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Deborah M. Franco, Esq.
VP, Clean Energy & Sustainability

October 2, 2020

Electronic Filing

Aida Camacho-Welch
Office of the Secretary
NJ Board of Public Utilities
44 South Clinton Avenue, 3rd Floor
P. O. Box 350
Trenton, NJ 08625-0350

Re: In the Matter of the Petition of New Jersey Natural Gas Company for Approval of Energy Efficiency Programs and the Associated Cost Recovery Mechanism Pursuant to the Clean Energy Act, N.J.S.A. 48:3-87.8 et seq. and 48:3-98.1 et seq.
BPU Docket No. GO20090622

Dear Secretary Camacho-Welch:

Enclosed please find South Jersey Gas Company's ("SJG") and Elizabethown Gas Company's ("ETG") Motion to Participate 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 person whose names appear on the attached Service List.

If you have any questions, please feel free to contact me directly.

Respectfully,

A handwritten signature in black ink, appearing to read "Deborah M. Franco", is written over a large, light gray, stylized graphic element that resembles a flame or a leaf.

Deborah M. Franco

DMF:caj
Enclosure

cc: See attached Service List

**IN THE MATTER OF THE PETITION OF NEW JERSEY NATURAL GAS
COMPANY FOR APPROVAL OF ENERGY EFFICIENCY PROGRAMS AND THE
ASSOCIATED COST RECOVERY MECHANISM PURSUANT TO THE CLEAN
ENERGY ACT, N.J.S.A. 48:3-87.8 et seq. and 48:3-98.1 et seq.
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**IN THE MATTER OF THE PETITION OF NEW JERSEY NATURAL GAS
COMPANY FOR APPROVAL OF ENERGY EFFICIENCY PROGRAMS AND THE
ASSOCIATED COST RECOVERY MECHANISM PURSUANT TO THE CLEAN
ENERGY ACT, N.J.S.A. 48:3-87.8 et seq. and 48:3-98.1 et seq.
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STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of New Jersey : BPU Docket No. GO20090622
Natural Gas Company for Approval of :
Energy Efficiency Programs and the :
Associated Cost Recovery Mechanism :
Pursuant to the Clean Energy Act, N.J.S.A. :
48:3-87.8 et seq. and 48:3-98.1 et seq. :

**MOTION TO PARTICIPATE OF
SOUTH JERSEY GAS COMPANY AND
ELIZABETHTOWN GAS COMPANY**

South Jersey Gas Company (“SJG”) and Elizabethtown Gas Company (“ETG”) hereby move for an Order granting SJG and ETG status as a participant in the above-referenced matter pursuant to *N.J.A.C. 1:1-16.6*. In support of this motion, SJG and ETG respectfully submit:

1. SJG and ETG are New Jersey public utilities as defined by N.J.S.A. 48:2-13.
2. SJG is engaged as a New Jersey public utility in the in the purchase, distribution, and sale of natural gas for approximately 400,000 customers located within the State of New Jersey. ETG is engaged as a New Jersey public utility in the in the purchase, distribution, and sale of natural gas for approximately 300,000 customers located within the State of New Jersey.
3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

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4. The issues that will be addressed in Petitioner's request for approval of its energy efficiency programs in this proceeding and related relief will substantially, specifically and directly impact SJG and ETG. Like the Petitioner, SJG and ETG filed for approval of proposed energy efficiency programs on September 25, 2020 in BPU Docket Numbers GR20090618 (SJG) and GR20090619 (ETG). These proceedings all give rise to issues concerning utility cost sharing and related budget issues that mutually impact SJG, ETG, other utilities and Petitioner; therefore, the outcome of the New Jersey Board of Public Utilities' ("Board") decision in this proceeding will have precedential effect and impact not only the Petitioner herein and its customers, but also may impact New Jersey's other utilities—including SJG and ETG.

5. The customers and the operations of SJG and ETG are distinct from those of other parties and participants in this case. Thus, no other party or participant will represent the interests of SJG and ETG in this case.

6. SJG and ETG have history of coordinating its activities in dockets at the Board with those of other utilities where appropriate. SJG and ETG will coordinate its representation with other similarly situated parties or participants in this docket to the extent appropriate. Accordingly, there is no prospect for confusion and delay arising from inclusion of SJG and ETG in this proceeding.

7. Due to SJG's and ETG's experience in the gas industry, their participation in this proceeding is likely to add constructively to the proceeding.

8. SJG and ETG will abide by the schedule set for this proceeding, to the extent one has been entered and therefore the participation of SJG and ETG will not result in delay.

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

10. Although SJG and ETG seek participant status, SJG and ETG are aware that certain

utilities may seek intervenor status in the SJG and ETG energy efficiency proceedings identified above. Any Board order approving intervention for a utility in the SJG and ETG case would have to find that, based on the common/overlapping concerns in the Board's June 10, 2020 Order in BPU Docket Number BPU Docket Nos. QO19010040, QO19060748, QO17091004, the utility satisfies the standard of being "substantially, specifically, and directly affected by the outcome" of the case. *N.J.A.C. 1:1-16.1(a)*. Of course, if the Board determines that the utility has a sufficient interest to be an intervenor in the SJG and ETG cases, then SJG and ETG would have the identical sufficient interest to be an intervenor in the other utility's case. *Accordingly, this motion for participant status is provisional, and should be treated as a motion to intervene should the utility that is the subject of the above captioned proceeding be granted intervenor status in the SJG and ETG cases.*

WHEREFORE, SJG and ETG request that the Board or Presiding Office issue an Order: (1) granting it rights as Participant in this matter pursuant to *N.J.A.C. 1:1-16.6*, (2) to the extent the Presiding Commissioner or Board grants intervenor status to any other utility in the ETG and SJG energy efficiency, granting SJG and ETG intervenor status in energy efficiency proceeding involving that utility; and (3) providing such further relief in connection therewith as is deemed reasonable, just and consistent with the foregoing.

SOUTH JERSEY GAS COMPANY
ELIZABETHTOWN GAS COMPANY



Deborah M. Franco, Esq.