

DECOTIIS, FITZPATRICK, COLE & GIBLIN, LLP

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Attorneys for PJM Power Providers Group (“P3”)

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

In the Matter of the Application of PSEG Nuclear, LLC and Exelon Generation Company, LLC For the Zero Emission Certificate Program - Salem Unit 1

Docket No. ER20080557

In the Matter of The Application of PSEG Nuclear, LLC and Exelon Generation Company, LLC For The Zero Emission Certificate Program - Salem Unit 2

Docket No. ER20080558

In the Matter of the Application of PSEG Nuclear, LLC For The Zero Emission Certificate Program – Hope Creek

Docket No. ER20080559

**NOTICE OF MOTION TO
INTERVENE AS A PARTY**

TO: Honorable Joseph L. Fiordaliso, Commissioner
Ms. Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
P.O. Box 350
Trenton, New Jersey 08625-0350

and

ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that, pursuant to N.J.A.C. 1:1-16.1, et seq., DeCotiis, FitzPatrick, Cole & Giblin, LLP, attorneys for the PJM Power Providers Group (“P3”) hereby

moves for an Order permitting P3 to intervene as a Party in the above-entitled proceedings with all the rights provided therefore, under all applicable rules, code and statutes, including, but not limited to, receive copies of all pleadings, papers, documents and exhibits and to introduce, submit and file direct testimony, pleadings, papers, documents and exhibits as appropriate, the right to participate in conferences, discovery, testimony and cross-examination, settlement, and to be heard on all issues before the Board;

PLEASE TAKE FURTHER NOTICE that, in support of its Motion, P3 shall rely upon the accompanying Letter Brief.

**DECOTIIS, FITZPATRICK, COLE
& GIBLIN, LLP**
Attorneys for the PJM Power Providers Group (“P3”)

By: s/ Alice Bergen
Alice M. Bergen

Dated: September 21, 2020