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CASE MANAGEMENT



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CASE MANAGEMENT

APR 23 2019

BOARD OF PUBLIC UTILITIES TRENTON, NJ

2019 APR 24 A 8: 39

BOARD OF PUBLIC UTILITIES TRENTON, NJ



April 22, 2019

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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

In the Matter of the Petition of New Jersey Natural Gas Company for Approval to Implement an Infrastructure Investment Program ("IIP") and Associated Cost Recovery Mechanism Pursuant to N.J.S.A. 48:2-21 and N.J.A.C. 14:3-2A

BPU Docket No. GR19020278

Dear Secretary Camacho-Welch:

Enclosed are an original and ten copies of 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

Attached Service List (E-Mail Only)

Case mant

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Public Service Electric and Gas Company NJNG INFRASTRUCTURE IIP - 2019 GR19020278

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Public Service Electric and Gas Company NJNG INFRASTRUCTURE IIP - 2019 GR19020278

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RECEIVED MAIL ROOM APR 23 2019 BOARD OF PUBLIC UTILITIES TRENTON, NJ

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

:

In the Matter of the Petition of New Jersey

Natural Gas Company for Approval to

Implement an Infrastructure Investment : BPU Dkt. No. GR19020278

Program ("IIP") and Associated Cost Recovery:

Mechanism Pursuant to :

N.J.S.A. 48:2-21 and N.J.A.C. 14:3-2A :

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 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.

VP - Regulatory & Deputy General Counsel

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- 3 -

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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 gas 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.

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DATED: April 22, 2019