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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
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**RE: I/M/O the Verified Petition of Jersey Central Power & Light Company
For Approval of JCP&L's Energy Efficiency and Conservation Plan
Including Energy and Peak Demand Reduction Programs
(JCP&L EE&C)
BPU Docket No. EO20090620**

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", written in a cursive style.

Danielle Lopez

C Attached Service List (E-Mail Only)

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of Jersey Central)
Power & Light Company for Approval of)
JCP&L's Energy Efficiency and Conservation) BPU Dkt. No. EO20090620
Plan Including Energy and Peak Demand)
Reduction Programs (JCP&L EE&C))

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:

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4. Jersey Central Power and Light (“JCP&L”), 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 gas territory overlaps with JCP&L's electric territory, any decision by the Board with respect to JCP&L'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 JCP&L 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 JCP&L'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,

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DATED: October 2, 2020

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