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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, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, New Jersey 08625-0350  
[board.secretary@bpu.nj.gov](mailto: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".

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:

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Additional electronic only copies should be addressed to:

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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, appearing to read "Katherine E. Smith", with a long horizontal flourish extending to the right.

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DATED: October 14, 2020

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