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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

STATE OF NEW JERSEY

BEFORE THE BOARD OF PUBLIC UTILITIES BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

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)  
)  
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

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

**LANDIS+GYR TECHNOLOGY, INC.  
MOTION FOR INTERVENTION**

Landis+Gyr Technology, Inc. ("Landis+Gyr"), by its undersigned counsel, pursuant to the Order issued by the New Jersey Board of Public Utilities ("Board") on October 29, 2018, hereby formally requests that the Board grant Landis+Gyr's request herein to intervene in the above-captioned proceeding. Landis+Gyr respectfully submits that all factors for intervenor status set forth in N.J.A.C. 1:1-16.3 support granting this motion. Landis+Gyr states in support thereof the following:

1. Landis+Gyr is a leading global provider of integrated energy management solutions for the utility sector. Landis+Gyr offers products and services that address complex industry challenges, including multi-purpose Advanced Metering Infrastructure (AMI) network platforms for advanced metering and grid modernization, as well as, smart metering, distribution network sensing and automation tools, load control, and analytics solutions that form the foundation of a smarter grid.

2. The Board's decision in this proceeding is expected to have an effect on Landis+Gyr's business operations in PSE&G's service territory, but also potentially serve as a precedent for AMI deployment in other utility service territories across the state and other jurisdictions across the country. Landis+Gyr will therefore likely be substantially, directly and specifically affected by the relief provided herein.

3. PSE&G's CEF-EC filing proposes the deployment of AMI throughout the utility's electric service territory. Specifically, PSE&G proposes to offer and install approximately 2.2 million advanced (or "smart") meters over five years. Accordingly, Landis+Gyr has a significant interest in the Board's review of PSE&G's CEF-EC filing as it pertains to the benefit of AMI implementation to energy efficiency, customer savings, system reliability, and the environment, among other things.

4. Landis+Gyr's expertise and interest is distinct from other parties in this case. Thus, no other party will represent the interests or insights of Landis+Gyr in this case.

5. Landis+Gyr will coordinate its representation with other similarly situated entities in this docket to the extent it finds such action appropriate.

6. In making this request, Landis+Gyr asks that all communications and correspondence for this proceeding be directed to the following individuals:

David K. Wilson, Esq.  
VP and General Counsel Americas  
Landis+Gyr Technology, Inc.  
30000 Mill Creek Avenue, Suite 100  
Alpharetta, Georgia 30022  
Tel: (678) 258 1338  
[David.Wilson@landisgyr.com](mailto:David.Wilson@landisgyr.com)

Barbara Koonz, Esq.  
T. David Wand, Esq.  
Wilentz, Goldman & Spitzer, P.A.  
90 Woodbridge Center Drive, Suite 900  
Woodbridge, New Jersey 07095  
Tel: (732) 855-6050/6093  
[bkoonz@wilentz.com](mailto:bkoonz@wilentz.com)  
[dwand@wilentz.com](mailto:dwand@wilentz.com)

7. Due to Landis+Gyr's experience in AMI deployment, its participation as an Intervenor in this proceeding is likely to add measurably and constructively to the scope of the proceeding.

8. Landis+Gyr will abide by any schedule set for this proceeding.

9. The granting of this Motion will not cause undue delay or confusion.

WHEREFORE, Landis+Gyr respectfully submits that all factors for intervention set forth in N.J.A.C. 1:1-16.3 weigh in favor of the granting of Landis+Gyr's motion in the above-captioned proceeding, because Landis+Gyr will be substantially, specifically and directly affected but its outcome; will provide a unique perspective and insight regarding the proposed CEF-EC Program; and will add constructively to the case without causing undue delay and confusion.

Respectfully submitted,

WILENTZ, GOLDMAN & SPITZER, P.A.  
A Professional Association  
Attorneys for Proposed Intervenor  
Landis+Gyr Technology, Inc.

By:

  
T. DAVID WAND

Dated: November 16, 2018

**CERTIFICATION OF SERVICE**

I hereby certify that I have this day served via electronic mail copies of the foregoing Motion to Intervention to the parties identified on the service list. An original and 10 copies have been forwarded via first class mail to Aida Camacho-Welch, Secretary, Board of Public Utilities.

Dated at Woodbridge, New Jersey, this 16th day of November, 2018.

By:   
T. DAVID WAND

STATE OF NEW JERSEY  
BEFORE THE BOARD OF PUBLIC UTILITIES

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IN THE MATTER OF THE PETITION OF	)	BPU DOCKET NO. EO18101115
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("CEF-EC") PROGRAM ON A REGULATED	)	
BASIS	)	
	)	

**CERTIFICATION OF T. DAVID WAND, ESQ.  
IN SUPPORT OF LANDIS+GYR'S MOTION FOR INTERVENTION**


T. David Wand, of full age, hereby certifies and says:

1. I am an attorney-at-law in the state of New Jersey and at the law firm of Wilentz, Goldman & Spitzer. We represent Landis+Gyr Technology, Inc. ("Landis+Gyr").
2. This certification is submitted in support of Landis+Gyr's motion for intervention in the above-captioned matter.
3. The basis for Landis+Gyr's motion and information demonstrating that Landis+Gyr's motion satisfies the New Jersey Board of Public Utilities' standard for intervention is set forth in the Motion filed herewith.
4. Landis+Gyr has reviewed the Order dated October 29, 2018, and understands that if intervenor status is granted, Landis+Gyr will be bound to the requirements of the Order, as may be amended during the proceeding.

I certify that the above statements made by me are true and accurate to the best of my knowledge. I am aware that if any of the above statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

WILENTZ, GOLDMAN & SPITZER, P.A.  
A Professional Association  
Attorneys for Proposed Intervenor  
Landis+Gyr Technology, Inc.

By:   
T. DAVID WAND

Dated: November 16, 2018