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November 5, 2018

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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

**VIA ELECTRONIC MAIL & FEDEX OVERNIGHT DELIVERY**

Honorable Dianne Solomon  
Commissioner  
New Jersey Board of Public Utilities  
44 South Clinton Avenue 3<sup>rd</sup> Floor  
Suite 314  
P.O. Box 350  
Trenton, New Jersey 08625-0350

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CASE MANAGEMENT

NOV 08 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

Re: In the Matter of the Petition of Public Service Electric and Gas Company for Approval of its Clean Energy Future Energy Efficiency ("CEF-EE") Program on a Regulated Basis  
BPU Dkt Nos. EO18101112 & GO18101113

Dear Commissioner Solomon:

Enclosed are an original and ten copies of New Jersey Natural Gas Company's ("NJNG") Motion to Intervene 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 name appear on the attached distribution list.

Please do not hesitate to contact me (732) 938-1073 if you have any questions.

Respectfully submitted,

NEW JERSEY NATURAL GAS COMPANY

A handwritten signature in blue ink that reads 'Andrew K. Dembia'.

Andrew K. Dembia

Regulatory Affairs Counsel

AKD:fk  
Enclosures

C: Service list –electronic service only ✓

*Case mgmt*



In the Matter of the Petition of Public Service Electric and Gas Company for Approval of its Clean Energy  
Future Energy Efficiency ("CEF-EE") Program on a Regulated Basis  
BPU Dkt Nos. EO18101112 & GO18101113

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In the Matter of the Petition of Public Service Electric and Gas Company for Approval of its Clean Energy  
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In the Matter of the Petition of Public Service Electric and Gas Company for Approval of its Clean Energy  
Future Energy Efficiency ("CEF-EE") Program on a Regulated Basis  
BPU Dkt Nos. EO18101112 & GO18101113

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STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

In the Matter of the Petition of	)	
Public Service Electric and Gas Company	)	MOTION TO
for Approval of its Clean Energy Future Energy	)	INTERVENE
Efficiency ("CEF-EE") Program on a Regulated	)	
Basis	)	BPU Dkt Nos. EO18101112 &
	)	GO18101113

New Jersey Natural Gas Company ("NJNG") hereby moves for an Order granting it status as an Intervenor in the above referenced matter pursuant to N.J.A.C. 1:1-16.6. In support of this Motion, NJNG respectfully submits:

1. NJNG is a New Jersey public utility as defined by N.J.S.A. 48:2-13.
2. NJNG is engaged as a New Jersey public utility in the purchase, distribution, and sale of natural gas for more than 530,000 customers located within the State of New Jersey.
3. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

Andrew K. Dembia, Esq.-Regulatory Affairs Counsel  
New Jersey Natural Gas Company  
1415 Wyckoff Road  
P. O. Box 1464  
Wall, New Jersey 07719  
Phone: (732) 938-1073  
Fax: (732) 938-2620  
[adembia@njng.com](mailto:adembia@njng.com)

Additional electronic copies should be addressed to France Karras at:

[Fkarras@njng.com](mailto:Fkarras@njng.com)



4. The criteria for intervention in a contested matter are set out in N.J.A.C. 1:1-16.1:

Any person or entity not initially a party, who has a statutory right to intervene or who will be substantially, specifically and directly affected by the outcome of a contested case, may on motion, seek leave to intervene.

5. The standards that must be taken into consideration when a motion to intervene is being considered are set out in N.J.A.C. 1:1-16.3(a):

the nature and extent of the movant's interest in the outcome of the case, whether or not the movant's interest is sufficiently different from that of any party so as to add measurably and constructively to the scope of the case, the prospect of confusion or undue delay arising from the movant's inclusion and other appropriate matters.

6. NJNG respectfully submits that the above criteria and standards support the granting of NJNG's motion to intervene in the above-captioned proceeding.

7. NJNG is a direct customer of PSE&G. NJNG takes retail electric distribution service from PSE&G at a NJNG facility in East Brunswick, NJ.

8. PSE&G is seeking approval of various items all of which have a direct impact upon NJNG, as a customer of PSE&G. PSE&G proposes to commit up to \$2.5 billion in CEF-EE Program investment, and proposes a \$283 million expense budget over the six-year term of the program. See, Petition at 13. Additionally, approval of these items will also have a precedential impact upon NJNG as its status as a regulated utility. Specifically, PSE&G seeks various energy efficiency programs to be administered by PSE&G. According to PSE&G, these programs support the State's vision for achieving 100% clean energy by 2050 by proposing a new clean energy paradigm where the utilities and the State, through the Board of Public Utilities ("Board" or the "BPU"), work together to reduce customers' energy bills, create "green" jobs, and lower greenhouse gas emissions, while also modernizing the electric grid, increasing its resiliency, and enhancing the overall utility experience for PSE&G customers. The CEF-EE Program consists of 22 subprograms, including seven residential subprograms, seven commercial and industrial ("C&I") subprograms, and eight pilot subprograms. The various pilot subprograms consist of PSE&G implementing and managing select, highly advanced approaches to energy efficiency that after the pilot phase may support future energy efficiency programs in New Jersey. Customers in PSE&G's electric and/or gas service territory who meet the criteria for the respective CEF-EE subprogram offerings will be eligible to participate in them. The CEF-EE Program has an emphasis on the following hardest to reach sectors: low income, multi-family, small business, and local government. See, Petition at 6.

9. In the filing, PSE&G is seeking, *inter alia*, approval of a Green Enabling Mechanism ("GEM"). PSE&G proposed the GEM in the base rate case it filed on January 12, 2018 ("2018



Rate Case”) and is reintroducing it here for consideration. According to PSE&G, this is a rate design change that removes the incentive to sell more kilowatt-hours of electricity and therms of gas. By “decoupling” sales and revenue, GEM encourages large-scale utility investments in energy efficiency, renewables, and other clean technologies that will ultimately benefit all customers by bringing down bills and reducing emissions. According to PSE&G, in the event that the Company’s decoupling proposal is not approved, PSE&G would be open to discussing with the parties another form of decoupling or an annual lost revenue adjustment mechanism. See, Petition at 11-12.

10. The Board’s decision in this proceeding is likely to have precedential effect and impact not only on the Petitioner herein and its customers, but also New Jersey’s other gas utilities. A variety of issues that will be addressed in this case may have an impact on NJNG by establishing precedent. NJNG will therefore likely be directly and specifically affected by the relief provided herein. Within the Direct Testimony of Karen Reif (Attachment I to the Petition) PSE&G specifically states that knowledge gained through their subprograms can also be used to support future energy efficiency development outside of PSE&G’s service territory to benefit all residents of New Jersey.

11. The service territories, customers, and the operations of NJNG are distinct from those of other parties and participants in this case. Thus, no other party or participant will represent the interests of NJNG in this case.

12. NJNG has a history of coordinating its activities in dockets at the New Jersey Board of Public Utilities with those of other utilities where appropriate. NJNG will coordinate its representation with other similarly situated parties or participants in this docket to the extent appropriate.

13. Due to NJNG’s experience in the gas industries, its intervention in this proceeding is likely to add constructively to the proceeding.

14. NJNG will abide by the schedule set for this proceeding. NJNG’s motion is timely and will not delay or otherwise disrupt the prosecution of this proceeding N.J.A.C. 1:1-16.2.

15. The granting of this Motion will not cause undue delay or confusion.

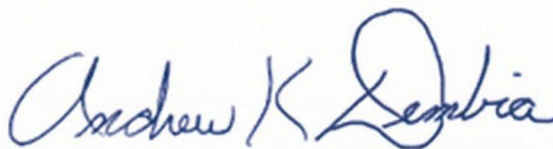
16. In the alternative, should Your Honor believe that full Intervention is not warranted, NJNG respectfully requests that this Motion be treated as a Motion to Participate as permitted under N.J.A.C. 1:1-16.5. The standard to Participate is less stringent than that of intervention. N.J.A.C. 1:1-16.6(a) provides “Any person or entity with a significant interest in the outcome of a case may move for permission to participate.”



**WHEREFORE**, NJNG respectfully requests an Order granting it full procedural and substantive rights as an Intervenor in this matter pursuant to N.J.A.C. 1:1-16.1 et seq. or, in the alternative, Participant status pursuant to N.J.A.C. 1:1-16.5 and providing such further relief in connection therewith as is deemed reasonable, just and consistent with the foregoing.

Respectfully submitted,

**NEW JERSEY NATURAL GAS COMPANY**

A handwritten signature in blue ink, reading "Andrew K. Dembia". The signature is written in a cursive style with a large, looped initial "A".

---

ANDREW K. DEMBIA

DATED: November 2, 2018

