



McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Kenneth R. Stark
Direct Dial: 717.237.5378
Fax: 717.237.5300
kstark@mcneeslaw.com

October 24, 2022

VIA ELECTRONIC FILING AND VIA E-MAIL

Carmen D. Diaz, Acting Board Secretary
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, New Jersey -8625-0350

**Re: In the Matter of the Rate Schedule CSG Transportation Service Agreement Between
Public Service Electric and Gas Company and Marcal Manufacturing, LLC
BPU Docket No. GR22100657**

Dear Secretary Diaz:

Enclosed is Marcal Manufacturing, LLC's ("Marcal") Motion to Intervene 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 persons whose names appear on the attached Service List.

In compliance with the Board's Order in Docket No. EO20030254, dated March 19, 2020, Marcal hereby submits this filing via electronic delivery only to the Board Secretary, and will suspend submitting such filings as paper documents until the Board directs otherwise.

Thank you for your anticipated courtesies.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth R. Stark".

Kenneth R. Stark
MCNEES WALLACE & NURICK LLC

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

IN THE MATTER OF THE RATE SCHEDULE CSG TRANSPORTATION SERVICE AGREEMENT BETWEEN PUBLIC SERVICE ELECTRIC AND GAS COMPANY AND MARCAL MANUFACTURING, LLC	BPU DOCKET NO. GR22100657
--	----------------------------------

**MOTION TO INTERVENE
OF
MARCAL MANUFACTURING, LLC**

Marcal Manufacturing, LLC (“Marcal”) hereby moves for an Order granting it status as an Intervenor in the above-referenced matter pursuant to *N.J.A.C. 1:1-16.1 – 16.4*. In support of this Motion, Marcal respectfully submits:

1. This proceeding involves a request by Public Service Electric & Gas Company (“PSE&G”) for a Service Agreement Extension between PSE&G and Marcal for natural gas distribution service provided to Marcal’s facilities located at 1 Market Street, Elmwood Park, New Jersey. Pursuant to Rate Schedule Contract Gas Service (“CSG”) in PSE&G’s Board-approved Tariff for Gas Service, PSE&G and Marcal request Board approval of the Service Agreement Extension for a period of three years, commencing on December 1, 2022.

2. Marcal’s current CSG Agreement, which was approved by the Board in 2015 is set to expire on December 1, 2022. *See In the Matter of Rate Schedule CSG Transportation Service Agreement Between Public Service Electric and Gas Company and Marcal Manufacturing, LLC and the Potential Discount of Societal Benefits Charges*, Order Approving Stipulation, Docket No. GR15060659 (Nov. 16, 2015).

3. Earlier this year, Marcal submitted a request to PSE&G seeking a three-year extension of its current CSG Agreement pursuant to Other Considerations in Rate Schedule CSG

in PSE&G's Gas Service Tariff. PSE&G reviewed the information set forth in Marcal's CSG application, and after additional discussions and information exchanges, agreed that it is reasonable to extend Marcal's CSG rate for three years, starting on December 1, 2022. Given the upcoming expiration of the current CSG Agreement, PSE&G has requested expedited approval of the Service Agreement Extension.

4. As a party to the Service Agreement including in this proceeding, Marcal will be directly and specifically affected by the relief requested in PSE&G's Letter Petition, and has a substantial interest in the outcome of this proceeding. Board approval of the Service Agreement Extension will allow Marcal to control its energy costs, which will in turn allow Marcal to continue to operate, employ New Jersey residents, and contribute to the State's economy.

5. Further, because Marcal is at risk of the expiration of the current CSG Agreement, Marcal requests that the Board expedite its treatment of this matter and approve the Service Agreement Extension (or a temporary extension to the current CSG Agreement) at its earliest convenience.

6. Marcal's interests in this proceeding are unique and distinct, and no other party can adequately represent Marcal's interests in this matter.

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

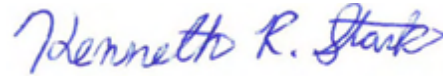
WHEREFORE, Marcal respectfully requests an Order (1) granting it rights as an intervenor in this matter pursuant to N.J.A.C. 1:1-16.1-16.5, thereby providing it all rights of a full party to this matter; (2) approving the CSG Service Agreement Extension at its earliest convenience (or a temporary extension in the current CSG rate); (3) and providing such further relief in connection therewith as is deemed reasonable, just, and consistent with the foregoing.

Respectfully submitted,

MARCAL MANUFACTURING, LLC

Date: October 24, 2022

By:




Kenneth R. Stark
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17011
Email: kstark@mcneeslaw.com

Counsel to Marcal Manufacturing, LLC

VERIFICATION

In accordance with N.J.A.C. § 14:1-4.6, I, Robert Baron, of full age, being duly sworn according to law, upon my oath, depose and say:

1. I am the Chief Executive Officer of Marcal Manufacturing, LLC ("Marcal") and am authorized to make this Verification on behalf of Marcal.
2. I have reviewed the foregoing Motion to Intervene and attest that the information contained therein is true and correct to the best of my knowledge, information, and belief.



ROBERT BARON

SERVICE LIST

In the Matter of The Rate Schedule CSG Transportation Service Agreement Between Public Service Electric and Gas Company and Marcal Manufacturing, LLC

BPU Docket No. GR22100657

NJ BPU and DAG

Secretary
Carmen D. Diaz, Acting Board Secretary
NJ Board of Public Utilities
PO Box 350
Trenton, NJ 08625-0350
Board.secretary@bpu.nj.gov

Bob Brabston, Executive Director
44 South Clinton Avenue, 9th Fl
PO Box 350
Trenton, NJ 08625-0350
Robert.Brabston@bpu.nj.gov

Paul Lupo, Director
Energy Division
Board of Public Utilities
PO Box 350
Trenton, NJ 08625-0350
Paul.Lupo@bpu.nj.gov

Heather Weisband, Esq.
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
Trenton, NJ 08625-0350
Heather.Weisband@bpu.nj.gov

Marko Ilic
Department of Law and Public Safety
PO Box 45029
Newark, NJ 07101
Matko.Ilic@law.njoag.gov

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

Stacy Peterson
Deputy Executive Director
Board of Public Utilities
PO Box 350
Trenton, NJ 08625-0350
Stacy.Peterson@bpu.nj.gov

Karriemah Graham, Chief
NJ Board of Public Utilities
PO Box 350
Trenton, NJ 08625-0350
Karriemah.Graham@bpu.nj.gov

Michael Kammer, Director
Water and Sewer Division/Energy
Board of Public Utilities
44 South Clinton Ave., Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
Mike.Kammer@bpu.nj.gov

Rachel Boylan, Legal Specialist
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
Trenton, NJ 08625-0350
Rachel.Boylan@bpu.nj.gov

Pamela Owen
Department of Law and Public Safety
PO Box 45029
Newark, NJ 07101
Pamela.Owen@law.njoag.gov

Sara Bluhm Gibson
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625.0350

Taryn.boland@bpu.nj.gov

Terel Klein
Department of Law and Public Safety
PO Box 45029
Newark, NJ 07101
Terel.Klein@law.njoag.gov

Sara.bluhm@bpu.nj.gov

Kelly Mooij
NJ Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625.0350
Kelly.mooij@bpu.nj.gov

Jacqueline Galka
Board of Public Utilities
PO Box 350
Trenton, NJ 08625-0350
Jacqueline.Galka@bpu.nj.gov

Rate Counsel

Brian O. Lipman, Esq., Director
Division of Rate Counsel
140 East Front Street, 4th Floor
PO Box 003
Trenton, NJ 08625-0003
blipman@rpa.state.nj.us

Maura Caroselli, Esquire
NJ Division of Rate Counsel
140 East Front Street, 4th Floor
PO Box 003
Trenton, NJ 08625-0003
mcaroselli@rpa.nj.gov

Sarah H. Steindel, Esquire
NJ Division of Rate Counsel
140 East Front Street, 4th Floor
PO Box 003
Trenton, NJ 08625-0003
ssteinde@rpa.nj.gov

Megan Lupo, Esquire
NJ Division of Rate Counsel
140 East Front Street, 4th Floor
PO Box 003
Trenton, NJ 08625-0003
mlupo@rpa.nj.gov

Kurt Lewandowski, Esquire
NJ Division of Rate Counsel
140 East Front Street, 4th Floor
PO Box 003
Trenton, NJ 08625-0003
klewando@rpa.nj.gov

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

PSE&G

Matthew M. Weissman, Esq.
PSEG Services Corporation
80 Park Plaza, T5, P.O. Box 570
Newark, NJ 07102
Matthew.weissman@pseg.com

Danielle Lopez, Esq.
PSEG Services Corporation
80 Park Plaza, T5, P.O. Box 570
Newark, NJ 07102
Danielle.Lopez@pseg.com

Katherine E. Smith, Esq.
PSEG Services Corporation
80 Park Plaza, T10
P.O. Box 570
Newark, NJ 07102
Katherine.Smith@pseg.com

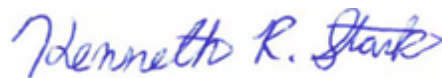
Michele Falcao, Regulatory Filings
Supervisor
PSEG Services Corporation
80 Park Plaza, T5, P.O. Box 570
Newark, NJ 07101
Michele.Falcao@pseg.com

Bernard Smalls
PSEG Services Corporation
80 Park Plaza, T5, P.O. Box 570
Newark, NJ 07102
Bernard.smalls@pseg.com

Caitlyn White
Regulatory Case Coordinator
PSEG Services Corporation
80 Park Plaza, T10
Newark, NJ 07102
Caitlyn.White@pseg.com

The Columbia Group, Inc.

Ms. Andrea C. Crane
The Columbia Group, Inc.
2805 East Oakland Park Boulevard, #401
Ft. Lauderdale, FL 33306
ctcolumbia@aol.com



Kenneth R. Stark

Counsel to Marcal Manufacturing, LLC

Dated this 24th day of October, 2022, in Harrisburg, Pennsylvania.