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January 22, 2021

VIA E-MAI

Aida Camacho-Welch, Secretary 44 South Clinton Avenue, 9th Floor P.O. Box 350 Trenton, New Jersey 08625-0350

RE: I/M/O the Petition of Atlantic City Electric Company for Approval of Amendments to Its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, and for Other Appropriate Relief (12/2020)
BPU Docket No. ER20120746

Dear Secretary Camacho-Welch:

Enclosed is Public Service Electric and Gas Company's ("PSE&G") 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 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, this document is being filed electronically with the Secretary of the Board and the New Jersey Division of Rate Counsel. No paper copies will follow.

Thank you for your anticipated courtesies.

Very truly yours,

Danielle Lopez

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

In the Matter of the Petition of Atlantic City)	
Electric Company for Approval of Amendments to	o)	
Its Tariff to Provide for an Increase in Rates and)	BPU Dkt. No. ER20120746
Charges for Electric Service Pursuant to N.J.S.A.)	
48;2-21 and N.J.S.A. 48:2-21.1 and for other)	
Appropriate Relief (10/2020))	

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 2,200,000 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:

Matthew W. Weissman, Esq. Managing Counsel – State Regulatory **PSEG Services Corporation** 80 Park Plaza, T5 P.O. Box 570 Newark, New Jersey 07102

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Additional electronic only copies should be addressed to:

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- 4. The issues that will be addressed in this base rate case and the relief provided herein will directly and specifically affect PSE&G. The Board of Public Utility's decision in this proceeding will have precedential effect and impact not only the Petitioner herein and its customers, but also New Jersey's other utilities—including PSE&G.
- 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

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DATED: January 22, 2021

ACE Base Rate Case 2020 ER20120746 PSE&G's Service List

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