

March 18, 2024

VIA E-FILING AND E-MAIL

Sherri L. Golden, Board Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 1st Floor
Post Office Box 350
Trenton, New Jersey 08625-0350
Board.Secretary@bpu.nj.gov

**RE: I/M/O the Petition of PSE&G for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service
BPU Docket Nos. ER23120924 & GR23120925; OAL Docket No. PUC00926-24**

Dear Secretary Golden:

On behalf of NRG Energy, Inc., and its affiliates Reliant Energy Northeast, LLC, d/b/a NRG Home/NRG Business; Energy Plus Natural Gas LP; Xoom Energy New Jersey, LLC; Stream Energy New Jersey, LLC; Direct Energy Services, LLC; Direct Energy Business, LLC; Direct Energy Business Marketing, LLC; and Gateway Energy Services Corporation (“NRG”), enclosed please find NRG’s reply to Rate Counsel’s opposition to NRG’s Motion to Intervene in the above docket.

Please do not hesitate to contact me if you have any questions.

Very truly yours,


Murray E. Bevan

Enclosure

cc: Service List (via e-mail w/ enc.)
Hon. Irene Jones, ALJ (via e-mail w/ enc.)

asserts here, i.e., that the utility’s proposed changes to its TPS requirements in its gas tariff would substantially, specifically, and directly affect NRG’s ability to serve their TPS customers.¹

4. NRG is the only TPS that has moved to intervene in this PSE&G proceeding. The BPU has previously found that this is a basis for granting intervention to NRG. For example, in the PSE&G GSMP III proceeding the Board granted NRG’s motion to intervene because NRG would be “representing the specific interests of TPSs and their customers.”²

NRG respectfully requests that it be permitted to intervene, with full procedural and substantive rights, in this proceeding pursuant to N.J.A.C. 1:1-16.1 et seq., and for the reasons set forth herein, in NRG’s initial motion filing, and in NRG’s reply to PSE&G’s opposition.

Respectfully submitted,



Murray E. Bevan, Esq.
Jennifer McCave, Esq.
Bevan, Mosca & Giuditta P.C.
163 Madison Avenue, Suite # 220-8
Morristown, NJ 07960
Phone: (908) 753-8300
Fax: (908) 753-8301
Email: mbevan@bmg.law
jmccave@bmg.law

Counsel for NRG Energy, Inc.

Dated: March 18, 2024

¹ On July 19, 2021, ALJ Gertsman granted intervenor status to NRG in the NJNG base rate case. See I/M/O The Petition Of New Jersey Natural Gas Company For Approval Of An Increase In Gas Base Rate And For Changes In Its Tariff For Gas Service Pursuant To N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1; And For Changes To Depreciation Rates For Gas Property Pursuant To N.J.S.A. 48:2-18 And In The Matter Of The Petition Of New Jersey Natural Gas Company For Approval Of A Base Rate Adjustment Pursuant To The Nj Rise And Safe II Programs (BPU DOCKET NO. GR21030679; OAL DOCKET. NO. PUC 04111-21; BPU DOCKET NO. GR21030680; OAL DOCKET. NO. PUC 04113-21)

² Order On Motions To Intervene Or Participate (June 27, 2023), I/M/O The Petition Of Public Service Electric And Gas Company For Approval Of The Next Phase Of The Gas System Modernization Program And Associated Recovery Mechanism (“GSMP III”) (BPU Docket No. GR23030102)

SERVICE LIST

Board of Public Utilities

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

Robert Brabston, Esq., Executive Director
robert.brabston@bpu.nj.gov

Stacy Peterson, Deputy Executive Director
stacy.peterson@bpu.nj.gov

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

Carol Artale, Esq.
carol.artale@bpu.nj.gov

Heather Weisband
heather.weisband@bpu.nj.gov

Dean Taklif
dean.taklif@bpu.nj.gov

Christopher Oprysk
christopher.oprysk@bpu.nj.gov

David Brown
david.brown@bpu.nj.gov

Nisa Rizvi
nisa.rizvi@bpu.nj.gov

Bart Kilar
bart.kilar@bpu.nj.gov

Bill Barkasy
william.barkasy@bpu.nj.gov

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

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

Jackie Galka
jacqueline.galka@bpu.nj.gov

AJ DeAnni
anthony.deanni@bpu.nj.gov

Dari Urban
dari.urban@bpu.nj.gov

Andrew Tuzzo
andrew.tuzzo@bpu.nj.gov

Justin Cederberg
justin.cederberg@bpu.nj.gov

Kofi Ocansey
kofi.ocansey@bpu.nj.gov

Kyle Felton
kyle.felton@bpu.nj.gov

Cindy Bianco
cindy.bianco@bpu.nj.gov

Division of Rate Counsel

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

T. David Wand, Esq.
dwand@rpa.nj.gov

Maura Caroselli, Esq.
mcaroselli@rpa.nj.gov

Carlina Morrison
cmorrison@rpa.nj.gov

Division of Law

Pamela Owen, Assistant Section Chief
pamela.owen@law.njoag.gov

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

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

SERVICE LIST

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

Public Service Electric & Gas

Joseph F. Accardo, Jr.
joseph.accardojr@pseg.com

Katherine Smith, Esq.
Katherine.smith@pseg.com

Aaron I. Karp, Esq.
aaron.karp@pseg.com

Danielle Lopez, Esq.
danielle.lopez@pseg.com

Matthew Weissman, Esq.
matthew.weissman@pseg.com

Stacey Mickles, Esq.
Stacey.mickles@pseg.com

Caitlyn White
Caitlyn.white@pseg.com

Bernard Smalls
Bernard.smalls@pseg.com

Maria Barling
maria.barling@pseg.com