

May 15, 2024

**VIA EMAIL**

[Board.Secretary@bpu.nj.gov](mailto:Board.Secretary@bpu.nj.gov)

Ms. Sherri L. Golden  
Secretary, New Jersey Board of Public Utilities  
44 Clinton Street, 1<sup>st</sup> Floor  
Trenton, NJ 08685

**Re: BPU Docket Nos. ER23120924 & GR23120925; OAL Docket No. PUC 00926-24 (I/M/O Petition of Public Service Electric & Gas Company for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service)**

Dear Madam Secretary:

This firm serves as counsel to the Creamer-Sanzari Joint Venture (“CSJV” or the “Joint Venture”). On behalf of the Joint Venture, we respectfully submit these written comments to express CSJV’s support for the Petition of Public Service Electric & Gas Company (“PSE&G”) for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service (“the Petition”).

The Joint Venture consists of two well-established New Jersey corporations in the business of heavy construction and utilities installation: J. Fletcher Creamer & Son and Joseph M. Sanzari, Inc. CSJV and its member companies have performed extensive work on various projects that the Board has approved for completion such as the Energy Strong Programs (ESP), Gas System Modernization Programs (GSMP I and GSMP II), and Infrastructure Advancement Project (IAP). This gives the Joint Venture a unique understanding of the scope, scale, and complexity of the work that PSE&G has performed; the need for these types of investments; and the value and benefits that New Jersey residents derive from such work.

CSJV and its individual member companies can attest first-hand that New Jersey’s energy infrastructure requires continued upgrades to address climate change, improve reliability and resiliency, and increase capacity as New Jersey’s population grows. Approving the Petition will allow PSE&G to recover funds it already spent on these initiatives, and allow for continued investment in future years.

As it relates to reliability and resiliency investments, PSE&G committed over \$3 billion in capital investments and strengthened infrastructure to meet both electric and gas needs, which is at the core of the Petition. PSE&G has improved 16 substations in flood zones as part of its electric station flood mitigation efforts. This work has impacted 166,000 customers located in Bergen, Essex, Hudson, Camden, and Middlesex Counties.

PSE&G also completed electric life cycle replacements and contingency reconfigurations to improve reliability, and modernized the grid by creating a high-speed wireless network across its service territory. These modernization efforts permit high bandwidth transmission and improve resiliency.

Lastly, PSE&G completed Gas Metering & Regulating (Gas M&R) Station Upgrades, which are essential to reducing carbon emissions, combatting climate change, and enhancing reliability. The essential gas main replacements occurred at six M&R stations located throughout the state in East Rutherford and Paramus (Bergen County), Burlington and Mount Laurel (Burlington County), Camden (Camden County), and Edison (Middlesex County).

The Joint Venture is aware of additional improvements that PSE&G has made to assist customers as they embrace clean energy and seek to reduce their out-of-pocket costs. These include PSE&G's Advanced Metering Infrastructure (AMI) and electric vehicle (EV) infrastructure programs. The Petition also proposed new programs to protect customers, such as mechanisms to mitigate volatility with regard to recovery for storms, pension costs, and interest rates, increase customers' choices, and enhance customers' opportunities to control their bills, including a new time of use rate.

Residents and businesses count on PSE&G to provide safe, reliable, and cost-effective energy. New Jersey households and businesses are embracing renewable energy sources as the State seeks to reduce general energy consumption and combat the effects of climate change. Today's energy needs require modern infrastructure to satisfy the demand for energy in an efficient manner. PSE&G's investments support evolving technologies, encourage reduced consumption, augment resiliency efforts, and allow for greater energy efficiency.

Finally, infrastructure investments like those PSE&G has completed create hundreds of jobs that help to grow the New Jersey economy during these tumultuous economic times without a significant burden on ratepayers. The Joint Venture has seen the positive impacts that flow from PSE&G's investments statewide, which far outweigh the minimal impact on ratepayers.

For all of these reasons, the Joint Venture requests that the Board approve PSE&G's Petition and appreciates your consideration of its views.

GIBBONS P.C.

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Respectfully Submitted,

**GIBBONS P.C.**

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Michael DeLoreto  
Director

A handwritten signature in black ink, appearing to read "Courtney A. Johnson".

Courtney A. Johnson  
Associate