

January 20, 2022

VIA E-MAIL*

New Jersey Board of Public Utilities
Attn: Aida Camacho-Welch, Board Secretary
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350
aida.camacho@bpu.nj.gov

**Re: In the Matter of the Petition of Public Service Electric and Gas
Company ("PSE&G") for Approval of an Infrastructure Advancement
Program ("IAP")
BPU Docket Nos. _____
Waters and Bugbee, Inc.'s Motion to Participate**

Dear Madam Secretary:

This firm represents Waters and Bugbee, Inc. ("W&B") in connection with the above-captioned matter. Enclosed for filing is W&B's Motion to Participate in PSE&G's IAP Petition.

Please process this Motion to Participate in order that it may be considered by the Board within its established timeframe for applications for participation in this proceeding.

In compliance with the Board's Order in Docket No. EO20030254, dated March 19, 2020, W&B hereby submits this filing via electronic delivery only to the Board Secretary, and will suspend submitting such filings as paper documents until the Board directs otherwise.

Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,



John D. Cromie, Esq.

****Hard copies, if requested, can be provided at a later date***

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Enclosures

cc: Attached Service List (via e-mail only w/ enclosures)
Jeff Waters (via e-mail only w/ enclosures)
Steve Minshall (via e-mail only w/ enclosures)

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Attorneys for Waters and Bugbee, Inc.

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

IN THE MATTER OF THE PETITION OF
PUBLIC SERVICE ELECTRIC AND GAS
COMPANY FOR APPROVAL OF AN
INFRASTRUCTURE ADVANCEMENT
PROGRAM

MOTION TO PARTICIPATE

Docket Nos.:

Waters and Bugbee, Inc. (“W&B”), by and through its undersigned counsel, hereby moves before the New Jersey Board of Public Utilities (“Board”) for leave to participate in the above-captioned proceeding pursuant to N.J.A.C. 1:1-16.6 and N.J.A.C. 1:1-16.2. In support of its motion, W&B respectfully submits:

1. The above-captioned matter is a request by Public Service Electric and Gas Company (“PSE&G”) for approval of an Infrastructure Advancement Program (“IAP” or “Program”). PSE&G describes the Program as an investment of \$848 million, over a four-year period, to further strengthen and modernize the utility’s electric and gas systems, and states that the Program is designed in a manner consistent with previous infrastructure investment programs that the Board has approved to modernize PSE&G’s infrastructure, enhance and maintain the safety and reliability of PSE&G’s electric and gas distribution systems, and provide a valuable stimulus to New Jersey’s economy.

2. W&B is a New Jersey Corporation specializing in the installation of utility infrastructure. Founded in 1964, W&B has been involved with major electrical and natural gas distribution construction for PSE&G for over 50 years. W&B's vast experience will provide the Board with critical insight as to the potential impact that the Program could have for job creation, accurate assessment of construction costs, and recommendations for its efficient implementation.

3. W&B stands ready to support and participate in the construction envisioned by the Program, as it has successfully been doing under PSE&G's other ongoing modernization initiatives.

4. W&B's participation in this proceeding will contribute to the development of a complete record for consideration by the Board on these issues. Accordingly, the issues to be decided in the above-captioned proceeding "substantially, significantly and directly affect" W&B, thereby making it appropriate for W&B to participate.

5. W&B supports a regulatory solution that focuses on the IAP initiatives and provides for an expeditious process for approval of the investments and the associated rate adjustments.

6. W&B's motion is timely and will not delay or otherwise disrupt the proceeding.

7. Copies of all correspondence and other communications related to this proceeding should be addressed to:

Jeff Waters
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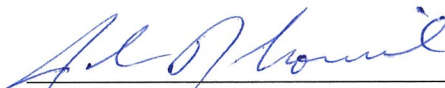
with a copy to

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WHEREFORE, W&B respectfully requests an Order: (1) granting W&B full rights as a participant in this matter pursuant to N.J.A.C. 1:1-16.1 *et seq.*, including, without limitation, the ability to offer oral argument, file statements and briefs, and participate in conferences; and (2) providing such other or further relief as the Board may deem just and proper.

Dated: January 20, 2022

Respectfully submitted,



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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 APPROVAL OF AN
INFRASTRUCTURE ADVANCEMENT
PROGRAM

CERTIFICATION OF SERVICE

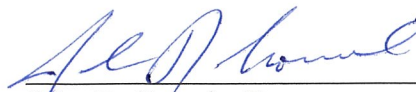
Docket Nos.:

I, **JOHN D. CROMIE**, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and an Associate of the law firm of Connell Foley LLP, attorneys for Waters and Bugbee, Inc. ("W&B").

2. On this date, in compliance with the Board's Order in Docket No. EO20030254, dated March 19, 2020, I caused W&B's Motion to Participate to be served as follows: (i) via electronic mail to Aida Camacho-Welch, Secretary, New Jersey Board of Public Utilities; and (ii) via electronic mail to each person identified on the Service List attached hereto as **Exhibit A**.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



John D. Cromie, Esq.

Dated: January 20, 2022

EXHIBIT A

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