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October 6, 2020

**Electronic Filing**

Aida Camacho-Welch  
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44 South Clinton Avenue, 3rd Floor  
P. O. Box 350  
Trenton, NJ 08625-0350

Re: **In the Matter of the Petition of South Jersey Gas Company for Approval of New Energy Efficiency Programs and Associated Cost Recovery Pursuant to the Clean Energy Act**  
**BPU Docket No. GO20090618**

Dear Secretary Camacho-Welch:

Enclosed please find South Jersey Gas Company's ("SJG") response to the Motions to Participate to Intervene in the above-captioned proceeding for RECO, JCP&L, ACE, NJNG, PSE&G, EEA-NJ and Google, LLC.

By copy of this letter, copies of the response to motions 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 that reads "Deborah M. Franco".

Deborah M. Franco

DMF:caj  
Enclosure

cc: See attached Service List

**IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR  
APPROVAL OF NEW ENERGY EFFICIENCY PROGRAMS AND ASSOCIATED  
COST RECOVERY PURSUANT TO THE CLEAN ENERGY ACT  
BPU DOCKET NO. GO20090618**

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BPU DOCKET NO. GO20090618**

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**IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR  
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BPU DOCKET NO. GO20090618**

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**IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR  
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BPU DOCKET NO. GO20090618**

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

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**In the Matter of the Petition of South Jersey Gas Company for Approval of New Energy Efficiency Programs and Associated Cost Recovery Pursuant to the Clean Energy Act** : **BPU Docket No. GO20090618**  
: **RESPONSE TO MOTIONS TO INTERVENE AND PARTICIPATE OF RECO, JCP&L, ACE, NJNG, PSE&G, EEA-NJ, AND GOOGLE, LLC**  
: **EEA-NJ, AND GOOGLE, LLC**  
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**TO THE HONORABLE BOARD OF PUBLIC UTILITIES:**

In accordance with *N.J.A.C. 1:1-12.2*, South Jersey Gas Company (“SJG” or “Company”) hereby submits this response to the New Jersey Board of Public Utilities (“Board” or “BPU”) in response to the following motions to intervene and participate in the above-referenced proceeding:

- Motion to Participate of Rockland Electric Company (“RECO”)
- Motion to Participate of Jersey Central Power & Light Company (“JCP&L”)
- Motion to Participate of Atlantic City Electric Company (“ACE”)
- Motion to Intervene of New Jersey Natural Gas Company (“NJNG”)
- Motion to Intervene of Public Service Electric & Gas Company (“PSE&G”)
- Motion to Intervene of Energy Efficiency Alliance of New Jersey (“EEA-NJ”)
- Motion to Participate of Google, LLC (“Google”)

As more fully described below, SJG respectfully submits that (1) it has no opposition to the motions to participate of RECO, JCP&L, ACE and Google; (2) NJNG and PSEG should similarly be granted participation status in lieu of intervention; and (3) it has no opposition to the motion to intervene of EEA-NJ. In support thereof, SJG states as follows:

### **Motions to Participate of RECO, JCP&L, ACE & Google**

1. Like RECO, JCP&L and ACE, by motion dated October 2, 2020, SJG sought participation status in these utilities' energy efficiency proceedings filed on September 25, 2020 in BPU Docket Nos. E020090623 (RECO), EO20090620 (JCP&L) and EO20090621 (ACE). Each of the utilities in New Jersey have a significant interest in the outcome of all the pending utility energy efficiency proceedings insofar as they may give rise to substantive policy and/or procedural requirements that can significantly influence, if not have a precedential effect over, each of the New Jersey utilities. Under these circumstances, participant status is appropriate to allow for an adequate monitoring of developments and an opportunity to address relevant issues in a timely manner. Likewise, SJG agrees with Google that as a leading developer of smart technology that could ultimately be deployed in the energy efficiency programs under consideration, Google has an interest in, and is likely to add constructively to this case; accordingly, SJG does not oppose Google's motion to participate.

### **Motions to Intervene of NJNG and PSE&G**

2. SJG agrees with NJNG and PSE&G that the energy efficiency programs to be implemented by each utility will require considerable coordination and involve important cost sharing and investment allocation issues, particularly in areas where gas and electric services territories overlap. That said, this effort can be adequately addressed through ongoing coordination amongst the utilities combined with the granting of participation status in each pending utility energy efficiency proceeding. Therefore, SJG respectfully submits that it is appropriate to grant NJNG and PSE&G participation, not intervention status. That said, to the extent, NJNG is granted intervention status in this proceeding, as set forth in the Motion to Participate submitted by the Company in NJNG's pending energy efficiency proceeding (BPU Docket No. GO20090622), SJG respectfully submits that it be granted intervenor status in NJNG's energy efficiency proceeding.



**Motion to Intervene of EEA-NJ**

3. SJG recognizes that EEA-NJ may have interests in this proceeding that warrant intervention by this party. Accordingly SJG does not oppose the granting of intervention status to EEA-NJ.

**Conclusion**

4. For the reasons set forth above, SJG respectfully submits that (1) it would support the participation of RECO, JCP&L, ACE, Google, NJNG and PSE&G; (2) it does not oppose the intervention of EEA-NJ; and (3) requests that the Board or Presiding Officer provide such further relief in connection herewith as is deemed just, reasonable and consistent with the foregoing.

Respectfully submitted,



By: \_\_\_\_\_

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Dated: October 6, 2020