

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

I/M/O THE PETITION OF PUBLIC SERVICE	)	Docket Nos. EO21111211
ELECTRIC AND GAS COMPANY FOR	)	GO21111212
APPROVAL OF AN INFRASTRUCTURE	)	
ADVANCEMENT PROGRAM (IAP)	)	

MOTION TO INTERVENE BY  
BURNS & McDONNELL ENGINEERING COMPANY, INC.

Burns & McDonnell Engineering Company, Inc. (“BMcD”) hereby moves to intervene as a party in this matter pursuant to N.J.A.C. 14:1-8.1 and N.J.A.C. 1:1-16.1 et seq. BMcD seeks full party status in the above-captioned proceeding, which involves a request by Public Service Electric & Gas Company (“PSE&G”) for approval of an Infrastructure Advancement Program (“IAP” or “Program”) involving estimated investments of \$708 million in electric infrastructure and \$140 million in gas infrastructure, and associated cost recovery for a four-year period.

BMcD is a leading utility design and construction firm providing critical infrastructure for the power, gas, and communication markets throughout North America. BMcD’s broad experience in all areas of utility design and construction (particularly electric distribution planning, design and construction, natural gas distribution systems, meter & regulator stations, gas transmission interconnects and district regulators design and construction) as well as its experience in electric vehicle and energy storage will constructively assist the Board in evaluating, among other things, the value and impact of the IAP.

BMcD has over 200 planners, designers, and engineers focused on the electric distribution grid. As the largest provider of services into the electric utility market, BMcD has ongoing

involvement with dozens of relevant programs across the country. Experience includes grid modernization strategy and consulting, asset renewal programs, overhead to underground conversions, cable replacement programs, and voltage optimization and FLISR (fault location, isolation and service restoration) deployments. BMcD is helping utilities from coast to coast, on programs stemming from various regulatory drivers such as reliability, storm hardening, grid modernization, and resiliency.

To provide some examples:

- BMcD helped Southern California Edison (SCE) design its 300+ substation Distribution Volt/VAR Control program, one of the largest centralized voltage optimization deployments in the U.S.
- BMcD is currently partnering with Georgia Power Company on its \$7.5B Grid Investment Program, serving as program manager and distribution owner's engineer.
- BMcD currently provides program management and design services for the DTE Energy Cable Replacement program, where BMcD has scoped, designed, and coordinated construction for replacement of over 100,000 feet of at-risk cables on DTE Energy's distribution and subtransmission system.

BMcD also supports clients' reliability and modernization efforts with respect to the gas distribution system with design, permitting, project management and construction services. Again to provide some examples:

- BMcD is designing or managing gas distribution modernization programs for DTE Energy (MRP), Southern California Gas Company (DREAMS) and Baltimore Gas & Electric Company (STRIDE).

- BMcD is providing detailed design and project management services for an interconnect program and a district regulator program for TC Energy and Duke Energy, respectively.

BMcD also has a business line dedicated to the planning, design, and deployment of transportation electrification infrastructure. BMcD has ongoing programs and exposure to dozens of utility base electrification programs. Currently, BMcD is assisting with the programs for ComEd, DTE, Evergy, Liberty Utilities, Midwest Energy, New York Power Authority, Portland General Electric, and SCE. The SCE program is currently the largest make-ready program in the US with a goal of seven million electric vehicles on the road in the SCE service territory by 2030.

Finally, among other issues facing electric and gas utilities, BMcD is witnessing throughout the United States the need for robust distribution infrastructure for both gas and electric service, as well as electric vehicle charging infrastructure to prepare for the growing demand of the electric vehicle market.

BMcD's status as a large-scale heavy infrastructure company operating throughout the United States, as well as its broad knowledge of electric and gas markets, combine to give it unique experience and a distinctive viewpoint concerning the IAP as compared to other parties. Thus, BMcD's intervention will be constructive.<sup>1</sup>

The criteria for intervention are set forth in part at N.J.A.C. 1:1-16.1(a) and provide:

Any person or entity not initially a party, who has a statutory right to intervene or who will be substantially, specifically and directly affected by the outcome of a contested case, may on motion, seek leave to intervene.

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<sup>1</sup> BMcD's expertise involving energy infrastructure design and construction has previously been found sufficient grounds for its intervention in another matter involving energy efficiency. See *In re the Petition of Public Service Electric and Gas Company for Approval of its Clean Energy Future-Electric Vehicle and Energy Storage ("CEF-EVES") Program*, Docket No. E018101111 (Order April 22, 2020).

The standards to be applied in considering a motion for intervention are further specifically enunciated at N.J.A.C. 1:1-16.3(a):

In ruling upon a motion to intervene, the judge [or Board] shall take into consideration the nature and extent of the movant's interest in the outcome of the case, whether or not the movant's interest is sufficiently different from that of any party so as to add measurably and constructively to the scope of the case, the prospect of confusion or undue delay arising from the movant's inclusion, and other appropriate matters.

As noted above, BMcD has a distinct perspective in terms of what a successful Program will require. Moreover, BMcD is prepared to coordinate its representation with similarly situated parties in this matter to the extent that it finds such action feasible. BMcD is also prepared to abide by the schedule to be established in this proceeding and, if granted intervention, BMcD will not seek to alter the scope of this or interject unrelated issues. Accordingly, allowing BMcD to intervene will not cause any undue delay or confusion with regard to these proceedings.

If for any reason the motion to intervene is not granted, then, pursuant to N.J.A.C. 1:1-16.5, BMcD requests participant status, so that it may make a statement or file a brief at the appropriate time.

Assuming this motion is granted, the following individuals should be added to the service list in this matter.

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## CONCLUSION

For the reasons set forth above, BMcD respectfully requests that its Motion for Intervention be granted, pursuant to N.J.A.C. 1:1-16.1, et seq., according BMcD full party status in this matter.

Respectfully submitted,



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Attorneys for Burns & McDonnell  
Engineering Company, Inc.

Dated: January 21, 2022

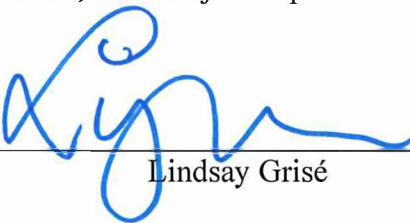
**VERIFICATION OF LINDSAY GRISE**

I, Lindsay Grisé, verify the foregoing Motion to Intervene as follows:

1. I am employed as in-house counsel for Burns & McDonnell Engineering Company, Inc. (“BMcD”) and am authorized to sign this verification on BMcD’s behalf.
2. I have read the foregoing Motion to Intervene and verify that the facts contained therein relating to BMcD are true to the best of my knowledge, and the opinions contained therein are correct to the best of my belief.

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.

Dated: January 21, 2022

  
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Lindsay Grisé