

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE VERIFIED)
PETITION OF THE COLLEGE OF)
NEW JERSEY FOR RELIEF FROM A) DOCKET NO. GC18111234
PENALTY ASSESSED BY PUBLIC)
SERVICE ELECTRIC & GAS)
COMPANY)

Certification of Shawn Cappellano-Sarver in Support of Petitioner's
Motion for Clarification Or, In The Alternative, Reconsideration Of
The Board's July 24, 2024 Decision

I, Shawn Cappellano-Sarver, of full age, certify the following:

1. I am the Associate Vice President of Facilities Management and Construction at Petitioner The College of New Jersey ("TCNJ"). I make this certification in support of the motion for clarification or, in the alternative, reconsideration pursuant to N.J.A.C. 14:17-9.6, of the Board's July 24, 2024 Decision resolving the competing motions filed by TCNJ, Public Service Electric and Gas ("PSE&G"), and the Division of Rate Counsel ("Rate Counsel") seeking summary disposition of this matter (the "July 2024 Decision").

2. TCNJ presently maintains two (2) above-ground tanks of No. 2 Fuel Oil as part of its alternate fuel backup system for the two boilers on campus that are serviced under Rate Schedule TSG-NF.

3. The two tanks presently maintained by TCNJ each hold 30,000 gallons of No. 2 Fuel Oil when filled.

4. In order to store enough on-site No. 2 Fuel Oil on its campus to provide for seven days of fuel, TCNJ would need to construct an additional five (5) 30,000-gallon above-ground storage tanks in order to increase its on-site capacity by 150,000 gallons.

5. It would not be practical, or even possible, for TCNJ to construct the additional tanks needed for the on-site storage of enough No. 2 Fuel Oil to last seven days on its campus. The area of TCNJ's campus on which any hypothetical new tanks would be built is a flood plain, meaning constructing additional tanks there would create a risk of serious environmental damage.

6. TCNJ has annually certified that, in the event of an interruption event lasting up to seven days, TCNJ would first use the 60,000 gallons of No. 2 Fuel Oil stored in TCNJ's on-site tanks and then, if needed, receive replacement fuel from a contracted No. 2 Fuel Oil supplier to timely refill its on-site tanks.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Shawn Cappellano-Sarver

Dated: August 13, 2024