



DEPARTMENT OF THE ARMY
U.S. ARMY COMBAT CAPABILITIES DEVELOPMENT COMMAND
ARMAMENTS CENTER
PICATINNY ARSENAL, NEW JERSEY 07806-5000

June 23, 2023

Honorable Irene Jones, ALJ
Office of Administrative Law
33 Washington Street
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Irene.jones@oal.nj.gov

Sherri L. Golden, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
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Re: In the Matter of the Verified Petition of Jersey Central Power & Light Company for Review and Approval of an Increases in and Other Adjustments to Its Rates and Charges for Electric Service, and for Approval of Other Proposed Tariff Revisions in Connection Therewith.
BPU Docket No. ER 23030144 | OAL Docket No. PUC 3346-23

Dear Judge Jones and Secretary Golden:

Please find attached for filing a Motion to Intervene and Notice of Appearance (“Motion”) of the United States Department of Defense and all other Federal Executive Agencies (DOD/FEA) in the above-captioned proceeding. The Motion is also being electronically served on all parties listed on the attached service list.

Respectfully submitted,

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STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF JERSEY CENTRAL POWER & LIGHT COMPANY FOR APPROVAL OF AN INCREASE IN ELECTRIC BASE RATES AND FOR CHANGES IN ITS TARIFF FOR ELECTRIC SERVICE)))))))))))	BPU DOCKET NO. ER 23030144 OAL Docket No. PUC 3346-23
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MOTION FOR LEAVE TO INTERVENE AND NOTICE OF APPEARANCE

The Secretary of Defense, through duly authorized counsel and on behalf of the consumer interests of the United States Department of Defense and all other Federal Executive Agencies (collectively, “DOD/FEA”), hereby petitions the New Jersey Board of Public Utilities for leave to intervene in the above-captioned proceeding. This Motion is filed pursuant to NJAC § 1.1-16.1. Undersigned counsel also hereby enters a notice of appearance. In support of its Motion, DOD/FEA states as follows:

I.

DOD/FEA is duly authorized to make and file this Motion.

II.

This proceeding was initiated on or about March 16, 2023.

III.

This Motion is timely filed in accordance with NJAC § 1:1-16.2(a) and (c).

IV.

DOD/FEA has direct, significant, and substantial interests that may be affected by this proceeding. Jersey Central Power & Light Company (“JCP&L”) provides electric service to Picatinny Arsenal, a United States Army installation, to Joint Base McGuire-Dix-Lakehurst (“JBMDL”), and to Naval Weapons Station Earle. Picatinny Arsenal provides products and services to all branches of the military and is the Army’s leading facility for the research, development, acquisition and lifecycle management of advanced conventional weapon systems and ammunition. DOD/FEA also owns, operates, and maintains other installations and facilities in New Jersey that obtain electric service from JCP&L and may be adversely impacted by the outcome of this proceeding.

V.

DOD/FEA’s advocacy on behalf of Federal customers will promote the proper disposition of the issues to be determined. DOD/FEA will work within all deadlines in the procedural schedule and will not impede the timely completion of this docket.

VI.

DOD/FEA’s interests cannot be adequately represented or protected by any other party. The load factor, characteristics, and rate schedules upon which DOD/FEA installations and facilities obtain electric service make their usage and needs distinct from other large customers. DOD/FEA’s interests will be substantially, specifically, and directly affected by the outcome of this proceeding. DOD/FEA will present relevant and proper testimony and evidence bearing upon the issues involved in this proceeding. DOD/FEA’s testimony and evidence will be of value to the OAL in its determination of the issues and DOD/FEA’s participation in this proceeding will add measurably and constructively to the scope of the case.

VII.

DOD/FEA's intervention and participation will not unreasonably broaden the issues, burden the record, unduly affect the rights of participating parties, or unreasonably delay the proceeding.

VIII.

All communications and pleadings for this proceeding should be directed to:

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(admitted in good standing in New Jersey), and

John J. McNutt, Esq.
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(*pro hac vice* motion forthcoming)

Wherefore, DOD/FEA petitions the Bureau of Public Utilities for leave to intervene in this proceeding as a party with full rights to participate in the proceeding, including the right to participate in discovery, to examine witnesses, to file testimony and briefs, and to be heard.

Respectfully submitted,

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Robert M. Preziosi, on behalf of the
United States Department of Defense
and all other Federal Executive Agencies

Dated: June 23, 2023

CERTIFICATE OF SERVICE

This is to certify that on the 23rd day of June, 2023 a true and correct copy of DOD/FEA's Motion to Intervene and Notice of Appearance was served by e-mail to the parties listed on the attached case service list.

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BPU Dkt. No.: ER23030144
OAL Dkt. No. PUC 03346-2023 N

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