



June 6, 2016

In The Matter Of The Petition Of  
Public Service Electric And Gas Company  
for Approval of a Second Extension of a  
Solar Generation Investment Program  
and Associated Cost Recovery Mechanism and  
for Changes in the Tariff for Electric Service

BPU Docket No. EO16050412

***VIA ELECTRONIC & REGULAR MAIL***

Irene Kim Asbury, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, New Jersey 08625

Dear Secretary Asbury:

Please accept this letter on behalf of Public Service Electric and Gas Company (“PSE&G”) in response to the New Jersey Large Energy Users Coalition (“NJLEUC”) motion to intervene in the above-referenced matter. An original and ten copies are enclosed for filing.

With respect to NJLEUC’s motion to intervene, PSE&G upon information and belief understands that this party is not a formal legal entity and, as such, does not have standing to intervene in this matter. However, PSE&G further understands that NJLEUC has moved to intervene on behalf of its member companies and subject to certain conditions does not object to the intervention.

NJLEUC’s intervention should be conditioned upon the movant furnishing to the Board of Public Utilities (“Board”) and PSE&G a complete list of all of its members, specifically

identifying those members that are current electric customers of PSE&G. In addition, the Board should require that NJLEUC update this membership list in the event of any material membership changes. Inclusion of association parties in this proceeding without up-to-date member verification could lead to confusion and delay, could undermine the Board's ability to determine whether the party's interest is sufficient to qualify for intervention, and could compromise all parties' ability to pursue discovery from this movant should the need arise.

Thank you very much for your consideration.

Respectfully submitted

A handwritten signature in blue ink, appearing to read "Steven Goldenberg".

C Steven Goldenberg, Esq.  
Attached Service List

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