



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
P.O. Box 350
Trenton, New Jersey 08625-0350

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,

A handwritten signature in blue ink, appearing to be "J. Incardone", written over a light blue circular stamp.

Justin B. Incardone, Esq.

C Attached Service List (E-Mail Only)

BPU

Rachel Boylan
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-1458
Rachel.Boylan@bpu.nj.gov

BPU

Scott Hunter
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-1956
B.Hunter@bpu.nj.gov

BPU

Stacy Peterson
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-4517
stacy.peterson@bpu.nj.gov

BPU

Kenneth Sheehan Esq.
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
(609) 777-3303
kenneth.sheehan@bpu.nj.gov

DAG

Renee Greenberg Esq.
124 Halsey St.
2nd Flr.
Newark NJ 07101
(973) 648-3441
Renee.Greenberg@dol.lps.state.nj.us

DAG

Emma Xiao DAG
NJ Dept of Law & Public Safety
Division of Law
124 Halsey Street, 2nd Floor
Newark NJ 07101
emma.xiao@law.njoag.gov

BPU

Paul Flanagan
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-2836
paul.flanagan@bpu.nj.gov

BPU

Sherri Jones
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-7471
sherri.jones@bpu.nj.gov

BPU

Grace S. Power Esq.
Board of Public Utilities
44 South Clinton Avenue, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
grace.power@bpu.nj.gov

BPU

Thomas Walker
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
thomas.walker@bpu.nj.gov

DAG

Alex Moreau DAG
NJ Dept. of Law & Public Safety
Division of Law
124 Halsey Street, 5th Flr.
P.O. Box 45029
Newark NJ 07101
(973) 648-3762
Alex.Moreau@dol.lps.state.nj.us

PSE&G

Michele Falcao
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark NJ 07102
(973) 430-6119
michele.falcao@pseg.com

BPU

Andrea Hart
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
andrea.hart@bpu.nj.gov

BPU

Anne Marie McShea
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
anne.mcshea@bpu.nj.gov

BPU

Bethany Rocque-Romaine Esq.
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-1496
bethany.romaine@bpu.nj.gov

DAG

Geoffrey Gersten
NJ Dept. of Law & Public Safety
Division of Law
124 Halsey Street, 5th Flr.
P.O. Box 45029
Newark NJ 07101
(973) 648-3510
geoffrey.gersten@dol.lps.state.nj.us

DAG

Caroline Vachier DAG
NJ Dept. of Law & Public Safety
Division of Law
124 Halsey Street, 5th Flr.
P.O. Box 45029
Newark NJ 07101
(973) 648-3709
caroline.vachier@dol.lps.state.nj.us

PSE&G

Justin Incardone Esq.
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark NJ 07102
(973) 430-6163
justin.incardone@pseg.com

PSE&G

Bernard Smalls
PSEG Services Corporation
80 Park Plaza-T5
Newark NJ 07102-4194
(973) 430-5930
bernard.smalls@pseg.com

PSE&G

Matthew M. Weissman Esq.
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark NJ 07102
(973) 430-7052
matthew.weissman@pseg.com

Rate Counsel

Stefanie A. Brand
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
sbrand@rpa.state.nj.us

Rate Counsel

James Glassen
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
jglassen@rpa.state.nj.us

Rate Counsel

Kurt Lewandowski Esq.
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
klewando@rpa.state.nj.us

Rate Counsel

Brian O. Lipman
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
blipman@rpa.nj.gov

Rate Counsel

Shelly Massey
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
smassey@rpa.nj.gov

Rate Counsel

Henry M. Ogden Esq.
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
hogden@rpa.nj.gov

Rate Counsel

Felicia Thomas-Friel
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
fthomas@rpa.nj.gov

Soundview Paper

Kenneth R. Stark Esq.
McNees, Wallace and Nurick, LLC
100 Pine Street
Harrisburg PA 17011
717-237-5378
kstark@meneeslaw.com

Soundview Paper

Robert A. Weishaar, Jr. Esq.
McNees Wallace & Nurick, LLC
1200 G. Street, NW
Suite 800
Washington DC 20005
202-898-0688
bweishaar@mcneeslaw.com

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

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

Matthew Weissman
General State Regulatory Counsel
PSEG Services Corporation
80 Park Plaza, T5G
Newark, New Jersey 07102
Tel: (973) 430-7052
Matthew.Weissman@pseg.com

Justin B. Incardone.
Associate General Regulatory Counsel
PSEG Services Corporation
80 Park Plaza, T5G
Newark, New Jersey 07102
Tel: (973) 430-6163
justin.incardone@pseg.com

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

bernard.smalls@pseg.com

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 blue ink, appearing to be 'J. Incardone', is positioned above a horizontal line. The signature is written in a cursive style with a large initial 'J'.

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

DATED: July 19, 2019