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THOMPSON & KELLY, LLP**

A NEW JERSEY LIMITED LIABILITY PARTNERSHIP

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REPLY TO WEST CALDWELL OFFICE

October 6, 2017

Kim Asbury, Secretary  
Board of Public Utilities  
44 South Clinton Ave  
P.O. Box 350  
Trenton, N.J. 08625-0359

RE: IMO The Petition of Public Service Electric and Gas Company for Approval of a Gas System Modernization Program and Associated Cost Recovery Mechanism – Motion to Participate BPU Docket No. GR17070776

Dear Ms. Asbury:

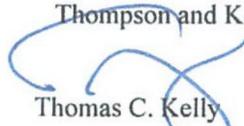
Enclosed please find the original and ten copies of a Motion to Participate in the above referenced matter submitted in behalf of Local Union 94 of the International Brotherhood of Electrical Workers and Local 855 of the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry.

Please process this Motion in order that it can be considered by the Board within its established time frame for this submission.

Thank you.

Very truly yours,

Russo Tumulty Nester  
Thompson and Kelly, LLP

By   
Thomas C. Kelly

c: Service List via email

*Case mgmt*  
*M. Lupo*  
*A. Malloy*  
*J. Walker*

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

**Thomas C. Kelly**  
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Docket No. GR17070776

**MOTION TO PARTICIPATE**

In the Matter of the Petition of Public Service  
Electric and Gas Company for Approval of a  
Gas System Modernization Program and  
Associated Cost Recovery Mechanism

**UNIONS' MOTION TO PARTICIPATE**

Local Union 94 of the International Brotherhood of Electrical Workers and Local 855 of the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry (collectively the "Unions") hereby move for leave to participate in the above-captioned matter. In support of their motion, the Unions state as follows:

1. All correspondence and communications concerning this matter should be directed to:

Kenneth Thoman  
IBEW Local Union 94  
219 Franklin Street  
Hightstown, New Jersey 08520  
609-426-9702  
[bud@ibew94.org](mailto:bud@ibew94.org)

Roger M. Schwarz  
Roger M. Schwarz Governmental Affairs  
1 Benjamin Rush Lane  
Princeton, New Jersey 08540  
908-202-7486  
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2. The Unions collectively represent more than 3,600 non-management employees who are engaged in all aspects of operations at Public Service Electric and Gas Company ("PSE&G" or the "Company"). Local 855 of the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry has 1,400 members who do the construction and maintenance of PSE&G's gas distribution lines and who work in appliance service. Local 94 of the International Brotherhood of Electrical Workers has 500 members who are employed in gas distribution and appliance service. (More than 1,800 members of Local 94 are employed in electric distribution and transmission, and another 1,400 members work at nuclear and fossil electric plants owned by PSE&G's affiliate, PSEG Power.)

3. The above-captioned matter is a request by for approval of both the elements of Phase II of PSE&G's Gas System Modernization Program ("GSMP II") and the proposed regulatory mechanism for recovery of the costs of said program. PSE&G describes GSMP II as a series of investments over five years to improve the reliability and safety of its gas distribution infrastructure, by replacing cast iron mains and unprotected steel mains and services and related work.

4. The members of the Unions -- PSE&G's skilled workforce -- will do the work envisioned by this GSMP II as they have successfully been doing for more than a year and a half during the initial and ongoing modernization program.

5. Accordingly, the issues to be decided in the above-captioned proceeding "substantially, significantly and directly affect" the Unions and their members, thereby making it appropriate for the Unions to participate.

6. The Unions support a regulatory solution that provides for an expeditious process for approval of the investments and the associated rate adjustments, thereby getting the projects underway.

7. The Unions' participant status will not cause confusion or delay the proceeding, particularly so given that this request is brought at the outset of the proceeding.

WHEREFORE, pursuant to N.J.A.C. 1:1-16.1, et seq., the Unions respectfully request that they be permitted to participate in this matter.

Respectfully submitted,  
Russo Tumulty Nester Thompson & Kelly. LLP

By Thomas C. Kelly, Esq.  
Attorney for: Local Union 94 of the International  
Brotherhood of Electrical Workers

and

Local 855 of the United Association of  
Journeymen and Apprentices of the Plumbing  
and Pipefitting Industry

October 6, 2017

CERTIFICATION OF SERVICE

I hereby certify that I have on this day served by electronic mail a copy of the foregoing Motion to Participate on the parties on the service list.

Dated at Princeton, New Jersey, this 11<sup>th</sup> day of October 2017.



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