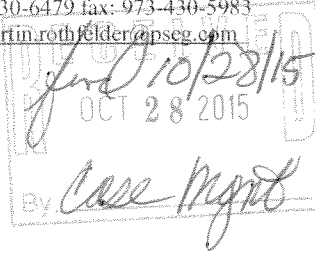


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Board of Public Utilities



MAIL RECEIVED

October 27, 2015

In The Matter Of The Petition Of Pivotal Utility Holdings, Inc. d/b/a
Elizabethtown Gas For Approval Of A Safety, Modernization And
Reliability Program And Associated Cost Recovery Mechanism
BPU Docket No. GR15091090

FIRST CLASS MAIL

Irene Kim Asbury, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350

Dear Secretary Asbury:

Enclosed are an original and ten copies of the Public Service Electric and Gas Company ("PSE&G") Motion to Participate in the above proceeding.

By copy of this letter, copies of the motion are being forwarded this date via electronic mail to all persons whose names appear on the attached distribution list.

Sincerely,

A handwritten signature in cursive script that reads "Martin C. Rothfelder".

C Attached Service List (E-Mail Only) ✓

A handwritten signature in cursive script that reads "Case Mgmt".

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**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

In The Matter Of The Petition Of Pivotal Utility Holdings, Inc. d/b/a Elizabethtown Gas For Approval Of A Safety, Modernization And Reliability Program And Associated Cost Recovery Mechanism	BPU DOCKET NO. GR15091090
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PSE&G MOTION TO PARTICIPATE

Public Service Electric and Gas Company (“PSE&G”) hereby moves for an Order granting it status as a participant in the above referenced matter pursuant to N.J.A.C. 1:1-16.6.

In support of this Motion, PSE&G respectfully submits:

1. PSE&G is a New Jersey public utility as defined by N.J.S.A. 48:2-13.
2. PSE&G is engaged in the purchase, transmission, distribution and sale of electric energy and related utility services to more than 2,100,000 residential, commercial, and industrial customers located within the State of New Jersey. PSE&G is also engaged as a New Jersey public utility in the purchase, distribution, and sale of natural gas for more than 1,800,000 customers located within the State of New Jersey.

3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

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4. The Board's decision in this proceeding could have precedential effect and impact not only the Petitioner herein, but also New Jersey's other electric and gas utilities, including PSE&G and its customers. PSE&G will therefore likely be directly and specifically affected by the relief provided herein.

5. The service territories, customers, and operations of PSE&G are distinct from those of other parties and participants, or potential parties and participants, in this case. Thus, no other party or participant will represent the interests on PSE&G in this case.

6. PSE&G has a history of coordinating its representation in dockets at the Board with other similar utilities where appropriate. PSE&G will coordinate its representation with other similarly situated parties in this docket to the extent it finds such action appropriate.

7. Due to PSE&G's experience in the gas and electric industries, its participation in this proceeding is likely to add constructively to the proceeding.

8. PSE&G will abide by the schedule set for this proceeding and will not seek to participate in this proceeding beyond the bounds permitted by N.J.A.C. 1:1-16.6(c). Moreover, the granting of this Motion will not cause undue delay or confusion.

WHEREFORE, PSE&G respectfully requests an Order (1) granting it full rights as a participant 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,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY



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