



**Van L. McPherson III, Esquire**  
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*Office of General Counsel*

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September 22, 2020

**VIA E-MAIL ONLY**

Ms. Aida Camacho-Welch  
Secretary of the Board  
State of New Jersey  
44 South Clinton Avenue, 3<sup>rd</sup> Floor, Suite 314  
Post Office Box 350  
Trenton, New Jersey 08625-0350

**RE: In the Matter of the Petition of Atlantic City Electric Company for Approval of the Smart Energy Network Program and Cost Recovery Mechanism and Other Related Relief  
BPU Dkt. No. EO20080541**

Dear Ms. Camacho-Welch:

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

If you have any questions or concerns, please do not hesitate to contact me at [vmcpherson@sjindustries.com](mailto:vmcpherson@sjindustries.com) or (609) 561-9000, ext. 4794. Thank you.

Very truly yours,

A handwritten signature in blue ink that reads "V L McPherson III".

Van L. McPherson III  
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VLM/cmm

cc: Attached Service List (E-Mail Only)

IMO the Petition of Atlantic City Electric Company for Approval of the Smart Energy Network  
Program and Cost Recovery Mechanism and Other Related Relief

BPU Docket No. EO20080541

**Service List**

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STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of Atlantic City Electric )  
Company for Approval of the Smart Energy )  
Network Program and Cost Recovery Mechanism ) BPU Dkt. No. EO20080541  
And Other Related Relief )

**SJG’S MOTION TO PARTICIPATE**

South Jersey Gas Company (“SJG”) 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, SJG respectfully submits:

1. SJG is a New Jersey public utility 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 400,000 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, Clean Energy & Sustainability  
South Jersey Industries, Inc.  
1 South Jersey Plaza  
Folsom, New Jersey 08037  
Phone: (908) 662-8448  
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Additional copies should be addressed to:

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4. The issues that will be addressed in this request for approval Smart Energy Network (“SEN”) and other relief provided herein will directly and specifically affect SJG. 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 SJG.

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

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

7. Due to SJG's experience in the gas industry, its participation in this proceeding is likely to add constructively to the proceeding.

8. SJG 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**, SJG 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.

SOUTH JERSEY GAS COMPANY



Van L. McPherson, III, Esq.