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BOARD OF PUBLIC UTILITIES TRENTON, NJ

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BOARD OF PUBLIC UTILITIES TRENTON, NJ

VIA OVERNIGHT MAIL AND EMAIL

Aida Camacho-Welch, Secretary Board of Public Utilities 44 South Clinton Avenue, 3rd Floor Suite 314 P.O. Box 350 Trenton, New Jersey 08625-0350

RE: I/M/O of the Petition of UMM Energy Partners, LLC for an SBC Reduction in Connection with a Transportation Service Agreement with Public Service Electric & Gas Company

BPU Docket No.: GR18040385

Dear Secretary Camacho-Welch:

On behalf of Public Service Electric and Gas Company ("PSE&G"), enclosed for filing are original and eleven (11) copies of a Motion to Intervene in the above captioned matter. Please return one (1) time-stamped copy of same in the enclosed postage prepaid, self-addressed envelope.

Additionally, I hereby also confirm that a copy of this letter and the within Notice of Motion is also being transmitted by electronic mail only to the parties named in the attached service list.

If you have any questions, please contact the undersigned. Thank you for your attention to this matter.

Respectfully submitted,

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Attached service list (via e-mail only)

Case mont

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Public Service Electric and Gas Company CSG-UMM GR18040385

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STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of UMM Energy Partners, LLC for an SBC Reduction in Connection with a Transportation Service Agreement with Public Service Electric & Gas Company

BPU DOCKET NO. GR18040385

PSE&G MOTION TO INTERVENE

Public Service Electric and Gas Company ("PSE&G") hereby moves for an Order granting it status as an Intervenor in the above referenced matter pursuant to *N.J.A.C.* 1:1-16.1 – 16.4. 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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Newark, New Jersey 07102 Phone: (973) 430-6479 danielle.lopez@pseg.com Matthew M. Weissman, Esq. General Regulatory Counsel-Rates PSEG Services Corporation 80 Park Plaza, T5 P. O. Box 570 Newark, New Jersey 07102 Phone: (973) 430-7052 matthew.weissman@pseg.com Caitlyn White Regulatory Case Coordinator PSEG Services Corporation 80 Park Plaza, T5 P. O. Box 570 Newark, NJ 07102 Phone: (973) 430-5659

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4. The Board's decision in this proceeding involves a request by UMM Energy Partners, LLC (UMM) to discount the Societal Benefit Charge (SBC) billed by PSE&G. PSE&G presently provides firm natural gas transportation services to the UMM electric cogeneration facility located at 1 Yogi Berra Drive on the property of Montclair State University, in Montclair, NJ under PSE&G's TSG-NF tariff service. On February 21, 2018, Public Service Electric & Gas Company ("PSE&G") filed a Verified Letter Petition (the "Letter Petition") seeking approval of a Transportation Service Agreement (the "Agreement") pursuant to PSE&G's Rate Schedule CSG. The Agreement between PSE&G and UMM provides for a reduction in PSE&G's volumetric transportation rates that UMM pays for twenty years. Such reductions are allowed in appropriate circumstances under PSE&G's Rate Schedule CSG.

5. In this matter, UMM has requested a discount of: "\$0.0392 per therm off of the SBC for the term of the Agreement." UMM's Petition further states that:

At the current time, this request would reduce the current SBC rate from the current SBC level of \$0.041995 per therm to \$0.002813 per therm. All SBC rates stated in this paragraph and below are exclusive of any Sales and Use tax. Under no circumstance would the SBC rate as discounted go below zero (to negative).

UMM Petition, paragraph 6.

6. The SBC includes components for: Social Programs, Energy Efficiency and Renewables Programs, Manufactured Gas Plant Remediation, Universal Service Fund – Permanent, and Universal Service Fund-Lifeline. PSE&G, in its role as a utility, has the duty to bill each of

these components accurately, reflecting any discount not only in the total SBC but also in each component of the SBC for the multi-year duration of any discount. During that period, the overall SBC, as well as the individual components will likely have different rates. The petition, as filed, does not indicate what the individual components of the SBC would be under the requested discount.

- 7. Under the facts stated above, PSE&G will be directly and specifically affected by the relief provided herein, and has an interest in any final order issued in this matter. PSE&G's interests are clearly distinct from other entities and no other party to this proceeding can adequately represent PSE&G's interests in this matter.
- 8. Due to PSE&G's experience in the electric and gas industries, its participation as an Intervenor in this proceeding is likely to add constructively to the proceeding.
 - 9. PSE&G will abide by the schedule set for this proceeding.
 - 10. The granting of this Motion will not cause undue delay or confusion.

WHEREFORE, PSE&G respectfully requests an Order (1) granting it rights as an intervenor in this matter pursuant to N.J.A.C. 1:1-16.1-16.5, thereby providing it all rights of a full party to this matter; 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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Ву

DATED: May 23, 2018

Matthew M. Weissman

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In the Matter of the Petition of UMM Energy Partners, LLC for an SBC Reduction in Connection with a Transportation Service Agreement with Public Service Electric & Gas Company

BPU DOCKET NO. GR18040385

VERIFICATION

I, Terrence J. Moran, Director of Energy Supply Acquisition & Operations for Public Service Electric and Gas Company, have reviewed forgoing the PSE&G Motion to Intervene in this matter. I have knowledge of the facts set forth herein and hereby state that they are truthful and accurate to the best of my knowledge and belief.

Terrence J. Morar