

TRIF & MODUGNO

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February 8, 2022

Via Electronic Mail

The Honorable Mary Anna Holden, Commissioner
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
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**RE: I/M/O of The Petition of Public Service Electric and Gas Company for
Approval of an Infrastructure Advancement Program (IAP)
Docket No.: EO21111211 and GO21111212**

Dear Commissioner Holden:

On behalf of Ferreira Construction Co., Inc. (“Ferreira”), please accept this letter, in lieu of a more formal submission, in further support of Ferreira’s motion for leave to intervene or, alternatively, participate in the present matter (“Motion”).

Ferreira adopts the arguments and positions set forth by Burns & McDonnell Engineering Company, Inc. (“BMcD”) in its February 7, 2022, letter, which responded to Rate Counsel’s objections to the pending motions to intervene. Similar to BMcD, Ferreira’s unique expertise and viewpoints, as a large-scale heavy infrastructure company that has completed the exact projects contemplated by the Infrastructure Advancement Program (“IAP”), will be helpful to the Board as it deliberates the value and impact of the IAP. Moreover, like BMcD, Ferreira will coordinate and cooperate its representation with the other proposed intervenors.

For the foregoing reasons, Ferreira asks that the Board grant its Motion as it meets the standards set forth in N.J.A.C. 1:1-16.3(a).

Please do not hesitate to contact us if you have any comments or questions.

Respectfully Submitted,

TRIF & MODUGNO LLC

/s/ Louis A. Modugno

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cc: Attached Service List (via e-mail)

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In the Matter of the Petition of Public
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BPU Docket Nos. EO21111211 &
GO21111212

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