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8/20/18

RECEIVED
CASE MANAGEMENT

AUG 17 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

John D. Cromie
Partner
JCromie@connellfoley.com

August 17, 2018

VIA HAND DELIVERY AND E-MAIL

New Jersey Board of Public Utilities
Attn: Aida Camacho-Welch, Board Secretary
44 South Clinton Avenue, 3rd Floor, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
aida.camacho@bpu.nj.gov

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AUG 17 2018
BOARD OF PUBLIC UTILITIES
TRENTON, NJ

**Re: In the Matter of the Petition of Public Service Electric and Gas Company
("PSE&G") for Approval of Second Energy Strong Program
(Energy Strong II)
Docket Nos. EO 18060629 and GO18060630
Waters and Bugbee, Inc.'s Motion to Participate**

Dear Madam Secretary:

This firm represents Waters and Bugbee, Inc. ("W&B") in connection with the above-captioned matter. Enclosed please find one (1) original and ten (10) copies of W&B'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,

CONNELL FOLEY LLP

Handwritten signature of John D. Cromie
John D. Cromie, Esq.

Handwritten: CMG
Legal
A. Moreau, Esq.
B. Kilar
D. Brown

New Jersey Board of Public Utilities

August 17, 2018

Page 2

Enclosures

cc: Stefanie A. Brand (via hand delivery and email w/ enclosures)
Attached Service List (via e-mail only w/ enclosures)
Jeff Waters (via e-mail only w/ enclosures)
Steve Minshall (via e-mail only w/ enclosures)

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TRENTON, NJ

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF
PUBLIC SERVICE ELECTRIC AND GAS
COMPANY FOR APPROVAL OF SECOND
ENERGY STRONG PROGRAM (ENERGY
STRONG II)

MOTION TO PARTICIPATE

Docket Nos.:EO18060629 and
GO18060630

Waters and Bugbee, Inc. (“W&B”), by and through its undersigned counsel, hereby moves before the New Jersey Board of Public Utilities (“Board”) for leave to participate in the above-captioned proceeding pursuant to N.J.A.C. 1:1-16.6. In support of its motion, W&B respectfully submits:

1. The above-captioned matter is a request by Public Service Electric and Gas Company (“PSE&G”) for approval of both (i) the elements of a second phase of the Energy Strong Program (“Energy Strong II”); and (ii) 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.

2. W&B is a New Jersey Corporation specializing in the installation of utility infrastructure. Founded in 1964, W&B has been involved with major electrical and natural gas distribution construction for PSE&G for over 50 years. W&B's involvement with the previous Energy Strong programs will provide the Board with critical insight as to the potential impact that Energy Strong II could have for job creation, accurate assessment of construction costs, and recommendations for its efficient implementation.

3. W&B will support and participate in the construction envisioned by Energy Strong II, as it has successfully been doing under PSE&G's Energy Strong Program and other PSE&G ongoing modernization initiatives.

4. W&B's participation in this proceeding will contribute to the development of a complete record for consideration by the Board on these issues. Accordingly, the issues to be decided in the above-captioned proceeding "substantially, significantly and directly affect" W&B, thereby making it appropriate for W&B to participate.

5. W&B 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.

6. W&B's motion is timely and will not delay or otherwise disrupt the proceeding.

7. Copies of all correspondence and other communications related to this proceeding should be addressed to:

Jeff Waters
President
Waters and Bugbee, Inc.
75 South Gold Drive
Hamilton, NJ 08691
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with a copy to

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WHEREFORE, W&B respectfully requests an Order: (1) granting W&B full rights as a participant in this matter pursuant to N.J.A.C. 1:1-16.1 *et seq.*, including, without limitation, the ability to offer oral argument, file statements and briefs, and participate in conferences; and (2) providing such other or further relief as the Board may deem just and proper.

Dated: August 17, 2018

Respectfully submitted,



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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF
PUBLIC SERVICE ELECTRIC AND GAS
COMPANY FOR APPROVAL OF SECOND
ENERGY STRONG PROGRAM (ENERGY
STRONG II)

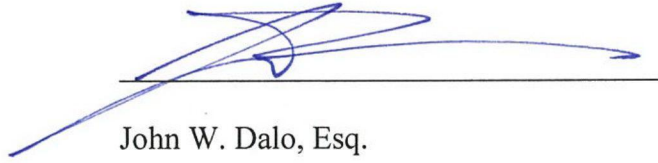
CERTIFICATION OF SERVICE

Docket Nos.:EO18060629 and
GO18060630

I, **JOHN W. DALO**, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and an Associate of the law firm of Connell Foley LLP, attorneys for Waters and Bugbee, Inc. ("W&B").
2. On this date, I caused W&B's Motion to Participate to be served as follows: (i) one (1) original and ten (10) copies via hand delivery to Aida Camacho-Welch, Secretary, New Jersey Board of Public Utilities; (ii) one (1) original and two (2) copies via hand delivery to Stefanie A. Brand, Rate Counsel; and (iii) via electronic mail to each person identified on the Service List attached hereto as **Exhibit A**.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



John W. Dalo, Esq.

Dated: August 17, 2018

EXHIBIT A

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