



State of New Jersey
DIVISION OF RATE COUNSEL
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Governor

TAHESHA L. WAY
Lt. Governor

BRIAN O. LIPMAN
Director

February 2, 2024

Via Electronic Mail

Sherri L. Golden, Board Secretary
NJ Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, NJ 08625

Re: Rate Counsel's Response to Motion

**In the Matter of the Petition of Elizabethtown Gas Company for
Approval to Implement an Infrastructure Investment Program ("IIP")
and Associated Cost Recovery Mechanism Pursuant to N.J.S.A. 48:2-21
and N.J.A.C. 14:3-2A
BPU Docket No. GR23120882**

Dear Secretary Golden:

Please accept for filing this letter as the non-objection of the New Jersey Division of Rate Counsel ("Rate Counsel") to the Motion to Participate dated January 23, 2024 filed on behalf of Public Service Electric and Gas Company ("PSE&G").

On December 11, 2023, Elizabethtown Gas Company ("ETG" or "Company") filed the above-referenced petition with the Board of Public Utilities ("BPU" or "Board") seeking authorization to implement a second Infrastructure Investment Program ("IIP 2" or "Program"). The Board authorized the Company's initial Infrastructure Investment Program in June 2019.¹ The Company is seeking approval to invest \$625 million in order to implement a five-year

¹ I/M/O the Petition of Elizabethtown Gas Company to Implement an Infrastructure Investment Program and Associated Recovery Mechanism Pursuant to N.J.S.A. 48:2-21 and N.J.A.C. 14:3-2A, BPU Docket No. GR18101197, Final Decision and Order Approving Stipulation (June 12, 2019), ("Petition").

Program to: (1) install approximately 250 miles of new main and retire approximately 274 miles of at-risk cast iron, vintage steel and vintage plastic mains and associated services; (2) continue to upgrade the Company's legacy low pressure system to elevate pressure; and (3) install approximately 35,000 excess flow valves where appropriate to services on the upgraded system.²

PSE&G states that it is a New Jersey Public Utility as defined by N.J.S.A. 48:2-13 engaged in the purchase, distribution, and sale of natural gas for more than 1,900,000 customers.³ PSE&G states that it will be impacted by the precedential effects of the issues addressed in this IIP.⁴ PSE&G states it will likely be directly and specifically affected by the relief provided.⁵ PSE&G states that its service territories, customers, and operations are distinct from other parties and participants and thus, no other party or participant will represent their interest.⁶ PSE&G further states that its participation will not cause undue delay or confusion.⁷ Rate Counsel has no objection to PSE&G's participation.

Respectfully Submitted,

Brian O. Lipman, Esq.
Director, Division of Rate Counsel



By:

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MWP

² Petition, para. 6.

³ PSE&G Motion, para. 1, 2.

⁴ Id. at para. 4.

⁵ Id.

⁶ Id. at para. 5.

⁷ Id at para. 9.

Elizabethtown Gas Company to Implement
An Infrastructure Investment Program
("IIP") And Associated Recovery
Mechanism Pursuant to N.J.S.A. 48:2-21
and N.J.A.C. 14:3-2A
BPU Docket No. GR23120882

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