

Via Overnight Mail

New Jersey Board of Public Utilities
Attn: Aida Camacho-Welch, Board Secretary
44 South Clinton Avenue, 3rd Floor, Suite 314
PO Box 350
Trenton, NJ 08625-0350

Lucy
11/27/18

**RE: I/M/O the Petition of the Public Service Electric and Gas Company for
Approval of its Clean Energy Future- Energy Efficiency ("CEF-EE")
Program on a Regulated Basis
Docket Nos. GO18101112 & ~~EO10121113~~**

EO18101113

Dear Madam Secretary:

On behalf of Lime Energy Co. ("Lime"), please accept for filing an original and ten (10) copies of Lime's Motion for Leave to Participate in the above-captioned matter. Also enclosed is an additional copy that we ask you to stamp as "FILED" and return to Lime in the enclosed, self-addressed, stamped envelope.

Please do not hesitate to contact me if you have any comments or questions.

Regards,



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CASE MANAGEMENT

NOV 21 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Lloyd Kass
Senior Vice President, Utility Strategy
eml: lkass@lime-energy.com
tel: (646) 522-4070

Case Mgmt
List Copied

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NOV 16 2018

BOARD OF PUBLIC UTILITIES
SECRETARY'S OFFICE

NOV 21 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF)	PETITION
PUBLIC SERVICE ELECTRIC & GAS)	
COMPANY FOR APPROVAL OF ITS CLEAN)	
ENERGY FUTURE-ENERGY EFFICIENCY)	DOCKET NOS. GO18101112
("CEF-EE") PROGRAM ON A REGULATED)	& EO10121113
BASIS)	

LIME ENERGY CO.'S MOTION TO PARTICIPATE

Lime Energy Co. ("Lime"), by way of this Motion, respectfully requests leave to participate in the above-captioned matter pursuant to N.J.A.C. § 1:1-16.

1. On or about September 27, 2018, Public Service Electric & Gas Company ("PSE&G") filed a Petition with the New Jersey Board of Public Utilities ("Board") seeking Board approval of PSE&G's Clean Energy Future-Energy Efficiency ("CEF-EE") Program, as well as associated cost-recovery mechanisms over the Program's proposed six-year period (the "Petition").

2. On October 29, 2018, the Board determined that the Petition should be retained by the Board for hearing (the "Order"). Pursuant to the New Jersey Administrative Code, "a motion to participate may be made at such time and in such manner as is appropriate for a motion for leave to intervene pursuant to N.J.A.C. § 1:1-16.2." N.J.A.C. § 1:1-16.6(b).

3. 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." N.J.A.C. § 1:1-16.6(b).

4. Lime designs and implements direct install energy efficiency programs for utilities that target energy savings for commercial customers. Lime's programs help these

businesses use less energy through the upgrade of existing equipment and installation of new, more energy efficient equipment. This service allows utilities to delay investments in transmission and distribution upgrades and new power plants, while cost-effectively complying with increasing environmental regulations. These programs benefit utilities' customers by lowering their energy bills, improving equipment reliability, reducing maintenance costs, and improving electric grid operations. Lime has delivered energy efficiency programs for 10 of the 25 largest electric utilities and five of the 10 largest municipal utilities in the U.S.

5. Lime is part of the Willdan Group, Inc. ("Willdan"). Willdan is a nationwide provider of professional technical and consulting services to utilities, government agencies, and private industry. Willdan's service offerings span a broad set of complementary disciplines that include electric grid solutions, energy efficiency and sustainability, engineering and planning, and municipal financial consulting. For several years, Lime and other Willdan affiliates have provided energy services to commercial and institutional facility customers in the State of New Jersey, including doing so as a participating contractor in energy efficiency programs administered by both the Board and PSE&G.

6. Lime's experience in providing energy efficiency solutions both nationally and in New Jersey gives it a distinct viewpoint concerning PSE&G's proposed CEF-EE Program. Further, given Lime's historic and ongoing activities in New Jersey, the outcome of the above-captioned matter will almost certainly impact Lime's current and future business activities in New Jersey.

7. Lime will coordinate its representation with similarly situated parties in the above-captioned matter to the extent that such action is appropriate. Further, Lime will abide by the schedule set forth in this proceeding, and, if granted participant status, will not seek to

participate beyond the bounds contemplated by N.J.A.C. § 1:1-16.6(c). Accordingly, allowing Lime participant status will not cause any undue delay or confusion with regard to these proceedings.

8. Copies of all correspondence and other communications related to this proceeding should be addressed to:

Lime, A Willdan Company
Attn: Lloyd Kass
Senior Vice President, Utility Strategy

4 Gateway Center, 4th Floor
100 Mulberry St.
Newark, NJ 07102

9. **WHEREFORE**, Lime respectfully requests an order from the Board granting it full rights as a participant in this matter pursuant to N.J.A.C. § 1:1-16.1, *et seq.*

Dated: November 16, 2018

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Lloyd Kass', with a stylized flourish at the end.

Lloyd Kass
Senior Vice President, Utility Strategy
eml: lkass@lime-energy.com
tel: (646) 522-4070

IN THE MATTER OF THE PETITION OF PUBLIC SERVICE ELECTRIC AND GAS
COMPANY FOR APPROVAL OF ITS CLEAN ENERGY FUTURE-ENERGY EFFICIENCY
("CEF-EE") PROGRAM ON A REGULATED BASIS
BPU DKT. NOS. G018101112 & E010121113

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