Law Department

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CASE MANAGEMENT

Fud 9/26/18

SEP 2 1 2018





BOARD OF PUBLIC UTILITIES TRENTON, NJ

VIA E-MAIL AND OVERNIGHT MAIL

Aida Camacho-Welch, Secretary 44 South Clinton Avenue, Suite 314 P.O. Box 350 Trenton, New Jersey 08625-0350 September 20, 2018 ECEIVED

MAIL ROOM

SEP 2 1 2018

BOARD OF PUBLIC UTILITIES

TRENTON, NJ

In the Matter of the Verified Petition of Jersey Central Power & Light Company for Approval of an Infrastructure Investment Program (JCP&L Reliability Plus)

BPU Docket No. EO18070728

Dear Secretary Camacho-Welch:

Enclosed is Public Service Electric and Gas Company's ("PSE&G") Motion to Participate in the above-captioned proceeding.

By copy of this letter, copies of the motion are being forwarded on this date via electronic mail to all persons whose name appears on the attached Service List.

Thank you for your anticipated courtesies.

Very truly yours,

Danielle Lopez

C Attached Service List (E-Mail Only)

EMS E. XIOO, DAG ENERGY B. Van Biznut, DAG Legal Andrea Start, Legal One: I Hamilton, Energy PAG P. Kilogman, DAG

## RECEIVED CASE MANAGEMENT

SEP 2 1 2018

BOARD OF PUBLIC UTILITIES TRENTON, NJ	BOARD OF PUBLIC UTILITIES
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In the Matter of the Petition of	)	
Jersey Central Power & Light Company for	)	
Approval of an Infrastructure Investment	)	BPU Dkt. No. EO18070728
Program (JCP&L Reliability Plus)	)	

## PSE&G'S 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 as a New Jersey public utility in the purchase, transmission, distribution, and sale of electric energy and related utility services to more than 2,200,000 residential, commercial, and industrial customers located within the State of New Jersey. PSE&G is also engaged 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:

Joseph F. Accardo Jr., Esq. Deputy General Counsel PSEG Services Corporation 80 Park Plaza, T5 P.O. Box 570 Newark, New Jersey 07102 Phone: (973) 430-5811

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- 3 -

Additional electronic only copies should be addressed to:

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4. The Board of Public Utility's decision in this proceeding is likely to have precedential effect and impact not only the Petitioner herein and its customers, but also New Jersey's other utilities. The issues that will be addressed in this infrastructure investment case may have an impact on PSE&G by establishing precedent. PSE&G will therefore likely be directly and specifically affected by the relief provided herein.

- 5. The service territories, customers, and the operations of PSE&G are distinct from those of other parties and participants in this case. Thus, no other party or participant will represent the interests of PSE&G in this case.
- 6. PSE&G has a history of coordinating its activities in dockets at the New Jersey Board of Public Utilities with those of other utilities where appropriate. PSE&G will coordinate its representation with other similarly-situated parties or participants in this docket to the extent appropriate.
- 7. Due to PSE&G's experience in the electric industry, 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, to the extent one has been entered.
  - 9. The granting of this Motion will not cause undue delay or confusion.

**WHEREFORE**, PSE&G respectfully requests an Order: (1) granting it 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

Danielle Lopez, Esq.

Associate General Regulatory Counsel
Public Service Electric and Gas Company

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Newark, New Jersey 07102

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DATED: September 20, 2018