters.

7. PSE&G, in its role as a utility, has the duty to implement the provisions of its tariff, including but not limited to section 9.2.1, which allows each energy user to be aware of, and accountable for, his or her usage.

8. The Petition also implicates Section 15 of the PSE&G tariff concerning net metering, including provisions covering the identity of the net metering customer and the permissible size of net metered installations.

9. Under the facts stated above, PSE&G will be directly and specifically affected by the relief provided herein, and has an interest in any final order issued in this matter. PSE&G's interests are clearly distinct from other entities and no other party to this proceeding can adequately represent PSE&G's interests in this matter.

10. Due to PSE&G's position as electric distribution provider and PSE&G's experience in the electric and gas industries, its participation as an Intervenor is likely to add constructively to the proceeding.

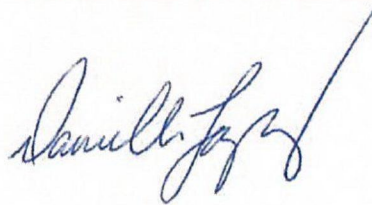
11. PSE&G will abide by the schedule set for this proceeding.

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

**WHEREFORE**, PSE&G respectfully requests an Order (1) granting it rights as an intervenor in this matter pursuant to N.J.A.C. 1:1-16.1-16.5, thereby providing it all rights of a full party to this matter; 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

A handwritten signature in blue ink, appearing to read "Danielle Lopez", with a long, sweeping flourish extending upwards and to the right.

By \_\_\_\_\_

Danielle Lopez, Esq.  
Assistant General Regulatory Counsel  
PSEG Services Corporation  
80 Park Plaza, T5  
P. O. Box 570  
Newark, New Jersey 07102  
Phone: (973) 430-6479  
danielle.lopez@pseg.com

DATED: June 22, 2018

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

**In the Matter of the Verified Petition of  
RPM Development, L.L.C. and Mantua Urban  
Renewal Associates, L.P. for Waiver of B.P.U.N.J.  
No. 15 Electric, Original Sheets Nos. 26 and 27,  
Standard Terms and Conditions No. 9.2**

**BPU DOCKET NO. EW18050497**

**VERIFICATION**

I, Stephen Swetz, Senior Director – Corporate Rates and Revenue Requirements for PSEG Services Corporation, have reviewed forgoing the PSE&G Motion to Intervene in this matter. I have knowledge of the facts set forth herein and hereby state that they are truthful and accurate to the best of my knowledge and belief.



---

Stephen Swetz