



520 Green Lane
Union, NJ 07083
T: (908) 662-8448
F: (908) 662-8496
dfranco@sjindustries.com

Deborah M. Franco, Esq.
VP, Rates, Regulatory & Sustainability

April 12, 2021

Electronic Filing

Aida Camacho-Welch
Office of the Secretary
NJ Board of Public Utilities
44 South Clinton Avenue, 3rd Fl, Ste 314
P.O. Box 350
Trenton, NJ 08625-0350

**Re: In the Matter of the Petition of New Jersey Natural Gas Company For Approval of an Increase in Gas Base Rates and for Changes in its Tariff for Gas Service, Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1; and for Changes to Depreciation Rates for Gas Property Pursuant to N.J.S.A. 48:2-18
BPU Docket No. GR21030679**

Dear Secretary Camacho-Welch:

Enclosed please find South Jersey Gas Company's ("SJG") and Elizabethtown Gas Company's ("ETG") 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 person whose names appear on the attached Service List.

If you have any questions, please feel free to contact me directly.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Deborah M. Franco".

Deborah M. Franco

Enclosure

cc: See attached Service List

In the Matter of the Petition of New Jersey Natural Gas Company For Approval of an Increase in Gas Base Rates and for Changes in its Tariff for Gas Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1; and for Changes to Depreciation Rates for Gas Property Pursuant to N.J.S.A. 48:2-18 BPU Docket No. GR21030679

SERVICE LIST

NJNG

Mark G. Kahrer
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

Andrew K. Dembia, Esq.
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

Tina Trebino
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

James Corcoran
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

Angela Cahill
New Jersey Resources
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

Marianne Harrell
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

Judy DeSalvatore
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

John Wyckoff
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

Gregory Eisenstark, Esq.
Cozen O'Connor
One Gateway Center
Suite 910
Newark, NJ 07102

Colleen A. Foley, Esq.
Saul Ewing Arnstein & Lehr LLP
One Riverfront Plaza
Suite 1520
Newark, NJ 07102-5426

Daniel P. Yardley, Esq.
Yardley & Associates
3 Apollo Circle,
Lexington, MA 02421

Ronald E. White, Ph.D.
Foster Associates, Inc
17595 S. Tamiami Trail, Suite 212
Fort Myers, FL 33908

Paul R. Moul, Esq.
P. Moul & Associates
251 Hopkins Road
Haddonfield, NJ 08033-3062

Isaac Gabel-Frank
Gabel Associates, Inc.
417 Denison Street
Highland Park, NJ 08904

Brendon Baatz
Gabel Associates, Inc.
417 Denison Street
Highland Park, NJ 08904

In the Matter of the Petition of New Jersey Natural Gas Company For Approval of an Increase in Gas Base Rates and for Changes in its Tariff for Gas Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1; and for Changes to Depreciation Rates for Gas Property Pursuant to N.J.S.A. 48:2-18 BPU Docket No. GR21030679

SERVICE LIST

NJ BOARD OF PUBLIC UTILITIES

Benjamin Witherell
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Dr. Son Lin Lai
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Stacy Peterson
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Paul Flanagan
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Robert Brabston
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Christine Lin
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Jacqueline O'Grady
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Heather Weisband
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Paul Lupo
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350

Andrea Reid
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Ryan Moran
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Scott Sumliner
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Christopher Oprysk
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Bart Kilar
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

In the Matter of the Petition of New Jersey Natural Gas Company For Approval of an Increase in Gas Base Rates and for Changes in its Tariff for Gas Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1; and for Changes to Depreciation Rates for Gas Property Pursuant to N.J.S.A. 48:2-18 BPU Docket No. GR21030679

SERVICE LIST

Beverly Tyndell
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Joseph Costa
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Julie Ford-Williams
N.J. Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

DIVISION OF RATE COUNSEL

Stefanie Brand, Esq., Director
Division of Rate Counsel
140 East Front Street, 4th Floor
P. O. Box 003
Trenton, N.J. 08625

Brian O. Lipman, Esq.
Litigation Manager
Division of Rate Counsel
140 East Front Street, 4th Floor
P. O. Box 003
Trenton, N.J. 08625

Felicia Thomas-Friel, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P. O. Box 003
Trenton, N.J. 08625

Shelly Massey
Division of Rate Counsel
140 East Front Street, 4th Floor
P. O. Box 003
Trenton, N.J. 08625

DEPT. OF LAW & PUBLIC SAFETY –
DIVISION OF LAW

Terel Klein, DAG
Dept. of Law & Public Safety
Division of Law
Public Utilities Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 112
Trenton, N.J. 08625

Pamela Owen, ASC
Department of Law & Public Safety
Division of Law, Public Utilities Section
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 112
Trenton, N.J. 08625

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of New Jersey :
Natural Gas Company For Approval of an :
Increase in Gas Base Rates and for Changes : BPU Docket No. GR21030679
in its Tariff for Gas Service, Pursuant to :
N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1; :
and for Changes to Depreciation Rates for :
Gas Property Pursuant to N.J.S.A. 48:2-18 :

**MOTION TO PARTICIPATE OF
SOUTH JERSEY GAS COMPANY AND
ELIZABETHTOWN GAS COMPANY**

South Jersey Gas Company (“SJG”) and Elizabethtown Gas Company (“ETG”) hereby move for an Order granting SJG and ETG status as a participant in the above-referenced matter pursuant to N.J.A.C. 1:1-16.6. In support of this motion, SJG and ETG respectfully submit:

1. SJG and ETG are New Jersey public utilities as defined by N.J.S.A. 48:2-13.
2. SJG is engaged as a New Jersey public utility in the in the purchase, distribution, and sale of natural gas for approximately 393,000 customers located within the State of New Jersey. ETG is engaged as a New Jersey public utility in the in the purchase, distribution, and sale of natural gas for approximately 300,000 customers located within the State of New Jersey.
3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

Deborah M. Franco, Esq.
Vice President, Rate, Regulatory &
Sustainability
South Jersey Industries, Inc.
520 Green Lane
Union, New Jersey 07083
dfranco@sjindustries.com

Cindy Capozzoli
Director, Rates
SJI Utilities, Inc.
1 South Jersey Place
Atlantic City, NJ 08401
ccapozzoli@sjindustries.com

Carolyn Jacobs
Regulatory Compliance Specialist
Rates & Regulatory
1 South Jersey Place
Atlantic City, NJ 08401
cjacobs@sjindustries.com

4. The New Jersey Administrative Code states: “Any person or entity with a significant interest in the outcome of a case may move for permission to participate.” N.J.A.C. 14:1-16.6(a). When considering motions to participate, the Board “shall consider whether the participant’s interest is likely to add constructively to the case without causing undue delay or confusion.” N.J.A.C. 14:1-16.6(b).

5. The issues that will be addressed in Petitioner’s request for approval in this base rate case proceeding and related relief will substantially, specifically and directly impact SJG and ETG. Like Petitioner, SJG and ETG are natural gas distribution utility in New Jersey and, as such, the Board’s decision in this proceeding will have precedential effect and impact not only the Petitioner herein and its customers, but also may impact New Jersey’s other utilities — including SJG and ETG.

6. The customers and the operations of SJG and ETG are distinct from those of other parties and participants in this case. Thus, no other party or participant will represent the interests of SJG and ETG in this case.

7. SJG and ETG have history of coordinating its activities in dockets at the Board with those of other utilities where appropriate. SJG and ETG will coordinate its representation

with other similarly situated parties or participants in this docket to the extent appropriate.

Accordingly, there is no prospect for confusion and delay arising from inclusion of SJG and ETG in this proceeding.

8. Due to SJG's and ETG's experience in the gas industry, their participation in this proceeding is likely to add constructively to the proceeding.

9. SJG and ETG will abide by the schedule set for this proceeding, to the extent one has been entered and therefore the participation of SJG and ETG will not result in delay.

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

WHEREFORE, SJG and ETG respectfully request an Order: (1) granting SJG and ETG rights as a Participants 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,

SOUTH JERSEY GAS SOMpany
ELIZABETHTOWN GAS COMPANY



Deborah M. Franco, Esq.

Dated: April 12, 2021