

January 18, 2024

Via Email Sherri Golden, Secretary Board of Public Utilities 44 South Clinton Avenue P.O. Box 350 Trenton, New Jersey 08625-0350 board.secretary@bpu.nj.gov

**Re:** In the Matter of the Petition of Public Service Electric and Gas Company for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service, B.P.U.N.J. No. 17 Electric and B.P.U.N.J. No. 17 Gas, and for Changes in Depreciation Rates, Pursuant to *N.J.S.A.* 48:2-18, N.J.S.A. 48:2-21, and N.J.S.A. 48:2-21.1, and for Other Appropriate Relief

BPU Docket Nos. ER23120924 and GR23120925

Dear Secretary Golden:

Enclosed please find South Jersey Gas Company's and Elizabethtown Gas Company's 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 persons whose names appear on the attached Service List.

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

Thank you for your anticipated courtesies.

Respectfully submitted,

By:

Ahere J. Kelly

Sheree L. Kelly, Esq.

Enclosures

cc: Service List

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BPU Docket Nos. ER23120924 and GR23120925

## Service List

Carol Artale Board of Public Utilities 44 South Clinton Avenue 9th Floor Trenton NJ 08625-0350 carol.artale@bpu.nj.gov

David Brown Board of Public Utilities 44 South Clinton Avenue Suite 314 P.O. Box 350 Trenton NJ 08625-0350 david.brown@bpu.nj.gov

Jacqueline Galka Board of Public Utilities 44 South Clinton Avenue 3rd Floor Suite 314 P.O. Box 350 Trenton NJ 08625-0350 jacqueline.Galka@bpu.nj.gov

Michael Kammer Board of Public Utilities 44 South Clinton Avenue 3rd Floor Suite 314 P.O. Box 350 Trenton NJ 08625-0350 mike.kammer@bpu.nj.gov William Barkasy Board of Public Utilities 44 South Clinton Avenue P.O. Box 350 Trenton NJ 08625 william.barkasy@bpu.nj.gov

Malike Cummings Board of Public Utilities 44 S. Clinton Avenue P.O. Box 350 Trenton NJ 08625 malike.cummings@bpu.nj.gov

Michael Hunter Board of Public Utilities 44 South Clinton Avenue P.O. Box 350 Trenton NJ 08625 michael.hunter@bpu.nj.gov

Bart Kilar Board of Public Utilities 44 South Clinton Ave 9th Floor P.O. Box 350 Trenton NJ 08625-0350 bart.kilar@bpu.nj.gov Cindy Bianco Board of Public Utilities 44 South Clinton Avenue 3rd Floor, Suite 314 P.O. Box 350 Trenton NJ 08625-0350 cindy.bianco@bpu.nj.gov

Anthony DeAnni Board of Public Utilities 44 South Clinton Avenue P.O. Box 350 Trenton NJ 08625 anthony.deanni@bpu.nj.gov

Jacqueline O'Grady Board of Public Utilities 44 South Clinton Avenue 9th Floor P.O. Box 350 Trenton NJ 08625-0350 jackie.ogrady@bpu.nj.gov

Yanina Lepore Board of Public Utilities 44 South Clinton Ave 9th Floor P.O. Box 350 Trenton NJ 08625 yanina.lepore@bpu.nj.gov Stacy Peterson Board of Public Utilities 44 South Clinton Ave 9th Floor P.O. Box 350 Trenton NJ 08625-0350 stacy.peterson@bpu.nj.gov

Dean Taklif Board of Public Utilities 44 South Clinton Avenue 3rd Floor, Suite 314 P.O. Box 350 Trenton NJ 08625-0350 dean.taklif@bpu.nj.gov

Heather Weisband Board of Public Utilities 44 South Clinton Avenue P.O. Box 350 Trenton NJ 08625 heather.weisband@bpu.nj.gov

DAG Steven Chaplar NJ Dept. of Law & Public Safety R.J. Hughes Justice Complex Public Utilities Section 25 Market Street, P.O. Box 112 Trenton NJ 08625 steven.chaplar@law.njoag.gov

DAG Pamela Owen NJ Dept. of Law & Public Safety Public Utilities Section R.J. Hughes Justice Complex 25 Market Street, P.O. Box 112 Trenton NJ 08625 Pamela.Owen@law.njoag.gov Farhana Rahman Board of Public Utilities 44 South Clinton Avenue P.O. Box 350 Trenton NJ 08625 farhana.rahman@bpu.nj.gov

Andrew Tuzzo Board of Public Utilities 44 South Clinton Avenue P.O. Box 350 Trenton NJ 08625 andrew.tuzzo@bpu.nj.gov

Benjamin Witherell Board of Public Utilities 44 South Clinton Avenue 3rd Floor, Suite 314 P.O. Box 350 Trenton NJ 08625-0350 benjamin.witherell@bpu.nj.gov

DAG Daren Eppley NJ Dept. of Law & Public Safety R.J. Hughes Justice Complex Public Utilities Section 25 Market Street, P.O. Box 112 Trenton NJ 08625 daren.eppley@law.njoag.gov

Joseph F. Accardo, Jr. PSEG Services Corporation 80 Park Plaza, T10 P.O. Box 570 Newark NJ 07102 joseph.accardojr@pseg.com Scott Sumliner Board of Public Utilities 44 South Clinton Ave 9th Floor P.O. Box 350 Trenton NJ 08625-0350 scott.sumliner@bpu.nj.gov

Dari Urban Board of Public Utilities 44 South Clinton Avenue P.O. Box 350 Trenton NJ 08625 dari.urban@bpu.nj.gov

DAG Michael Beck NJ Dept. of Law & Public Safety R.J. Hughes Justice Complex 25 Market Street P.O. Box 112 Trenton NJ 08625 michael.beck@law.njoag.gov

DAG Matko Ilic NJ Dept. of Law & Public Safety R.J. Hughes Justice Complex Public Utilities Section 25 Market Street, P.O. Box 112 Trenton NJ 08625 matko.ilic@law.njoag.gov

Aaron I. Karp PSEG Services Corporation 80 Park Plaza, T10 P.O. Box 570 Newark NJ 07102 aaron.karp@pseg.com Danielle Lopez PSEG Services Corporation 80 Park Plaza, T10 P.O. Box 570 Newark NJ 07102 danielle.lopez@pseg.com

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

Annette Cardec Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton NJ 08625 acardec@rpa.nj.gov

Christine M. Juarez Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton NJ 08625 cjuarez@rpa.state.nj.us

Megan Lupo Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton New Jersey 08625 mlupo@rpa.nj.gov Stacey M. Mickles PSEG Services Corporation 80 Park Plaza, T-10 P.O. Box 570 Newark NJ 07102 stacey.mickles@pseg.com

Matthew M. Weissman PSEG Services Corporation 80 Park Plaza, T10 P.O. Box 570 Newark NJ 07102 matthew.weissman@pseg.com

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

Debora Layugan Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton NJ 08625 dlayugan@rpa.nj.gov

Mamie Purnell Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton NJ 08625 mpurnell@rpa.nj.gov Bernard Smalls PSEG Services Corporation 80 Park Plaza-T10 P.O. Box 570 Newark NJ 07102-4194 bernard.smalls@pseg.com

Caitlyn White PSEG Services Corporation 80 Park Plaza, T-10 P.O. Box 570 Newark NJ 07102 caitlyn.white@pseg.com

Robert Glover Division of Rate Counsel 140 East Front Street 4th Floor P.O. Box 003 Trenton NJ 08625 rglover@rpa.nj.gov

Brian O. Lipman Division of Rate Counsel 140 East Front Street 4th Floor P.O. Box 003 Trenton NJ 08625 blipman@rpa.nj.gov

Bethany Rocque-Romaine Division of Rate Counsel 140 East Front Street 4th Floor P.O. Box 003 Trenton New Jersey 08625 bromaine@rpa.nj.gov Sarah Steindel Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton NJ 08625 ssteinde@rpa.nj.gov

Brian Weeks Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton NJ 08625 bweeks@rpa.state.nj.us Emily Smithman Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton NJ 08625 esmithman@rpa.nj.gov David Wand Division of Rate Counsel 140 East Front Street 4th Floor P.O. Box 003 Trenton NJ 08625 dwand@rpa.nj.gov

## STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of	:	
Public Service Electric and Gas Company for	:	
Approval of an Increase in Electric and Gas Rates	:	BPU Docket Nos.
and for Changes in the Tariffs for Electric and Gas	:	
Service, B.P.U.N.J. No. 17 Electric and	:	ER23120924 and
B.P.U.N.J. No. 17 Gas, and for Changes in	:	GR23120925
Depreciation Rates, Pursuant to N.J.S.A. 48:2-18,	:	
N.J.S.A. 48:2-21, and N.J.S.A. 48:2-21.1,	:	
and for Other Appropriate Relief	:	

## JOINT MOTION TO PARTICIPATE

South Jersey Gas Company ("SJG") and Elizabethtown Gas Company ("ETG") hereby move for an Order granting their status as Participants 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 purchase, distribution, and sale of natural gas utility services for more than 400,000 customers located within the State of New Jersey. ETG is engaged as a New Jersey public utility in the purchase, distribution, and sale of natural

gas utility services for more than 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:

Dominick DiRocco, Esq. Vice President, Rates and Regulatory Affairs SJI Utilities, Inc. 1 South Jersey Place Atlantic City, NJ 08401 <u>ddirocco@sjindustries.com</u> Sheree Kelly, Esq. Regulatory Affairs Counsel Elizabethtown Gas Company 520 Green Lane Union, New Jersey 07083 <u>skelly@sjindustries.com</u> Carolyn A. Jacobs Regulatory Compliance Specialist Senior SJI Utilities, Inc. 1 South Jersey Place Atlantic City, NJ 08401 cjacobs@sjindustries.com Cindy Capozzoli Director, Rates SJI Utilities, Inc. 1 South Jersey Place Atlantic City, NJ 08401 ccapozzoli@sjindustries.com

4. The New Jersey Administrate 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 New Jersey Board of Public Utilities ("Board" or "BPU") "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 that make filings with the Board similar to the instant matter. As the Board's decision in this proceeding will have precedential effect, it will 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 a history of coordinating their activities in dockets at the Board with those of other utilities where appropriate. SJG and ETG will coordinate their 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 the inclusion of SJG and ETG

in this proceeding.

8. Due to SJG's and ETG's experience in the natural 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 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

By:

Sheree L. Kelly, Esq.

Dated: January 12, 2024