



400 Crossing Boulevard
8th Floor
P.O. Box 5933
Bridgewater, NJ 08807
T: 908-722-0700
F: 908-722-0755

Jan
11/15/18

RECEIVED
CASE MANAGEMENT

NOV 14 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

VIA EMAIL AND OVERNIGHT COUYRIER

November 13, 2018

RECEIVED
MAIL ROOM

NOV 14 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Aida Camacho, Secretary
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor
Post Office Box 350
Trenton, New Jersey 08625-0350

Re: I/M/O PSE&G Clean Energy Future-Electric Vehicle and Energy Storage
("CEF-EVES")
Docket No. EO18101111

Dear Secretary Camacho:

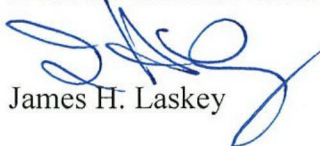
On behalf of Burns & McDonnell Engineering Company, Inc., enclosed are an original and eleven copies of a motion to intervene in the above proceeding.

By copy of this letter, copies of the motion are being forwarded this date via electronic mail to all persons on the service list. Two hard copies are being sent to counsel for Petitioner. Hard copy to any other party will be provided upon request.

Please return a copy of the filed motion in the enclosed self-addressed, stamped envelope.

Very truly yours,

NORRIS McLAUGHLIN, P.A.


James H. Laskey

Enc.

cc: *Case Mgmt*
Service list (via email) ✓ *4 hard*
Mathew M. Weissman, Esq.



BRIDGEWATER, NJ | NEW YORK, NY | ALLENTOWN, PA

WWW.NORRISMCLAUGHLIN.COM

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

DOCKET NO. EO18101111

SERVICE LIST

PSEG

PSEG Services Corporation
80 Park Plaza, T5G
Post Office Box 570
Newark NJ 07102

Joseph F. Accardo, Jr., Esq.
joseph.accardojr@pseg.com

Joseph A. Shea Esq.
PSEG Service Corporation
joseph.shea@pseg.com

Bernard Smalls
bernard.smalls@pseg.com

Matthew M. Weissman Esq.
PSEG Services Corporation
matthew.weissman@pseg.com

Caitlyn White
caitlyn.white@pseg.com

Michele Falcao, Esq.
michele.falcao@pseg.com

Justin Incardone Esq.
justin.incardone@pseg.com

Danielle Lopez Esq.
danielle.lopez@pseg.com

Cullen and Dykman LLP
Deborah M. Franco
Cullen and Dykman LLP
One Riverfront Plaza
Newark NJ 07102
dfranco@cullenanddykman.com

BPU

Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
Post Office Box 350
Trenton, NJ 08625-0350

Aida Camacho-Welch
Secretary of the Board
board.secretary@bpu.nj.gov

Paul E. Flanagan, Esq.
Executive Director
paul.flanagan@bpu.nj.gov

Grace Strom Power, Esq.
Chief of Staff
grace.power@bpu.nj.gov

Ken Sheehan, Esq., Director
Division of Clean Energy
Ken.Sheehan@bpu.nj.gov

Sherri Jones
Assistant Director
Division of Clean Energy
sherri.jones@bpu.nj.gov

Scott Hunter
Division of Clean Energy
B.Hunter@bpu.nj.gov

Stacy Peterson, Director
Division of Energy
Stacy.peterson@bpu.nj.gov

Bart Kilar
Division of Energy
Bart.kilar@bpu.nj.gov

Rate Counsel

Division of Rate Counsel
140 East Front Street, 4th Floor
Post Office Box 003
Trenton, NJ 08625-0003

Stefanie A. Brand, Esq., Director
sbrand@rpa.nj.gov

Henry Ogden, Esq.
hogden@rpa.nj.gov

Felicia Thomas-Friel, Esq.
ftthomas@rpa.nj.gov

Brian O. Lipman, Esq.
blipman@rpa.nj.gov

Ami Morita, Esq.
amorita@rpa.state.nj.us

Shelly Massey, Paralegal
smassey@rpa.nj.gov

Sarah Steindel, Esq.
ssteinde@rpa.state.nj.us

Diane Schulze Esq.
dschulze@rpa.state.nj.us

James Glassen, Esq.
jglassen@rpa.state.nj.us

Lisa Gurkas, Paralegal
lgurkas@rpa.state.nj.us

Kurt Lewandowski, Esq.
klewando@rpa.state.nj.us

Scott Sumliner
Division of Energy
Scott.sumliner@bpu.nj.gov

Jacqueline O'Grady
Division of Energy
jackie.ograde@bpu.nj.gov

Bethany Rocque Romaine
Deputy Chief Counsel
Bethany.romaine@bpu.nj.gov

Andrea Hart, Esq.
Legal Specialist
andrea.hart@bpu.nj.gov

Alice Bator, Director
alice.bator@bpu.nj.gov

Christine Lin
Office of the Economist
christine.lin@bpu.nj.gov

Division of Law

Department of Law & Public Safety
Division of Law
124 Halsey Street
Post Office Box 45029
Newark, NJ 07101-45029

Caroline Vachier, Esq.
Deputy Attorney General
caroline.vachier@law.njoag.gov

Geoff Gersten, Esq.
Deputy Attorney General
Geoffrey.Gersten@law.njoag.gov

Jenique Jones, Esq.
Deputy Attorney General
jenique.jones@dol.lps.state.nj.us

Patricia A. Krogman, Esq.
Deputy Attorney General
patricia.krogman@dol.lps.state.nj.us

Renee Greenberg, Esq.
Deputy Attorney General
Renee:greenberg@law.njoag.gov

Emma Yao Xiao, Esq.
Deputy Attorney General
Emma.Xiao@law.njoag.gov

Andrew Kuntz, Esq..
Deputy Attorney General
Andrew.Kuntz@law.njoag.gov

Peter VanBrunt
Deputy Attorney General
Peter.VanBrunt@law.njoag.gov

RECEIVED
CASE MANAGEMENT

NOV 14 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

RECEIVED
MAIL ROOM

NOV 14 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

I/M/O THE PETITION OF PUBLIC SERVICE)
ELECTRIC AND GAS COMPANY FOR)
APPROVAL OF ITS CLEAN ENERGY) Docket No. EO18101111
FUTURE – ELECTRIC VEHICLE AND)
ENERGY STORAGE (“CEF-EVES”))
PROGRAM ON A REGULATED BASIS)
)
)

MOTION TO INTERVENE BY BURNS & McDONNELL ENGINEERING COMPANY, INC.

Burns & McDonnell Engineering Company, Inc. (“BMcD”) hereby moves to intervene as a party in this matter pursuant to N.J.A.C. 14:1-8.1 and N.J.A.C. 1:1-16.1 et seq. BMcD seeks full party status in the above-captioned matter, which involves a request by Public Service Electric & Gas Company (“PSE&G”) for approval of its Clean Energy Future-Electric Vehicle and Energy Storage Program (“CEF-EVES Program,” or “Program”).

BMcD is a leading utility design and construction firm providing critical infrastructure for the power, gas, and communication markets throughout North America. BMcD’s broad experience in all areas of utility design and construction combined with its experience in electric vehicle and energy storage design and construction will constructively assist the Board in evaluating, among other things, the value of the continuity and familiarity in the evaluation of the new Program.

BMcD is witnessing throughout the United States the need for electric vehicle charging infrastructure to prepare for the growing demand of the electric vehicle market. Additionally, BMcD is witnessing throughout the United States, and in particularly in the Northeast, including New Jersey, the demand for energy storage to optimize electricity costs for utility customers, support grid operations, and facilitate the integration of renewables on the grid.

BMcD believes that the Program is fully consistent with Governor Murphy’s Executive Order No. 28 to make New Jersey’s energy production profile 100% clean energy sources by January 1, 2050. The

Program provides an opportunity for New Jersey to be a leader in a clean energy future. It also has the opportunity to create new jobs in New Jersey, both for BMcD and others.

BMcD's status as a large-scale heavy infrastructure company and its knowledge of the electric vehicle and energy storage market combine to give it unique experience and a distinctive viewpoint concerning CEF-EVES as compared to other parties. Thus, BMcD's intervention will be constructive.

The criteria for intervention are set forth in part at N.J.A.C. 1:1-16.1(a) and provide:

Any person or entity not initially a party, who has a statutory right to intervene or who will be substantially, specifically and directly affected by the outcome of a contested case, may on motion, seek leave to intervene.

The standards to be applied in considering a Motion for Intervention are further specifically enunciated at N.J.A.C. 1:1-16.3(a):

In ruling upon a motion to intervene, the judge [or Board] shall take into consideration 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 undue delay arising from the movant's inclusion, and other appropriate matters.

As noted above, BMcD has a unique perspective in terms of what a successful Program will require. Moreover, BMcD is prepared to coordinate its representation with similarly situated parties in this matter to the extent that it finds such action feasible. BMcD is also prepared to abide by the schedule to be established in this proceeding and, if granted intervention, BMcD will not seek to alter the scope of this or interject unrelated issues. Accordingly, allowing BMcD to intervene will not cause any undue delay or confusion with regard to these proceedings.

If for any reason the motion to intervene is not granted, then, pursuant to N.J.A.C. 1:1-16.5, BMcD requests participant status, so that it may make a statement or file a brief at the appropriate time.

Assuming this motion is granted, the following individuals should be added to the service list in this matter.

James H. Laskey
Norris McLaughlin, P.A.
400 Crossing Blvd, 8th Floor
Bridgewater, New Jersey 08807
908-722-0700 (phone)
908-722-0755 (fax)
jlaskey@norris-law.com

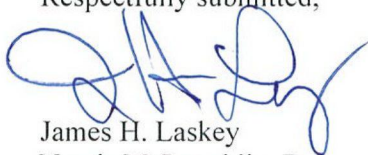
and

Lindsay Grisé
Legal Counsel
Burns & McDonnell Engineering Company, Inc.
9400 Ward Parkway
Kansas City, MO 64112
816-822-3074 (phone)
816.822.3413 (fax)
lgrise@burnsmcd.com

CONCLUSION

For the reasons set forth above, BMcD respectfully requests that its Motion for Intervention be granted, pursuant to N.J.A.C. 1:1-16.1, et seq., according BMcD full party status in this matter.

Respectfully submitted,



James H. Laskey
Norris McLaughlin, P.A.
400 Crossing Blvd, 8th Floor
Bridgewater, New Jersey 08807
908-252-4221 (phone)
908-722-0755 (fax)
jhlaskey@nmmlaw.com

Attorneys for Burns & McDonnell Engineering Company, Inc.

Dated: November 13, 2018

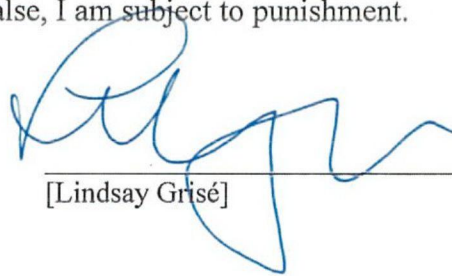
VERIFICATION OF [LINDSAY GRISÉ]

I, [Lindsay Grisé], verify the foregoing Motion to Intervene as follows:

1. I am employed as [in-house counsel] for Burns & McDonnell Engineering Company, Inc. ("BMcD") and am authorized to sign this verification on BMcD's behalf.
2. I have read the foregoing Motion to Intervene and verify that the facts contained therein relating to BMcD are true to the best of my knowledge, and the opinions contained therein are correct to the best of my belief.

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

Dated: November 13, 2018



[Lindsay Grisé]