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CASE MANAGEMENT

DEC 27 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ
December 24, 2018

**In the Matter of the Verified Petition of The College of New Jersey
for Relief from a Penalty Assessed by Public Service Electric and Gas Company
BPU Docket No. GC18111234**

VIA E-MAIL AND OVERNIGHT MAIL

Aida Camacho-Welch, Secretary
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Dear Secretary Camacho-Welch:

Enclosed are an original and ten copies of Public Service Electric and Gas Company's Motion to Intervene in the above proceeding. Kindly return one filed copy to me in the enclosed, self-addressed stamped envelope. Thank you.

Respectfully submitted,

Justin B. Incardone

Cc: James H. Laskey, Esq. (via e-mail, w/ encl.)

Case mgmt
S. Patraude
M. Supt, Esq
P. Krognan, Esq
E. Xiao, Esq

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DEC 27 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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

In the Matter of the Verified Petition of the)	MOTION
College of New Jersey for Relief from a Penalty)	TO
Assessed by Public Service Electric and Gas)	INTERVENE
Company)	
)	BPU DOCKET NO. GC18111234

Public Service Electric and Gas Company ("PSE&G" or the "Company") hereby moves for an Order granting it status as an Intervenor (with all the rights of a full party) in the above-referenced matter, pursuant to *N.J.A.C. 1:1-16.1 et seq.* In support of this Motion, PSE&G respectfully submits:

1. PSE&G is a New Jersey public utility as defined by *N.J.S.A. 48:2-13*.
2. PSE&G is engaged as a New Jersey public utility in the purchase, distribution, and sale of natural gas for more than 1.8 million customers located within the State of New Jersey, including The College of New Jersey ("TCNJ" or the "College"). PSE&G is also engaged in the purchase, transmission, distribution, and sale of electric energy and related utility services to more than 2.1 million residential, commercial, and industrial customers located within the State of New Jersey.
3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

Matthew M. Weissman
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4. Additional electronic copies should be addressed to Bernard Smalls at

bernard.smalls@pseg.com

5. TCNJ, an interruptible gas customer of PSE&G, has filed the subject Petition seeking relief from a penalty assessed by the Company pursuant to its tariff for gas service for the College not curtailing service during an interruption period in January 2018.

6. PSE&G has a substantial interest in this matter given that it provides gas service to TCNJ and the College challenges the penalty provision set forth in the Company's gas tariff. By way of example of PSE&G's substantial interest, the Board's determination in this proceeding may have precedential impact in future cases when an interruptible gas customer in the state does not curtail service during an interruption period.

7. PSE&G can also assist the Board of Public Utilities ("BPU") in its determination of this matter by, *e.g.*, providing the BPU with relevant billing and tariff information.

8. PSE&G's interest in this proceeding is sufficiently different from that of any party so as to add measurably and constructively to the scope of this matter. Indeed, PSE&G is aware of no other party to this proceeding besides TCNJ.

9. PSE&G's intervenor status would not result in undue delay or confusion. PSE&G agrees to abide by any procedural schedule that has been set in this proceeding.

WHEREFORE, PSE&G respectfully requests an Order granting it rights as a full party Intervenor in this matter pursuant to *N.J.A.C. 1:1-16.1 et seq*

Respectfully submitted,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY



Justin B. Incardone, Esq.
Associate General Regulatory Counsel
Public Service Electric and Gas Company
80 Park Plaza, T-5
Newark, New Jersey 07102

DATED: December 21, 2018.