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CASE MANAGEMENT



Rockland Electric Company

NOV 15 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

*Sent
11/19/18*

Margaret Comes
Associate Counsel
Law Department

VIA OVERNIGHT

November 14, 2018

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

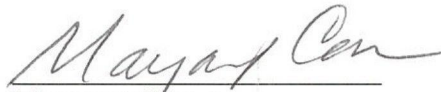
RECEIVED
MAIL ROOM
NOV 15 2018
BOARD OF PUBLIC UTILITIES
TRENTON, NJ

RE: In the Matter of the Petition Of Public Service Electric & Gas Company for
Approval of Its Clean Energy Future-Energy Cloud ("CEF-EC") Program on a
Regulated Basis
Docket No. EO18101115

Dear Secretary Camacho:

Enclosed please find for filing an original and ten copies of Rockland Electric
Company's Motion to Participate and supporting Certification of Margaret Comes, Esq.
in the above-captioned matter.

Respectfully submitted,


Margaret Comes

Enclosures
c: attached service list ✓

CMS

IN THE MATTER OF THE PETITION OF PUBLIC SERVICE GAS AND ELECTRIC COMPANY
FOR APPROVAL OF ITS CLEAN ENERGY FUTURE - ENERGY CLOUD ("CEF-EC")
PROGRAM ON A REGULATED BASIS

BPU DOCKET NO. EO18101115

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STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF PUBLIC) NOTICE OF MOTION TO
SERVICE ELECTRIC & GAS COMPANY FOR) PARTICIPATE
APPROVAL OF ITS CLEAN ENERGY FUTURE-)
ENERGY CLOUD ("CEF-EC") PROGRAM) Docket No. EO18101115
ON A REGULATED BASIS)

TO: Office of the Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue 9th Floor
Trenton, New Jersey 08625

RECEIVED
MAIL ROOM
NOV 15 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.* 1:1-16.6, Rockland Electric Company ("Rockland" or "the Company") by its undersigned counsel, hereby moves to participate in the above-entitled proceeding.

PLEASE TAKE FURTHER NOTICE that in support of its Motion to Participate, Rockland submits the annexed Certification of Margaret Comes, Esq. dated November 14, 2018.

Dated: November 14, 2018


Margaret Comes, Esq.
Associate Counsel
Rockland Electric Company
4 Irving Place Suite 1815-S
New York, New York 10003
Phone: (212) 460-3013
Fax: (212) 677-5850


STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF PUBLIC) CERTIFICATE OF SERVICE
SERVICE ELECTRIC & GAS COMPANY FOR)
APPROVAL OF ITS CLEAN ENERGY FUTURE-)
ENERGY CLOUD ("CEF-EC") PROGRAM) Docket No. EO18101115
ON A REGULATED BASIS)

I, Margaret Comes, of full age, hereby certify as follows:

- 1, I am an attorney at law in the State of New Jersey and counsel for Rockland Electric Company ("Rockland" or "the Company").
2. On this day I caused Rockland's Motion to Participate and Certification of Margaret Comes, Esq. to be delivered via Federal Express to the Office of the Secretary of the New Jersey Board of Public Utilities at 44 South Clinton Avenue, 9th Floor, P.O. Box 35, Trenton, New Jersey 08625-0350.
3. On this day I caused copies of Rockland Motion to Participate and Certification of Margaret Comes, Esq. to be served by electronic mail to the entities on the enclosed Service List.

The foregoing statements made by me are true. I understand that if any of the foregoing statements are willfully false, I am subject to punishment.


Margaret Comes, Esq.

November 14, 2018

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF PUBLIC)	CERTIFICATION IN
ELECTRIC & GAS COMPANY FOR)	SUPPORT OF MOTION
APPROVAL OF ITS CLEAN ENERGY FUTURE-)	
ENERGY CLOUD ("CEF-EC") PROGRAM)	Docket No. EO18101115
ON A REGULATED BASIS)	

I, Margaret Comes, of full age, do hereby certify as follows:

1. I am Associate Counsel for Rockland Electric Company ("Rockland" or "the Company"), and an attorney admitted in the State of New Jersey. As such, I am familiar with the facts and circumstances concerning this matter, and I make this Certification in support of Rockland's Motion to Participate.
2. On October 11, 2018, Public Service Gas and Electric Company ("PSE&G" or "the Company") filed a petition ("EC-AMI Petition") with the New Jersey Board of Public Utilities ("Board") for approval of the Company's Clean Energy Future-Energy Cloud ("CEF-EC") program on a regulated basis. PSE&G requests the Board approve a five-year, \$7.3 billion program designed to implement an Advanced Metering Infrastructure ("AMI") program within the PSE&G service territory. The Company states that the proposed AMI program will allow the Company greater visibility of its distribution system, as it will allow operators to "see" the status of the network down to the customer meter level, including those customers who are still without power during an outage. The Company also states that the CEF-EC or AMI program will help with restoration improvements which will include faster identification of "nested outages."
3. Rockland is a New Jersey public utility, which maintains its principal office at One Lethbridge Plaza, Suite 32 – 2nd Floor, Route 17 North, Mahwah, New Jersey 07430. Rockland

is engaged in the distribution and sale of electric energy for residential, commercial, and industrial purposes within New Jersey in the northern parts of Bergen and Passaic Counties and small areas in the northeastern and northwestern parts of Sussex County. Rockland is one of four investor-owned electric utilities in New Jersey. Rockland serves approximately 72,000 electric customers in New Jersey.

4. *N.J.A.C. 1:10-16.6(a)* sets forth the criteria for participation:

[A]ny person or entity with a significant interest in the outcome of a case may move for permission to participate.

5. *N.J.A.C. 1:10-16.6(b)* sets forth the standards that must be weighted when the Board considers a motion to participate:

In deciding whether to permit participation, the judge shall consider whether the participant's interest is likely to add constructively to the case without causing undue delay or confusion.

6. Rockland is entitled to participate because as one of only four investor-owned electric utilities in New Jersey serving retail customers, it has a significant interest in the above-captioned proceeding, *N.J.A.C. 1:10-16.6(a)*, and its interests will add constructively to this proceeding without causing undue delay or confusion. *N.J.A.C. 1:10-16.6(b)*. Rockland's significant interest in the outcome of the proceeding is rooted in the fact that substantive policy and/or procedural requirements established in this proceeding can significantly influence, if not have a precedential effect over, the positions taken by parties in, and the outcome of, proceedings involving Rockland. Therefore, it is important that Rockland be permitted participant status in this proceeding, so that it may monitor developments and be apprised of potential policy developments, both substantive and procedural, on these important issues in a timely manner.

7. Rockland's interests in this proceeding, as an investor-owned electric utility serving retail customers, are materially different from the petitioner, which represents its own interests, or the other parties (e.g., Board Staff and the Division of Rate Counsel), who primarily represent consumer interests.

8. Moreover, Rockland's interests will contribute to the development of a complete record for the consideration by the Board without causing any delay or confusion since the proceeding has just commenced. *N.J.A.C. 1:10-16.6(b)*. In this matter, Rockland intends only to participate in order to receive copies of testimony, briefs and other materials, to monitor the proceedings and perhaps file briefs and/or exceptions. Rockland will abide by whatever procedural schedule is set by the Board.

9. At this time, Rockland seeks only participant status and does not foresee expanding that role. Rockland must, of course, reserve its right to seek full party intervener status if the relevant circumstances underlying this proceeding change, and it can establish that it satisfies regulatory requirements for such a change.

10. Rockland requests that all communications, correspondence, orders and other documentation relating to this proceeding be directed to the following persons:

Margaret Comes, Esq.
Associate Counsel
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4 Irving Place Suite 1815-S
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Phone: (212) 460-3013
Fax: (212) 677-5850
Email: comesm@coned.com

With copies to:

Jack Carley, Esq.
Assistant General Counsel

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4 Irving Place Suite 1815-S
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Phone: (212) 460-2097
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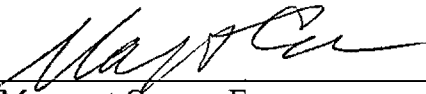
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Rockland also requests that the above attorneys be placed on the official service list compiled for this proceeding.

11. According, Rockland respectfully requests that the Board grant its motion to participate in this proceeding, with the rights to argue orally, file briefs or statements, or file exceptions.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: November 14, 2018



Margaret Comes, Esq.