



Sheree L. Kelly, Esq.
Regulatory Affairs Counsel

520 Green Lane
Union, NJ 07083
T: (973) 886-7635
skelly@sjindustries.com

October 24, 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 Public Service Electric and Gas Company for
Approval of its Clean Energy Future-Energy Efficiency ("CEF-EE") Program on a
Regulated Basis
BPU Docket Nos. GO1801112 and EO1810113**

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

Enclosure

cc: See attached Service List

In the Matter of the Petition of Public
Service Electric and Gas Company for
Approval of its Clean Energy Future-
Energy Efficiency (“CEF-EE”) Program
on a Regulated Basis
BPU Docket Nos.
GO18101112/EO18101113

Carmen D. Diaz, Acting
Board Secretary
NJ Board of Public Utilities
44 South Clinton Avenue, 1st Flr.
P.O. Box 350
Trenton, NJ 08625-0350

Brian O. Lipman, Director
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Maura Caroselli, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Kurt S. Lewandowski, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Sarah H. Steindel, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Megan Lupo, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Carlena Morrison, Paralegal
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625

Robert Brabston
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Ben Witherell
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Malike Cummings
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Sara Bluhm Gibson
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Kelly Mooij
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Bart Kilar
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Benjamin S. Hunter
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Mahogany A. Hall
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Stacy Ho Richardson
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Stacy Peterson
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625-0350

Paul Lupo
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Pamela Owen, ASC, DAG
Division of Law
Public Utilities Section
R.J. Hughes Justice Complex
25 Market Street, P.O. Box 112
Trenton, NJ 08625

Carol Artale
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Rachel Boylan
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Joseph F. Accardo, Jr., Esq.
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, NJ 07102

Charles Gurkas
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

William Barkasy
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

Caitlyn White
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, NJ 07102-4194

Michael Beck, DAG
Division of Law
Public Utilities Section
R.J. Hughes Justice Complex
25 Market Street, P.O. Box 112
Trenton, NJ 08625

Darren Eppley, DAG
Division of Law
Public Utilities Section
R.J. Hughes Justice Complex
25 Market Street, P.O. Box 112
Trenton, NJ 08625

Matko Ilic, DAG
Division of Law
Public Utilities Section
R.J. Hughes Justice Complex
25 Market Street, P.O. Box 112
Trenton, NJ 08625

Dante Mugrace
c/o Karl Richard Pavlovic
PCMG and Associates, LLC
22 Brookes Avenue
Gaithersburg, MD 20877

Ezra D. Hausman, Ph.D.
Ezra Hausman Consulting
77 Kaposia Street
Newton, MA 024466

Stacey Barnes, Esq.
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, NJ 07102

Barnard Smalls
PSE&G Services Corporation
80 Park Plaza – T5
P.O. Box 570
Newark, NJ 07102

Michele Falcao
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, NJ 07102

Kenneth Maloney, Esq.
Cullen and Dykman LLP
Public Service Electric and Gas
Company
One Riverfront Plaza
Newark, NJ 07102

Lauren M. Lepkowski, Esq.
Jersey Central Power &
Light Company
FirstEnergy Service Company
2800 Pottsville Pike
Reading, PA 19712-6001

Philip J. Passanante, Esq.
Atlantic City Electric Company
500 N. Wakefield Drive
Newark, DE 19702

Margaret Comes, Esq.
Rockland Electric Company
4 Irving Place, Suite 1815-S
New York, NY 10003

John Carley, Esq.
Consolidated Edison Company
of New York, Inc.
4 Irving Place, Suite 1815-S
New York, NY 10003

Andrew K. Dembia, Esq.
New Jersey Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719

Christopher Torkelson, Esq.
Eckert Seamans Cherin & Mellot, LLC
P.O. Box 5404
Princeton, NJ 08543

Daniel Greenhouse, Esq.
Eastern Environmental Law Center
50 Park Place, Suite 1025
Newark, NJ 07102

James C. Meyer
Riker Danzig Scherer Hyland &
Perretti LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962

Katie Guerry, Vice President
Regulatory Affairs – North America
Enel X North America, Inc.
One Marina Park Drive
Boston, MA 02210

Brian Kauffman, Manager
Regulatory Affairs
Enel X North America, Inc.
One Marina Park Drive
Boston, MA 02210

William D. Bittinger, Esq.
Eastern Environmental Law Center
50 Park Place, Suite 1025
Newark, NJ 07102

Brian Kauffman, Esq.
Regulatory Affairs
Enel X North America, Inc.
One Marina Park Drive
Boston, MA 02210

William Harla, Esq.
Decotiis, Fitzpatrick, Cole &
Giblin, LLP
Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, NJ 07666

Karen O. Moury, Esq.
Eckert Seamans Cherin & Mellot, LLC
213 Market Street, 8th Street
Harrisburg, PA 17101

Murray E. Bevan, Esq.
Bevan, Mosca, Jr., Esq.
222 Mount Airy Road, Suite 200
Basking Ridge, NJ 07920

William K. Mosca, Jr., Esq.
Bevan, Mosca, Jr., Esq.
222 Mount Airy Road, Suite 200
Basking Ridge, NJ 07920

Gregory Geller
Enel X North America, Inc.
Regulatory Affairs – North America
One Marina Park Drive
Boston, MA 02210

Eric Miller
Keystone Energy Efficiency Alliance
14 S. 3rd Street, 2nd Floor
Philadelphia, PA 19106

Matt Elliott, Executive Director
Keystone Energy Efficiency Alliance
14 S. 3rd Street, 2nd Floor
Philadelphia, PA 19106

Alice M. Bergen, Esq.
Decotiis, Fitzpatrick, Cole &
Giblin, LLP
Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, NJ 07666

Steven S. Goldenberg, Esq.
Giordano, Halleran & Ciesla, P.C.
125 Half Mile Road, Suite 300
Red Bank, NJ 07701-6777

Paul F. Forshay, Esq.
Eversheds Sutherland (US) LLP
700 Sixth Street, N.W., Suite 700
Washington, DC 20001-3980

Kristine Marsilio, Esq.
Eckert Seamans Cherin & Mellot, LLC
213 Market Street, 8th Street
Harrisburg, PA 17101

Lloyd Kass
McCarter and English, LLP
Gateway Center, 4th Floor
100 Mulberry Street
Newark, NJ 07102

Nathan Howe, Esq.
McCarter and English, LLP
Gateway Center, 4th Floor
100 Mulberry Street
Newark, NJ 07102

Ben Adams
MaGrann Associates
701 East Gate Drive, Suite 100
Mount Laurel, NJ 08054

Lauri A. Mazzuchetti
Kelley Drye & Warren LLP
One Jefferson Road, 2nd Floor
Parsippany, NJ 07054

Glenn T. Graham
Kelley Drye & Warren LLP
One Jefferson Road, 2nd Floor
Parsippany, NJ 07054

Ben Brinkert, Esq.
Phillips Lightings North America Corp.
3 Burlington Woods Drive
Burlington, MA 01803

Barbara Koonz, Esq.
Wilentz, Goldman & Spitzer, P.A.
90 Woodbridge Center Drive
Suite 900
Woodbridge, NJ 07095

Ryan J. Scerbo, Esq.
Decotiis, Fitzpatrick, Cole &
Giblin, LLP
Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, NJ 07666

Beren Argetsinger, Esq.
Keyes & Fox LLP
3774 Carpet Road
P.O. Box 166
Burdell, NY 14818

Kerry Cahill, Esq.
Florio Perrucci Steinhardt &
Capelli, LLC
235 Broubalow Way
Phillipsburg, NJ 08865

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION :
OF PUBLIC SERVICE ELECTRIC AND :
GAS COMPANY FOR APPROVAL : BPU Docket Nos. GO1801112 and
OF ITS CLEAN ENERGY FUTURE- : EO1810113
ENERGY EFFICIENCY (“CEF-EE”) :
PROGRAM ON A REGULATED BASIS :

**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 393,000 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 300,000 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, Rate, Regulatory &
Sustainability
South Jersey Industries, Inc.
520 Green Lane
Union, New Jersey 07083
dfranco@sjindustries.com

Maureen Minkel
Senior Director, Energy Efficiency
SJI Utilities, Inc.
1 South Jersey Place
Atlantic City, NJ 08401
ccapozzoli@sjindustries.com

Sheree L. Kelly, Esq.
Regulatory Affairs Counsel
South Jersey Industries
520 Green Lane
Union, New Jersey 07083
skelly@sjindustries.com

Carolyn Jacobs
Regulatory Compliance Specialist
Rates & Regulatory
1 South Jersey Place
Atlantic City, NJ 08401
cjacobs@sjindustries.com

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 in this proceeding will substantially, specifically and directly impact SJG and ETG. Like Petitioner, SJG and ETG are natural gas distribution utilities in New Jersey engaged in energy efficiency programs 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.

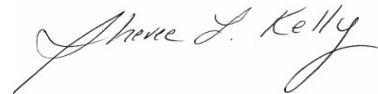
9. SJG and ETG will abide by the schedule set for this proceeding, to the extent one has been entered and therefore the participation of SJG and ETG will not result in delay.

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 COMPANY
ELIZABETHTOWN GAS COMPANY



Sheree L. Kelly, Esq.

Dated: October 24, 2022