

Danielle Lopez
Associate General Regulatory Counsel

Law Department
80 Park Plaza, T-5G, Newark, New Jersey 07102-4194
Tel: 973.430.6479 fax: 973.430.5983
Email: Danielle.Lopez@pseg.com



October 2, 2020

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

**RE: In the Matter of the Petition of Elizabethtown Gas Company for Approval of
New Energy Efficiency Programs and Associated Cost Recovery Pursuant to
the Clean Energy Act and the Establishment of a Conservation Incentive
Program
BPU Docket No. GR20090619**

Dear Secretary Camacho-Welch:

Enclosed is Public Service Electric and Gas Company's ("PSE&G") Motion to Intervene in the above-captioned proceeding.

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

Thank you for your anticipated courtesies.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Danielle Lopez". The signature is fluid and cursive, with a long, sweeping flourish at the end.

Danielle Lopez

C Attached Service List (E-Mail Only)

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of Elizabethtown Gas)
Company for Approval of Energy Efficiency)
Programs and Associated Cost Recovery Pursuant) BPU Dk; No GR20090619
to the Clean Energy Act and the Establishment of)
a Conservation Incentive Program)

PSE&G'S MOTION TO INTERVENE

Public Service Electric and Gas Company ("PSE&G") hereby moves for an Order granting it status as an Intervenor in the above-referenced matter pursuant to *N.J.A.C. 1:1-16.6*. 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, transmission, distribution, and sale of electric energy and related utility services to more than 2,200,000 residential, commercial, and industrial customers located within the State of New Jersey. PSE&G is also engaged in the purchase, distribution, and sale of natural gas for more than 1,800,000 customers located within the State of New Jersey.
3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

Joseph F. Accardo Jr., Esq.
Vice President Regulatory &
Deputy General Counsel
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, New Jersey 07102
Phone: (973) 430-5811
Fax: (973) 430-5983
Joseph.Accardo@pseg.com

Matthew M. Weissman, Esq.
Managing Counsel
State Regulatory
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, New Jersey 07102
Phone: (973) 430-7052
Fax: (973) 430-5983
Matthew.Weissman@pseg.com

Danielle Lopez, Esq.
Associate Counsel - Regulatory
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, New Jersey 07102
Phone: (973) 430-6479
Fax: (973) 430-5983
Danielle.Lopez@pseg.com

Additional electronic only copies should be addressed to:

Bernard Smalls
Paralegal
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, New Jersey 07102
Phone: (973) 430-5930
Fax: (973) 430-5983
Bernard.Smalls@pseg.com

Michele Falcao
Regulatory Case Supervisor
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, New Jersey 07102
Phone: (973) 430-6119
Fax: (973) 430-5983
Michele.Falcao@pseg.com

Caitlyn White
Regulatory Case Coordination
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, New Jersey 07102
Phone: (973) 430- 5659
Fax: (973) 430-5983
Caitlyn.White@pseg.com

4. Elizabethtown Gas Company (“ETG”), filed a Petition with the Board on September 25, 2020, requesting that the Board issue an Order approving its Energy Efficiency (“EE”) programs and associated cost recovery mechanism.

5. In determining whether to grant a motion for intervention, *N.J.A.C. 1:1-16.3(a)* requires that the Board consider the following: (1) the nature and extent of the movant’s interest in the outcome of the case; (2) whether the interest is sufficiently different from that of any other party so as to add measurably and constructively to the scope of the case; (3) the prospect for confusion and delay arising from the movant’s inclusion; and (4) other appropriate matters.

6. Application of the above-referenced criterion demonstrates that PSE&G's motion for intervention should be granted. As the state's largest electric and gas distribution company and the only combined electric and gas distribution utility, PSE&G has a significant interest in the outcome of the case. The Company has invested over \$450 million in Board-approved energy efficiency programs since 2009 and just recently received Board approval on September 23, 2020 to invest an additional \$1 billion in energy efficiency programs through the Clean Energy Future—Energy Efficiency ("CEF-EE Program).

7. It is imperative, as noted in the Board's Order directing the utilities to establish energy efficiency and peak demand reduction programs, that in areas where gas and electric services territories overlap, the utilities design a program structure that results in coordinated, consistent delivery of programs among all of the utilities and allocates costs and energy savings appropriately based on the fuel type(s) treated by EE measures.¹

8. The Order goes on to note that coordination among the utilities is necessary to avoid redundant or competing offerings, and to ensure that customers do not face confusion as a result of overlapping territories and can access both electric and gas measures simultaneously.²

9. Since the Company's electric territory overlaps with ETG's gas territory, any decision by the Board with respect to ETG's Petition could have precedential effect and other impacts on PSE&G that could directly impact the Company's energy efficiency programs. More specifically, any Board decision in the ETG matter could directly impact the cost sharing and investment split associated with EE sub-program structure in overlapping territories.

10. PSE&G is in a unique position as the only energy utility whose service territories overlap with the service territories of the other major utilities, and as the utility with the most

¹ In The Matter Of The Implementation of P.L. 2018, C. 17 Regarding The Establishment Of Energy Efficiency And Peak Demand Reduction Programs, BPU Docket No. QO19010040, June 10, 2020.

² *Id.*

extensive experience administering energy efficiency programs in the state. Moreover the Company has very recently completed the comprehensive CEF-EE proceeding and is beginning to implement the same complex processes that will be under consideration in ETG's (and all other NJ utilities') EE filings submitted on or about September 25, 2020.

11. Therefore the Company's intervention in this proceeding is likely to add constructively to the proceeding.

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

13. PSE&G will abide by the schedule set for this proceeding, to the extent one has been entered.

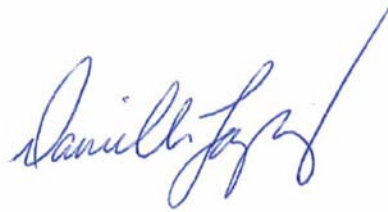
14. The granting of this motion will not cause undue delay or confusion.

15. PSE&G respectfully requests that the Board grant its motion to intervene because: (1) PSE&G's interest is sufficiently different from that of any other party so as to add measurably and constructively to the scope of the case; (2) no other party in the proceeding could adequately represent PSE&G's unique interests; (3) this motion has been timely filed in accordance with the Board's September 23, 2020 Order Designating Commissioner, Setting Manner of Service and Bar Date in BPU Docket No. QO19010040; and (4) the granting of this motion will not cause undue delay or confusion.

16. Accordingly, PSE&G respectfully requests that the Board grant this request for intervenor status in this proceeding pursuant to *N.J.A.C. 1:1-16.1 et seq.*

Respectfully submitted,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

A handwritten signature in blue ink, appearing to read "Danielle Lopez", is positioned above a horizontal line.

Danielle Lopez, Esq.
Associate General Regulatory Counsel
Public Service Electric and Gas Company
80 Park Plaza, T-5
P. O. Box 570
Newark, New Jersey 07102
Phone (973) 430-6479
Fax (973) 430-5983

DATED: October 2, 2020

BPU

Robert Brabston
Board of Public Utilities
44 South Clinton Avenue
9th Floor
P.O. Box 350
Trenton NJ 08625
robert.brabston@bpu.nj.gov

BPU

Mahogany A. Hall
Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton NJ 08625-0350
mahogany.hall@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

Paul Lupo
Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton NJ 08625-0350
paul.lupo@bpu.nj.gov

BPU

Kelly Mooij
Board of Public Utilities
44 South Clinton Avenue
9th Avenue
P.O. Box 350
Trenton NJ 08625
Kelly.Mooij@bpu.nj.gov

BPU

Stacy Peterson
Board of Public Utilities
44 South Clinton Avenue
9th Floor
P.O. Box 350
Trenton NJ 08625-0350
(609) 292-4517
stacy.peterson@bpu.nj.gov

BPU

Stacy Richardson
Board of Public Utilities
44 South Clinton Avenue
9th Floor
Trenton NJ 08625-0350
stacy.richardson@bpu.nj.gov

DAG

Terel Klein
NJ Dept. of Law and Public Safety
25 Market Street, P.O. Box 112
P.O. Box 112
Trenton NJ 08625
Terel.Klein@law.njoag.gov

DAG

Pamela Owen
NJ Dept of Law & Public Safety
Division of Law, Public Utilities Section
R.J. Hughes Justice Complex
25 Market Street, P.O. Box 112
Trenton NJ 08625
Pamela.Owen@law.njoag.gov

Elizabethtown

Frank Vetri
Elizabethtown Gas Company
520 Green Lane
Union NJ 07083
(908) 662-8448
fvetri@sjindustries.com

Elizabethtown

Thomas Kaufmann
Elizabethtown Gas
520 Green Lane
Union NJ 07083
(908) 662-8461
tkaufmann@sjindustries.com

PSE&G

Joseph F. Accardo, Jr.
PSEG Services Corporation
80 Park Plaza, T5G
P.O. Box 570
Newark NJ 07102
(973) 430-5811
joseph.accardojr@pseg.com

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

PSE&G

Danielle Lopez Esq.
Public Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark NJ 07102
973-430-6479
danielle.lopez@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

PSE&G

Caitlyn White
PSEG Services Corporation
80 Park Plaza, T-5
P.O. Box 570
Newark NJ 07102
(973)-430-5659
caitlyn.white@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

Maura Caroselli Esq.
Division of Rate Counsel
140 East Front Street
4th Floor
Trenton NJ 08625
mcaroselli@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

SJG

Deborah M. Franco
SJI
520 Green Lane
Union NJ 07083
(908) 662-8448
dfranco@sjindustries.com

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

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

SJIG

Dominick DiRocco
SJIU
One South Jersey Place
Atlantic City NJ 08401
(609) 561-9000 x4262
ddirocco@sjindustries.com

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

SJG

Tim Rundall
South Jersey Gas Company
One South Jersey Plaza
Route 54
Falsom NJ 08037
(609) 561-9000 X4390
trundall@sjindustries.com

SJIG

Carolyn Jacobs
SJIU
One South Jersey Place
Atlantic City NJ 08401
(609) 561-9000 X4212
cjacobs@sjindustries.com