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March 18, 2108

3/20/19

In the Matter of the Petition of Public Service Electric and Gas Company for Approval of its Clean Energy Future-Energy Efficiency Program on a Regulated Basis
BPU Docket No. GO18101112 & EO18101113

VIA E-MAIL AND OVERNIGHT DELIVERY

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Fl., Suite 314
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Dear Secretary Camacho-Welch:

In accordance with N.J.A.C. 1:1-12.2(b), Public Service Electric and Gas Company ("PSE&G" or "Company") submits this letter in opposition to the March 8, 2019 Motion for Reconsideration filed by the Direct Energy companies, as well as NRG Energy, Inc., Just Energy Group Inc., and Centrica Business Solutions (collectively, the "Movants"). The Movants seek reconsideration of the New Jersey Board of Public Utilities' ("BPU" or "Board") February 27, 2019 Order ("February 2019 Order") granting interlocutory review of, but ultimately affirming, Commissioner Dianne Solomon's January 22, 2019 Order ("January 2019 Order") denying the Movants intervenor status in this proceeding, while granting them participant status. PSE&G is enclosing an original and two copies of this letter response. Kindly stamp one of those copies filed and return it in the enclosed, self-addressed envelope. Copies of this filing are being served via electronic mail on the parties listed on the attached service list.

As more fully described below, PSE&G respectfully requests that the Board deny

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Movants' latest motion and once again affirm its Order granting them participant status. In fact, the Movants have not even cited the authority supporting this request, because there is none, given that the Order they request the BPU reconsider is not a final order, and they have already sought interlocutory review of the Board's decision granting them participant status. As for the substance of the motion, the Board, as Commissioner Solomon did before it, appropriately and carefully weighed the Movants' interest in this proceeding, and ultimately decided that their interest was not sufficient to justify intervenor status. This decision was a proper exercise of the Board's discretion, and is far from the irrational, arbitrary, capricious, or palpably incorrect rationale that is required for the rare act of reconsideration to be exercised. The motion should be denied.

Background

On October 11, 2018, PSE&G filed a Petition seeking approval of the Board to implement its Clean Energy Future – Energy Efficiency Program (the "CEF-EE Program") pursuant to N.J.S.A. 48:3-98.1(a)(1). The CEF-EE Program consists of 22 subprograms whereby the Company implements and manages select, highly advanced approaches to energy efficiency. By Order dated October 29, 2018, the Board decided to retain jurisdiction over this filing, designated Commissioner Solomon as the presiding officer, and authorized Commissioner Solomon to rule on all motions that arise during the proceeding. October 29, 2018, Order, p. 3. The October 2018 Order set a deadline of November 16, 2018 for intervenor or participant motions. *Id.* The Movants filed a motion to intervene on November 16, 2018, which PSE&G opposed on the grounds that the Movants' clearly were trying to re-litigate an issue that has long

been decided, *i.e.*, the role of the utility in energy efficiency.[1]

In addition to the Movants' application, the Board received eight other motions to intervene in this proceeding. Besides the Movants, the intervenor applicants with a claimed business interest in this proceeding included Tendril, Enel X, Keystone Energy Efficiency Alliance ("KEEA"), MaGrann Associates, and Sunrun Inc.

On January 22, 2019, Commissioner Solomon issued an Order deciding the intervention and participation motions.[2] With respect to the Movants, Commissioner Solomon, while noting their "significant" interest in the CEF-EE filing, found appropriately that their interest was not "so substantial that they merit these entities becoming parties to this proceeding." January 22, 2019 Order, p. 15. Commissioner Solomon further reasoned that:

> [The Movants'] concerns must be weighed against the Board's need to meet its statutory obligations in a timely manner. Multiple entities have moved to intervene on the same or very similar bases. Admitting each entity that has presented this argument would tend to produce delay or disruption in the proceeding, while distinguishing among them such that some participants in the energy efficiency market are found to have an interest justifying intervention while others do not would likely prove problematic. After weighing the issues, **I FIND** that these entities have not demonstrated that their interest in this matter warrants granting their motion to intervene, given the need for prompt and expeditious administrative proceedings.

Id.

Commissioner Solomon denied the motions to intervene of Tendril, Enel X, MaGrann Associates, and Sunrun on similar grounds. January 22, 2019 Order, pp. 14-16. These entities,

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[1] In addition to the RGGI law, which authorizes utilities to make energy efficiency investments, the Clean Energy Act *requires* utilities to make these investments. N.J.S.A. 48:3-98.1(a)(1) (RGGI) and N.J.S.A. 48:3-87.9 (Clean Energy Act).

[2] The Board received six motions to participate in this proceeding, including from the following entities with a claimed business interest in the proceeding: Google, LLC, Lime Energy Co., and Philips Lighting North America Corporation. January 22, 2019 Order, page 13.

as well as the Movants, were granted participant status. Commissioner Solomon granted two motions for intervention: one from a group of environmental organizations, and the other from the New Jersey Large Energy Users Coalition. *Id.*

The January 22, 2019 Order also approved a procedural schedule that calls for evidentiary hearings in a little more than six weeks from the date of this submission. January 22, 2019 Order, Exhibit A. In light of the 180-day period for the Board to review utilities' energy efficiency filings such as CEF-EE, the BPU must rule on the merits of this proceeding no later than early July 2019, less than four months from the date of this submission. N.J.S.A. 48:3-98.1(b).

On January 29, 2019, the Movants took their second bite at the apple, *i.e.*, a motion for interlocutory review of Commissioner Solomon's order denying them intervenor status. PSE&G opposed that application. In its February 2019 Order, the Board granted interlocutory review, but ultimately affirmed Commissioner Solomon's decision to grant the Movants participant status. The Board correctly ruled that "the nature and extent of [the Movants'] interest does not warrant intervenor status." February 2019 Order, p. 9. The Board also found that granting the Movants intervenor status would not sufficiently aid the record in this proceeding. *Id.* Neither Commissioner Solomon's nor the Board's decision should be overturned in response to the Movants' third bite at the apple.

The Movants' Reconsideration Motion is Improper

Rule 14:1-8.6(a) states: "A motion for rehearing, reargument, or reconsideration of a proceeding may be filed by any party within 15 days after the effective date of any final decision or order by the Board." Emphasis added. The Board's February 2019 Order granting interlocutory review, but affirming Commissioner Solomon's January 2019 Order, is

interlocutory in nature, not final. Thus, the Movants cannot seek reconsideration of the Board's February 2019 Order. *I/M/O Standard Offer Capacity Agreements*, BPU Docket No. EO12020145 (May 7, 2012 Order, p. 5) (noting that it was improper for the movant to seek reconsideration of an order granting it participant status, as opposed to intervenor status, because the order was interlocutory and not final).

Under different circumstances, the Board could excuse the Movants' filing error and recast their application as a motion for interlocutory review. *See* N.J.A.C. 1:1-14.10 and N.J.A.C. 1:14-14.4; *see also I/M/O Standard Offer Capacity Agreements, supra* (noting that a movant should seek interlocutory review of an order denying it intervenor status, as opposed to requesting reconsideration, because such an order is not final). Here, however, the Movants have already filed a motion for interlocutory review of the Board's decision, and the BPU ruled on that motion in its February 2019 Order. The Movants should not be heard a third time on the same issue.

Moreover, the Board set a deadline for intervention motions in this case of November 16, 2019, four months ago. PSE&G has already responded to 200 discovery questions and the parties have conducted two in-person discovery/settlement conferences. Assuming the Board rules on the Movants' latest application at its next agenda meeting on March 29, 2019, the public hearings will have concluded by that point; intervenor testimony will have been submitted a week earlier; PSE&G will have propounded its discovery on that testimony; and the intervenors' discovery responses will be due just five days later. Evidentiary hearings are set for May 1-2, less than five weeks from the March 29, 2019 BPU agenda meeting, and the Board must rule on the CEF-EE filing a little more than three months from that meeting. At this point, given that the Movants have had more than ample opportunity to demonstrate that they should be granted

intervenor status, and have been unsuccessful at each turn, it is time for this matter to proceed with the Movants as participants. The Board has reached that determination twice. Any contrary ruling at this point would throw the procedural schedule into chaos. The motion for reconsideration should be denied.

The Board Appropriately Affirmed the Movants' Participant Status

Even if the Board were to consider the merits of the Movants' latest motion, it is clear that they fall woefully short of meeting the high standard for the Board to set aside an order (or, in this case, two orders). A movant's mere dissatisfaction with a decision, such as that expressed by the Movants here, does not provide justification for the Board to modify an order. *D'Atria v. D'Atria*, 242 N.J. Super. 392, 401 (Ch. Div. 1990). Instead, reconsideration is reserved for those rare cases where: (1) the Board's decision is based upon a "palpably incorrect or irrational basis"; or (2) it is obvious that the Board "did not consider, or failed to appreciate, the significance of probative, competent evidence." *Id.* A party seeking reconsideration must demonstrate that the action was arbitrary, capricious, or unreasonable. *Id.* at 401. Simple disagreement is not enough to overcome the presumption of reasonableness ascribed to an agency's decision. *Animal Prot. League of N.J. v. N.J. Dept. of Envtl. Prot.*, 423 N.J. Super. 549, 562 (App. Div. 2011) (citations omitted). As set forth below, the high standard for granting a motion for reconsideration has not been met here.

Like Commissioner Solomon before it, the Board appropriately weighed various factors when assessing the Movants' intervenor request.[3] It found that the Movants have some interest in this proceeding as participants in the energy efficiency market. February 2019 Order, p. 7. However, the Board agreed with Commissioner Solomon that this interest was not "substantial

[3] At this point, the standard for intervention has been sufficiently briefed and is not repeated here.

enough" to warrant intervention because, given the scope of the CEF-EE Program, many energy efficiency businesses could be impacted by the Company's proposal. Thus, the Movants' individual interests, the Board found, are not, "on their own", sufficient to warrant intervenor status. *Id.* To grant intervenor status to all the entities with a claimed economic interest in the Company's filing would, as both Commissioner Solomon and the Board found, create confusion and undue delay. *Id.* As the Board and Commissioner Solomon appropriately ruled, such confusion and delay would be exacerbated by the accelerated procedural schedule in this RGGI filing. *Id.* at p. 8. As the Board aptly noted: "Administrative efficiency must also be taken into account." *Id.*

Put simply, the Board, like Commissioner Solomon, carefully weighed various factors and ultimately determined that the Movants' interest in this proceeding was not sufficient enough to justify their intervention. The Board properly exercised its discretion and granted participant status to the Movants, which is the same status afforded to the other private market entities that moved to intervene in this proceeding (*i.e.*, Tendril, Enel X, MaGrann Associates, and Sunrun). The Board's and Commissioner Solomon's decisions were far from palpably incorrect, irrational, arbitrary or capricious. In fact, they were correct. The Movants' reconsideration motion should be denied.

The Movants' Rehashed Arguments Do Not Warrant the Reversal of the Board's Decisions

The Movants proffer three arguments in support of their motion for reconsideration, none of which come close to establishing that the Board's February 2019 Order was irrational, arbitrary, capricious, or palpably incorrect. First, the Movants note that while the Board granted intervenor status to KEEA as a trade organization representing various private market interests, KEEA "does not intend to represent the interests" of the Movants in this proceeding. Movants'

Motion, Appendix A, ¶8; Movants' Brief, pp. 6-7. Thus, according to the Movants, they should be granted intervenor status so that they can present their individual views as a party to this proceeding, as opposed to as a participant.

Movants' reliance on the KEEA affidavit misstates the Board's reasoning for granting the latter intervenor status while denying the Movants' application. The Board, and Commissioner Solomon before it, is appropriately concerned with numerous parties, each with individual interests, being granted intervenor status in this case that is scheduled to conclude in less than four months from the date of this submission. February 2019 Order, p. 7. Granting KEEA intervenor status is a means by which the Board will streamline the interests of the private market to avoid confusion and delay in this expedited proceeding. *Id.* at p. 11. The Board's Order gives no indication that it intends KEEA to be a substitute for each and every private business that may be impacted by the Company's proposal. Moreover, the Board found that the Movants' interest in this proceeding is not, on its own, sufficient enough to warrant full party status because, given the scope of the CEF-EE proposal, it has the potential to impact many private market businesses. *Id.* at p. 7. KEEA's position with respect to the Movants does not alter that fact.

Second, the Movants' resort to their argument that their interest in this proceeding is to "avoid[] any further penetration by the public utility into the private, competitive market that has developed for energy efficiency programs." Movants' Motion, p. 7. The Movants go as far as to suggest that the Board should not permit PSE&G to engage in further energy efficiency initiatives because to do so would "divert PSE&G from performing its critical poles and wires functions." *Id.* at p. 8. Simple rehashing of old arguments does not warrant reconsideration. *See In re Levelized Gas Adjustment Clause Proceedings, BPU Docket Nos.* GR99100778, *et al.*

(March 7, 2002 Order) (noting that mere reiteration of prior claims is insufficient to warrant reconsideration of a Board order). Moreover, the Movants' recycled argument ignores that: (1) the RGGI law first granted utilities the ability to invest in energy efficiency measures in 2008; (2) PSE&G has been implementing BPU-approved energy efficiency programs for a decade; and (3) the Clean Energy Act *requires* utilities to reduce their customers' energy usage to a certain level, with penalties for non-compliance. N.J.S.A. 48:3-87.9 and N.J.S.A. 48:3-98.1(a). Thus, not only is the Movants' "utility penetration" argument tired, it is also moot.

Third, the Movants take issue with the Board's thorough analysis distinguishing its ruling in the PSE&G EE 2017 filing granting Direct Energy intervenor status. Movants' Motion, pp. 8-10. The Movants' critique of the Board's analysis represents mere disagreement with the BPU's decision, and does not warrant reconsideration of the February 2019 Order. *D'Atria*, 242 N.J. Super. at 401. As the Board aptly noted, significant differences exist between PSE&G's EE 2017 and CEF-EE filings so that intervenor status in the former does not warrant it in the latter. February 2019 Order, p. 8. For example, the scope of the CEF-EE filing as compared to the EE 2017 filing supports the Board's rationale that not every private market entity with individual interests -- of which there are many -- can be granted full party rights in this expedited proceeding. *Id.* The Movants' motion for reconsideration should be denied.

Conclusion

The Board should summarily reject the Movants' motion for reconsideration because three bites at the apple are not permitted under the Board's regulations. Even if the Board were to entertain the Movants' application one last time, it is clear that they have failed to demonstrate that the BPU's February 2019 Order was irrational, arbitrary, capricious, or palpably incorrect. Rather, the Board, like Commissioner Solomon before it, carefully considered the Movants' interest in this proceeding, properly considered the statutory and regulatory context, and appropriately exercised its discretion by granting the Movants participant status. The motion should be denied.

Respectfully submitted,

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Dated: March 18, 2019

cc: Service List (via e-mail only)

Certification of Service

I hereby certify that on this date a copy of the foregoing response was served by electronic service on all parties as indicated on the attached service list. I further certify that on this date two copies of this opposition has been sent via overnight delivery for filing to the Board of Public Utilities.

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Dated: March 18, 2019

CEF-EE

* Hard Copy GO18101112 and EO18101113

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