

Philip J. Passanante
Assistant General Counsel



92DC42
PO Box 6066
Newark, DE 19714-6066

302.429.3105 - Telephone
302.429.3801 - Facsimile
philip.passanante@pepcoholdings.com

500 N. Wakefield Drive
Newark, DE 19702

atlanticcityelectric.com

An Exelon Company

Surf
11/15/18

November 13, 2018

RECEIVED
CASE MANAGEMENT

VIA FEDERAL EXPRESS and
ELECTRONIC MAIL

aida.camacho@bpu.nj.gov
board.secretary@bpu.nj.gov

NOV 14 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

RECEIVED
MAIL ROOM

NOV 14 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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

RE: 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
BPU Docket No. EO18101111

Dear Secretary Camacho-Welch:

On behalf of Atlantic City Electric Company, enclosed for filing please find an original and ten copies of the Company's Motion to Participate in the above docket.

Pursuant to the Order Designating a Commissioner, Setting a Bar Date and Manner of Service, dated October 29, 2018, this matter has been retained by the Board and has been assigned to the Honorable Upendra J. Chivukula as the Presiding Officer. We are copying Commissioner Chivukula on this letter and enclosing a copy of the Motion to Participate.

Feel free to contact the undersigned with any questions.

Respectfully submitted,

Passanante /jpr
Philip J. Passanante
An Attorney at Law of the
State of New Jersey

Case Mgmt

Enclosure

cc: Honorable Upendra J. Chivukula, Commissioner
Service List ✓

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)

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES
BPU DOCKET NO. EO18101111

NOTICE OF MOTION
TO PARTICIPATE

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

RECEIVED
CASE MANAGEMENT

NOV 14 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

RECEIVED
MAIL ROOM

NOV 14 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

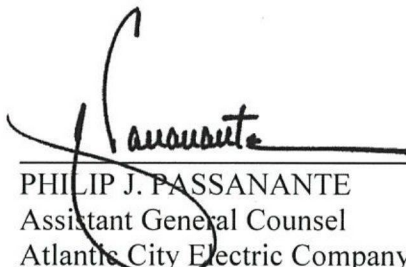
and

All Parties on the Attached Service List

PLEASE TAKE NOTICE that, pursuant to *N.J.A.C. 1:1-16.6*, Atlantic City Electric Company ("ACE"), by its undersigned counsel, hereby moves to participate in the above-titled proceeding.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion to Participate, ACE submits the annexed Certification of Philip J. Passanante, Esquire, dated November 13, 2018.

Dated: November 13, 2018

 /jpr
PHILIP J. PASSANANTE
Assistant General Counsel
Atlantic City Electric Company – 92DC42
500 North Wakefield Drive
Post Office Box 6066
Newark, Delaware 19714-6066
(302) 429-3105 – Telephone (Delaware)
(609) 909-7034 – Telephone (Trenton)
philip.passanante@pepcoholdings.com

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)

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

BPU DOCKET NO. EO18101111

CERTIFICATION IN SUPPORT OF
MOTION TO PARTICIPATE

I, Philip J. Passanante, of full age, do hereby certify as follows:

1. I am Assistant General Counsel for Atlantic City Electric Company ("ACE" or the "Company"), and an attorney at law of 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 ACE's Motion to Participate.

2. On or about October 11, 2018, Public Service Electric and Gas Company ("PSE&G" or the "Petitioner") filed a petition (the "Petition") with the New Jersey Board of Public Utilities (the "Board") for approval of its Clean Energy Future Electric Vehicle and Energy Storage Program (the "Program"), including a proposed cost recovery mechanism, in accordance with N.J.S.A. 48:2-21 and 48:2-21.1. According to the Petition, PSE&G proposes to invest up to \$261 million over a six year period and approximately \$103 million in expenses.

3. ACE is a New Jersey public utility incorporated in the State of New Jersey and maintains a regional office at 5100 Harding Highway, Mays Landing, New Jersey 08330. ACE is engaged in the transmission, distribution, and sale of electric energy for residential, commercial, and industrial purposes within New Jersey. The Company's service territory comprises eight counties located in southern New Jersey and includes approximately 553,000 customers.

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

Any person or entity with a significant interest in
the outcome of a case may move for permission to

participate.

5. *N.J.A.C.* 1:1-16.6(b) sets forth the standard that must be weighed when considering 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. ACE 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.* 1:1-16.1(a), and its interests will add constructively to this proceeding without causing any delay or confusion, *N.J.A.C.* 1:1-16.3(a). ACE'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 on, the positions taken by parties in, and the outcome of, proceedings involving ACE. Therefore, it is important that ACE 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. It is also important to note that ACE has filed a Plug-In Electric Vehicle Petition which is pending before the Board as BPU Docket No. EO18020190.

7. As an investor-owned electric utility serving retail customers, the Company's interests in this proceeding are materially different from Petitioner, who represents its own interests, and from the other parties (*i.e.*, Board Staff and the Division of Rate Counsel), who represent primarily consumer interests.

8. Moreover, ACE's interests will contribute to the development of a complete record for consideration by the Board without causing any delay or confusion, as the proceeding

has just commenced. *N.J.A.C. 1:1-16.3(a)*. In this matter, ACE intends to participate only in order to receive copies of testimony, briefs, and other materials; to monitor the proceedings; and possibly to file briefs and/or exceptions. ACE will abide by the procedural schedule(s) set in this matter.

9. At this time, ACE seeks only Participant status and does not foresee expanding that role. ACE must, however, reserve its right to seek full party intervenor status if the relevant circumstances underlying this proceeding change, and if it can establish that it satisfies regulatory requirements for such status.

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

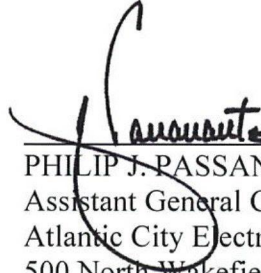
Philip J. Passanante, Esquire
Assistant General Counsel
Atlantic City Electric Company
92DC42
500 North Wakefield Drive
Newark, DE 19702
(302) 429-3105 – Telephone (Delaware)
(609) 909-7034 – Telephone (Trenton)
(302) 429-3801 – Facsimile
philip.passanante@pepcoholdings.com

ACE also respectfully requests that the above attorney be placed on the official service list compiled for purposes of this proceeding.

11. Accordingly, ACE respectfully requests that the Board grant its Motion to Participate in this proceeding, with the rights to argue orally, file briefs or statements, and file exceptions.

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


_____/jpr
PHILIP J. PASSANANTE
Assistant General Counsel
Atlantic City Electric Company – 92DC42
500 North Wakefield Drive
Post Office Box 6066
Newark, Delaware 19714-6066
(302) 429-3105 – Telephone (Delaware)
(609) 909-7034 – Telephone (Trenton)
philip.passanante@pepcoholdings.com

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)

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

BPU DOCKET NO. EO18101111

CERTIFICATION OF
SERVICE

I, Philip J. Passanante, of full age, hereby certify as follows:

1. I am an attorney at law in the State of New Jersey and Assistant General Counsel to Atlantic City Electric Company ("ACE") in the above referenced matter, with which I am familiar.


2. On this day, I caused ACE's Motion to Participate and Certification of Philip J. Passanante, Esquire to be delivered via Federal Express to Aida Camacho-Welch, Secretary of the Board, Board of Public Utilities, 44 South Clinton Avenue, Suite 314, Trenton, New Jersey 08625..

3. On this day, I further caused copies of ACE's Motion to Participate and Certification of Philip J. Passanante to be served by Federal Express to Hon. Upendra J. Chivukula, Commissioner, Board of Public Utilities, 44 South Clinton Avenue, Suite 314, Trenton, New Jersey 08625.

4. On this day, I further caused copies of ACE's Motion to Participate and Certification of Philip J. Passanante to be served by electronic mail to the entities on the Service List.

5. I further and finally 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


_____/jpr
PHILIP J. PASSANANTE
Assistant General Counsel
Atlantic City Electric Company – 92DC42
500 North Wakefield Drive
Post Office Box 6066
Newark, Delaware 19714-6066
(302) 429-3105 – Telephone (Delaware)
(609) 909-7034 – Telephone (Trenton)
philip.passanante@pepcoholdings.com

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
BPU Docket No. EO18101111

Service List

BPU

Aida Camacho-Welch
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, Suite 314
Trenton, NJ 08625
aida.camacho@bpu.nj.gov
board.secretary@bpu.nj.gov

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

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

Kenneth J. Sheehan, Esq.,
ken.sheehan@bpu.nj.gov

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

Scott Hunter
B.Hunter@bpu.nj.gov

Stacy Peterson
stacy.peterson@bpu.nj.gov

Bart Kilar
Bart.kilar@bpu.nj.gov

Scott Sumliner
Scott.sumliner@bpu.nj.gov

Jacqueline O'Grady
Jackie.ograde@bpu.nj.gov

Bethany Rocque-Romaine, Esq.
Bethany.romaine@bpu.nj.gov

Andrea Hart, Esq.
Andrea.hart@bpu.nj.gov

Alice Bator
Alice.bator@bpu.nj.gov

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

DIVISION OF LAW

Deputy Attorney General
Division of Law
124 Halsey Street
P.O. Box 45029
Newark, NJ 07101-45029

Caroline Vachier, Esq.
Caroline.vachier@law.njoag.gov

Geoffrey Gersten, Esq.
geoffrey.gersten@law.njoag.gov

Jenique Jones, Esq.
Jenique.jones@dol.lps.state.nj.us

Patricia A. Krogman, Esq.
Patricia.krogman@dol.lps.state.nj.us

Renee Greenberg, Esq.
renee.greenberg@law.njoag.gov

Emma Yao Xiao, Esq.
Emma.xiao@law.njoag.gov

Andrew Kuntz, Esq.
Andrew.kuntz@law.njoag.gov

Peter VanBrunt, Esq.
Peter.vanbrunt@law.njoag.gov

RATE COUNSEL
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003

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

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

Felecia Thomas-Friel, Esq.
ftomas@rpa.nj.gov

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

Ami Morita, Esq.
amorita@rpa.nj.gov

Shelly Massey, Paralegal
smassey@rpa.nj.gov

Sarah Steindel, Esq.
ssteinde@rpa.nj.gov

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

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

Lisa Gurkas, Paralegal
lgurkas@rpa.nj.gov

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

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

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

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

Bernard Smalls
bernard.smalls@pseq.com

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

Caitlyn White
caitlyn.white@pseg.com

Michele Falcao
michele.falcao@pseg.com

Justin Incardone Esq.
justin.incardone@pseg.com

Danielle Lopez, Esq.
Danielle.lopez@pseg.com

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