

January 10, 2022

VIA ELECTRONIC MAIL

Honorable Aida Camacho-Welch Secretary, New Jersey Board of Public Utilities 44 South Clinton Avenue, 1st Floor P.O. Box 350 Trenton, NJ 08625-0350

RE: IN THE MATTER OF THE PETITION OF ELIZABETHTOWN GAS

COMPANY FOR APPROVAL OF INCREASED BASE TARIFF RATES AND CHARGES FOR GAS SERVICE, CHANGES TO

DEPRECIATION AND OTHER TARIFF REVISIONS

BPU DOCKET NO. GR21121254

Dear Secretary Camacho-Welch:

Please accept, on behalf of New Jersey Natural Gas Company, the attached Motion to Participate ("Motion") in the above captioned matter.

By copy of this letter, this Motion is being forwarded this date via electronic mail to all persons whose names appear on the attached Service list.

In accordance with the Order issued by the Board in connection with I/M/O 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 electronically filed. No paper copies will follow.

Respectfully submitted,

Andrew K. Dembia

Regulatory Affairs Counsel

C: Service List

SERVICE LIST

NJNG

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

Andrew Dembia, Esq.
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

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

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

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

NJ BOARD OF PUBLIC UTILITIES

Stacy Peterson N.J. Board of Public Utilities Division of Energy 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

Cindy Bianco 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

Paul Lupo 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

SERVICE LIST

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

Oneil Hamilton 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

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

Jackie 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

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

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

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

<u>DIVISION OF RATE COUNSEL</u> Brian O. Lipman, Esq. Director, Division of Rate Counsel 140 East Front Street – 4th Floor P.O. Box 003 Trenton, NJ 08625

Maura Caroselli, Esq. Division of Rate Counsel 140 East Front Street – 4th Floor P.O. Box 003 Trenton, NJ 08625

Kurt Lewandowski, Esq. Division of Rate Counsel 140 East Front Street – 4th Floor P.O. Box 003 Trenton, NJ 08625

Megan Lupo, Esq. Division of Rate Counsel 140 East Front Street – 4th Floor P.O. Box 003 Trenton, NJ 08625

SERVICE LIST

Sarah H. Steindel, Esq. Division of Rate Counsel 140 East Front Street – 4th Floor P.O. Box 003 Trenton, NJ 08625

Karen Forbes Division of Rate Counsel 140 East Front Street – 4th Floor P.O. Box 003 Trenton, NJ 08625

<u>DEPT. OF LAW & PUBLIC SAFETY</u> – DIVISON 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

Matko Ilic, 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
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

SJI UTILITIES
Deborah M. Franco, Esq
520 Green Lane
Union, NJ 07083

Sheree Kelly 520 Green Lane Union, NJ 07083

Cindy Capozzoli 1 South Jersey Place Atlantic City, NJ 08401

Carolyn A. Jacobs 1 South Jersey Place Atlantic City, NJ 08401

John Houseman 1 South Jersey Plaza Hammonton, NJ 08037

James Madden 215 Cates Road Egg Harbor Twp., NJ 08234

ELIZABETHTOWN GAS COMPANY

Gary Akmentins 520 Green Lane Union, NJ 07083

Thomas Kaufmann 520 Green Lane Union, NJ 07083

Michael Scacifero 520 Green Lane Union, NJ 07083

Len Willey 520 Green Lane Union, NJ 07083

SERVICE LIST

Susan Potanovich 520 Green Lane Union, NJ 07083

Kenneth T. Maloney Cullen and Dykman 1101 14th Street, NW Suite 750 Washington, DC 20005

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

STATE OF NEW JERSEY

OFFICE OF ADMINISTRATIVE LAW

IN THE MATTER OF THE PETITION OF)	MOTION TO PARTICIPATE
ELIZABETHTOWN GAS COMPANY FOR)	
APPROVAL OF INCREASED BASE TARIFF)	BPU Docket No.GR21121254
RATES AND CHARGES FOR GAS SERVICE,)	
CHANGES TO DEPRECIATION AND OTHER)	OAL Docket No.
TARIFF REVISIONS)	

New Jersey Natural Gas Company ("NJNG") hereby moves for an Order granting it status as a Participant in the above referenced matter pursuant to <u>N.J.A.C.</u> 1:1-16.6. In support of this Motion, NJNG respectfully submits:

- 1. NJNG is a New Jersey public utility as defined by N.J.S.A. 48:2-13.
- 2. NJNG is engaged as a New Jersey public utility in the purchase, distribution, and sale of natural gas for more than 565,500 customers located within the State of New Jersey.
- 3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

Andrew K. Dembia, Esq.-Regulatory Affairs Counsel New Jersey Natural Gas Company 1415 Wyckoff Road P. O. Box 1464 Wall, New Jersey 07719 Email: adembia@njng.com

Additional electronic copies should be addressed to Susan Fastuca at: sfastuca@njng.com

Phone: (732) 938-1073

- 4. The Board's decision in this proceeding is likely to have precedential effect and impact not only on the Petitioner herein and its customers, but also New Jersey's other gas utilities. A variety of issues that will be addressed in this case may have an impact on NJNG by establishing precedent. NJNG will therefore likely be directly and specifically affected by the relief provided herein.
- 5. The service territories, customers, and the operations of NJNG are distinct from those of other parties and participants in this case. Thus, no other party or participant will represent the interests of NJNG in this case.

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

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

8. NJNG will abide by the schedule set for this proceeding. NJNG's motion is timely and will not delay or otherwise disrupt the prosecution of this proceeding <u>N.J.A.C.</u> 1:1-16.2.

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

WHEREFORE, NJNG respectfully requests an Order (1) granting it rights as a Participant in this matter pursuant to <u>N.J.A.C.</u> 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,

NEW JERSEY NATURAL GAS COMPANY

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ANDREW K. DEMBIA

DATED: January 10, 2022