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BOARD OF PUBLIC UTILITIES
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KEYSTONE ENERGY EFFICIENCY ALLIANCE

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Via Hand Delivery And E-Mail

Hon. Aida Camacho-Welch
Board Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
Trenton, New Jersey 08625-0350

**RE: Petition of the Public Service Electric and Gas Company for Approval of its Clean
Energy Future- Energy Efficiency Program on a Regulated Basis ("CEF-EE")
Docket Nos. GO1810112 & ~~E01012113~~**

E01810113

Dear Secretary Camacho-Welch:

On behalf of the Keystone Energy Efficiency Alliance ("KEEA"), please accept for filing an original and ten copies of KEEA's Motion to Intervene in the above-captioned matter. Please do not hesitate to contact us with questions or comments.

Sincerely,

Matt Elliott

Executive Director
Keystone Energy Efficiency Alliance

Enclosures

cc: Attached Service List (via e-mail)

Case mgmt

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CASE MANAGEMENT

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

State of New Jersey
Board of Public Utilities

IN THE MATTER OF THE PETITION OF
PUBLIC SERVICE ELECTRIC AND GAS
COMPANY FOR APPROVAL OF ITS
CLEAN ENERGY FUTURE- ENERGY
EFFICIENCY PROGRAM ON A
REGULATED BASIS (“CEF-EE”)

DOCKET NOS. GO1810112
EO1012113

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

MOTION TO INTERVENE

1. The Keystone Energy Efficiency Alliance (“KEEA”), by way of this motion, respectfully requests to intervene in the above-captioned petition filed by the Public Service and Gas Company (“PSE&G”) pursuant to N.J.A.C. § 1:1-16.1. All communications and correspondence concerning this proceeding should be directed to:

Eric Miller
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A. Introduction

2. KEEA is a 501(c)(6) trade association with nearly 50 business members that manufacture, design, and implement energy efficiency improvements in buildings across Pennsylvania and New Jersey on behalf of regulated utilities, the State, and ratepayers.¹

¹ KEEA is a non-profit tax-exempt 501(c)(6) corporation and is comprised of the following members: Advanced Energy Economy, Applied Energy Group, A1 Energy, C-Power, Clean Markets, LLC, CLEAResult, CMC Energy Services, Conservation Consultants, Inc., DMI Companies, DNV GL, Ecova, Electric Advisors Consulting, EMC Electric Market Connection, Encentiv Energy, Energy Coordinating Agency, Energy Federation, Inc., Energy Opportunities, Inc., FirstFuel, Four Seasons Produce Inc., Green Building Alliance, Green Building United, Home Performance Coalition, Honeywell Utility Solutions, ICF International, Lime Energy, MaGrann Associates,

3. On January 13, 2008, L. 2007, c. 340 was signed into law based on the finding that energy efficiency and conservation measures must be essential elements of the state's energy future. The legislature further found that public utility involvement in the energy efficiency industry is essential to maximize efficiency. N.J.S.A. 26:2C-45.

4. Pursuant to Section 13 of the Act, an electric or gas utility may provide and invest in energy efficiency and conservation programs in its service territory on a regulated basis. Further, such investment may be eligible for rate treatment approved by the New Jersey Board of Public Utilities ("Board"), including a return on equity, or other incentives or rate mechanisms that decouple utility revenue from sales of utility service N.J.S.A. 48:3-98.1(b). An electric or gas utility seeking cost recovery for any energy efficiency programs pursuant to N.J.S.A. 48:3-98.1 must file a petition with the Board

5. On October 11, 2018 PSE&G filed the above referenced petition with the Board. PSE&G seeks approval of twenty-two programs including seven residential programs subprograms, seven commercial and industrial programs, and eight pilot programs (collectively "2018 EE Programs"). Collectively PSE&G proposed to invest \$2.8 billion for the 2018 EE Programs over the 6-year term of the program. PSE&G proposed cost recovery be made and tracked *via* a new CEF-EE Program Component ("CEF-EEC") of PSE&G's Green Programs

National Energy Foundation, National Energy Improvement Fund, Natural Resources Defense Council, Nest, Northeast Energy Efficiency Partnerships, Nexant, NRG Energy, Inc., Oracle, Performance Systems Development, Philips, Practical Energy Solutions, Schaedler Yesco Distribution, Inc., SmartWatt Energy, Inc., Sota Construction, Threshold, The Franklin Energy Group, U.S. Green Building Council Central Pennsylvania, Veolia, and Warren Energy Engineering, LLC.

Recovery Charge (“GPRC”). Additionally, PSE&G proposed a mechanism for recovering lost revenues and asks the Board to approve this mechanism.

6. October 29 2019, 2018, the Board determined that the petition should be retained by the Board for hearing, and pursuant to N.J.S.A. 48:2-32 designated Commissioner Dianna Solomon as the presiding officer, authorized to rule on all motions that arise during these proceedings and render a decision on stipulations, pursuant to N.J.S.A. 48:2-21.3.

B. Motion to Intervene

7. Pursuant to N.J.A.C. § 1-16.1(a) a party may intervene in a matter where that party “will be substantially, specifically and directly affected by the outcome” of those proceedings. N.J.A.C. § 1: 1-16.3(a) further provides that, in ruling on a motion to intervene, the Board is directed to consider the nature and extent of the moving party’s interest in the outcome of the case, the extent to which the movant’s interest is “sufficiently different from that of any other party so as to add measurable and considerably to the scope of the case;” the “prospect of confusion or undue delay” resulting from the movant’s inclusion; and other “appropriate matters.”
8. KEEA’s members will be substantially, specifically, and directly affected by the outcome of this proceeding. KEEA’s interest in this case differs from that of any other party, KEEA’s interest will add measurable and constructively to the scope of the case, and inclusion of KEEA as a intervenor will not cause confusion or delay.

9. KEEA's members will be directly affected by the outcome of this proceeding. KEEA is committed to improving the efficiency of New Jersey's buildings. As such, KEEA's members implement energy efficiency programs and improvements in buildings across the state of New Jersey, including the service territory of PSE&G. Examples include lighting improvements, energy efficiency residential and commercial new constructions and retrofits, efficiency equipment manufacture and distribution, architectural and engineering services, and building control software solutions. PSE&G's proposed efficiency programs will directly affect the utilization of KEEA's members services and products across the service territory

10. KEEA's interests in the proceeding are unique from, and not adequately represented by other parties that may seek to intervene or participate. KEEA is a well-established organization in the mid-Atlantic, and has extensive experience in utility-run energy efficiency programs. KEEA's members participate in a number of programs and projects across the state, and therefore, KEEA can assess and offer its perspectives about how PSE&G's proposal will impact the success of program design and implementation.

11. Finally, allowing KEEA to intervention in this action is not likely to cause any confusion or undue delay. KEEA will coordinate its representation with similarly situated parties in this docket to the extent that it finds such action appropriate and will abide by the schedule set forth for this proceeding.

12. For the foregoing reasons, KEEA respectfully requests that the Board grant this motion, and grant KEEA intervenor status in this proceeding.

WHEREFORE, pursuant to N.J.A.C. 1:1-16, KEEA respectfully requests in be permitted to intervene in this matter.

Date: November 16, 2018

Respectfully submitted,



Matt Elliott

Keystone Energy Efficiency Alliance

Public Service Electric and Gas Company
CEF-EE
GO18101112 and EO18101113

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