

In support of this motion, NJUSA states as follows.

NJUSA is a nonprofit corporation whose members are retail shareholders of New Jersey investor-owned utilities who reside in New Jersey and have an interest in public policy issues that affect utilities and their shareholders. The mission of NJUSA is to serve and represent the interests of its members and other retail shareholders of investor-owned public utilities operating in the State of New Jersey, including being a conduit through which member shareholders can be informed about and participate in the legislative and regulatory processes on matters affecting utilities. More details regarding NJUSA are set forth in the certification of NJUSA's President, Karen D. Alexander, that accompanies this motion.

Utility shareholders play an important part in ensuring that utilities have the financial resources to allow them to continue to provide safe and reliable service and construct critical utility infrastructure, such as the Southern Reliability Link ("SRL") Pipeline. If utilities are going to continue to play that role, their shareholders must be incentivized to make these investments because of the opportunity to earn a fair return on their investments; otherwise they will invest in other more attractive options.

With respect to the SRL specifically, its construction is the cornerstone to enabling reliable delivery of natural gas to New Jersey Natural Gas (hereinafter "NJNG") customers in the future. It complements the ongoing investments NJNG has been making for many years to replace aging infrastructure. New pipelines are not only more reliable, they also release significantly lower levels of methane gas which enhances both safe operations and the minimization of environmental impacts. Reliability and safety are important to NJUSA because its members are not only utility shareholders, they are also New Jersey residents. Through the members of NJUSA, public policy decisions can be better informed about the role played by

utility investors in ensuring safe and reliable utility service – now and in the future. NJUSA therefore seeks participant status in this proceeding in order to address these issues regarding investment and cost recovery for major new pipeline investments.

The standards for participation in this proceeding are set forth in N.J.A.C. 1:1-16.6. Specifically, any person with a significant interest in the outcome of a case may move to participate. N.J.A.C. 1:1-16.6(a). As a membership organization, NJUSA exists to advance the interests of its members, which interests are both directly and indirectly affected by the resolution of the issues identified above. A reasonable determination of these issues is important not only for the Petitioner, but also for other investor-owned utilities who may be similarly affected by the resolution of these issues, and ultimately for the investors who, in helping to provide the capital needed for the Petitioner and other utilities to meet their statutory mandate to provide safe and reliable service, expect a reasonable return on their investment.

Once the significant interest test is met, participation is freely granted so long as such participation will not cause undue delay or confusion. N.J.A.C. 1:1-16.6(b). In that regard, NJUSA notes that its motion is consistent with the draft procedural schedule that has been proposed. NJUSA proposes to comply with the briefing schedule, and hence its participation will not cause undue delay or confusion in this proceeding. As noted above, NJUSA is not seeking to interject any new issues into the case – only to comment on behalf of its members on certain of the issues that may separately be determined to be part of the case.

This is the fourth base rate case for which NJUSA has sought participant status. Its motions to participate in New Jersey Natural Gas Company's base rate cases in 2016 and 2019 and New Jersey American Water's base rate case in 2018 were all granted.

Assuming participant status is granted, the following individuals should be added to the service list in this matter.

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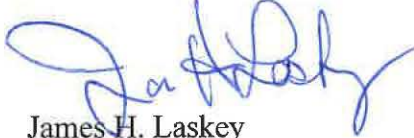
and

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CONCLUSION

For the reasons set forth above, NJUSA respectfully requests that its Motion for Participant Status be granted.

Respectfully submitted,



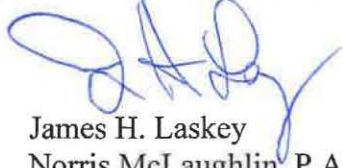
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June 16, 2021

Certification of Service

I hereby certify that I have this 16th day of June, 2021, served by electronic mail a copy of the foregoing Motion for Participant Status on all parties set forth on the attached service lists.



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