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January 3, 2022

Electronic Filing

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

**Re: In the Matter of the Petition of Public Service Electric and Gas Company for
Approval of an Infrastructure Advancement Program (IAP)
BPU Docket Nos. EO21111211 and GO21111212**

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 cursive script that reads "Sheree L. Kelly".

Sheree L. Kelly, Esq.

Enclosure

cc: See attached Service List

PSE&G Service List
Infrastructure Advancement Program
EO21111211 & GO21111211

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PSE&G Service List
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STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION :
OF PUBLIC SERVICE ELECTRIC AND :
GAS COMPANY FOR : BPU Docket Nos. EO21111211 AND
APPROVAL OF AN : GO21111212
INFRASTRUCTURE :
ADVANCEMENT PROGRAM (IAP) :

**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 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:

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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 proceeding and related relief will substantially, specifically and directly impact SJG and ETG. Like Petitioner, SJG and ETG are natural gas distribution utilities 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



Sheree L. Kelly, Esq.

Dated: January 3, 2022