

NEW JERSEY
NEW YORK

**RECEIVED
CASE MANAGEMENT**

OCT 24 2018

**BOARD OF PUBLIC UTILITIES
TRENTON, NJ**

Via Overnight Mail and Email

Ms. 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: I/M/O the Implementation of L. 2018, c. 16 Regarding the Establishment of a
Zero Emission Certificate Program for Nuclear Power Plants
BPU Docket No.: EO18080899**

**I/M/O Public Service Electric and Gas Company's Request for Approval of a
Zero Emission Certificate Recovery Charge
BPU Docket No.: EO18091004**

Dear Secretary Camacho-Welch:

On behalf of the PJM Power Providers Group ("P3") we submit herewith an original and ten (10) copies of a Notice of Motion to Intervene as a Party in the above-referenced matters, along with an accompanying Letter Brief, Proposed Form of Order and Certification of Service in support of the Motion.

Thank you for your attention to this matter.

Very truly yours,

**DECOTIIS, FITZPATRICK,
COLE & GIBLIN, LLP**

By: WH
William Harla

Encls.
WH/sh

2415998v1

— LAW OFFICES —
DECOTIIS
DeCotiis, FitzPatrick, Cole & Giblin, LLP

GLENPOINTE CENTRE WEST
500 FRANK W. BURR BOULEVARD, SUITE 31
TEANECK, NEW JERSEY 07666

TELEPHONE: (201) 928-1100
TELEFAX: (201) 928-0588
WWW.DECOTIISLAW.COM

October 23, 2018

WILLIAM HARLA
WHARLA@DECOTIISLAW.COM
201.907.5205

RECEIVED
MAIL ROOM

OCT 24 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Case Mgmt
A. Hart, Esq.
S. Peterson
P. Krogman, Esq.
S. Richardson, Esq.

cc: BPU Service List (*via e-mail only*)

DECOTIIS, FITZPATRICK, COLE & GIBLIN, LLP

Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, New Jersey 07666
(201) 928-1100

Attorneys for PJM Power Providers Group ("P3")

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

RECEIVED
MAIL ROOM
OCT 24 2018
BOARD OF PUBLIC UTILITIES
TRENTON, NJ

I/M/O THE IMPLEMENTATION OF L. 2018, c. 16
REGARDING THE ESTABLISHMENT OF A ZERO
EMISSION CERTIFICATE PROGRAM FOR
NUCLEAR POWER PLANTS

BPU Docket No. EO18080899

I/M/O PUBLIC SERVICE ELECTRIC AND GAS
COMPANY'S REQUEST FOR APPROVAL OF A
ZERO EMISSION CERTIFICATE RECOVERY
CHARGE

BPU Docket No. EO18091004

NOTICE OF MOTION TO INTERVENE
AS A PARTY

TO: Honorable Joseph L. Fiordaliso, Commissioner
Ms. 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

RECEIVED
CASE MANAGEMENT

OCT 24 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

and

ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that, pursuant to N.J.A.C. 1:1-16.1, et seq., DeCotiis, FitzPatrick, Cole & Giblin, LLP, attorneys for the PJM Power Providers Group ("P3") hereby moves for an Order permitting P3 to intervene as a Party in the above-entitled proceeding with all the rights provided therefore, under all applicable rules, code and statutes, including, but not limited to, receive copies of all pleadings, papers, documents and exhibits and to introduce, submit and file direct testimony, pleadings, papers, documents and exhibits as appropriate, the


right to participate in conferences, discovery, testimony and cross-examination, settlement, and to be heard on all issues before the Board;

PLEASE TAKE FURTHER NOTICE that, in support of its Motion, P3 shall rely upon the accompanying Letter Brief.

**DECOTIIS, FITZPATRICK,
COLE & GIBLIN, LLP**

Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, New Jersey 07666
(201) 928-1100

Attorneys for the PJM Power Providers Group ("P3")

By:  _____
William Harla

Dated: October 23, 2018