

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with <b>D.N.J. LBR 9004-1(b)</b>	
Alexandra F. Grant, Esq. (212622017) <b>PSEG</b> 80 Park Plaza Newark, NJ 07101 T: (862) 867-6702 Alexandra.Grant@PSEG.com <i>Attorney for Defendant, Public Service                  Electric and Gas Company (PSE&amp;G)</i>	
In re:  CYXTERA TECHNOLOGIES, INC., <i>et al.</i> ,  Debtors.	Chapter 11  Case No. 23-14853 (JKS)  (Jointly Administered)

**JOINDER OF PUBLIC SERVICE ELECTRIC AND GAS COMPANY TO THE  
 OBJECTION OF CERTAIN UTILITY COMPANIES TO THE DEBTORS’ INTERIM AND  
 FINAL ORDERS (I) APPROVING THE DEBTORS’ PROPOSED ADEQUATE  
 ASSURANCE OF PAYMENT FOR FUTURE UTILITY SERVICES, (II) PROHIBITING  
 UTILITY COMPANIES FROM ALTERING, REFUSING, OR DISCONTINUING  
 SERVICES, (III) APPROVING THE DEBTORS’ PROPOSED PROCEDURES FOR  
 RESOLVING ADEQUATE ASSURANCE REQUESTS, AND (IV) GRANTING RELATED  
 RELIEF**

Public Service Electric and Gas Company (“PSE&G”) hereby joins in the *Objection of Certain Utility Companies to the Debtors’ Motion for Entry of Interim and Final Orders (I) Approving the Debtors’ Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors’ Proposed Procedures for Resolving Additional Assurance Requests, and (IV) Granting Related Relief* (the “Objection”) (ECF No. 108), and sets forth the following:



**Introduction**

1. PSE&G adopts and incorporates by reference herein the *Introduction* section set forth in the Objection.

**Facts**

2. PSE&G adopts and incorporates by reference herein the *Facts* section set forth in the Objection.

**Facts Regarding PSE&G**

3. PSE&G provided the Debtors with prepetition utility goods and/or services and has continued to provide the Debtors with utility goods and/or services since the Petition Date.
4. Under PSE&G's billing cycle, the Debtors receive approximately one month of utility goods and/or services before PSE&G issues a bill for such charges. Once a bill is issued, the Debtors have approximately 20 to 30 days to pay the applicable bill before a late charge may be subsequently imposed on the account. If the Debtors fail to pay the bill after the issuance of the past due notice, PSE&G issues a notice that informs the Debtors that they have a certain period of time from the issuance of the notice to cure the arrearage or their service will be disconnected. Accordingly, under PSE&G's billing cycle, the Debtors could receive approximately two months of unpaid charges before PSE&G could cease the supply of goods and/or services for a post-petition payment default.
5. Debtors have identified and PSE&G confirms that Debtors have eight utility accounts with PSE&G. Accordingly, PSE&G files this *Joinder* seeking adequate assurance of payment for eight post-petition Debtor accounts with PSE&G.
6. In order to avoid the need to bring witnesses and have lengthy testimony regarding PSE&G's regulated billing cycle, PSE&G requests that this Court, pursuant to Rule 201 of the Federal Rules of Evidence, take judicial notice of PSE&G's billing cycle. Pursuant to the foregoing

request and based on the voluminous size of the applicable documents, PSE&G’s web site link to the following tariffs and/or state laws, regulations and/or ordinances is as follows:

- a. Electric: <https://nj.pseg.com/aboutpseg/regulatorypage/electrictariffs>
- b. Gas: <https://nj.pseg.com/aboutpseg/regulatorypage/gastariffs>

7. Subject to a reservation of PSE&G’s right to supplement its post-petition deposit request if additional accounts belonging to the Debtors are subsequently identified, PSE&G’s post-petition deposit request is as follows:

Number of Accounts	Estimated Prepetition Debt	Deposit Request (Two Months)
8	\$136,600.69	\$592,896.00

**Discussion**

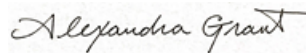
8. PSE&G incorporates and adopt by reference the legal and factual arguments set forth in the *Discussion* section in the Objection.

WHEREFORE, PSE&G respectfully requests that this Court enter an order:

- 1. Denying the Utility Motion as to PSE&G;
- 2. Awarding PSE&G the post-petition adequate assurance of payment pursuant to Section 366 in the amount and form satisfactory to PSE&G; and
- 3. Providing such other and further relief as the Court deems just and appropriate.

Dated: June 21, 2023

Respectfully Submitted,



Alexandra F. Grant, Esq.  
Attorney for Public Service Electric  
and Gas Company (PSE&G)

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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In Re:	

Case No.: \_\_\_\_\_  
Chapter: \_\_\_\_\_  
Adv. No.: \_\_\_\_\_  
Hearing Date: \_\_\_\_\_  
Judge: \_\_\_\_\_

**CERTIFICATION OF SERVICE**

- I, \_\_\_\_\_ :
  - represent \_\_\_\_\_ in this matter.
  - am the secretary/paralegal for \_\_\_\_\_, who represents \_\_\_\_\_ in this matter.
  - am the \_\_\_\_\_ in this case and am representing myself.
- On \_\_\_\_\_, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.
- I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: \_\_\_\_\_  
Signature \_\_\_\_\_

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
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