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CASE MANAGEMENT

JUL 22 2019

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

July 19, 2019



**In the Matter of the Petition of
Soundview Paper Company, LLC for Approval to
Modify the Electric and Natural Gas Societal Benefits Charge
Due to Changed Circumstances
BPU Docket No. ER19070812**

VIA E-MAIL AND OVERNIGHT MAIL

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

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JUL 22 2019

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-captioned proceeding.

By copy of this letter, copies of this motion are being forwarded this date via electronic mail to all persons whose name appear on the attached distribution list.

Thank you for your anticipated courtesies.

Respectfully submitted,

Justin B. Incardone, Esq.

C Attached Service List (E-Mail Only)

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JUL 22 2019

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of Soundview Paper)
Company, LLC to Modify the Electric and Natural)
Gas Societal Benefits Charge Due to)
Changed Circumstances)

MOTION
TO
INTERVENE

) BPU DOCKET NO. ER19070812

Public Service Electric and Gas Company (“PSE&G”) 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. 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:

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

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5. Soundview Paper Company, LLC (“Soundview” or “Petitioner”) has filed the subject Petition seeking a determination from the Board that it qualifies, on a temporary and limited basis, for a reduction of at least 90% of the Societal Benefits Charge (“SBC”) associated with the electric and natural gas distribution service to its Marcal Mill in Elmwood Park, New Jersey. PSE&G provides electric and natural gas service to the Marcal Mill.

6. Petitioner specifically references PSE&G’s interest in the outcome of this matter, alleging: “Rather than Soundview paying 0% of its load-based allocation of SBC costs, PSE&G’s customers would prefer that Soundview pay a reduced rate for the next two and a half years and then pay the full SBC rate thereafter.” (Petition, ¶38)

7. Petitioner also alleges in its Petition that it “has a limited amount of time to make a final decision on the Marcal Mill and determine whether permanently restarting operations in New Jersey is economically viable.” (Petition, ¶55). Soundview is a large customer of PSE&G, and therefore its economic viability is of significant interest to PSE&G.

8. The service territories, customers, and the operations of PSE&G are distinct from others parties and participants in this case. Thus, no other party or participant will represent the interests of PSE&G in this case.

9. PSE&G has a history of coordinating its activities in dockets at the Board with other parties where appropriate. PSE&G will coordinate its representation with other similarly situated parties or participants in this docket to the extent it finds such action appropriate.

10. Due to PSE&G's experience in the gas and electric industry, and the fact that it provides gas and electric service to the Marcal Mill, its intervention in this proceeding is likely to add constructively to the proceeding.

11. Precedent exists for PSE&G being granted intervention status in a matter such as the instant filing. For example, in BPU Docket No. EW17030256, Gerdau Ameristeel Sayreville, Inc. ("Gerdau") filed a petition with the Board of Public Utilities ("BPU") seeking a waiver of certain SBC requirements. Jersey Central Power and Light, as Gerdau's applicable electric service provider, and PSE&G as Gerdau's applicable gas service provider, both sought and were granted intervention status in that filing. *See* BPU Order dated May 31, 2017. In BPU Docket No. ER18070706, Soundview sought a 50% reduction in its electric SBC obligations. The Board granted PSE&G intervenor status in that proceeding.

12. PSE&G will abide by the schedule set for this proceeding.

13. Soundview filed the Petition with the BPU on or about July 12, 2019; thus, PSE&G submits this intervention application in a timely manner that will not cause undue delay or confusion.

WHEREFORE, PSE&G respectfully requests an Order: (1) granting it rights as a full party Intervenor in this matter pursuant to *N.J.A.C. 1:1-16.1 et seq.*, and (2) providing such further relief in connection therewith as is deemed reasonable, just, and consistent with the foregoing.

Respectfully submitted,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

A handwritten signature in black ink, appearing to be 'J. Incardone', enclosed within a dashed rectangular box.

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DATED: July 19, 2019