



# STOP THE LINES!

Opposition to PSE&G Susquehanna Roseland Powerline Project

PO Box 398, Tranquility NJ 07879

[www.stophelines.com](http://www.stophelines.com)

February 25, 2009

Kristi Izzo  
Office of the Secretary  
Board of Public Utilities  
Two Gateway Center  
Newark, NJ 07102

RE: PSE&G Susquehanna-Roseland Transmission Project  
BPU Docket No: EM09010035

Dear Secretary Izzo:

Enclosed please find the Original and ten copies of STOP THE LINES Motion to Intervene and Application for Leave to Represent Party at Contested Case Hearing.

If you require anything further, please let me know.

Sincerely,

---

David Slaperud  
for  
Stop the Lines

cc: Service List

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

IN THE MATTER OF THE PETITION OF	)	
PUBLIC SERVICE ELECTRIC AND GAS	)	BPU DOCKET NO. EM09010035
COMPANY FOR A DETERMINATION	)	
PURSUANT TO THE PROVISIONS OF	)	
N.J.S.A. 40:55D-19	)	
	)	
SUSQUEHANNA-ROSELAND PROJECT	)	

**STOP THE LINES MOTION TO INTERVENE**

Stop the Lines, pursuant to N.J.A.C. 1:1-166.1 – 1:1-16.5, makes this motion to intervene in the above-entitled matter, Public Service Electric and Gas Company’s (hereinafter “PSE&G”) Petition for a Determination pursuant to the provisions of N.J.S.A. 40:55D-19 for the Susquehanna Roseland Transmission Project.

Stop the Lines is a non-profit organization incorporated under the laws of the State of New Jersey. Stop the Lines members live, work and recreate along the PSE&G Susquehanna-Roseland Transmission Project proposed Route B. Members of Stop the Lines will be substantially, specifically and directly affected by the outcome of this contested case.

Stop the Lines’ interests are as many and varied as its members. Stop the Lines is concerned about the energy policy and public interest issues reflected in this proposal. Transmission infrastructure is an irretrievable commitment of money at a time when capital for construction projects is hard to secure. If this line is built, we will commit to a means and manner of electrical generation and usage, one that will not facilitate conservation and efficiency, but instead that will facilitate market transactions of electricity.

Stop the Lines is concerned about the methodology, inputs and theory of PSE&G’s /PJM’s forecasting. We are not in a high growth area. A goal of the New Jersey Energy Masterplan is to use less energy in 2020 than today. The recent drop in demand is due not only to our current economic downturn, but also with growing awareness, conservation, and better efficiency. We do not want to repeat the 1970s, where people learned about energy use, conserved dramatically, and the result was that utility forecasting was improperly based on prior trends (which were grossly incorrect) and the industry

overbuilt. The result was that many plants were cancelled, others were stopped in mid-construction saddling ratepayers with unnecessary costs and lack of local generation that would solve today's perceived problem of overloaded transmission lines. We have needed little utility infrastructure because of this surplus.

Stop the Lines has an interest in the location of claimed load -- most of the energy proposed to run through these lines is not ultimately intended for use in NJ, it is instead intended for export to New York City. What is the cost to the ratepayers and landowners of New Jersey to be a "pass-through," and to pay for the capital costs and provide land for a project from which we will not benefit?

Stop the Lines has an interest in alternatives to this transmission project, and is concerned about the lack of system alternatives to transmission to address any increase in demand. PSE&G and PJM are only looking at transmission, and does not address satisfaction of need by implementing demand side management, conservation awareness programs, local solar, and various steps that constitute the energy policy of New Jersey, as outlined in the New Jersey Energy Masterplan.

Stop the Lines would inform the record about efficiency and inefficiency when comparing this proposal against other options, such as distributed generation near load. Line loss alone could preclude this project as an economic option. Local generation is a much better solution than the inherently inefficient long distance transmission of energy in Alternating Current along 195'+ high towers.

Stop the Lines has an interest in assuring that any project approved be compatible with the Obama administration's proposed electrical priorities and new grid design. Hopefully, this new grid design will incorporate a focus on local and distributed generation, with a supporting transmission grid designed for lower energy loss and EMF emissions.

Stop the Lines is also concerned about financing, including costs, sources and amounts of capital for this project and will address these financing issues in the hearing. Private capital is not available for construction costs, and public capital may be available from sources such as stimulus money. Any stimulus money project must be doubly vetted to assure it is in the public interest.

Stop the Lines members are landowners along the route. We are concerned because the current Right of Way through the New Jersey portion is only 150' wide. Petitioners should allow for a larger Right of

Way. The original grantors of the easements clearly were not anticipating a grant to PSE&G of the right to construct towers of this magnitude for high capacity transmission. This is an “order of magnitude” difference – low level transmission for local load and massive transmission for bulk power transfer.

Stop the Lines has concerns with the 190'+ high towers that are proposed. We believe that through their height, they pose a very real safety concern. From an engineering standpoint, putting towers that are up to 195' tall in a right-of-way only 75 foot across is physically unsafe – this Right of Way does not provide a sufficient setback for clearance in the event a tower would fall. There is also a major visual and environmental price to pay if towers of this height are put above the tree canopy and are visible through our historic, rural, and protected communities. Our water supplies and several sensitive habitats may also be at risk from the planned construction of new towers.

Stop the Lines has a direct interest in the economic impacts of this line, which should be considered in a cost-benefit analysis of the project. Stop the Lines would submit evidence that this transmission line would affect property values, income from tourism, business income, and would “industrialize” our rural area beyond recognition.

Stop the Lines has substantive concerns with the higher EMF levels that would result with the proposed line. We question whether the “cancellation techniques” that PSE&G plans to use will lower EMF levels to lower than the current levels. There are studies that show that high EMF levels are associated with an increased rate of child leukemia, and corona attracts aerosol pollutants, triggering the “Henshaw Effect,” which leads to serious health problems. Landowners should be given the option to force a buyout so they can get out from under the line should this project or future projects be built along this ROW.

As landowners along the existing easement, Stop the Lines has an interest in the routing of the line. If this transmission project is approved, it should be buried or run along the Route 80 corridor, which is a much shorter and more logical route. We will address New Jersey’s policy of “accommodation” and use of DOT corridor.

In our current economic crisis, it is very difficult for us to raise funds to retain legal representation and experts to challenge PSE&G’s claims. We respectfully request that the BPU require PSE&G to be

assessed and pay into escrow for Intervenor to retain experts to inform the record. This is equitable because PSE&G was saved the expense of Intervenor experts that would have been assessed had they brought their application to the 15 individual planning boards in communities along the route in New Jersey as originally announced.

No other intervenor addresses the issues or has the same concerns of Stop the Lines. Stop the Lines' interests are sufficiently different from any other party to support granting Intervenor status as a full party with all rights and obligations. Through its work informing the record, Stop the Lines will add measurably and constructively to the scope of this docket. There is no intent or action to confuse or delay – Stop the Lines seeks to contribute to an equitable and fully informed decision on this matter.

The following party IS to receive filings and documents on behalf of Stop the Lines:

David Slaperud  
PO Box 398  
Tranquility NJ 07879  
973-940-2976  
[info@stophelines.com](mailto:info@stophelines.com)

WHEREFORE, Stop the Lines respectfully requests that the Board of Public Utilities:

1. Grant Stop the Lines permission to intervene in the above proceeding and be treated as a party, with full rights of participation as provided by the Board's policies and procedures and by N.J.S.A. 48:2, subject to its agreement to take the record as it stands.
2. Stop the Lines be afforded all such other relief deemed appropriate by the Board.

Respectfully submitted:

STOP THE LINES

By \_\_\_\_\_

David Slaperud  
PO Box 398  
Tranquility NJ 07879  
973-940-2976  
[info@stophelines.com](mailto:info@stophelines.com)

IN THE MATTER OF THE PETITION OF )  
PUBLIC SERVICE ELECTRIC AND GAS )  
COMPANY FOR A DETERMINATION )  
PURSUANT TO THE PROVISIONS OF )  
N.J.S.A. 40:55D-19 )  
SUSQUEHANNA-ROSELAND PROJECT )  
)  
)  
)

BPU DOCKET NO. EM09010035

**APPLICATION FOR PERMISSION TO REPRESENT A PARTY  
AT A CONTESTED CASE HEARING**

1. Public Service Electric and Gas Company’s (hereinafter “PSE&G”) Petition for a Determination pursuant to the provisions of N.J.S.A. 40:55D-19 for the Susquehanna Roseland Transmission Project has been filed and the above-entitled docket will be heard by the Board of Public Utilities as a contested case.
2. Applicant David Slaperud requests permission to represent a party, Stop the Lines, in this contested case proceeding.
3. Stop the Lines is a non-profit closely-held corporation organized in the state of New Jersey.
4. Applicant David Slaperud is a member of the Board of Directors of Stop the Lines, and as such is a principal of the corporation.
5. Applicant David Slaperud certifies that he is not a suspended or disbarred attorney and that he or she is not receiving a fee for the appearance.
6. Applicant David Slaperud has completed a Notice of Appearance, attached.

Respectfully submitted:

STOP THE LINES

By \_\_\_\_\_  
David Slaperud  
PO Box 398  
Tranquility NJ 07879  
973-940-2976  
[info@stophelines.com](mailto:info@stophelines.com)

**State of New Jersey  
Board of Public Utilities**

IN THE MATTER OF THE PETITION OF /  
PUBLIC SERVICE ELECTRIC AND GAS /  
COMPANY FOR A DETERMINATION / BPU DOCKET NO. EM09010035  
PURSUANT TO THE PROVISIONS OF /  
N.J.S.A. 40:55D-19 /

**NOTICE OF APPEARANCE/APPLICATION  
CLOSE CORPORATION**

**STOP THE LINES, INC.**

I, David Slaperud, hereby apply to represent Stop The Lines in above captioned case. Pursuant to N.J.A.C. 1:1-5.4(a)(5), I submit the following information in support of my application.

Stop the Lines is a non-profit Corporation that is not publicly owned. It is engaged in the business of Public Interest and incorporated in the State of New Jersey.

I am not a suspended or disbarred attorney.

I am not receiving a fee for the appearance.

I have served a copy of this application on all parties.

I hereby certify that the above information is true and accurate.

\_\_\_\_\_  
DATE

\_\_\_\_\_  
SIGNATURE

David Slaperud  
PO Box 398  
Tranquility NJ 07879  
973-940-2976  
[info@stophelines.com](mailto:info@stophelines.com)

**In the Matter of the Petition of  
Public Service Electric and Gas Company  
For a Determination Pursuant to the  
Provisions of N.J.S.A. 40:55D-19**

**(SUSQUEHANNA-ROSELAND)  
BPU DOCKET NO. EM09010035**

<p>Tamara L. Linde, Esq. PSEG Services Corporation 80 Park Plaza, T5G Newark, NJ 07102</p>	<p>Jodi L. Moskowitz, Esq. PSEG Services Corporation 80 Park Plaza, T5G Newark, NJ 07102</p>	<p>David K. Richter, Esq. PSEG Services Corporation 80 Park Plaza, T5G Newark, NJ 07102</p>
<p>Alexander C. Stern, Esq. PSEG Services Corporation 80 Park Plaza, T5G Newark, NJ 07102</p>	<p>Jeanette Carlo PSEG Services Corporation 80 Park Plaza, T5G Newark, NJ 07102</p>	<p>Kristi Izzo, Secretary Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>
<p>Ed Beslow, Esq. Counsel's Office Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>	<p>Samuel Wolfe, Esq. Chief Counsel Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>	<p>Damase Hebert, Esq. Counsel's Office Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>
<p>Jerry May Division of Energy Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>	<p>Andrea-Sarmentero-Garzon Counsel's Office Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>	<p>Frank Perrotti Division of Energy Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>
<p>David Ballengee Division of Energy Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>	<p>Carl Dzierzawiec Division of Energy Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>	<p>Chris Haun Policy and Planning Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>
<p>Elise Goldblat, DAG Acting Section Chief Division of Law Dept. of Law and Public Safety 124 Halsey Street P.O. Box 45029 Newark, NJ 07102</p>	<p>Joe Costa Policy and Planning Board of Public Utilities Two Gateway Center Newark, NJ 07102</p>	<p>Kerri Kirschbaum Division of Law Dept. of Law and Public Safety 124 Halsey Street P.O. Box 45029 Newark, NJ 07102</p>
<p>Alex Moreau Division of Law Dept. of Law and Public Safety 124 Halsey Street P.O. Box 45029 Newark, NJ 07102</p>	<p>Ken Sheehan, DAG Division of Law Dept. of Law and Public Safety 124 Halsey Street P.O. Box 45029 Newark, NJ 07102</p>	<p>Stephanie Brand, Esq., Director Division of the Rate Counsel 31 Clinton Street, 11<sup>th</sup> Floor P.O. Box 46005 Newark, NJ 07102</p>

<p>Henry Ogden, Esq. Division of the Rate Counsel 31 Clinton Street, 11<sup>th</sup> Floor P.O. Box 46005 Newark, NJ 07102</p>	<p>Anne Marie Shatto Division of Law Dept. of Law and Public Safety 124 Halsey Street P.O. Box 45029 Newark, NJ 07102</p>	<p>Vita Thompson Andover Township Municipal Clerk 134 Newton-Sparta Road Newton, NJ 07860-2746</p>
<p>Barbara Shepard Boonton Township Municipal Clerk 155 Powerville Road Boonton, NJ 07005-8729</p>	<p>Felicia Thomas-Friel, Esq. Division of the Rate Counsel 31 Clinton Street, 11<sup>th</sup> Floor P.O. Box 46005 Newark, NJ 07102</p>	<p>Marilyn Snow East Hanover Township Municipal Clerk 411 Ridgedale Avenue East Hanover, NJ 07936-1400</p>
<p>Joanne Charner Fredon Township Municipal Clerk 443 Route 94 Newton, NJ 07860</p>	<p>Doris Flynn Byram Township Municipal Clerk 10 Mansfield Drive Stanhope, NJ 07874</p>	<p>Lydia Magnotti Jefferson Township Municipal Clerk 1033 Weldon Road Lake Hopatcong, NJ 07849-2211</p>
<p>Elizabeth Sebrowski Kinnelon Borough Municipal Clerk 130 Kinnelon Road Kinnelon, NJ 07405-2347</p>	<p>Judith Fisher Hardwick Township Municipal Clerk 40 Spring Valley Road Hardwick, NJ 07825</p>	<p>Lorraine Read Newton Town Municipal Clerk 39 Trinity Street Newton, NJ 07860-1800</p>
<p>Judith Silver Parsippany-Troy Hills Township Municipal Clerk 1001 Parsippany Blvd. Parsippany, NJ 07054</p>	<p>Gertrude Akinson Montville Township Municipal Clerk 65 Mt. Hope Road Montville, NJ 07866-1699</p>	<p>Thomas Kaczynski Roseland Borough Municipal Clerk 19 Harrison Avenue Roseland, NJ 07068-1397</p>
<p>Miriam Tower Sparta Township Municipal Clerk 65 Main Street Sparta, NJ 07871</p>	<p>Mary Cilurso Rockaway Township Municipal Clerk 65 Mt. Hope Road Rockaway, NJ 07866-1699</p>	<p>Richard Reilly Dept. of Environmental Protection 501 E. State Street, 2<sup>nd</sup> Floor Trenton, NJ 08625</p>
<p>Alyssa Wolfe Dept. of Environmental Protection 501 E. State Street, 2<sup>nd</sup> Floor Trenton, NJ 08625</p>	<p>Judith Fisher Stillwater Township Municipal Clerk 964 Stillwater Road Newton, NJ 07860</p>	<p>Lorraine E. Stark Hopatcong Borough 111 River Styx Rd. Hopatcong, NJ 07843-1599</p>
<p>Eileen Swan Highlands Council 100 North Road Chester, NJ 07930</p>	<p>Dave Slaperud Stophelines.com 6 Highview Rd. Fredon, NJ 07860</p>	<p>Michael J. Donow, RSBA Interim School Business Administrator/Board Secretary Montville Township Public Schools 328 Changebridge Road Pine Brook, NJ 07058</p>

Thomas F. Collins, Jr., Esq. P.P.  
Municipal Attorney for the  
Township of Byram  
Vogel, Chait, Collins and Schneider  
25 Lindsley Drive, Suite 200  
Morristown, NJ 07960-4454

Ryan J. Scerbo  
General Counsel for the Township  
of Parsippany-Troy Hills  
Cole & Wisler, LLP  
Glenpointe Centre West  
500 Frank W. Burr Boulevard,  
Suite 31  
Teaneck, NJ 07666