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AUG 17 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

August 17, 2018

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AUG 17 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

VIA ELECTRONIC MAIL & HAND DELIVERY

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
P.O. Box 350
Trenton, New Jersey 08625-0350

**Re: In the Matter of the Petition of Public Service Electric and Gas
Company for Approval of the Second Energy Strong Program (Energy
Strong II) Docket Nos. EO18060629 and GO18060630**

Dear Secretary Camacho-Welch:

I enclose for filing an original and ten copies of the motion of the Creamer-Sanzari Joint Venture to participate in the above-referenced proceeding pursuant to N.J.A.C. 1:1-16.6. Copies of the motion are being electronically served today on all persons appearing on the enclosed service list.

Thank you for your attention to this matter.

Respectfully submitted,

Kevin G. Walsh

Enclosures

cc: Service List (via email w/encl.)

*CMS
list copied*

Kevin G. Walsh (Attorney # 044241998)
Michael D. DeLoreto (Attorney #108002014)

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Attorneys for Creamer-Sanzari Joint Venture

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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 THE
SECOND ENERGY STRONG PROGRAM
(ENERGY STRONG II)

MOTION TO PARTICIPATE

Docket Nos. EO18060629 and
GO18060630

Creamer-Sanzari Joint Venture (“CSJV”), 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, CSJV respectfully submits:

1. CSJV is a joint venture between J. Fletcher Creamer & Son, Inc. (“Creamer”) and Joseph M. Sanzari Inc. (“Sanzari”), New Jersey corporations in the business of heavy highway construction and utilities installation. Formed in 2004, CSJV has been involved in major construction work on the New Jersey Turnpike and New Jersey Department of Transportation’s highways, roads and bridges. CSJV was recognized by Engineering News as one of the top 25 contractors in the country. The members of CSJV, Creamer and Sanzari, have been responsible for, among other things, the reconstruction of the Route 4 and 17 overpasses, the largest highway

project in the State of New Jersey in recent memory. This project was completed eighteen months ahead of schedule.

2. On May 21, 2014, the Board authorized Public Service Electric and Gas Company (“PSE&G”) to invest up to \$1 billion for the purpose of hardening its infrastructure and strengthening PSE&G’s delivery system (“Energy Strong I”). The Energy Strong I Order allowed PSE&G to recover its investment through future base rate adjustments, and also approved a cost recovery mechanism that allowed for semi-annual rate adjustments for spending related to electric utility investment, and annual rate adjustments for spending related to gas utility investment.

3. On June 12, 2018, PSE&G filed a petition for approval to implement the next phase of its infrastructure resiliency program (“Energy Strong II”). PSE&G is proposing a five year program with a total investment level of approximately \$2.5 billion in order to improve the reliability and resiliency of the PSE&G electric and gas system by rebuilding critical electrical equipment, installing strong poles, deploying advanced technology, building backup pipes, modernizing critical gas equipment, and improving customer service.

4. CSJV is in a unique position to provide the Board with critical insight as to the implications that Energy Strong II would have for the improvement and hardening of utility infrastructure in the State, job creation and retention in New Jersey, an accurate assessment of the construction costs associated with Energy Strong II, and recommendations concerning its implementation. CSJV’s significant understanding of utility infrastructure would be of great benefit to the Board in this matter due to the Board’s focus on extreme weather resiliency, which is a primary purpose of Energy Strong II.

5. Creamer and Sanzari, the companies that constitute CSJV, have decades of experience in New Jersey between them working with the utility industry, including the type of work necessary to implement Energy Strong II. CSJV has employed a significant number of union workers from various trades to perform that work, including laborers and operating engineers.

6. CSJV performed a significant amount of installation work in connection with Energy Strong I, as well as other infrastructure improvement programs implemented by PSE&G including the Gas System Modernization Program (“GSMP”). The extensive work of Creamer, Sanzari, and CSJV with PSE&G gives CSJV a unique understanding of PSE&G’s standards of reliability, quality, safety, and detail in the installation and replacement of its utility infrastructure and of the scope, scale, and complexity of the work necessary to implement the Energy Strong II.

7. N.J.A.C. § 1:1-16.6(c) provides that “[a]ny person or entity with a significant interest in the outcome of a case may move for permission to participate.”

8. Based on Creamer’s, Sanzari’s and CSJV’s extensive experience with the utility industry generally, PSE&G and Energy Strong I specifically, and the likelihood that CSJV may be retained to effect at least some of the construction work Energy Strong II will entail, CSJV not only has a significant interest in the outcome of this 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.

9. CSJV will be able to leverage its substantial experience with utilities and PSE&G to provide the Board with valuable insight both as to the impact Energy Strong II will have for utility reliability and infrastructure resiliency, job creation in New Jersey, as well as a detailed, practical assessment of the most effective strategies for the successful implementation of Energy

Strong II. CSJV's participation in this proceeding will contribute to the development of a complete record for consideration by the Board on these issues.

10. CSJV's motion is timely and will not delay or otherwise disrupt the prosecution of this proceeding.

11. For the foregoing reasons, CSJV respectfully requests a participant status in the above-captioned proceeding that will include the ability to offer oral argument, file statements and briefs, and participate in conferences. N.J.A.C. § 1:1-16.6(c); see, e.g., In re the Petition of Public Service Electric & Gas Company for Approval of the Energy Strong Program, BPU Dkt. Nos. EO13020155; GO130201562013, N.J. PUC LEXIS 307, Final Decision (October 16, 2013) (environmental organization permitted to "appropriately share its expertise . . . by participating in conferences and site visits, and filing statements and briefs including its perspective on the various proposals.").

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

Kevin G. Walsh
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(973) 596-4769
kwash@gibbonslaw.com

with a copy to

Michael D. DeLoreto
mdeloreto@gibbonslaw.com

WHEREFORE, CSJV respectfully requests an Order: (1) granting CSJV full rights as a participant in this matter pursuant to N.J.A.C. § 1:1-16.6(c) 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: 8.17.2018
Newark, New Jersey

Respectfully submitted,



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*Counsel for Creamer-Sanzari
Joint Venture*

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AUG 17 2018

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 THE
SECOND ENERGY STRONG PROGRAM
(ENERGY STRONG II)

CERTIFICATION OF SERVICE

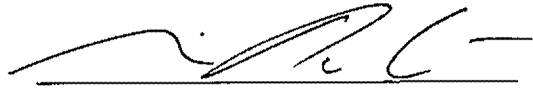
Docket Nos. EO18060629 and GO18060630

I, **MICHAEL D. DELORETO, 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 an Associate of the law firm of Gibbons P.C., counsel for Creamer-Sanzari Joint Venture (“CSJV”).

2. On August 17, 2018, I caused to be served via electronic mail copies of CSJV’s Motion to Participate in the above-captioned proceeding on each person identified on the service list. An original and ten (10) hard copies have this day been hand delivered to Aida Camacho-Welch, Secretary, New Jersey Board of Public Utilities, as well as a copy via electronic mail. Two (2) hard copies have this day been sent via regular mail to a representative for each party identified on the service list.

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

A handwritten signature in black ink, appearing to read 'M. DeLoreto', written over a horizontal line.

Michael D. DeLoreto, Esq.

Dated: 8-17-18
Trenton, New Jersey

I/M/0 THE PETITION OF PSE&G FOR APPROVAL OF THE SECOND ENERGY STRONG PROGRAM (ENERGY STRONG II)

BPU DOCKET NOS. EO18060629 and GO18060630

Service List (As of 7/25/18)

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