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May 23, 2022

**Electronic Filing**

Carmen Diaz, Acting Secretary  
Office of the Secretary  
NJ Board of Public Utilities  
44 South Clinton Avenue  
P.O. Box 350  
Trenton, NJ 08625-0350

**Re: In the Matter of the Petition of Rockland Electric Company for Approval of An  
Infrastructure Investment Program, and Related Cost Recovery Mechanism  
BPU Docket No. ER22030198**

Dear Acting Secretary Diaz:

Enclosed please find South Jersey Gas Company's ("SJG") and Elizabethtown Gas Company's ("ETG") Motion to Participate in the above-captioned proceeding.

By copy of this letter, copies of the motion are being forwarded on this date via electronic mail to all person whose names appear on the attached Service List.

If you have any questions, please feel free to contact me directly.

Respectfully submitted,

A handwritten signature in cursive script that reads "Sheree L. Kelly".

Sheree L. Kelly, Esq.

Enclosure

cc: See attached Service List

IN THE MATTER OF THE PETITION OF ROCKLAND ELECTRIC COMPANY FOR  
APPROVAL OF AN INFRASTRUCTURE INVESTMENT PROGRAM, AND RELATED COST  
RECOVERY MECHANISM

BPU DOCKET NO. ER22030198

SERVICE LIST

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BPU DOCKET NO. ER22030198

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

**In the Matter of the Petition of Rockland       :**  
**Electric Company for Approval of An       :**  
**Infrastructure Investment Program, and       :** **BPU Docket No. ER22030198**  
**Related Cost Recovery Mechanism       :**

**MOTION TO PARTICIPATE OF  
SOUTH JERSEY GAS COMPANY AND  
ELIZABETHTOWN GAS COMPANY**

South Jersey Gas Company (“SJG”) and Elizabethtown Gas Company (“ETG”) hereby move for an Order granting SJG and ETG status as a participant in the above-referenced matter pursuant to N.J.A.C. 1:1-16.6. In support of this motion, SJG and ETG respectfully submit:

1. SJG and ETG are New Jersey public utilities as defined by N.J.S.A. 48:2-13.
2. SJG is engaged as a New Jersey public utility in the in the purchase, distribution, and sale of natural gas for approximately 412,900 customers located within the State of New Jersey. ETG is engaged as a New Jersey public utility in the in the purchase, distribution, and sale of natural gas for approximately 303,000 customers located within the State of New Jersey.
3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

Deborah M. Franco, Esq.  
Vice President/Rates, Regulatory &  
Sustainability  
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4. The New Jersey Administrative Code states: “Any person or entity with a significant interest in the outcome of a case may move for permission to participate.” N.J.A.C. 14:1-16.6(a). When considering motions to participate, the Board “shall consider whether the participant’s interest is likely to add constructively to the case without causing undue delay or confusion.” N.J.A.C. 14:1-16.6(b).

5. The issues that will be addressed in Petitioner’s request for approval Infrastructure Investment Program proceeding and related relief will substantially, specifically and directly impact SJG and ETG. Like Petitioner, SJG and ETG are natural gas distribution utility in New Jersey and, as such, the Board’s decision in this proceeding will have precedential effect and impact not only the Petitioner herein and its customers, but also may impact New Jersey’s other utilities—including SJG and ETG.

6. The customers and the operations of SJG and ETG are distinct from those of other parties and participants in this case. Thus, no other party or participant will represent the interests of SJG and ETG in this case.

7. SJG and ETG have history of coordinating its activities in dockets at the Board with those of other utilities where appropriate. SJG and ETG will coordinate its representation

with other similarly situated parties or participants in this docket to the extent appropriate.

Accordingly, there is no prospect for confusion and delay arising from inclusion of SJG and ETG in this proceeding.

8. Due to SJG's and ETG's experience in the gas industry, their participation in this proceeding is likely to add constructively to the proceeding.

9. SJG and ETG will abide by the schedule set for this proceeding, to the extent one has been entered and therefore the participation of SJG and ETG will not result in delay.

10. The granting of this Motion will not cause undue delay or confusion.

**WHEREFORE**, SJG and ETG respectfully request an Order: (1) granting SJG and ETG rights as a Participants in this matter pursuant to N.J.A.C. 1:1-16.6, and (2) providing such further relief in connection therewith as is deemed reasonable, just, and consistent with the foregoing.

Respectfully submitted,

SOUTH JERSEY GAS SOMpany  
ELIZABETHTOWN GAS COMPANY



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Sheree L. Kelly, JD, MDA

Dated: May 23, 2022