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TRENTON, NJ

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

August 14, 2018

Via Hand Delivery and Email

Office of the Secretary
Attn: Aida Camacho-Welch
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Trenton, NJ 08625

**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)
BPU Docket No. EO 18060629
BPU Docket No. GO 18060630**

Dear Ms. Camacho-Welch:

Enclosed are an original and ten copies of the Motion of AARP to intervene in the above-reference proceeding as a participant. Please file same and list the Motion on the Board's docket for action.

By copy of this letter, copies of the AARP Motion are being forwarded this date via electronic mail to the attached service list.

Thank you for your anticipated cooperation in this matter.

Sincerely,


JANINE G. BAUER

JGB/ac

cc: Service List (via email only) ✓

Public Service Electric and Gas Company
Energy Strung II
BPU Docket Nos.

08/14/2018

EO 18060629 & GO 18060630

Page 1 of 2

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

In the Matter of the Petition of Public)
Service Electric and Gas Company for) **BPU Docket No. EO 18060629**
Approval of The Second Energy Strong) **BPU Docket No. GO 18060630**
Program (Energy Strong II))

MOTION TO INTERVENE OF

AARP

AARP, a nonprofit, nonpartisan social welfare organization with a membership, including more than 1.3 million individuals residing in New Jersey, hereby moves to intervene in the above-captioned proceeding. In support of its motion, AARP states as follows:

1. All communications and correspondence in this proceeding should be directed to:

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2. On June 12, 2018, PSE&G filed a petition with the New Jersey Board of Public Utilities ("BPU" or "Board") for approval to implement the next phase of its Energy Strong

Program ("Energy Strong II" or "Program") and an associated cost recovery mechanism. The Company proposed a five (5) year program with a total investment level of approximately \$2.5 billion, which would, if approved, increase rates.

3. Specifically, PSE&G has forecasted a cumulative increase in the typical annual electric residential customer bill of 3.99% by September 1, 2024, and a projected cumulative forecasted increase in the typical annual gas heating residential customer bill of 6.80% by September 1, 2024.

4. By Decision and Order dated July 25, 2018, which Order became effective on August 4, 2018, the BPU accepted PSE&G's petition, and determined to retain the matter at the Board for hearing. Board President Joseph Fiordaliso is the presiding officer.

5. Pursuant to N.J.A.C. 1:1-16.2, this motion by AARP to intervene as a participant is timely filed.

WHEREFORE, in support of its application for intervention in this proceeding, and as further summarized below, AARP respectfully submits that all criteria for intervention set forth in N.J.A.C. 1:1-16.3 (standards for intervention) are met and there is ample support to grant AARP's motion to intervene in the above-captioned proceeding. Specifically:

1. AARP is a non-governmental, non-profit, and non-partisan organization whose interest is to protect the affordability, reliability, efficiency and safety of utility services for its NJ members who are concurrently residential ratepayers in the PSE&G service area aged 50 and over.

2. In New Jersey, AARP has 1.3 million members aged 50+ including hundreds of thousands of members residing within PSE&G's service territory. Members of AARP purchase

natural gas service from PSE&G and, therefore, will be affected by the outcome of the above captioned proceeding;

3. AARP has sought, through its affordable utilities work, to guarantee that all residents in the state of New Jersey have access to safe, reliable, and affordable utility rates, advocating in particular for the needs of 50+ low, moderate and fixed-income ratepayers many of whom are AARP's members.

4. In 2011, AARP commissioned a survey designed to better gather information on the needs, interests and concerns of 50+ New Jerseyans and determined that over two-thirds of NJ 50+ adults have experienced a problem paying their household utilities.

5. AARP found that older adults are especially vulnerable to high utility prices, in part because they spend a far greater proportion of their income on home energy costs than younger households.

6. AARP also found that older people limit or do without food (15%), medical services (11%) and prescription medicine (11%) to pay for higher energy bills.

7. Based on the impact of higher rates and tariffs and mechanisms to recover other costs on individuals who are age 50+ and who are less likely to be able to increase their income to meet higher rates of service and costs, AARP's purpose in intervening in this proceeding is to represent the interest of its members aged 50+ who purchase gas and electric service from PSE&G and who stand to be directly affected and impacted monetarily by PSE&G's gas and electric service rates and tariffs.

8. AARP and its members have a substantial, direct and specific interest not represented by other parties to this proceeding, which interest is sufficiently different from that of any other party.

9. AARP's interests are unique from and not adequately or sufficiently represented by the Division of the Rate Counsel or any other party. Rate Counsel's statutory duty is to represent all ratepayers whereas AARP represents the specific interests of its members who are age 50+ residential, many of whom live on fixed and limited household budgets.

10. N.J.A.C. 1:1-16.3(b) states that "In cases where one of the parties is a State agency authorized by law to represent the public interest in a case, no movant shall be denied intervention solely because the movant's interest may be represented in part by said State agency."

11. AARP's members' interests are substantially different from those of any other parties including Rate Counsel in this proceeding.

12. AARP will add measurably and constructively to the scope of the case because of its policy expertise, the experience of its counsel and professional staff, by helping the fact finder to achieve a fair, balanced and informed examination of the issues presented by PSE&G's petition and the impact of those rates, tariffs, depreciation rates and cost recovery mechanisms on ratepayers age 50+ particularly low, moderate and fixed income ratepayers.

13. AARP will not confuse or delay the proceeding if the motion for intervention is granted.

14. AARP has actively participated in numerous energy proceedings including base rate, infrastructure investment and modernization cases and storm cost recovery-related proceedings.

15. AARP was granted intervenor status in PSE&G's initial Energy Strong (I) proceeding and participated at trial, cross-examining witnesses and offering direct testimony, AARP was also a party to the Board-approved settlement in that matter. See NJBPU Docket

Nos. EO13020155 and GO13020156. The current petition is filed, in part, pursuant to the terms of the Board-approved settlement of PSE&G's Energy Strong proceeding.

16. AARP has also actively participated in energy policy proceedings including the State's Energy Master Plan, legislative initiatives leading to and following the adoption of the Electric Discount & Energy Competition Act of 1999 (EDECA), and numerous deregulation and/or energy proceedings before the BPU and/or the state legislature.

17. Since 1998 AARP has advocated for and actively participated in the establishment of New Jersey's Universal Service Fund ("USF") to provide affordable utility rates for low and fixed-income consumers, a program which became operational in 2003 and is now a model for the nation (BPU Docket No. EX0002091).

18. AARP is a member of the BPU's USF Working Group and continues in its efforts to make the program fully operational and accessible to all eligible ratepayers.

19. Considering AARP's history of both federal and state advocacy in support of affordable, safe and reliable utility services as well as AARP's intervention in past proceedings including PSE&G's Energy Strong proceeding, participation in legislative proceedings leading to and following the adoption of the Electric Discount & Energy Competition Act of 1999 (EDECA), and our participation in the Energy Master Plan process and our work to establish the USF, AARP holds a unique perspective and insight regarding the impact of an increase in gas and electric rates and tariffs, and mechanisms for recovering costs to replace existing infrastructure.

20. Fundamental fairness to older ratepayers and due process considerations militate in favor of allowing AARP an opportunity to participate in this proceeding, the outcome of which

poses significant and imminent risks to all of PSE&G's customers including the potential for irreparable harm to ratepayers' quality of life.

21. Notwithstanding its unique interests, where it is possible and practical for it to do so, AARP will endeavor to work cooperatively with other parties in this proceeding in the interests of administrative efficiency and economy, and will not delay, obstruct or confuse the issues, as it always does.

22. For the foregoing reasons, and because PSE&G's gas service and rates will affect the quality of the lives of our members, AARP has a direct, substantial, specific and immediate interest in the outcome of this proceeding that cannot be adequately represented by any other party.

23. WHEREFORE, pursuant to N.J.A.C. 1:1-16.3, AARP respectfully requests that it be permitted to intervene in this proceeding, with full procedural and substantive rights including discovery, and participation in the hearing including oral argument, cross-examination of witnesses and the filing of briefs and exceptions to the initial decision, in this proceeding.

Respectfully submitted,



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CERTIFICATION OF SERVICE

I hereby certify that I have this day served by electronic mail a copy of the foregoing Motion to Intervene on all parties set forth on the attached service list.

Dated at Lawrenceville, New Jersey on this ^{14th JB} ~~13th~~ day of August, 2018.



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CERTIFICATION

1. I am the New Jersey Director of Advocacy for AARP.
2. I have read the contents of the foregoing Motion and hereby certify that the statements therein contained are true and accurate to the best of my knowledge.



Evelyn Liebman, New Jersey Director of Advocacy
AARP

DATED: August 13, 2018