

STATE OF NEW JERSEY)
)
COUNTY OF ESSEX) ss.

**BEFORE THE
NEW JERSEY BOARD OF PUBLIC UTILITIES**

In the Matter of the Petition of Public Service Electric and Gas Company for Approval of the Next Phase of the Gas System Modernization Program and Associated Cost Recovery Mechanism (“GSMP II”)	BPU Docket No. GR 17070776
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AFFIDAVIT OF WADE E. MILLER
REGARDING REBUTTAL TESTIMONY

I hereby declare under penalty of perjury that:

1. I am the Director of Gas Transmission & Distribution Engineering for Public Service Electric and Gas Company (“PSE&G”) and I am authorized to make this statement in the above-stated case.
2. Pursuant to the procedural schedule in this docket, on or about February 15, 2018 PSE&G is filing Rebuttal Testimony of Wade E. Miller.
3. PSE&G has designated the limited discussion of the contents of PSE&G’s 2016 Distribution Integrity Management Plan (“DIMP”) in this rebuttal testimony “confidential,” as the entire DIMP is a confidential document that contains commercially sensitive information of PSE&G. Therefore any references to the contents of the document should likewise be deemed confidential. Additionally, Attachments 1, 2 and 5 to this rebuttal testimony have also been designated as “confidential” because each contains financial and/or commercially sensitive information of PSE&G, which is not appropriate for public dissemination.

4. Pursuant to the Board's rules at N.J.A.C. 14:1-12.1 *et seq.* implementing OPRA, I hereby make the following additional statements in support of maintaining confidential treatment of PSE&G's Confidential Information.
5. The Confidential Information has been clearly labeled "CONFIDENTIAL."
6. PSE&G requests that the Board maintain the confidentiality of the Confidential Information for an indefinite period of time.
7. PSE&G will at all times take measures to protect the Confidential Information from public disclosure, such measures including but not limited to asserting claims of confidentiality in all regulatory and public proceedings, such as this case, as they arise.
8. PSE&G does not make such Confidential Information routinely available to the general public through any manner, including without limitation, initial and final orders in contested case adjudications, press releases, copies of speeches, pamphlets and educational materials.
9. PSE&G has taken all precautions available to it to prevent the public disclosure of the Confidential Information in proceedings before the applicable state utility commissions or other jurisdictional agencies.
10. To the best of PSE&G's knowledge, neither the Board, its Custodian nor any other State or Federal agency, nor a court of competent jurisdiction, has previously made an adverse determination with respect to the confidentiality of the Confidential Information.
11. PSE&G requests that the Board and its Custodian maintain the Confidential Information until such time as PSE&G consents to its disclosure upon any request made to disclose such information, or as otherwise ordered by law.

12. I am advised by counsel that Confidential Information contained in the information that PSE&G has designated as confidential falls within the exemption from classification as a “government record” under OPRA, as the information pertains to or comprises “emergency or security information or procedures which, if disclosed, would jeopardize security of the building or facility or persons therein,” “proprietary commercial information,” and/or “information which, if disclosed, would give an advantage to competitors or bidders.” N.J.S.A. 47:1A-1.1.

13. PSE&G requests that communications related to this request be directed to:

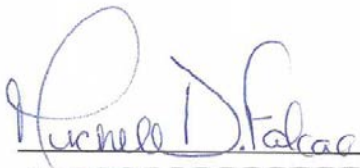
Matthew M. Weissman, Esq.
 General Regulatory Counsel – Rates
 PSEG Services Corporation
 80 Park Plaza, T5
 P. O. Box 570
 Newark, NJ 07102
 Phone: (973) 430-7052
 e-mail: matthew.weissman@pseg.com

Danielle Lopez, Esq.
 Assistant General Regulatory Counsel
 PSEG Services Corporation
 80 Park Plaza, T5
 P. O. Box 570
 Newark, NJ 07102
 Phone: (973) 430-6479
 e-mail: Danielle.Lopez@pseg.com



By: _____
 Wade Miller

Sworn and subscribed before me
 this 15th day of February, 2018



MICHELE D. FALCAO
 Notary Public, State of New Jersey
 My Commission Expires
 November 14, 2021