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CASE MANAGEMENT

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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

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November 16, 2018

**VIA HAND DELIVERY AND EMAIL TO MaryAnna.Holden@bpu.nj.gov**

The Honorable Mary-Anna Holden  
New Jersey Board of Public Utilities  
44 S. Clinton Ave., 3rd Fl. Ste. 314  
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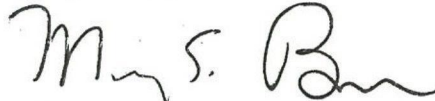
**Re: *Public Service Electric And Gas Company – In the Matter of the Petition of Public Service Electric And Gas Company For Approval of Its Clean Energy Future – Energy Cloud (“CEF-EC”) Program on a Regulated Basis***  
***BPU Docket No. EO18101115***

Dear Commissioner Holden:

This firm represents Google, LLC (“Google”) in the above-referenced matter. Enclosed for filing, please find an original and two copies of Google’s Motion to Intervene as a Participant in this matter.

Thank you and please do not hesitate to contact me should you have any questions or concerns.

Respectfully submitted,



Murray E. Bevan

Enclosures

Cc: Service List ✓

*CMS*  
*A. Hard, Esq.*

*I/M/O* the Petition of PSE&G for Approval of its Clean Energy Future – Energy Cloud (“CEF-EC”) Program  
on a Regulated Basis  
BPU Docket No. EO18101115

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NOV 21 2018

BOARD OF PUBLIC UTILITIES STATE OF NEW JERSEY  
TRENTON, NJ 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 : BPU Docket No. EO18101115  
CLOUD (“CEF-EC”) PROGRAM ON A :  
REGULATED BASIS :

**MOTION TO INTERVENE OF  
GOOGLE, LLC**

Google, LLC (“Google”) hereby moves before the New Jersey Board of Public Utilities (“Board”), pursuant to N.J.A.C. 1:1-16.1 *et seq.*, to permit Google to intervene as a participant in the above-captioned proceeding with all of those rights and obligations typically afforded to a participant in such proceedings. In support of its motion, Google states as follows:

1. On October 11, 2018, Public Service Electric and Gas Company (“PSE&G”) initiated the above-captioned proceeding by filing a Petition requesting Approval of its Clean Energy Future – Energy Cloud (the “CEF-EC Petition”). The CEF-EC Petition requests approval of a five-year, \$721 million investment into deployment of advanced metering infrastructure (“AMI”) to PSE&G’s 2.2 million electric customers.

2. Google is a multinational technology company specializing in cloud-based services and products. In particular, Google offers its Google Cloud Platform (GCP), which is a suite of cloud computing services that runs on the same infrastructure that Google uses internally for its

own end-user products, to other companies and industries including the energy industry generally and the electric utility industry specifically.

3. In addition, Google offers cloud-based services to the utility industry that utilize the unique capabilities of the Nest Learning Thermostat and the Nest Thermostat E. These services include Seasonal Savings (an energy efficiency program) and Rush Hour Rewards (a demand response program to help maintain system reliability).

4. Finally, through its Google Assistant products, Google offers cloud-based, voice activated assistant services to consumers which utilities are also using to increase customer satisfaction by allowing them to interact with their utility and its services by voice.

5. Currently, New Jersey lags behind many other states in deployment of AMI.

6. Deployment of AMI to PSE&G's 2.2 million electric customers will give those customers the data and tools to understand their energy usage and impact on the grid, giving consumers the ability to participate in the State's ambitious energy efficiency goals.

7. PSE&G's proposal naturally involves use of the internet to transmit the data collected by the AMI meters it will deploy throughout its service territory. In addition, the quantity of information collected by AMI metering systems is a huge increase compared to the amount collected by analog meters read monthly. This quantity of data can only be reasonably collected, stored and used in the cloud. As the world's leading developer of web-based technology, Google has an interest in the process and outcome of this matter.

8. N.J.A.C. 1:1-16.6(a) provides the standard for participation in a proceeding before this Board. The party seeking to participate must show that it has a significant interest in the

outcome of the case. In granting a motion to intervene, the Board must consider whether the participant's interest is likely to add constructively to the case without causing undue delay or confusion. See N.J.A.C. 1:1-16.6(b).

9. Google has a significant interest in the outcome of this proceeding as a leading developer of cloud-based services generally and specifically for the energy industry.

10. Second, Google's participation will add constructively to this case. Google will participate in discussions with the parties in this matter to explain how its technology can assist PSE&G in its energy cloud goals.

11. Finally, intervention by Google will not cause confusion or delay the conclusion of this proceeding. Google is filing for intervention pursuant to the terms of the Board's Order. Google's intervention will clarify certain issues and contribute to the development of a complete record based on its unique, significant interests. Moreover, Google will not seek to delay the proceeding in any manner.

12. The Certification of Richard Counihan is attached hereto certifying that the facts and statements herein are true and accurate to the best of his knowledge and belief.

13. All communications and correspondence concerning this proceeding should be directed to:

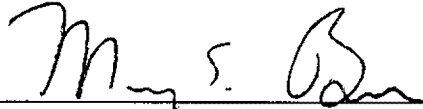
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In addition to the foregoing, Google submits that fundamental fairness and due process require that the Board grant its Motion to Intervene as a Participant in the above matter and to grant such further relief as it deems is just, reasonable and proper.

Pursuant to N.J.A.C. 1:1-16.1 et seq., Google respectfully requests that it be permitted to intervene, as a participant, in this proceeding:

Respectfully submitted,



---

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Attorneys for Google, LLC

Dated: November 16, 2018


**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 : BPU Docket No. EO18101115  
CLOUD (“CEF-EC”) PROGRAM ON A :  
REGULATED BASIS :

**CERTIFICATION**

Richard Counihan, of full age and upon my oath, deposes and says:

1. I am Richard Counihan, Head, Energy Regulatory Affairs at Google, LLC.
2. I am authorized to make this statement on behalf of Google, LLC.
3. I have received the attached Motion to Intervene as a Participant and certify that the facts set forth therein are true and accurate to the best of my knowledge and belief.

  
Richard Counihan

Dated: November 16, 2018

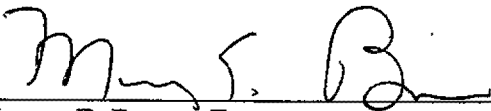


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CLOUD (“CEF-EC”) PROGRAM ON A :  
REGULATED BASIS :

**CERTIFICATION**

Pursuant to R. 1:4-4(c), I am an attorney-at-law duly admitted to practice in the State of New Jersey, certify that Richard Counihan has acknowledged that the signature on the electronic transmission is his signature. I further certify that the original document bearing the original signature will be filed if requested by the Board or any party to this proceeding.

  
\_\_\_\_\_  
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Dated: November 16, 2018

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CLOUD (“CEF-EC”) PROGRAM ON A :  
REGULATED BASIS :

**CERTIFICATION OF SERVICE**

I certify that on this 16th day of November, 2018, I caused an original and two (2) copies of Google, LLC’s Motion to Intervene as a Participant to be served by way of hand delivery upon the following individual:

The Honorable Mary-Anna Holden  
New Jersey Board of Public Utilities  
44 S. Clinton Ave., 3rd Fl. Ste. 314  
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I further certify that I caused one (1) copy of the aforementioned document to be served upon the following individuals by electronic mail or regular mail:

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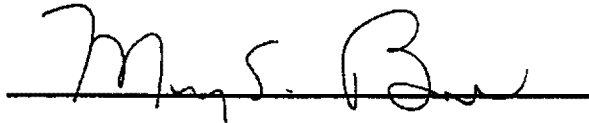
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