

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Broadwater Energy LLC)	
)	Docket No. CP06-54-000
)	
Broadwater Pipeline LLC)	
)	Docket Nos. CP06-55-000
)	CP06-56-000

**MOTION TO INTERVENE
OF
PSEG ENERGY RESOURCES & TRADE LLC**

Pursuant to Section 214 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, 18 C.F.R. § 385.214, PSEG Energy Resources & Trade, LLC (“PSEG”) hereby moves to intervene in the above-captioned proceeding. In support of the foregoing, PSEG respectfully states as follows:

**I.
IDENTITY OF PSEG**

PSEG is engaged in, among other things, the business of natural gas supply. PSEG purchases firm transportation capacity and storage services from a number of natural gas interstate pipeline companies and provides gas supply in support of the basic gas service offering of Public Service Electric and Gas Company (“PSE&G”). PSE&G is a public utility operating company, that provides distribution and serves gas to approximately 1.7 million customers in an area having a population in excess of 5.5 million persons and which extends from the Hudson River opposite New York City, south to the Delaware River at Trenton and west to Camden, New Jersey. PSEG and PSE&G are both wholly owned direct or indirect subsidiaries of Public Service Enterprise Group Incorporated. PSEG’s principal and executive offices are located at 80 Park Plaza, Newark, New Jersey 07102-0570.

**II.
COMMUNICATIONS**

Correspondence or communication with respect to this Motion may be addressed to

PSEG's attorneys:

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*David F. Caffery
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*These persons are designated to receive service.

**III.
FILINGS SUBMITTED BY
BROADWATER ENERGY LLC
AND
BROADWATER PIPELINE LLC**

On January 30, 2006, Broadwater Energy LLC (“Broadwater Energy”) filed an application under section 3 of the Natural Gas Act (NGA) and Part 153 of the Commission’s Rules and Regulations seeking authorization to site, construct and operate an offshore liquefied natural gas (“LNG”) receiving terminal and associated facilities (“Floating Storage and Regasification Unit”) in Long Island Sound, approximately nine miles from the shore of Long Island in New York State waters, as a place of entry for the importation of LNG. Broadwater Energy’s proposed terminal is intended to facilitate the importation of LNG from foreign nations into the United States.

Also, on January 30, 2006, Broadwater Pipeline LLC (“Broadwater Pipeline”) concurrently filed an application requesting: (i) in Docket No. CP06-55-000 a certificate of public convenience and necessity, pursuant to Subpart A of Part 157 of the Commission's regulations, authorizing Broadwater Pipeline to construct, own, operate and maintain a 30-inch, 22 mile subsea lateral (and related facilities) as a single-use pipeline; and (ii) in Docket No. CP06-56-000, Broadwater Pipeline requests a blanket certificate under Section 7(c) of the NGA and Part 157, Subpart F of the Commission’s regulations to perform routine activities in connection with the future construction, operation and maintenance of the proposed 22- mile pipeline. Broadwater Pipeline sought authorization to permit its proposed pipeline to be operated as a single-use pipeline. That is, it would be used for just one purpose - to transport natural gas approximately 22 miles from the Floating Storage and Regasification Unit (FSRU), to a subsea interconnection with an existing interstate pipeline.

Broadwater Energy and Broadwater Pipeline (collectively the “Broadwater Companies”) requested that the Commission issue a final order granting them all necessary authorizations for the Broadwater LNG project by March 31, 2007.

IV. STATEMENT OF ISSUES

The issue in this filing is whether PSEG should be granted intervenor status. PSEG should be granted intervenor status because it satisfies all requirements for intervention set forth in Rule 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.214.

**V.
INTERVENTION**

PSEG is an industry participant, and has a substantial interest in this proceeding. Given its interest in this proceeding, PSEG will not be adequately represented by any other party. Accordingly, PSEG should be permitted to intervene in, and be made a party to, the subject proceeding, with all rights attendant thereto.

**V.
CONCLUSION**

WHEREFORE, for the foregoing reasons, PSEG respectfully requests that PSEG be permitted to intervene in, and be made a party to, the subject proceeding, with all rights attendant thereto.

Respectfully submitted,

PSEG ENERGY RESOURCES & TRADE LLC

By: **Thomas P. Thackston**

Thomas P. Thackston
PSEG Services Corporation
80 Park Plaza – T5G
Newark, New Jersey 07102
(973) 430-8878

Dated: March 6, 2006
 Newark, New Jersey

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the official service list in accordance with the requirement of Rule 2010 of the Commission's Rules of Practice.

Dated at Newark, New Jersey, this March 6, 2006.

Thomas P. Thackston

Thomas P. Thackston

Submission Contents

Motion to Intervene of PSEG Energy Resources & Trade LLC
PSEGIntCP0654000.pdf..... 1-5