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RECEIVED
CASE MANAGEMENT
7/20/2018
AUG 20 2018

Brian R. Tipton, Esq.
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August 17, 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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AUG 20 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Via Electronic and Overnight Delivery

New Jersey Board of Public Utilities
Attn: Aida Camacho-Welch, Board Secretary
44 South Clinton Avenue, 3rd Floor, Suite 314
PO BOX 350
TRENTON, NJ 08625-0350

**Re: IMO the Petition of Public Service Electric and Gas Company
For Approval of Second Energy Strong Program (Energy Strong II)
Docket Nos. EO 18060629 and GO18060630**

Dear Ms. Camacho-Welch:

The undersigned represents Joseph Jingoli & Son, Inc. ("Jingoli"). Enclosed please find an original and ten copies of Jingoli's Motion to Participate in PSE&G's Energy Strong II Petition.

Please process this Motion to Participate in order that it may be considered by the Board within its established timeframe for applications for participation in this proceeding.

Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,

FLORIO PERRUCCI STEINHARDT
& CAPPELLI, LLC

Brian R. Tipton

Encs
Energy
Legal
DAG

B. Kilian, Energy
D. Brown, Energy

Enclosure
c. Service List

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

Brian R. Tipton, Esq. (Attorney ID 024101999)
Florio Perrucci Steinhardt & Cappelli, LLC
235 Broubalow Way
Phillipsburg, New Jersey 08865
Attorneys for Joseph Jingoli & Son, Inc.
Phone: (908) 454-8300
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Docket Nos. EO 18060629
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IMO the Petition of Public Service Electric
And Gas Company for Approval of Second
Energy Strong Program (Energy Strong II)

JOSEPH JINGOLI & SON, INC. MOTION TO PARTICIPATE

Joseph Jingoli & Son, Inc. ("Jingoli") hereby moves for leave to participate in the above-captioned matter. In support of its motion, Jingoli states as follows:

1. All correspondence and communication concerning this matter should be directed to:

Brian R. Tipton, Esq.
Florio Perrucci Steinhardt & Cappelli, LLC
235 Broubalow Way
Phillipsburg, New Jersey 08865
Phone: (908) 454-8300
btipton@floriolaw.com

Scott Weiner
Florio Perrucci Steinhardt & Cappelli, LLC
218 Rt. 17 North
Suite 410
Rochelle Park, NJ 07662
Phone: (201) 843-5858
sweiner@floriolaw.com

2. Jingoli has decades of experience as a contractor performing site development work and underground utility work for the utility industry in New Jersey, including the types of work necessary to implement PSE&G's proposed Energy Strong Program ("Energy Strong II"). Jingoli and its affiliates have previously employed a significant number of union workers from various trades to perform such work. Jingoli has previously worked for PSE&G and this prior experience gives Jingoli an understanding of the standards necessary to meet the quality, safety and schedule requirements for the installation and replacement of PSE&G's utility infrastructure under Energy Strong II.

3. The above-captioned matter is a request by PSE&G for approval of both the elements of a second phase of Energy Strong II and the proposed regulatory mechanism for recovery of the costs of said program. PSE&G describes Energy Strong II as a series of investments to improve the reliability and resiliency of its electric and gas distribution infrastructure, by rebuilding critical electrical equipment, installing stronger poles, deploying advanced technology, building backup pipes, modernizing critical gas equipment, and improving customer service.

4. Based on Jingoli's experience with the utility industry in general, its prior work for PSE&G and the likelihood that Jingoli may be retained to perform services in support of Energy Strong II, Jingoli not only has an interest in the outcome of the Petition, but will be uniquely affected by the outcome of this case in a manner that will assist the Board in its resolution of the Petition. Jingoli will be in a position to provide the Board with valuable insight both as to the impact Energy Strong II will have for job creation in New Jersey as well strategies for the successful implementation of Energy Strong II. Jingoli's participation will contribute to the development of a more complete record for consideration by the Board.

5. According, the issues to be decided in the above-captioned proceeding “substantially, significantly and directly affect” Jingoli, thereby making it appropriate for Jingoli to participate.
6. Jingoli supports a regulatory solution that focuses on the Energy Strong II initiatives and provides for an expeditious process for approval of the investments and the associated rate adjustments.
7. Jingoli participant status will not cause confusion or delay the proceeding, particularly so given that this request is brought as the outset of the proceeding.

WHEREFORE, pursuant to N.J.A.C. 1:1-16.1, et seq., Jingoli respectfully requests that it be permitted to participate in this matter.

Respectfully submitted,

**FLORIO PERRUCCI STEINHARDT
& CAPPELLI, LLC**



BRIAN R. TIPTON

Attorneys for Joseph Jingoli & Son, Inc.

Brian R. Tipton, Esq. (Attorney ID 024101999)
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STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IMO the Petition of Public Service
Electric and Gas Company
For Approval of Second Energy Strong
Program (Energy Strong II)

CERTIFICATION OF SERVICE

Docket Nos. EO 18060629 and GO18060630

I, **BRIAN R. TIPTON, ESQ.**, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and a member in good standing of the bar of this Court. I am a Partner of the law firm of Florio Perrucci Steinhardt & Cappelli LLC for Joseph Jingoli & Son, Inc. ("Jingoli").
2. On August 17, 2018, I caused to be served via electronic mail copies of Jingoli's Motion to Participate in the above-captioned proceeding on each person identified on the Service List. An original and ten (10) hard copies also have been sent via overnight delivery to Aida Camacho-Welch and New Jersey Board of Public Utilities, as well as a copy via electronic mail. Two (2) hard copies have also been sent via overnight delivery to Stephanie A. Brand, Esq., Division of Rate Counsel.

I certify under penalty of perjury that the foregoing is true and correct.


Brian R. Tipton

Dated: August 17, 2018



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STEINHARDT &
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Respectfully submitted,

**FLORIO PERRUCCI STEINHARDT
& CAPPELLI, LLC**

A handwritten signature in black ink, appearing to read "Brian R. Tipton", written in a cursive style.

BRIAN R. TIPTON

Attorneys for Joseph Jingoli & Son, Inc.

Brian R. Tipton, Esq. (Attorney ID 024101999)
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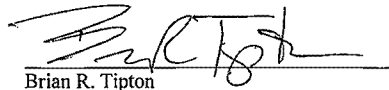
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