

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-1
WITNESS(S): GIBBS
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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
CONDEMNATION

QUESTION:

Direct Gibbs-p.4. Explain what authority PSE&G will rely upon for the purpose of condemnation.

ANSWER:

Please see direct testimony of Robert L. Gibbs, page 4, lines 22-23.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
FERC

QUESTION:

What is the impact of PSE&G having New Jersey public utility status for Federal Energy Regulatory Commission regulation?

ANSWER:

It is not clear what is meant by the phrase the “impact of PSE&G having New Jersey public utility status for Federal Energy Regulatory Commission regulation.” Notwithstanding this lack of clarity, PSE&G’s status as an electric public utility under N.J.S.A. Title 48 has no bearing on its status as a “public utility” under Section 201 of the Federal Power Act, and vice versa.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
TRANSMISSION; FERC

QUESTION:

What are the benefits of PSE&G being a transmission company?

ANSWER:

PSE&G objects to this question on the grounds that the information sought is ambiguous, vague, overbroad and unduly burdensome.

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WITNESS(S): POLLOCK
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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS

QUESTION:

Please identify and describe all environmental evaluations pertaining to endangered species along the proposed power line.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

See response to ENV-D-2.

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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL CONSULTANTS

QUESTION:

Please identify and describe all environmental consultants that you have retained to perform any inquiries, surveys, evaluations, and/or environmental assessments pertaining to the proposed routing of the PSE&G power line in New Jersey.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

EcolSciences, Inc
Environmental Consulting Resources
The Louis Berger Group

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WITNESS(S): POLLOCK
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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS

QUESTION:

Please identify and describe all inquiries, studies, evaluations, and/or analyses pertaining to the Indiana bat or any other known threatened, endangered, or candidate species that may live or inhabit any portion of the proposed PSE&G power line. Are you aware of any other threatened, endangered, or candidate species along the proposed power line?

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

See response to ENV-D-2.

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WITNESS(S): POLLOCK / CROUCH
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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HERBICIDES

QUESTION:

Direct Halpern, Pollock - p. 7. Has PSE&G committed to not using aerial spraying of herbicides in the Project Area?

ANSWER:

PSE&G will not spray herbicides on any property not owned by PSE&G without the owners permission. Furthermore, PSE&G will not use any aerial spraying of herbicides for this Project.

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WITNESS(S): RIBARDO
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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PESTICIDES

QUESTION:

Please identify all pesticides that will be used in the maintenance, construction, and/or upgrade of the line proposed in this BPU proceeding, including, but not limited to, a description of the specific types of pesticides, the frequency of use, strength of dosage, MSDS sheets, and any other relevant information pertaining to the used pesticides.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony

ANSWER:

PSE&G does not have any plans to use any pesticides on this Project at this time.

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WITNESS(S): GIBBS
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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PROPERTY RIGHTS

QUESTION:

Please identify and describe all parcels of land on the proposed route, including cleared rights of ways, construction staging areas, and temporary or permanent access roads, within New Jersey that the Company currently does not have existing rights-of ways.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

Please refer to Exhibit RFC-3 attached to the direct testimony of Richard F. Crouch. The only parcel of land within New Jersey that is currently proposed for the Project that PSE&G does not have an existing right-of-way is in connection with the proposed Hopatcong Switching Station in Hopatcong, New Jersey. Construction access routes and construction lay down areas are being proposed outside of the existing right-of-way as shown on Exhibit RFC-3.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LEAKAGE

QUESTION:

Please identify and describe all air pollution studies, analyses, and/or documents pertaining to air pollution that refer or relate to the PSE&G power line, or generation facilities that will send power through the proposed PSE&G power line.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

See responses to SRTT-58 to SRTT-60 and S-PP-73 to S-PP-75.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL STUDIES

QUESTION:

Please identify and describe any and environmental studies, analyses, and/or documents pertaining to the exploration (e.g. natural gas), mining (e.g. coal, gas, uranium), milling, refining, or other such processes used to create the fuel for the generation facilities that will send power through the proposed PSE&G power line.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G has conducted no such studies. See responses to SRTT-58 to SRTT-60 and S-PP-73 to S-PP-75. See also response to ENV-138.

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WITNESS(S): POLLOCK
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
TREE STUDIES

QUESTION:

Direct Pollock. Does PSE&G have any studies in its possession that examine the long term health of trees after they've been trimmed by aerial saw compared to other non-aerial trimming methods? If so please provide all such studies.

ANSWER:

PSE&G does not have any of the referenced studies in its possession.

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WITNESS(S): POLLOCK
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS

QUESTION:

Direct Pollock - p. 4. What measures does PSE&G propose to take during construction and ongoing operation and maintenance of the Project to reduce impacts on federal and state listed threatened and endangered species, as well as imperiled species, candidate species, and those of special concern?

ANSWER:

See direct pre-filed testimony of Robert Pollock at page 6, lines 14-23 and Page 7, lines 1-9. See also response to PALS-53.

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WITNESS(S): POLLOCK
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS

QUESTION:

Direct Pollock - p. 3. When will all actual wetland surveys and delineations be completed?

ANSWER:

Wetland surveys have been completed for the ROW and are shown on the BPU filed plans at exhibit RFC-3. Additional delineations are being performed for access roads and other attributes of the project which will be filed as part of the NJDEP wetland application.

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WITNESS(S): CROUCH
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ACCESS ROADS

QUESTION:

Direct Crouch - pp. 16-17, Pollock - p.6, Gibbs. Describe the process used and the factors considered in determining where to locate the access roads through existing open space and preserved lands.

ANSWER:

Please see direct testimony of Richard F. Crouch, page 16, lines 3 through 17 and page 17, lines 11-14. Access to the existing right of way was developed via aerial and ground investigation. Primary consideration was given to existing maintenance access and former construction access routes.

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WITNESS(S): CROUCH
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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ACCESS ROADS; RESTORATION

QUESTION:

Direct Ribardo. Identify all studies and plans for rehabilitation, restoration, or repair of access roads.

ANSWER:

PSE&G has not finalized plans for rehabilitation, restoration and repair of access roads. Please see direct testimony of Richard F. Crouch, page 17, line 20 through page 18, line 3.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS

QUESTION:

Direct Crouch, Gibbs, Halpern. Describe how access roads will impact existing trail networks and other publicly valued resources.

ANSWER:

Access roads will be temporary in nature. See also direct testimony of Richard F. Crouch at page 17, line 20 to page 18, line 3.

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS; ACCESS ROADS

QUESTION:

Direct Crouch, Halpern. Pollock - p. 6. Describe what type of equipment will travel over the access roads and the impact that travel will have on soils and sensitive environmental areas. Please include, but do not be limited by, the following information: the maximum size of the vehicles that would use the construction access routes (length, width, weight (bearing maximum load and no load), minimum turning radius, outside of turning radius, number of wheels or axles, number of segments).

ANSWER:

Specific construction measures are currently being evaluated. Vehicles will vary based upon structure type, topography and other construction related constraints. The engineered systems will consider vehicle types and vehicle operating constraints to design roadways that are functional and minimize environmental damage. Regardless of vehicle type or impacts, PSE&G plans to mitigate or restore affected areas wherever possible. Protective measures for sensitive environmental areas will be developed throughout construction planning and implementation.

The design of the roadways in virtually all cases is sensitive to sharp changes in horizontal alignment which will require sufficient road width for vehicle turning purposes. The maximum vehicle loading will be 80,000 pounds gross vehicle weight. (NJDOT HS 25 vehicle).

The pavement box will be placed on a suitable subgrade capable of supporting the design vehicle(s). All unsuitable material revealed at subgrade will be removed and replaced with, imported or onsite, suitable material to insure proper support for the design vehicle. Topsoil 6 inches +/- will be stripped and stockpiled in ROW or other designated location and used for vegetating sideslopes in fill and cut areas to minimize erosion and sedimentation. Excess if any will be redistributed in ROW.

Anticipated rock within 1 to 3 feet of surface dictates minimizing cut where possible. Excavated materials if suitable for embankment shall be used for that purpose. This procedure will minimize hauling of fill over existing road networks. Testholes will be used to determine suitability of cut materials and therefore final profiles in cut/ fill cases. Adjustments to alignment and profile will be made as necessary.

Means and methods of construction will be explored with the appropriate parties to determine controls for the design of access roads to include critical grades for equipment necessary to construct each tower. Aerial construction will reduce road widths and allow for profiles that follow the existing terrain.

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HALPERN
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS; ACCESS ROADS

QUESTION:

Direct Pollock - p. 2, Halpern - pp. 3-6 and exhibit JH-1. Identify other options explored or considered for routing, constructing, or maintaining the Project that that do not require access roads through publicly owned or purchased lands.

ANSWER:

All routing and construction options explored require access roads through publicly owned or purchased lands. PSE&G is minimizing access roads through publicly owned or purchased lands wherever possible.

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WITNESS(S): CROUCH
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS

QUESTION:

Direct Crouch, Gibbs. Describe the impediments to construction that exist if the State House Commission does not grant access for certain aspects of the Project.

ANSWER:

PSE&G objects to this question as speculative, vague and ambiguous. Without waiving this objection, it is PSE&G's intention to obtain all necessary governmental permits and approvals.

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WITNESS(S): GIBBS
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
SURVEYS

QUESTION:

Direct Gibbs - p. 4. Identify all surveys or studies that have been conducted to determine diminished property values adjacent to the ROW.

ANSWER:

PSE&G has not performed any surveys or studies on diminution of property values adjacent to the right-of-way. Please see response to S-ENR-32.

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WITNESS(S): GIBBS / MILLIES
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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PROPERTY VALUES

QUESTION:

Direct Gibbs, Millies. Describe how PSE&G determines impacts to land values, and how it will address the diminished value of currently preserved open space, farmland and historic sites adjacent or near the right-of-way.

ANSWER:

Please see response to ENV-21.

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WITNESS(S): POLLOCK / CROUCH /
HALPERN
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS

QUESTION:

Direct Crouch, Halpern, Pollock. Describe how the limestone and other sensitive geological formations and features in the project area will be protected from stormwater and other construction related pollutants.

ANSWER:

See response to PALS-53.

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WITNESS(S): CROUCH / HALPERN
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
CONSTRUCTION

QUESTION:

Direct Crouch, Millies. Identify any crane pad sites currently mapped to be situated on limestone geological formations.

ANSWER:

Crane pads in Andover are situated on a limestone geological formation. Further soil borings may identify other possible locations.

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WITNESS(S): POLLOCK
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS

QUESTION:

Direct Halpern, Pollock. Describe how PSE&G intends to plan for and control stormwater, including all Best Management Practices to be employed.

ANSWER:

See response to PALS-53.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
CONSTRUCTION; BLASTING

QUESTION:

Direct Crouch. Describe specific blasting techniques and methodology to be employed, specific to each tower location, including but not limited to identification of blasting equipment or other equipment to be used, time of day that blasting or work will be occurring, and all considerations that are utilized in determining what blasting techniques should be used at given locations.

ANSWER:

PSE&G has not completed a final construction plan for the Project. If blasting activities are utilized, PSE&G will work to minimize impacts blasting activities may have on adjacent property owners. Blasting activities are strictly regulated and monitored to ensure safety.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HIGHLANDS

QUESTION:

Direct Ribardo, Halpern, Pollock. How has the project been designed to address the specific and significant resource protections of the Highlands Region?

ANSWER:

See PSE&G's amended application for a Highlands Applicability Determination ("HAD"), submitted to NJDEP on May 19, 2009, including the Components of the PSE&G Comprehensive Mitigation Plan, attached to the amended HAD application, which can be found at <http://www.pseg.com/companies/pseandg/powerline/updatesreports.jsp>.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HIGHLANDS

QUESTION:

Direct Ribardo, Halpern, Pollock. Explain how the Highlands Council's consistency determination of the project will be used to guide construction practices that are consistent with the goals and purposes of the Highlands Act.

ANSWER:

A formal consistency determination has not been finalized by the Highlands Council Staff. As stated in PSEG's amended HAD application, PSE&G developed its revised application, and CMP, based upon the input of many, including the Highlands Council, which provides an implementation mechanism for identifying the specific environmental resource issues, the means to avoid and minimize the specific impact and ways that would help to mitigate unavoidable environmental impacts. The amended HAD application is available for review at <http://www.pseg.com/companies/pseandg/powerline/updatesreports.jsp>.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HIGHLANDS

QUESTION:

Direct Ribardo, Halpern, Pollock. Please quantify all lands that will be disturbed permanently and during the construction of the project within the Highlands Region.

ANSWER:

See PSE&G's amended HAD application,
<http://www.pseg.com/companies/pseandg/powerline/updatesreports.jsp>, at Table 3, page 4.

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WITNESS(S): POLLOCK
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HIGHLANDS ACT

QUESTION:

Direct Jacober, Halpern, Pollock. Explain how the Jefferson Switching Station has been designed to be consistent with the resource protection standards set forth in the Highlands Act, especially impacts to groundwater recharge areas that have a direct affect on the quality and quantity of drinking water.

ANSWER:

Please refer to PSE&G's Amended Highlands Applicability Determination for the Project at the following link:

http://www.pseg.com/companies/pseandg/powerline/pdf/pseg_amended_051909.pdf

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WITNESS(S): JACOBBER / HALPERN /
POLLOCK
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
JEFFERSON SWITCH

QUESTION:

Direct Jacobber, Halpern, Pollock. Has the Jefferson Switching Station been designed to minimize all impacts to the environmental resources on the site, especially critical habitat and groundwater recharge?

ANSWER:

Please refer to PSE&G's Amended Highlands Applicability Determination for the Project at the following link:

http://www.pseg.com/companies/pseandg/powerline/pdf/pseg_amended_051909.pdf

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WITNESS(S): JACOBBER
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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
JEFFERSON SWITCHING STATION

QUESTION:

Direct Jacobber - p. 6. Explain why it is not appropriate to minimize the footprint of the Jefferson Switching Station site by utilized GIS technology.

ANSWER:

Please refer to PSE&G's Amended Highlands Applicability Determination for the Project at the following link:

http://www.pseg.com/companies/pseandg/powerline/pdf/pseg_amended_051909.pdf

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HIGHLANDS

QUESTION:

Direct Crouch, Halpern. What specific techniques will be used to ensure that lands identified by the Highlands Water Protection and Planning Council as no-build lands (Special Environmental Areas) and critically important groundwater recharge lands will not be impacted during the construction of the project?

ANSWER:

See response to ENV-27.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HIGHLANDS

QUESTION:

Direct Halpern - p. 3-4. Please explain the role the Highlands Region -- designated as a Special Resource Area in the New Jersey State Development and Redevelopment Plan, recognized as a "landscape of national significance" in federal studies in 1992 and 2002, and formally by Congress in the 2004 Highlands Conservation Act, and designated for protection by the 2004 NJ Highlands Water Protection and Planning Act – played in the selection of the route(s)? What value was placed on the Highlands Region and its natural, wildlife, historic, cultural, recreational and scenic resources that are noted in both Highlands protection acts?

ANSWER:

Impacts to the Highlands region played a significant role in the selection of Alternative B. As stated in the Testimony of Jack Halpern, Project Director for the Louis Berger Group, which prepared the Alternative Route Identification Report for the Project, Alternative B provided the least impact to the Highlands region of the alternatives selected. Specifically, Alternative B crossed the least distance in the Highlands Planning Area. Further while 17.1 miles of the Project would cross the Highlands Planning Area, nearly all of that crossing would occur on existing right of way.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING

QUESTION:

Direct Halpern - p. 4. Please provide all criteria and rating systems employed to evaluate the resources listed in the document, including Geology and Soils, Surface Water Resources, etc.

ANSWER:

Criteria used to evaluate alternative routes are presented in Table 3.1-1 of the Alternative Route Evaluation Report. No rating systems were employed.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GROUNDWATER

QUESTION:

Direct Halpern - p. 4. Many inhabitants of the Highlands and rural New Jersey get their water from wells. To what extent were groundwater, aquifers and wellhead protection zones considered and evaluated in the alternatives selection process.

ANSWER:

We recognize that groundwater is an important source of water for inhabitants of the Highlands and rural New Jersey. However, avoiding groundwater, aquifers, and wellhead protection zones in an alternative route identification study is not feasible. We consider it most appropriate to implement appropriate protective measures once the location of structures has been defined and associated soil borings conducted. With proper Best Management Practices, we do not anticipate adverse impact to groundwater, aquifers, and wellhead protection zones.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
SURFACE WAYERS; ROUTING

QUESTION:

Direct Halpern - p. 4. In the evaluation of surface water resources and aquatic habitats, were NJDEP Surface Water Quality standards included? Were DEP buffers for surface water and wetlands buffers included in any rating system?

ANSWER:

Consideration of surface waters designated by NJDEP Surface Water Quality Standards as Category 1 (streams protected from any measurable change in water quality because of their exceptional ecological, recreational, water supply, or fishery resource significance) was given during the alternative route identification process. The 300-foot buffer zones from the edge of such streams was also considered in the Alternative Route analysis (see pages 37 through 39 of the ARI Report). As indicated in Table 3.1-2 of the ARI Report, the Proposed Route crosses the fewest number of Category 1 streams compared to the other two alternatives evaluated. Other designated NJDEP buffer zones for surface water and wetlands were not considered in the alternative route identification process, but were a major factor in the placement of transmission structures, work areas, and access roads.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING; HIGHLANDS

QUESTION:

Direct Halpern - p. 4. The Highlands Preservation Area delineated by the New Jersey Legislature in the Highlands Water Protection and Planning Act in 2004 is subject to strict NJDEP regulations. Please explain whether and how these regulations were factored into the route evaluation and selection process.

ANSWER:

During the route evaluation and selection process, distances (miles) within the Highlands Planning and Preservation Area was determined for Alternatives A, B, and C. Distances for each alternative are outlined in Section 3.4 of the ARIR. The Highlands Preservation & Planning Areas were taken into account during route evaluation (see table Table 3.1-2 of the ARI Report). It is not possible to completely avoid Highlands Preservation and Planning areas when establishing alternatives from the Delaware River to Roseland. However, avoidance of virgin rights-of-way within Highlands Preservation Areas was a determining factor in dismissing Potential Route links and evaluating the three alternative routes carried forward (as we indicate in section 3.4 of the ARI Report).

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING; HIGHLANDS

QUESTION:

Direct Halpern - p. 4. In September 2008, the Regional Master Plan (RMP) for the Highlands Region, mandated by the NJ Highlands Act and prepared by the New Jersey Highlands Water Protection and Planning Council, was finalized and approved by the Governor. Please explain whether and how the Highlands RMP factored into the route evaluation and selection process.

ANSWER:

The Proposed Route was selected prior to the Regional Master Plan (September 2008) and was not a factor in the route evaluation and selection process. However, as required by the Highlands Water Protection and Planning Act Rules (Highlands Act Rules), PSE&G submitted a Highlands Applicability and Water Quality Management Plan Consistency Determination (Highlands Applicability Determination) on September 5, 2008 to the New Jersey Department of Environmental Protection (NJDEP) Division of Watershed Management (DWM) requesting an exemption from the Highlands Act Rules in accordance with NJAC 7:38-2.3(a)11 for the preferred alternative. The Highlands Applicability Determination was deemed administratively complete on October 14, 2008 by the NJDEP DWM (Program Interest No.: 435442, Activity No.: CSD080079). In response to comments from NJDEP, the Highlands Council, public and other agencies, PSE&G submitted an amendment to the HAD application on May 19, 2009 that documents changes to the project to reduce environmental impacts. A detailed description of the preferred alternatives compliance with the goals, objectives and policies of the Highlands Regional Master Plan is included in Part IV. Section 4.0 of the Highlands Applicability Determination application.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-40
WITNESS(S): HALPERN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING; HIGHLANDS

QUESTION:

Direct Halpern - p. 4. Farmlands are an important part of the Highlands economy and landscape. It appears that impacts on farmlands, including preserved farmlands, were not considered or evaluated. Please explain whether and how they were. If not, why not.

ANSWER:

We recognize that farmlands represent a significant land use in New Jersey (see table 3.1-1, Agriculture, page 23 of the Alternative Route Identification Report). We point out in the first paragraph of the "Impacts on Land Use" section (page 51) that agricultural uses would be able to continue on either new or existing transmission line rights-of-way. We note on page 42 that "... a new utility right-of-way along Alternative A could result in some minor loss of crop production if structures are placed on agricultural lands." Such minor loss of crop production could also occur if new structures are placed parallel to existing structures, as would potentially occur along portions of Alternative C. In such cases, farmers would be compensated for any such losses. If new structures are replacing existing structures, as would generally be the case along Alternative B, there would likely be little if any additional impact on farmland. We therefore consider the potential impacts on farmlands to be negligible. However, as indicated in Table 3.1.6-6, the Alternative B would cross by far the least amount of agricultural land (12,100 feet) compared to Alternatives A (22,600 feet) and Alternative C (38,200 feet). Included in these totals would be preserved farmlands.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-41
WITNESS(S): HALPERN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING; HIGHLANDS

QUESTION:

Direct Halpern - p. 4. The Highlands Region has over the past 25 years seen many additional acres protected in fee or by conservation easement. Protected lands include national park and recreation area, state parks, forests, easements and wildlife management areas, county parks and reservations, municipal preserved lands on a Green Acres ROSI (Recreation and Open Space Inventory) list, and non-profit preserved lands, as well as privately owned preserved farmland. Please explain which lands were and were not considered in the route selection process, and why, or why not. For those that were considered, please explain how they were considered.

ANSWER:

Protected lands listed in the question were taken into account during route selection (see Table 3.1-2, NPS, state Parks, wildlife management areas, natural areas, conservation and open space lands crossed, and agriculture). Green Acres parcels are roughly accounted for in NJDEP GIS layers. Absent mitigating circumstances, the ideal would be to minimize the distances of such lands crossed by the Proposed Route. However, we consider a major mitigating factor to minimize impacts on such protected lands to be the use of an existing right-of-way. The chosen route is almost entirely on existing PSE&G right of way. Replacing structures on existing ROW ensures minimal impact to protected lands by not acquiring protected lands or permanently impacting protected lands. Please See Preferred Route Identification section 3.4 and Executive Summary of the PSE&G Alternative Route Identification Report.

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING; PRIORITY SITES

QUESTION:

Direct Halpern - p. 4. How were impacts on State Natural Heritage Priority Sites crossed by the Right-of-Way and proposed construction access routes evaluated and valued? If they were not, why not?

ANSWER:

During the route evaluation and selection process, linear feet crossed was determined for Natural Heritage Priority Sites located within the proposed ROW for each alternative. The Natural Heritage Priority Sites Coverage was created to identify critically important areas to conserve New Jersey's biological diversity, with particular emphasis on areas with known populations of rare plant species and rare ecological communities. The boundaries of each Natural Heritage Priority Site are drawn to encompass critical habitats for the rare species or ecological communities. Often, the boundaries extend to include additional buffer lands that should be managed to protect this critical habitat. Natural Heritage Priority Sites are based on analysis of information in the New Jersey Natural Heritage Database. We define Natural Heritage Priority Sites in Table 3.1-1 of the Alternative Route Evaluation Report (page 24) and such sites include rare ecological communities (which includes both plants and wildlife). We discuss the specific sites crossed by each Alternative Route on page 44 of the report. Seven sites would be crossed by Alternative A, five by Alternative B, and two by Alternative C. Potential impacts to each site are not readily assessed by the linear distance crossed the centerline of the Alternative Route (which are presented in Table 3.1-2) but by the amount of potential permanent alteration of Priority Site habitat. Alternative B, which would have little additional vegetative clearing, would have the least impact on Priority Sites compared to Alternatives A (which would cross four Priority Sites on the virgin right-of-way portion of the alignment) and Alternative C (where both Priority Sites crossed occur along the segment where the new line would likely be constructed parallel to the existing line, and thus some clearing of forested areas would be necessary). Priority Sites can include wetland, vegetation, and wildlife habitat and the conclusions regarding impacts of the three Alternative Routes on pages 40, 42, and 45/46 of the report, respectively, would apply to Priority Sites.

We did not directly consider impacts to Priority Sites due to access road construction during the route selection process. Our assumption is that regardless of the Alternative Route selected, every effort would be made to avoid placing access roads at locations that would adversely affect designated Priority Sites. Specific access road locations are typically not established until after a Proposed Route is selected.

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING

QUESTION:

Direct Halpern - p. 4. The Highlands is a renowned hiking area that is crossed by long distance trails including the Appalachian National Scenic Trail and the Highlands Millennium Trail, as well as numerous smaller trail systems. Describe how these recreational resources, and the scenic effects on the trails of the higher towers, were evaluated. If they were not, why not?

ANSWER:

When new transmission structures are constructed at locations that are visible to hikers along established trails where previously there were either no structures or shorter structures, there will be a visual impact. The linear nature of trails, especially long distance trails such as the Appalachian National Scenic Trail, makes them difficult to avoid. We discuss the Appalachian Trail in depth on page 53, 54, and 55 of the Alternative Route Identification Report. Included in this discussion is the Appalachian Trail Council's Policy on Roads and Utility Developments. One germane policy is: "Any new impacts associated with the proposed development shall coincide with existing major impacts to the Trail experience." Thus if a new transmission line should be necessary, it would need to be placed on or adjacent to an existing right-of-way (such as a transmission line, road, or underground pipeline). This policy would also be applicable to other trails in the study area. This policy was a key in establishing the Alternative Route alignments. Our assessment of the impacts of each Alternative Route on the Appalachian Trail is presented on pages 58 and 59 of the report, and our conclusions on page 59 focus on the relative degree of visual impact on hikers.

We also discuss aesthetic impacts along all three Alternative Routes in section 3.1.9 of the report. In this section, we identify recreational users, including hikers, as a specific "viewer/user group" that could be influenced by the proposed transmission line. We present our description of aesthetic impacts and conclusions on page 83 and 84 of the report, which would apply to hikers at locations where Alternative Routes cross designated trails. Because Alternative B would occupy an existing transmission line right-of-way and minimal additional clearing would be required, we conclude that it would have the least visual impact on hikers.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-44
WITNESS(S): HALPERN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING

QUESTION:

Direct Halpern - JH-1. Relating to habitat and type of wildlife in the right-of-way or adjoining areas, and any effects of the Project upon them, the Alternative Route Identification Report (ARI), Sec. 3.1.5, fails to address the specific State Rare, Threatened and Endangered species, including numerous rare species of birds that migrate through the Highlands, impacted by the ROW and the proposed construction access routes. Please explain this failure, or provide the analysis.

ANSWER:

For the Louis Berger Alternative Route analysis, it was considered most appropriate to use data sources that have a uniform level of applicability throughout the study area. The Priority Site mapping available from the NJDEP provides a uniform level of applicability throughout the New Jersey portion of the study area and is more suited as a factor to be considered in our routing analysis. Giving deference to an Alternative Route that minimizes permanent Priority Site alteration should also serve to protect the state listed rare species that may occur within those Priority Sites. Once a Proposed Route is selected, and more details about structure placement and access roads along that route are developed, specific rare species surveys can be conducted, as appropriate, and measures to avoid and protect rare species developed in consultation with NJDEP.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-45
WITNESS(S): CROUCH / HALPERN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENVIRONMENTAL IMPACTS; ACCESS ROADS

QUESTION:

Direct Halpern – JH-1. The ARI states that “Alternative B is entirely within existing right-of-way,” (e.g., ARI, Conclusions, p.45); however, it appears there are over 20 miles of proposed construction access routes outside the existing ROW in the Highlands portion alone. Please explain this discrepancy.

ANSWER:

Alternative B refers to construction of the transmission assets (i.e. the towers and the circuits) not proposed temporary access roads.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-46
WITNESS(S): HALPERN / POLLOCK
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
BIRDS

QUESTION:

Direct Halpern – JH-1. The ARI refers to Avian Powerline Interaction Committee guidelines from 2005 and 2006. Did PSE&G consider Mitigating Bird Collisions With Power Lines, 1994? If yes, what conclusions were reached? If not, why not? Were any other guidelines or studies relating to avian impacts reviewed? If yes, please provide them, describe their conclusions, and explain why they are not discussed.

ANSWER:

PSE&G is currently evaluating its design with regards to potential avian impacts. We anticipate utilizing additional information including the Mitigating Bird Collisions With Power Lines, 1994 to prepare our Avian Protection Plan as outlined within the Comprehensive Mitigation Plan.

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING

QUESTION:

Direct Pollock – p. 5. Please explain the claim that the Project “will be constructed within the existing ROW...resulting in no additional impacts to existing stream corridors” in light of the fact that over 20 miles of construction access routes are planned within the Highlands portion alone, with numerous small stream crossings?

ANSWER:

In connection with this Project, there will be construction activities located on and off the right-of-way.

On-Right-of-Way Activities: The existing right-of-way is subject to routine NJDEP and New Jersey Board of Public Utilities authorized vegetative clearing. Because the Alternative B transmission line will be constructed along the existing right-of-way, the additional effects of the new line on existing stream corridors would be minimal. It is noted that, in general, each proposed tower location will be replacing an existing tower, and the existing towers will ultimately be removed. The proposed/improved on-right-of-way access roads will be temporary, and based on ongoing discussions with the NJDEP Division of Land Use Regulation, the proposed/improved access roads will not require stream riparian zone mitigation, as they will be temporary in nature, and the access road sites will be stabilized/revegetated upon completion of construction activities. Proposed on-right-of-way stream crossings, a number of which have been minimized to the extent practicable, will be accomplished with temporary clear-span bridges, which will maximize channel flow areas and have received initial concurrence by the NJDEP Division of Land Use Regulation. Associated impacts to stream corridors within the existing right-of-way will therefore be minimized with regard to the proposed transmission line and on-right-of-way access roads.

Off-Right-of-Way Activities: The proposed off-right-of-way access roads will be temporary, and based on ongoing discussions with the NJDEP Division of Land Use Regulation, the proposed/improved access roads will not require stream riparian zone mitigation, as they will be temporary in nature, and the access road sites will be restored to their pre-existing contour and revegetated upon completion of construction activities. Proposed off-right-of-way stream crossings, a number of which have been minimized to the extent practicable, will be accomplished with temporary clear-span bridges, which will maximize channel flow areas and have received initial concurrence by the NJDEP Division of Land Use Regulation. Associated impacts to stream corridors outside the existing right-of-way will therefore be minimized with regard to the proposed off-right-of-way access roads.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-48
WITNESS(S):
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HIGHLANDS

QUESTION:

Direct Pollock – p. 4. Why is the N.J. Highlands Council not included in the list of entities from which PSE&G will require a permit or authorization? Have other bodies or agencies been omitted from this response? If yes, which ones? If so, why were they omitted?

ANSWER:

The New Jersey Highlands Council was not identified as an entity from which PSE&G will require a permit or authorization because no permit or authorization is required. PSE&G believes the Project qualifies for an exemption pursuant to N.J.S.A. 13:20-28(a)(11) and N.J.A.C. 7:38-23.(a)(11). PSE&G has applied to the NJDEP for a Highlands Applicability Determination (“HAD”) that the Project is exempt under this section. PSE&G’s application for a HAD is currently being reviewed by the Highlands Council. A HAD is not a permit or authorization from either NJDEP or the Highlands Council, it is a determination that the exemption applied for by an applicant meets the exemption requirements.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-49
WITNESS(S): POLLOCK
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HIGHLANDS

QUESTION:

Direct Pollock – p. 6. Why has the Highlands Regional Master Plan been omitted as a basis for the design of the project. Please explain.

ANSWER:

See PSE&G's application for a Highlands Applicability Determination ("HAD") and Highlands mitigation plan filed with the NJDEP and posted at <http://www.pseg.com/companies/pseandg/powerline/updatesreports.jsp#anchor4> at page 8 of the CMP.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-50
WITNESS(S): POLLOCK
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
JEFFERSON SWITCHING STATION

QUESTION:

Direct Pollock. The Jefferson switching station is located in the legislatively delineated Highlands Preservation Area, and is located in the Protection Zone of the Highlands Regional Master Plan. Please explain why PSE&G proposes to locate the switching station in that location.

ANSWER:

Please refer to PSE&G's Amended Highlands Applicability Determination for the Project at the following link:

http://www.pseg.com/companies/pseandg/powerline/pdf/pseg_amended_051909.pdf

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-51
WITNESS(S): CROUCH
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DESIGN; VEGETATION MANAGEMENT

QUESTION:

Direct Ribardo. Has PSE&G or its consultants performed any micro siting and sizing of towers for spans across sensitive areas to determine whether any valleys and streams could be crossed with minimal ROW clearing along valley floors and lower slopes? If so provide the results of all such studies.

ANSWER:

No, PSE&G has not performed such studies. See direct testimony of Richard F. Crouch at page 7, lines 4 to 11 for how PSE&G determined the location of structures.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-52
WITNESS(S): CROUCH
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
WORK FORCE

QUESTION:

What PSE&G personnel is responsible for operation and maintenance expense on existing PSE&G high voltage transmission lines?

ANSWER:

PSE&G's Transmission Construction & Maintenance Group. This group is responsible for overseeing and performing the operation and maintenance activities on the existing lines.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-53
WITNESS(S): CROUCH
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
CONSTRUCTION RESPONSIBILITY

QUESTION:

What PSE&G Company personnel will be responsible for operation and maintenance expense on the proposed line?

ANSWER:

PSE&G's Transmission Construction & Maintenance Group. This group will be responsible for overseeing and performing the operation and maintenance activities on the proposed line.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-54
WITNESS(S): CROUCH
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
WORK FORCE

QUESTION:

Would the maintenance be performed by PSE&G personnel?

ANSWER:

The majority of the maintenance will be performed by PSE&G personnel. Specialty contractors may be utilized on occasion. Any contracted work is overseen by PSE&G associates.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-55
WITNESS(S): CROUCH
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
WORK FORCE; MAINTENANCE

QUESTION:

If answer to 54 is no, who would perform the maintenance?

ANSWER:

See response to ENV-54.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-56
WITNESS(S):
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

Please identify and then explain the rationale for deactivating generators owned and or operated by PSE&G affiliates located in New Jersey.

ANSWER:

PSE&G objects to this question as irrelevant and beyond the scope of this proceeding. Without waiving this objection, PSE&G does not currently own generation and thus does not make decisions regarding whether to deactivate generation. Moreover, Part V of the PJM Tariff sets forth a process for generator deactivation that includes reliability reviews and notice requirements.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-57
WITNESS(S):
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

Please identify and explain the rationale for providing power outside of the PJM region supplied by PSE&G affiliates.

ANSWER:

PSE&G objects to this question as irrelevant and beyond the scope of this proceeding. Without waiving this objection, PSE&G is not involved in decision-making with its affiliates to provide power outside (or inside) the PJM region. In addition, PSE&G affiliates have consistently incurred obligations to supply basic generation service ("BGS") load within New Jersey and have committed generation output as part of the RPM Auction process.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-58
WITNESS(S):
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
CONSULTANTS

QUESTION:

Identify all economists and other experts that PSE&G contacted concerning this matter, whether retained or not.

ANSWER:

PSE&G objects to this question as irrelevant, vague, ambiguous and unduly burdensome.

Without waiving this objection, PSE&G consulted with individuals at the Center for Urban Policy Research (CUPR) at Rutgers Edward J Bloustein School of Planning and Public policy including:

Dr. Joseph J. Seneca
Dr. Michael L. Lahr
Dr. James W. Hughes
Will Irving

Additionally, Professor Anton Nelessen, President of A. Nelessen Associates, Inc. was also consulted.

See also exhibits P-1 to P-13 for the experts providing pre-filed testimony in this proceeding.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-59
WITNESS(S):
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
CONSTRUCTION COSTS

QUESTION:

Please provide an explanation of how PSE&G intends to segregate and record the costs incurred for the operation and maintenance on the proposed transmission line and existing transmission lines.

ANSWER:

PSE&G records maintenance costs based upon the assets being maintained: work being performed on the 230kV line will be charged to the 230kV assets while work being performed on the 500kV line will be charged to the 500kV assets. Shared costs will be split between both asset classes.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-60
WITNESS(S): HERLING
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP

QUESTION:

Direct Herling, McGlynn - p. 8. Did PJM, as part of the RTEP process, simulate likely generation pattern changes should various carbon constraints be enacted? If so, please provide all such studies and explain how those impact the need for this proposed line.

ANSWER:

PJM did not conduct an analysis as part of the RTEP process to determine generation pattern changes resulting from CO2 prices. The input assumptions used in the economic portion of the 2008 RTEP process are summarized in the material located at <http://www.pjm.com/Media/committees-groups/committees/teac/20080521-r-m-efficiency-analysis-update.pdf>. Slide 59 shows the CO2 prices assumptions used in this analysis. The CO2 prices of slide 59 were assumed to be in place for all simulations that were made as part of the 2008 RTEP process.

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ENERGY EFFICIENCY; DEMAND RESPONSE; CONSERVATION

QUESTION:

Direct Reynolds - pp. 7-8. Please list each conservation, demand response and efficiency improvement program currently implemented by members of the Eastern PJM area. Include the expected megawatt reduction and timing of each program.

ANSWER:

PJM’s knowledge of conservation, demand response and energy efficiency programs is limited to those which have registered as Interruptible Load for Reliability or Demand Resource in PJM’s Load Response programs. Preliminary data for summer 2009 indicate there will be 1,011.1 MWs of Load Management in the Eastern MAAC Locational Deliverability Area. Listed below are the amounts of Load Management for each zone, with detail provided for program type (Direct Load Control, Firm Service Level, Guaranteed Load Drop). There are no energy efficiency programs registered for 2009.

PJM Interconnection				
Load Management in the E-MAAC Area				
Summer 2009 (MW)				
ZONE	DLC	FSL	GLD	Total
AECO		17.6	43.9	61.5
DPL	25.9	73.5	63.0	162.4
JCPL	24.2	33.0	89.5	146.7
PECO		129.0	222.8	351.8
PSEG	61.9	40.0	211.0	312.9
RECO		0.1	3.4	3.5
E-MAAC	112.0	293.2	633.6	1,038.8
All MW values are ICAP				
Load Management Registration Data as of 6/15/2009				
DLC - Direct Load Control				
FSL - Firm Service Level				
GLD - Guaranteed Load Drop				

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-62
WITNESS(S): MCGLYNN / HERLING
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP

QUESTION:

Direct Herling, McGlynn - p. 9. In the RTEP models, how were the various pump storage generation units, east of the constraint, modeled during times when transmission reliability violations occurred? In other words, were the units in a pumping or generating mode?

ANSWER:

Pumped storage units were modeled in the generating mode.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-63
WITNESS(S): RIBARDO
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PROJECT COSTS

QUESTION:

Direct Ribardo, Halpern - JH-1 p. 86. Please provide the total cost of construction for each of the Alternative Routes A through C. Was cost used as an evaluation criteria in any of the alternative analyses and comparisons? If so, please provide the decision matrices or other data that provides this information.

ANSWER:

Please see response to S-ENR-19.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-64
WITNESS(S): HALPERN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ROUTING

QUESTION:

Direct Halpern – p.3. Please provide descriptions and maps of all existing and potential rights-of-way that comprise the full spectrum of possible routes, whether or not held by PSE&G, that were inventoried, noted, mentioned, discussed, evaluated, etc., in any way, to move power between western Pennsylvania and the New York City metropolitan area, from which the three alternatives selected were chosen.

ANSWER:

A map displaying all Potential Routes can be found in Ex. JH1, Figure 2.8-1.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-65
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

Direct Herling, McGlynn. Please provide current information with regard to new generation additions, retirements, including type of generation, number of megawatts, and dates, for the New York ISE, New England ISO, and the New Jersey and Pennsylvania PJM RTO areas.

ANSWER:

New generation addition information for PJM can be found at:

<http://www.pjm.com/planning/generation-interconnection/generation-queue-active.aspx>

Retirement information can be found at:

<http://www.pjm.com/planning/generation-retirements/gr-summaries.aspx>

PJM does not have the requested information for NY and NE.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-66
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
FERC FILINGS AND ORDERS

QUESTION:

Please identify, describe and produce all rate filings, rate Orders, FERC filings and FERC Orders in connection with the proposed line and/or related facilities.

ANSWER:

FERC filings and FERC Orders in connection with the proposed line and/or related facilities are available on the FERC web site at <http://elibrary.ferc.gov/idmws/search/fercadvsearch.asp>.

The relevant pleadings can be found under:

FERC Docket No. EL08-23-000.

FERC Docket No. ER08-1233.

FERC Docket No. ER07-1186

FERC Docket No. ER06-456

FERC Docket No. ER09-1257

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-67
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DEMAND RESPONSE; CONSERVATION

QUESTION:

Please identify and describe PSE&G's demand reduction, conservation and peak management programs, and the penetration of these programs into its service territory for businesses and individuals.

ANSWER:

See Exhibit ENV-67.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-68
WITNESS(S): REYNOLDS
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LOAD FORECAST; RTEP

QUESTION:

Please identify, describe, and produce the load forecast used in PJM's 2006 Regional Transmission Expansion Plan ("RTEP").

ANSWER:

The load forecast used in the 2006 RTEP Report (published in February 2007) was the 2006 PJM Load Forecast Report. PJM Load Forecast Reports for previous years can be found at:

<http://www.pjm.com/planning/resource-adequacy-planning/load-forecast-dev-process/prev-load-reports.aspx>

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-69
WITNESS(S): REYNOLDS
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LOAD FORECAST; RTEP

QUESTION:

Please identify, describe, and produce the load forecast used in PJM's 2007 RTEP.

ANSWER:

The load forecast used in the 2007 RTEP Report (published in February 2008) was the 2007 PJM Load Forecast Report. See response to ENV-68 for link.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-70
WITNESS(S): REYNOLDS
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LOAD FORECAST; RTEP

QUESTION:

Please identify, describe, and produce the load forecast used in PJM's 2008 RTEP.

ANSWER:

The primary load forecast used in the 2008 RTEP Report (published in February 2009) was the 2008 PJM Load Forecast Report. See response to ENV-68 for link.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-71
WITNESS(S): REYNOLDS
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LOAD FORECAST

QUESTION:

Please identify, describe, and produce the most recent PJM load forecast.

ANSWER:

The most recent PJM load forecast was published in January 2009 and can be accessed at:
<http://www.pjm.com/planning/resource-adequacyplanning/~ / media/documents/reports/2009-pjm-load-report.ashx>.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-72
WITNESS(S): REYNOLDS
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP

QUESTION:

Please identify, describe and produce documents identifying large generator retirements, or expected retirements, in eastern PJM assumed during the 2006 RTEP process, including expected retirement dates and sizes of the facilities, and describe if any of these actual or projected retirements has been post-phoned, delayed or canceled since that time.

ANSWER:

See section 3.3.2 of the 2006 RTEP Report (page 54) for a list of generator deactivations in Eastern PJM used in the 2006 RTEP process. Whether or not those generators actually retired can be determined by visiting the generation retirements link which are posted on the PJM web page at:
<http://www.pjm.com/planning/generation-retirements/~//media/planning/genretire/20080523-generator-deactivations.ashx>

Generators that had announced their intention to retire but have since withdrawn or deferred that deactivation request are posted to the PJM web page at the following link:
<http://www.pjm.com/planning/generation-retirements/~//media/planning/genretire/20080523-withdrawn-requests.ashx>

Generators that had given notice of their intended deactivation prior to the start of the 2006 RTEP and that did not have a reliability must run contract would have assumed to be deactivated as part of the RTEP analysis if their requested deactivation date was prior to the year being studied.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-73
WITNESS(S): REYNOLDS
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP

QUESTION:

Please identify, describe and produce documents identifying large generator retirements, or expected retirements, in eastern PJM assumed during the 2007 RTEP process, including expected retirement dates and sizes of the facilities, and describe if any of these actual or projected retirements has been post-phoned, delayed or canceled since that time.

ANSWER:

See section 3.5.2 of the 2007 RTEP Report (pages 80-81) for a list of generator deactivations in Eastern PJM used in the 2007 RTEP process. See response to ENV-72 for determining the ultimate status of those planned deactivations.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-74
WITNESS(S): REYNOLDS
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP

QUESTION:

Please identify, describe and produce documents identifying large generator retirements, or expected retirements, in eastern PJM assumed during the 2008 RTEP process, including expected retirement dates and sizes of the facilities, and describe if any of these actual or projected retirements has been post-phoned, delayed or canceled since that time.

ANSWER:

Deactivations, withdrawn deactivations and pending deactivations used in the 2008 RTEP process are those documented on the PJM website noted in the response to ENV-72.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-75
WITNESS(S): REYNOLDS
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP

QUESTION:

Please identify, describe and produce documents identifying large generator retirements, or expected retirements, in eastern PJM assumed after the 2008 RTEP process, including expected retirement dates and sizes of the facilities, and describe if any of these actual or projected retirements has been post-phoned, delayed or canceled since that time.

ANSWER:

Deactivations, withdrawn deactivations and pending deactivations assumed after the 2008 RTEP process are those documented on the PJM website noted in the response to ENV-72.