**Law Department PSEG Services Corporation**80 Park Plaza – T10, Newark, New Jersey 07102-4194

Email: Stacey.Barnes@pseg.com



June 7, 2023

In the Matter of the Verified Petition of Jersey Central Power & Light Company for Review and Approval of Increases in and Other Adjustments to its Rates and Charges for Electric Service, and for Approval of Other Proposed Tariff Revisions in Connection Therewith ("2023" Base Rate Filing")

BPU Docket No. ER23030144

OAL Docket No. PUC3346-23

## Via Email

Kurt Schwartz, Deputy Clerk Office of Administrative Law 33 Washington Street Newark, NJ 07102 Transmittals@oal.nj.gov

Dear Mr. Schwartz:

Enclosed is Public Service Electric and Gas Company's ("PSE&G") Motion to Participate in the above-captioned proceeding.

Copies of the motion are being forwarded on this date via electronic mail to all persons whose name appears on the attached Service List.

Thank you for your anticipated courtesies.

Respectfully submitted,

Stacey M. Barnes, Esq.

Stacon Bares

# STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Verified Petition of Jersey	)	
Central Power & Light Company for Review	)	
and Approval of Increases in and Other	)	
Adjustments to its Rates and Charges for	)	BPU Docket No. ER23030144
Electric Service, and for Approval of Other	)	OAL Docket No. PUC3346-23
Proposed Tariff Revisions in Connection	)	
Therewith ("2023 Base Rate Filing")	)	

## PSE&G'S MOTION TO PARTICIPATE

Public Service Electric and Gas Company ("PSE&G") hereby moves for an Order granting it status as a Participant in the above-referenced matter pursuant to *N.J.A.C.* 1:1-16.6. In support of this motion, PSE&G respectfully submits:

- 1. PSE&G is a New Jersey public utility as defined by N.J.S.A. 48:2-13.
- 2. PSE&G is engaged in the purchase, distribution, and sale of electric energy and related utility services for more than 2,200,000 customers located within the State of New Jersey.
- 3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

Stacey M. Barnes	Katherine Smith
Associate Counsel- Regulatory	Managing Counsel—State Regulatory
PSEG Services Corporation	PSEG Services Corporation
80 Park Plaza, T10	80 Park Plaza, T10
Newark, New Jersey 07102	Newark, New Jersey 07102
Stacey.Barnes@pseg.com	Katherine.Smith@pseg.com

Additional electronic only copies should be addressed to:

Bernard Smalls	Michele Falcao
Paralegal	Regulatory Case Supervisor
PSEG Services Corporation	PSEG Services Corporation
80 Park Plaza, T5	80 Park Plaza, T5
Newark, New Jersey 07102	Newark, New Jersey 07102
Bernard.Smalls@pseg.com	Michele.Falcao@pseg.com

Caitlyn White Regulatory Case Coordination PSEG Services Corporation 80 Park Plaza, T5 Newark, New Jersey 07102 Caitlyn.White@pseg.com

- 4. The Board of Public Utility's decision in this proceeding is likely to have precedential effect and impact not only the Petitioner herein and its customers, but also New Jersey's other utilities. The issues that will be addressed in this rate case may have an impact on PSE&G by establishing precedent. PSE&G will therefore likely be directly and specifically affected by the relief provided herein.
- 5. The service territories, customers, and the operations of PSE&G are distinct from those of other parties and participants in this case. Thus, no other party or participant will represent the interests of PSE&G in this case.
- 6. PSE&G has a history of coordinating its activities in dockets at the New Jersey Board of Public Utilities with those of other utilities where appropriate. PSE&G will coordinate its representation with other similarly situated parties or participants in this docket to the extent appropriate.
- 7. Due to PSE&G's experience in the electric industry, its participation in this proceeding is likely to add constructively to the proceeding.
- 8. PSE&G will abide by the schedule set for this proceeding, to the extent one has been entered.
  - 9. The granting of this Motion will not cause undue delay or confusion.

**WHEREFORE**, PSE&G respectfully requests an Order: (1) granting it rights as a Participant 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,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY Respectfully submitted,

Stacey M. Barnes, Esq.

Stace on Bares

**DATED:** June 7, 2023

In the Matter of the Verified Petition of Jersey Central Power & Light Company for Review and Approval of Increases in and Other Adjustments to its Rates and Changes for Electric Service, and For Approval of Other Proposed Tariff Revisions ("JCP&L 2023 Base Rate Filing")

Docket No. ER2303014

OAL Docket No. PUC3346-23

#### **SERVICE LIST**

Jersev Central Power & Light Company

300 Madison Avenue Morristown, NJ 07960

Mark A. Mader mamader@firstenergycorp.com

<u>Joshua R. Eckert. Esq.</u> jeckert@firstenergycorp.com

<u>James E. O'Toole</u> <u>jotoole@firstenergycorp.com</u>

FirstEnergy Service Company 800 Cabin Hill Drive Greensburg, PA 15612

Carol A. Pittavino cpcittavino@firstenergycorp.com

2800 Pottsville Pike P.O. Box 16011 Reading, PA, 19612

Tori L. Giesler, Esq. tgiesler@firstenergycorp.com

Cozen O'Connor, P.C. 1010 Kings Highway South Cherry Hill, NJ 08034 Gregory Eisenstark, Esq. geisenstark@cozen.com

Michael J. Connolly, Esq. mconnolly@cozen.com

3 World Trade center 175 Greenwich Street- 55<sup>th</sup> Floor New York, NY 10007

William Lesser, Esq. wlesser@cozen.com

Post & Schell, P.C. 17 North Second Strett, 12<sup>th</sup> Floor Harrisburg, PA 17101 Devin Ryan, Esq. dryan@postschell.com **Board of Public Utilities** 

44 South Clinton Avenue P.O. Box 350 Trenton, NJ 08625-0350

Sherri Golden
Secretary of the Board
board.secretary@bpu.nj.gov

Stacy Peterson, Deputy Executive Director <a href="mailto:stacy.peterson@bpu.nj.gov">stacy.peterson@bpu.nj.gov</a>

Office of General Counsel

Michael Beck, General Counsel michael.beck@bpu.nj.gov

Carol Artale, Deputy General Counsel carol.artale@bpu.nj.gov

Heather Weisband, Regulatory Officer <a href="mailto:heather.weisband@bpu.nj.gov">heather.weisband@bpu.nj.gov</a>

Michael Hunter, Regulatory Officer michael.hunter@bpu.nj.gov

Division of Water and Energy

Mike Kammer, Director mike.kammer@bpu.nj.gov

Malike Cummings, Deputy Director malike.cummings@bpu.nj.gov

Scott Sumliner scott.sumliner@bpu.nj.gov

Ryan Moran <a href="mailto:ryan.moran@bpu.nj.gov">ryan.moran@bpu.nj.gov</a>

Jacqueline Galka jacqueline.galka@bpu.nj.gov

Bill Barkasy
William.barkasy@bpu.nj.gov

## **New Jersev Division of Rate Counsel**

Post Office Box 003 Trenton, NJ 08625-0003

Brian Lipman, Esq., Director blipman@rpa.nj.gov

T. David Wand, Esq., Managing Attorney <a href="mailto:dwand@rpa.nj.gov">dwand@rpa.nj.gov</a>

Robert Glover, Esq. rglover@rpa.nj.gov

Bethany Rocque-Romaine, Esq. bromaine@rpa.nj.gov

## **New Jersey Division of Law**

25 Market Street Post Office Box 112 Trenton, NJ 08625

Daren Eppley, SC, DAG daren.eppley@law.njoag.gov

Pamela Owen, ASC, DAG pamela.owen@law.njoag.gov

Matko Ilic, DAG matko.ilic@law.njoag.gov

Steven Chaplar, DAG steven.chaplar@law.njoag.gov

#### PSE&G

80 Park Plaza, T10 Newark, NJ 07102

Stacey M. Barnes Stacey.Barnes@pseg.com

Michele Falcao Michele.Falcao@pseg.com

Caitlyn White <a href="mailto:Caitlyn.White@pseg.com">Caitlyn.White@pseg.com</a>

Bernard Smalls
Bernard.Smalls@pseg.com

## **BPU Cont.**

Division of Water and Energy

Bart Kilar bart.kilar@bpu.nj.gov

AJ DeAnni anthony.deanni@bpu.nj.gov

Dari Urban dari.urban@bpu.nj.gov

Dean Taklif dean.taklif@bpu.nj.gov

Cindy Bianco Cindy.bianco@bpu.nj.gov

David Brown david.brown bpu.nj.gov

#### **Economist Office**

Dr. Benjamin Witherell, Chief Economist benjamin.witherell@bpu.nj.gov

Jackie O'Grady jackie.ogrady@bpu.nj.gov