

Katherine E. Smith
Associate Counsel - Regulatory

Law Department
80 Park Plaza, T5, Newark, New Jersey 07102-4194
Tel: 973.430.6996
Email: Katherine.Smith@pseg.com



October 14, 2020

VIA E-MAIL

In the Matter of the Petition of
Jersey Central Power and Light Company
for Approval of an
Advanced Metering Infrastructure (AMI) Program (JCP&L AMI)

BPU Docket No. EO20080545

Ms. Aida Camacho
Secretary, Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350
board.secretary@bpu.nj.gov

Dear Secretary Camacho:

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

Copies of the motion are being forwarded on this date via electronic mail to all persons whose name appears on the attached Service List. Consistent with the Order issued by the Board in connection with In the Matter of the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations, BPU Docket No. EO20030254, Order dated March 19, 2020, these documents are being filed electronically with the Secretary of the Board. No paper copies will follow.

Thank you for your anticipated courtesies.

Very truly yours,

A handwritten signature in blue ink that reads "Katherine E. Smith" with a stylized flourish at the end.

Katherine E. Smith

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 and Light Company) BPU Dkt. No. EO20080545
For Approval of an)
Advanced Metering Infrastructure (AMI))
Program (JCP&L AMI))

PSE&G’S MOTION TO PARTICIPATE

Public Service Electric and Gas Company (“PSE&G”) hereby moves for an Order granting it status as a Participant 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 2,300,000 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 1,900,000 customers located within the State of New Jersey.
3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

Matthew M. Weissman, Esq.
PSEG Services Corporation
80 Park Plaza, T5G
P.O. Box 570
Newark, New Jersey 07102
Phone: (973) 430-7052
Matthew.weissman@pseg.com

Katherine E. Smith, Esq.
PSEG Services Corporation
80 Park Plaza, T5G
P.O. Box 570
Newark, New Jersey 07102
Phone: (973) 430-6996
katherine.smith@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 Coordinator
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. The Board of Public Utility's decision in this proceeding is likely to have precedential effect and impact not only the Petitioner herein and its customers, but also New Jersey's other electric utilities. The advanced metering infrastructure ("AMI") and associated cost recovery issues that will be addressed in this case may have an impact on PSE&G by establishing precedent. PSE&G will therefore likely be directly and specifically affected by the relief provided herein.

5. 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.

6. PSE&G has a history of coordinating its activities in dockets at the New Jersey Board of Public Utilities with those of other utilities where appropriate. PSE&G will coordinate its representation with other similarly-situated parties or participants in this docket to the extent appropriate.

7. Due to PSE&G's experience in the electric industry, its participation in this proceeding is likely to add constructively to the proceeding.

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

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

WHEREFORE, PSE&G respectfully requests an Order: (1) granting it rights as a Participant in this matter pursuant to *N.J.A.C.* 1:1-16.6, and (2) providing such further relief in connection therewith as is deemed reasonable, just, and consistent with the foregoing.

Respectfully submitted,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

A handwritten signature in blue ink that reads "Katherine E. Smith". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Katherine E. Smith, 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) 430-6996
katherine.smith@pseg.com

DATED: October 14, 2020

BPU

Christopher Oprysk
Board of Public Utilities
44 South Clinton Avenue
3rd Floor., Suite 314
P.O. Box 350
Trenton NJ 08625-0350
christopher.oprysk@bpu.nj.gov

BPU

David Brown
Board of Public Utilities
44 South Clinton Avenue
Suite 314
P.O. Box 350
Trenton NJ 08625-0350
david.brown@bpu.nj.gov

BPU

Christine Sadovy
Board of Public Utilities
44 South Clinton Avenue
9th Floor
P.O. Box 350
Trenton NJ 08625
christine.sadovy@bpu.nj.gov

BPU

Heather Weisband
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
Heather.Weisband@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

JCP&L

Mark Mader
Jersey Central Power & Light Co.
300 Madison Avenue
P.O. Box 1911
Morristown NJ 07962-1911
973-401-8199
mamader@firstenergycorp.com

BPU

Carol Artale
Board of Public Utilities
44 South Clinton Avenue
9th Floor
Trenton NJ 08625-0350
carol.artale@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

Abe Silverman
Board of Public Utilities
44 South Clinton Avenue
9th Floor
Trenton NJ 08625-0350
abe.silverman@bpu.nj.gov

DAG

Michael Beck
NJ Dept. of Law and Public Safety
25 Market Street
P.O. Box 112
Trenton NJ 08625

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

JCP&L

James C. Meyer Esq.
Riker Daning Scherer Hyland & Perretti
One Speedwell Avenue
Headquarters Plaza
Morristown NJ 07962-1981
jmeyer@riker.com

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

Ryan Moran
Board of Public Utilities
44 South Clinton Avenue
9th Floor
P.O. Box 350
Trenton NJ 08625-0350
ryan.moran@bpu.nj.gov

BPU

Dean Taklif
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton NJ 08625-0350
(609) 777-0193
dean.taklif@bpu.nj.gov

DAG

Daren Eppley
NJ Division of Law & Public Safety
Richard J. Hughes Justice Complex
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton NJ 08625
daren.eppley@law.njoag.gov

JCP&L

Lauren M. Lepkoski
First Energy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading PA 19612-6001
610-921-6203
llepkoski@pirstenergycorp.com

JCP&L

James O'Toole
Jersey Central Power & Light Co.
300 Madison Avenue
P.O. Box 1911
Morristown NJ 07962-1911
(973) 401-8296
jotoole@firstenergycorp.com

JCP&L

Carol Pittavino
FirstEnergy Service Company
Rates & Regulatory Affairs-NJ
Greensburg Corporate Center
800 Cabin Hill Drive
Greensburg PA 15601
cpittavino@firstenergycorp.com

PSE&G

Katherine E. Smith
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark NJ 07102
(973) 430-6996
katherine.smith@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

Ami Morita
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
amorita@rpa.state.nj.us

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

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

Rate Counsel

Christine M. Juarez
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
cjuarez@rpa.state.nj.us

Rate Counsel

Maria Novas-Ruiz Esq.
Division of Rate Counsel
140 East Front Street, 4th Flr.
P.O. Box 003
Trenton NJ 08625
(609) 984-1460
mnovas.ruiz@rpa.state.nj.us

PSE&G

Bernard Smalls
PSEG Services Corporation
80 Park Plaza-T5
Newark NJ 07102-4194
(973) 430-5930
bernard.smalls@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

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