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BOARD OF PUBLIC UTILITIES
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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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August 16, 2018

BY 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
MOTION TO PARTICIPATE**

Dear Madam Secretary:

The undersigned represents Local Union 94 of the International Brotherhood of Electrical Workers ("IBEW Local Union 94"). Enclosed please find an original and ten copies of IBEW Local Union 94'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.

CMB
J. Legal
D. Brown
B. Kelso
A. Moran, Esq.

Respectfully submitted,

RUSSO TUMULTY NESTER
THOMPSON & KELLY, LLP

[Signature]
HOWARD O. THOMPSON

Enclosure
c. Service List as per Board's July 25, 2018 Order

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

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**Docket Nos. EO 18060629
and GO18060630**

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

IBEW LOCAL UNION 94'S MOTION TO PARTICIPATE

Local Union 94 of the International Brotherhood of Electrical Workers ("IBEW Local Union 94") hereby moves for leave to participate in the above-captioned matter. In support of its motion, IBEW Local Union 94 state as follows:

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

Kenneth Thoman
IBEW Local Union 94
219 Franklin Street
Hightstown, New Jersey 08520
609-426-9702
bud@ibew94.org

Howard O. Thompson, Esq.
Russo Tumulty Nester Thompson & Kelly
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2. IBEW Local Union 94 represents thousands of non-management employees who are engaged in all aspects of operations at Public Service Electric and Gas Company

("PSE&G" or the "Company"). IBEW Local Union 94 has approximately 2,200 members who are employed in electric distribution and transmission, gas distribution and appliance service, and other work in support of those operations. (Another 1,400 members work at nuclear and fossil electric plants owned by PSE&G's affiliate, PSEG Power.)

3. The above-captioned matter is a request by PSE&G for approval of both the elements of a second phase of Energy Strong Program ("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. The members of IBEW Local Union 94 are part of PSE&G's skilled workforce and will do the work envisioned by this Energy Strong II as they have successfully been doing for PSE&G's Energy Strong Program and other PSE&G ongoing modernization initiatives.

5. Accordingly, the issues to be decided in the above-captioned proceeding "substantially, significantly and directly affect" IBEW Local Union 94 and its members, thereby making it appropriate for IBEW Local Union 94 to participate.

6. IBEW Local Union 94 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. IBEW Local Union 94's participant status will not cause confusion or delay the proceeding, particularly so given that this request is brought at the outset of the proceeding.

WHEREFORE, pursuant to N.J.A.C. 1:1-16.1, et seq., IBEW Local Union 94 respectfully requests that it be permitted to participate in this matter.

Respectfully submitted,

**RUSSO TUMULTY NESTER
THOMPSON & KELLY, LLP**



HOWARD O. THOMPSON

**Attorneys for Local Union 94 of the
International Brotherhood of Electrical
Workers**

August 16, 2018