



*Send  
11/19/18*

Dr. Shihab Kuran  
Direct Contact Number: (732) 474-7747  
salkuran@poweredison.com

RECEIVED  
MAIL ROOM

NOV 13 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

166 Deer Run  
Watchung, NJ 07069  
(908) 312-1242

November 7, 2018

**Via Electronic Delivery & Overnight Delivery**

New Jersey Board of Public Utilities  
Attn: Hon. Aida Camacho-Welch  
44 South Clinton Avenue, 3<sup>rd</sup> Floor, Suite 314  
Trenton, NJ 08625-0350

RECEIVED  
CASE MANAGEMENT

NOV 14 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

**Re: In the matter of Public Service Electric and Gas Company  
for Approval of the Clean Energy Future-Electric Vehicle  
and Energy Storage Program (CEF-EVES)  
Docket No. EO1810111.**

Dear Secretary Camacho-Welch,

Enclosed please find ten copies of Power Edison's Motion to Intervene in the above-captioned matter.

Please process this Motion to Intervene in order that it may be considered by the Board within its established timeframe for applications for participating in this proceeding.

Please do not hesitate to contact us if you have any questions or comments.

Respectfully Submitted,

Power Edison, LLC

Shihab Kuran, Ph.D.

*CMS  
Legal  
A. Moreau, Esq.  
S. Peterson*

RECEIVED  
CASE MANAGEMENT

NOV 14 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

State of New Jersey  
Board of Public Utilities

RECEIVED  
MAIL ROOM

NOV 13 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

In the matter of Public Service Electric and )  
Gas Company for Approval of the Clean ) Docket NO. EO1810111  
Energy Future-Electric Vehicle and Energy )  
Storage Program (CEF-EVES) )

**MOTION OF POWER EDISON, LLC FOR LEAVE TO INTERVENE IN  
THE PRESENT MATTER**

1. Power Edison, LLC ("Power Edison"), by way of this Motion, respectfully requests leave to intervene in the present matter pursuant to N.J.A.C 1:1-16.1(a). All Communication and correspondence concerning these proceedings should be directed to:

Shihab Kuran, Ph.D.  
Power Edison, LLC  
166 Deer Run  
Watchung, NJ 07069  
(732) 474-7747  
[salkuran@poweredison.com](mailto:salkuran@poweredison.com)

**A. Background**

2. Power Edison is a New Jersey based privately held, utility-scale energy storage system developer and supplier. Additionally, Power Edison develops and supplies utility-scale *mobile* energy storage systems.

3. New Jersey enacted legislation 3723 in May that sets a target for the state to reach 600 MW of energy storage by 2021 and 2,000 MW by 2030.
4. Governor Murphy signed an executive order No. 28 which calls for the development of a revised Energy Master Plan by June 1, 2019. The plan will highlight a path for the conversion of New Jersey's energy generation to 100% clean energy sources by January 1, 2050.
5. On or about October 11, 2018, PSE&G filed a petition for approval of a Clean Energy Future – Electric Vehicle and Energy Storage Program (“Program”). This program supports the installation of 40,000 electric vehicle charging stations and supports vehicle electrification in general. The Program also supports the deployment of 35 MW of energy storage pilot projects which is a crucial step forward in achieving the energy storage targets set forth in the legislation. Specifically, the Program includes a subsegment of *mobile* energy storage systems.
6. The Program seeks to help establish New Jersey as a leader in clean energy and will provide the investment needed to advance New Jersey's energy storage and electric vehicle developments.
7. The program is expected to have significant positive impact on economic development and create employment opportunities in the sector, most of which are high-tech jobs.

intervene. N.J.A.C. § 1: 1-16.3(a) provides that, in ruling on a motion to intervene, consideration should be made of the nature and extent of the movant's interest in the outcome of the case, whether or not the movant's interest is sufficiently different from that of any party so as to add measurably and constructively to the scope of the case, the prospect of confusion or delay arising from the movant's inclusion, and other appropriate matters.

### **C. Argument**

#### **Direct Impact to Power Edison**

12. Power Edison offers unique energy storage solutions, many of which are contemplated by the Program.
13. Knowing whether a multi-year energy storage program will be approved by the board is important for companies like Power Edison because it allows them to make investments in staff, R&D, materials and manufacturing equipment and facilities with greater certainty.
14. Accordingly, Power Edison has a concrete interest in the Program and will be “substantially and directly” affected by the outcome of this matter.

#### **Power Edison's Interest Will Add Measurably and Constructively to the Scope of the Case**

15. Power Edison staff has a successful history of engaging in New Jersey's energy initiatives including testifying before the Board of Public Utilities in the 2009 Solar 4 All Program routinely attend New Jersey public stakeholder meetings and routinely attend and actively participate in the Energy Master Plan meetings.
16. Power Edison team has a long successful history of working in the electricity sector including with state utility commissions, legislature, organized labor, rate advocates, electric utilities, independent power producers, electric equipment manufacturers, solar and storage developers and battery technology manufacturers. This broad knowledge gives Power Edison a unique and distinct perspective concerning the Program as compared to other parties in this proceeding.

*Power Edison's Interests are Not Adequately Represented*

17. There are no other parties to the proceeding with interests identical to those of Power Edison and specifically of mobile energy storage. Power Edison brings the energy storage private sector's interests into the discussion which is extremely valuable to this matter.

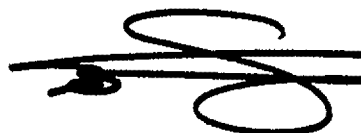
*Inclusion of Power Edison as an Intervenor Will Not Cause Delay or Confusion*

18. Intervention of Power Edison will not cause undue delay. This motion is being made in accordance with the November 13<sup>th</sup>, 2018 deadline for motions to intervene. Additionally, no prospect of confusion arises from allowing Power Edison to intervene.

Wherefore, pursuant to N.J.A.C. 1:1.16, Power Edison respectfully requests it be permitted to intervene in this matter.

Dated: November 7, 2018

Respectively submitted,

A handwritten signature in black ink, appearing to be 'Shihab Kuran', written over a horizontal line.

Shihab Kuran, Ph.D.  
Power Edison  
President & CEO  
166 Deer Run  
Watchung, NJ 07069  
(732) 474-7747