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CASE MANAGEMENT

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ORIGINAL

September 20, 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

In the Matter of the Petition of Pivotal Utility Holdings, Inc.
d/b/a Elizabethtown Gas for Authority to Extend the Term of
Energy Efficiency Programs and Approval of Associated Cost
Recovery Mechanism
BPU Docket No. GR18070682

VIA ELECTRONIC MAIL AND OVERNIGHT DELIVERY

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, Suite 314
Post Office Box 350
Trenton, New Jersey 08625-0350

Dear Secretary Camacho-Welch:

Enclosed are an original and ten copies of the Public Service Electric and Gas Company's ("PSE&G") Motion to Participate in the above-captioned proceeding.

By copy of this letter, copies of the motion are being forwarded this date via electronic mail to all persons whose names appear on the attached distribution list.

Sincerely,

Justin B. Incardone

c: Attached Service List (E-Mail Only)

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TRENTON, NJ

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CASE MANAGEMENT

SEP 21 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

**In the Matter of the Petition of Pivotal
Utility Holdings, Inc. d/b/a Elizabethtown
Gas Company for Authority to Extend the
Term of Energy Efficiency Programs and
Approval of Associated Cost Recovery
Mechanism**

BPU DOCKET NO. GR18070682

PUBLIC SERVICE ELECTRIC AND GAS COMPANY'S MOTION TO PARTICIPATE

1. Pivotal Utility Holdings, Inc., d/b/a Elizabethtown Gas Company, filed a Petition with the Board of Public Utilities ("BPU" or the "Board") on July 2, 2018 seeking to continue certain energy efficiency programs that it has implemented. Public Service Electric and Gas Company ("PSE&G" or the "Company") hereby files this motion to participate in this proceeding. PSE&G's timely files this motion to participate in accordance with the Board's August 29, 2018 Order setting a September 21, 2018 deadline for entities seeking to file a motion to intervene or participate in this matter.

2. PSE&G is a New Jersey public utility as defined by N.J.S.A. 48:2-13.

3. PSE&G is engaged in the purchase, transmission, distribution and sale of electric energy and related utility services to approximately 2.2 million residential, commercial, and industrial customers located within New Jersey. PSE&G is also engaged as a New Jersey public utility in the purchase, distribution, and sale of natural gas for more than 1.8 million customers located within New Jersey.

4. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

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5. The New Jersey Administrative Code states: “Any person or entity with a significant interest in the outcome of a case may move for permission to participate.” N.J.A.C. 14: § 1:1-16.6(a). When considering motions to participate, the Board “shall consider whether the participant’s interest is likely to add constructively to the case without causing undue delay or confusion.” N.J.A.C. 14: § 1:1-16.6(b).

6. Application of the above-referenced criterion demonstrates that PSE&G’s motion for participation should be granted. As the state’s largest electric and gas distribution company, PSE&G has a significant interest in the outcome of the case. The Company has made significant investments in Board-approved energy efficiency programs since 2009, and will be investing more in energy efficiency consistent with the new Clean Energy Law Governor Murphy signed on May 23, 2018.

7. The service territories, customers, and operations of PSE&G are distinct from those of other parties and participants, or potential parties and participants, in this case. Thus, no other party or participant will represent the interests of PSE&G in this case.

8. Due to PSE&G's experience with energy efficiency programs in the gas (and electric) industry, its participation is likely to add constructively to this proceeding.

9. Granting of this motion would be consistent with recent Board precedent. For example, by Order dated September 11, 2018 in BPU Docket No. GO18030355, the Board granted PSE&G participant status in an energy efficiency filing made by another gas utility, New Jersey Natural Gas Company.

10. PSE&G will abide by any procedural schedule set for this proceeding.

11. The granting of this motion will not cause undue delay or confusion.

12. PSE&G has a history of coordinating its representation in dockets at the Board with other similar utilities where appropriate. PSE&G will coordinate its representation with other similarly-situated parties in this docket to the extent it finds such action appropriate.

WHEREFORE, PSE&G respectfully requests an Order: (1) granting it full rights as a participant in this matter pursuant to N.J.A.C. 1:1-16.6, and (2) providing such further relief in connection therewith as is deemed reasonable, just, and consistent with the foregoing.

Respectfully submitted,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY



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