

June 26, 2018

**Via Electronic Mail and Overnight Delivery**

Aida Camacho-Welch, Secretary  
Board of Public Utilities  
44 South Clinton Avenue, 3<sup>rd</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Re: Verified Joint Petition of RPM Development, L.L.C. and Mantua Urban  
Renewal Associates, L.P. for Waiver of B.P.U.N.J. No. 15 Electric,  
Original Sheets Nos. 26 and 27, Standard Terms and Conditions No. 9.2  
Docket No. EW18050497

Dear Secretary Camacho-Welch:

Please accept this letter on behalf of Petitioners in lieu of a formal response to Public Service Electric and Gas Company's ("PSE&G") June 22, 2018 Motion to Intervene in the above proceeding.

Petitioners of course do not deny that PSE&G is entitled to be heard with respect to Petitioners' requested waiver of a PSE&G tariff provision. However, Petitioners submit that the Motion to Intervene is unnecessary.

Petitioners initially served PSE&G because they are seeking a waiver of a PSE&G tariff provision. As a party "against whom a petition is directed," PSE&G had a clear right under N.J.A.C. 14:1-6.1(a) to file an answer to the petition. While such an answer was due within 20 days after service, N.J.A.C. 14:1-6.2(a), Petitioners do not object to treating PSE&G's motion as its late-filed answer.

Of course, neither a respondent nor an intervenor should be allowed to prevent the Board's consideration of the petition in a meaningful way. Construction of Petitioners' project is already under way, and a timely ruling by the Board is crucial. Therefore, even if the Board is inclined to grant the Motion to Intervene, it should only do so conditioned upon such intervention not delaying the proceeding to a point where it becomes moot.



**NORRIS, McLAUGHLIN & MARCUS, P.A.**

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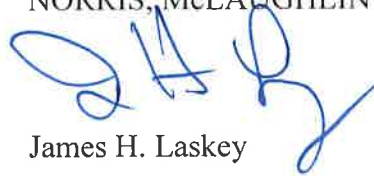
Copies of this response are being forwarded this date via electronic mail to all persons whose names appear on the attached Service list. Additional hard copies will be provided on request.

An original and eleven copies of this letter are enclosed for the Board's convenience. Please return one date-stamped copy in the enclosed self-addressed stamped envelope.

Thank you for your anticipated courtesies.

Very truly yours,

NORRIS, McLAUGHLIN & MARCUS, P.A.



James H. Laskey

JHL/lis

Enclosures

cc: Attached Service List (Electronic Mail Only)