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**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

—LAW OFFICES—
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November 13, 2018

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**BOARD OF PUBLIC UTILITIES
TRENTON, NJ**

**Re: I/M/O 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 Enel X North America, Inc. ("Enel X") and Electric Motor Werks, Inc., we submit herewith an original and ten (10) copies of a Notice of Motion to Intervene as a Party in the above-referenced matter, 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: *William Harla*
William Harla

Encls.
WH/sh

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

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*Attorneys for Enel X North America, Inc.
and Electric Motor Werks, Inc.*

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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

**I/M/O 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

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

and

ALL PARTIES ON THE ATTACHED SERVICE LIST

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

PLEASE TAKE NOTICE that, pursuant to N.J.A.C. 1:1-16.1, et seq., DeCotiis, FitzPatrick, Cole & Giblin, LLP, attorneys for Enel X North America, Inc. and Electric Motor Werks, Inc. hereby move for an Order permitting them 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, Enel X North America, Inc. and Electric Motor Werks, Inc., shall rely upon the accompanying Letter Brief.

**DECOTHS, FITZPATRICK,
COLE & GIBLIN, LLP**
Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, New Jersey 07666
(201) 928-1100
*Enel X North America, Inc.
and Electric Motor Werks, Inc.*

By: William Harla
William Harla

Dated: November 13, 2018