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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Via overnight mail 1ZF A33602310008794

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

**Re: IMO the Petition of Public Service Electric and Gas Company
For approval of an Infrastructure Advancement Program
Docket Nos. EO21111211 and GO 21111212
MOTION TO PARTICIPATE**

Dear Madam Secretary:

The undersigned represents Local Union 94 of the International Brotherhood of Electrical Workers ("IBEW Local Union 94"). Enclosed please find an original and ten (10) copies of IBEW Local Union 94's Motion for Leave to Permit Late Filing and Motion to Participate.

Please process these two Motions in order that it may be considered by the Board within its established timeframe for applications for participation in this proceeding.

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

Respectfully submitted,



Paul A. Montalbano

PAM:cs

encs.

cc Service List as per Board's Order

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

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**Docket Nos. EO 21111211
and GO 2111212**

**IMO the Petition of Public Service Electric
And Gas Company for Approval of an
Infrastructure Advancement Program**

**IBEW LOCAL UNION 94'S MOTION FOR LEAVE TO PERMIT LATE FILING
AND TO PARTICIPATE**

Local Union 94 of the International Brotherhood of Electrical Workers ("IBEW Local Union 94")
hereby moves for leave to permit the late filing of its Motion to Participate in the above-captioned matter.
In support of its Motion, IBEW Local Union 94 states as follows:

1. All correspondence and communications concerning this matter should be directed to:

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IBEW Local Union 94
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East Windsor, New Jersey 08520
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and

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2. IBEW Local Union 94 represents thousands of non-management employees who are engaged
in all aspects of operations at Public Service Electric and Gas Company ("PSEG" or the

“Company”). IBEW Local Union 94 has approximately 2,200 members who are employed in electric distribution and transmission, gas distribution and appliance service, and other work in support of those operations. (Another 1,400 members work at nuclear and fossil electric plans owned by PSE&G’s affiliate, PSEG Power.)


3. The above-captioned matter is a request by PSE&G for approval of a comprehensive, multi-facet program for the modernization of the PSE&G infrastructure of both the electric and gas distribution systems. PSE&G describes the proposed Infrastructure Advancement Program as a series of investments to improve the reliability and resiliency of its electric and gas distribution infrastructure, by rebuilding critical electrical equipment, installing stronger poles, deploying advanced technology, building backup pipes, modernizing critical gas equipment, and improving customer service.
4. The members of IBEW Local Union 94 are part of PSE&G’s skilled workforce and will do the work envisioned by this Infrastructure Program as they have successfully performed and continue to perform PSE&G’s Energy Strong Program and other PSE&G ongoing modernization initiatives.
5. Accordingly, the issues to be decided in the above-captioned proceeding “substantially, significantly and directly affect” IBEW Local Union 94 and its members, thereby making it appropriate for IBEW Local Union 94 to participate.
6. IBEW Local Union 94 supports a regulatory solution that focuses on infrastructure modernization and enhancement initiatives and provides for an expeditious process for approval of the investments and the associated rate adjustments.
7. IBEW Local Union 94’s participant status will not cause confusion or delay the proceeding, particularly as the Petition’s processing is in the preliminary stages.

8. IBEW Local Union 94 only recently learned of the PSE&G Petition for approval of an Infrastructure Advancement Program and more significantly, such knowledge was obtained three (3) business days after the January 14, 2022 deadline for filing applications to participate in the proceeding. IBEW Local Union 94 has acted promptly to submit this request. IBEW Local Union 94 knows of no prejudice which would be placed upon any participant by allowing for a late filing.

WHEREFORE, pursuant to N.J.A.C. 1:1-16.1, et seq., IBEW Local Union 94 respectfully requests that it be permitted to participate in this matter.

Respectfully submitted,

COHEN, LEDER, MONTALBANO & CONNAUGHTON, LLC

By:  1/21/2022

Paul A. Montalbano

Attorneys for Local Union 94 of the International
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PSE&G Service List
Infrastructure Advancement Program

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