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RECEIVED  
CASE MANAGEMENT

November 15, 2018

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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

**VIA FEDEX:**

New Jersey Board of Public Utilities  
Attn: Ada Camacho-Welch, Board Secretary  
44 South Clinton Avenue, 3<sup>rd</sup> Floor, Suite 314  
P.O. Box 350  
Trenton, New Jersey 08625-0350

Re: **IMO 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**  
**Docket Nos. EO ~~10121113~~ and GO18101112**  
*EO18101113*

Dear Ms. Camacho-Welch:

The undersigned represents Tendril Networks, Inc. ("Tendril"). Enclosed please find an original and ten copies of Tendril's Motion to Intervene in PSE&G's CEF-EE Petition.

Please process this Motion to Intervene in order that it may be considered by the Board within its established timeframe for applications for participation in this proceeding.

Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,

FLORIO PERRUCCI STEINHARDT  
& CAPELLI, LLC

*EMS*  
*Legal*  
*DAG*  
*S. Peterson*

*Kerry Cahill*  
Kerry Cahill, Esq.

Encl.

cc: Service List as per Board's October 29, 2018 Order

Kerry Cahill, Esq. (Attorney ID: 045372012)  
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STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

IMO 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

**CERTIFICATION OF SERVICE**

Docket Nos. EO 18060629 and GO18060630

I, **KERRY E. CAHILL, ESQ.**, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and a member in good standing of the bar of this Court. I am an Associate of the law firm of Florio Perrucci Steinhardt & Cappelli, LLC, and represent Tendril Networks, Inc. ("Tendril").

2. On November 15, 2018, I caused to be served via electronic mail copies of Tendril's Motion to Intervene in the above-captioned proceeding on each person identified on the Service List. An original and ten (10) hard copies also have been sent via overnight delivery to Aida Camacho-Welch and New Jersey Board of Public Utilities, as well as a copy via electronic mail. Two (2) hard copies have also been sent via overnight delivery to Stephanie A. Brand, Esq., Division of Rate Counsel, and Mathew Weissman, Esq., PSEG Services Company.

I certify under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Kerry Cahill, Esq.

Dated: November 15, 2018

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

**Kerry E. Cahill, Esq. (Attorney ID: 045372012)**  
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**235 Broubalow Way**  
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**Docket Nos. EO 18060629  
and GO18060630**

**IMO 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**

**MOTION TO INTERVENE OF TENDRIL, INC.**

Tendril Networks, Inc. ("Tendril") hereby moves for leave to intervene in the above-captioned matter. In support of its motion, Tendril states as follows:

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

Kerry Cahill, Esq.  
Florio Perrucci Steinhardt & Cappelli, LLC  
235 Broubalow Way  
Phillipsburg, New Jersey 08865  
Attorneys for Tendril, Inc.  
Phone: (908) 454-8300  
[KCahill@FlorioLaw.com](mailto:KCahill@FlorioLaw.com)

2. Generally, a motion to intervene is governed by N.J.A.C. 1:1-16.3(a), which requires the Board to consider the following factors: (1) the nature and extent of the moving party's interest in the outcome of the case; (2) whether that interest is sufficiently different from that of any other party so as to add measurably and constructively to the scope of the case; (3) the prospect for confusion and delay arising from the inclusion of the party; and (4) other appropriate matters.



3. Since 2004, Tendril has been providing energy services management solutions to customers across the United States, including a significant number in New Jersey. Tendril offers an open cloud-based software platform that provides the infrastructure, analytics, and understanding required to deliver personalized energy services. Additionally, Tendril provides home energy reports and energy assessments, to keep customers apprised of their energy usage. Tendril's technology also includes customer alerts and notifications, which enable users to send proactive communications partway through a billing cycle if customers are exceeding their regular usage. Notably, Tendril has worked PSE&G to deliver these services to a significant number of PSE&G customers, and this experience provides Tendril an understanding of the standards necessary to accomplish PSE&G's implementation of the CEF-EE program. As such, Tendril has a significant interest in the outcome of the case, which is sufficiently different than the current participants. Tendril's experience permits it to add measurable and constructive advice to the Board, in the decision and implementation of this application.

4. As an overview, the CEF-EE petition is a request by PSE&G for approval of its Clean Energy Future-Energy Efficiency ("CEF-EE") Program, which is intended to: (1) make New Jersey a national leader in energy efficiency; (2) seed a market to support electric vehicle adoption; (3) begin exploring the potential of energy storage applications; and (4) enable a number of customer, community, and company smart energy capabilities, including advanced metering infrastructure in PSE&G's electric service territory that will, among other customer benefits, improve outage responses.

5. Additionally, Tendril currently works with PSE&G to run PSE&G's residential behavioral energy efficiency program. As such, Tendril has a direct influence and effect in helping PSE&G achieve its intention to make New Jersey a national leader in energy efficiency.

6. According, as a result of Tendril's experience in energy storage applications and customer enablement for energy monitoring interest in the outcome of the petition, Tendril will uniquely be affected by the outcome of this case in the manner that will assist the Board in its resolution of the Petition. Additionally, Tendril will be in a position to provide the Board with valuable insight both as to the impact CEF-EE will have in New Jersey, as well as strategies for the successful implementation of CEF-EE. Tendril's participation will contribute to the development of a more complete record for consideration by the Board.

7. Significantly, the issues to be decided in the above-captioned proceeding "substantially, significantly and directly affect" Tendril, thereby making it appropriate for Tendril to intervene in these matters.

8. Tendril supports a regulatory solution that focuses on the CEF-EE initiatives and encourages the energy storage applications and customer-enabled energy monitoring, as sought to be implemented in the CEF-EE program.

9. Tendril's intervention will not cause confusion or delay the proceeding, particularly so given that this request is brought at the outset of the proceeding.

10. In the event that Tendril is not permitted to intervene in this action, Tendril alternatively requests the ability to act as a participant.

**WHEREFORE**, pursuant to N.J.A.C. 1:1-16.1, et seq., Tendril respectfully requests that it be permitted to intervene in this matter.

Respectfully submitted,  
**FLORIO PERRUCCI STEINHARDT  
& CAPELLI, LLC**



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Kerry Cahill, Esq.  
*Counsel for Tendril Networks, Inc.*