

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

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	:	
	:	
NORTH CENTRAL RELIABILITY PROJECT	:	
	:	
	:	BPU DOCKET NO.
	:	

**TO THE HONORABLE COMMISSIONERS OF THE
NEW JERSEY BOARD OF PUBLIC UTILITIES:**

Petitioner, Public Service Electric and Gas Company (hereinafter referred to as "Petitioner," "PSE&G" or "Company") by way of this Petition filed pursuant to N.J.S.A. 40:55D-19, respectfully requests that the New Jersey Board of Public Utilities ("Board") determine that, as further described herein, the construction of the proposed North Central Reliability Project, a 230kV transmission upgrade that is necessary to address eight (8) projected reliability criteria violations in New Jersey and to replace aging infrastructure (hereinafter "the Project") is reasonably necessary for the service, convenience or welfare of the public and, in accordance thereto, issue an order that the zoning, site plan review and all other Municipal Land Use Ordinances or Regulations promulgated under the auspices of Title 40 of the New Jersey Statutes and the Municipal Land Use Act of the State of New Jersey shall not apply to the Project.

The Petition of PSE&G, a Corporation of the State of New Jersey having its general offices at 80 Park Plaza, Newark, New Jersey, 07102, respectfully states that:

BACKGROUND

1. Petitioner is a corporation duly organized and existing under the laws of the State of New Jersey and is engaged principally in the transmission and distribution of electric energy and gas service in New Jersey.

2. PSE&G has turned over the operational control of its electric transmission system to PJM Interconnection, L.L.C. ("PJM"), which is the Regional Transmission Organization ("RTO") approved by the Federal Energy Regulatory Commission ("FERC") for a centrally dispatched control area comprising all or parts of several states and the District of Columbia.¹

3. PSE&G is an "electric public utility" and a "gas public utility" as those terms are defined in N.J.S.A. 48:2-13 and N.J.S.A. 48:3-51, and, therefore, is subject to regulation by the Board of Public Utilities ("BPU" or "Board"). PSE&G is primarily engaged in the transmission and distribution of electric energy and gas service in New Jersey. It provides service to approximately 2.1 million electric customers and 1.7 million gas customers. PSE&G's transmission system spans approximately 1,400 circuit miles, including approximately 500 circuit miles of 230kV transmission facilities. PSE&G is a Transmission Owner in PJM and a signatory to both the Amended and Restated Operating Agreement ("OA") and the PJM Consolidated Transmission Owners Agreement ("TOA").²

4. PSE&G is committed to providing safe, adequate and proper service in accordance with N.J.S.A. 48:3-3.³ A critical component to discharging this obligation and

¹ Pursuant to FERC Orders, PJM is responsible for planning and operating the electric transmission system within its footprint in a reliable manner. The PJM footprint includes all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia.

² TOA available at <http://www.pjm.com/documents/downloads/agreements/toa.pdf>. OA available at <http://www.pjm.com/~media/documents/agreements/oa.ashx>.

³ See also Matter of Valley Road Sewerage Co., 154 N.J. 224 (1998) (holding the primary obligation of a utility is to provide safe, adequate, and proper service at fair and reasonable rates).

providing reliable service is ensuring adequate planning, as well as necessary construction and operation of the PSE&G system.

**PJM REGIONAL TRANSMISSION
EXPANSION PLANNING (“RTEP”) PROCESS**

5. PJM is responsible for planning the region’s transmission grid to maintain reliability within established reliability standards. Through its Regional Transmission Expansion Planning (“RTEP”) process, PJM identifies transmission system upgrades, expansions and enhancements that are necessary to ensure the reliability of the PJM transmission system. The RTEP provides “an open non-discriminatory framework” to identify the system enhancements that will ensure reliability in PJM. The RTEP process specifies transmission upgrades that are necessary to address both near-term needs within the next five years and longer-term needs (Years 6 through 15) within PJM’s long-term planning horizon.

6. The protocol for PJM’s RTEP process is set forth in Schedule 6 of the OA. As part of the RTEP protocol, annually PJM initiates a system-wide analysis to determine the ability of the PJM transmission grid to meet the reliability standards and requirements of, among others, the North American Electric Reliability Corporation (“NERC”) and ReliabilityFirst Corporation. The RTEP process reflects numerous inputs, including: forecasted firm loads in PJM, firm imports from, and exports to, neighboring systems, existing generation and transmission assets in PJM, and anticipated new generation and transmission facilities. Using this baseline reliability analysis, PJM identifies future reliability violations and transmission expansions and upgrades that are needed to resolve any anticipated violations.

7. PJM models in its RTEP both generation projects and demand response (“DR”) resources that have progressed to a stage where their existence may be relied upon by PJM. With respect to generation, once an interconnection customer has executed an Interconnection Service Agreement (“ISA”) the generation project is modeled in all RTEP studies, beginning in

the year in which it is expected to be in service, in the same manner as any existing in-service generator. That is, it may contribute to resolve potential reliability criteria violations in planning studies by reducing flow on constrained transmission facilities and it may, likewise, increase flow on constrained transmission facilities, contributing to the possibility that a criteria violation will result. Alternatively, if a generator bids and clears in a Reliability Pricing Model (“RPM”) auction and takes on a forward commitment to provide service in a future planning year, it is modeled in the same manner as if it had executed an ISA.

8. With respect to DR, these programs are integrated into the development of the RTEP when they clear in an RPM auction and undertake a forward commitment to provide service in a future planning year. Such programs, however, are only modeled in circumstances where they would expect to be enacted in day-to-day operations. Specifically, DR programs can only be enacted during operational emergency conditions.

9. The RTEP process includes a mechanism by which PJM considers input from all interested stakeholders. PJM solicits input during a series of meetings with the Transmission Expansion Advisory Committee (“TEAC”), at which PJM presents its analyses and provides descriptions of the baseline projects to address any identified reliability problems. During this process, stakeholders have an opportunity to provide feedback to PJM. Interested stakeholders are also given an opportunity to provide written comments to both the TEAC and the PJM Board.⁴ After review and input from the TEAC, projects included in the RTEP are presented to the PJM Board of Managers for approval.⁵

DESCRIPTION OF THE PROJECT

10. The Project is a transmission system upgrade consisting of upgrading (i) four (4) 138kV lines transmission lines to three (3) 230kV transmission lines and (ii) several

⁴ PJM Operating Agreement, Schedule 6 at Section 1.5.6(b).

⁵ *Id.* at Section 1.6(a).

interconnected switching and substations. The Project follows an existing transmission right-of-way for the entire length and will pass through fifteen (15) municipalities: West Orange Township, Livingston Township, Roseland Borough, Florham Park Borough, Chatham Borough, Chatham Township, New Providence Borough, Berkeley Heights Township, Watchung Borough, Scotch Plains Township, Fanwood Borough, Clark Township, Edison Township, Metuchen Borough and Woodbridge Township. The following stations will be upgraded: West Orange Switching Station (West Orange), Marion Drive Substation (West Orange), Laurel Avenue Substation (Livingston), Fanwood Substation (Fanwood), New Dover Substation (Edison), Pierson Avenue (Edison) and Woodbridge Substation (Woodbridge). The total estimated cost of the Project is \$330-350 million.

11. From an outside plant engineering and design perspective, the Project is divided into three (3) segments. The first segment is from Roseland Switching Station in Roseland to Metuchen Switching Station in Edison ("Segment 1"). The second segment is from Metuchen Switching Station to Sewaren Switching Station in Woodbridge ("Segment 2"). Finally, the third segment runs from Roseland Switching Station to West Orange Switching Station in West Orange ("Segment 3").

12. PSE&G proposes to replace all of the existing transmission structures on Segment 1 to Tower 19/1 located adjacent to the Conrail – Lehigh Valley Railroad in Clark Township (the "Railroad") except for four (4) transmission structures already built for 230kV operation. For the remaining portion of Segment 1, from Tower 19/1A to the Metuchen Switching Station, PSE&G proposes to use the existing structures that are already constructed to support 230kV. In addition, PSE&G proposes to install four (4) new structures along Segment 1, three (3) of which will be located within PSE&G's Metuchen Switching Station, and one (1) of which will be an approximately 75-foot high tower east of the New Jersey Transit's Northeast Corridor Railroad.

PSE&G proposes to use the existing structures for the entire length of Segment 2. On Segment 3, PSE&G proposes to replace all of the existing transmission structures with new monopoles.

13. As explained in the attached testimony of Barry Baker, pursuant to N.J.A.C. 14:5-7.1, PSE&G focused the routing of this Project on existing transmission right-of-way. PSE&G investigated alternative routes different than the existing right-of-way but the existing right-of-way was selected as the best option because it has (i) the least impact on the environment and (ii) the least impact on surrounding properties.

NEED FOR THE PROJECT

14. The proposed construction of the Project is necessary for the service, convenience and welfare of the public generally and, more specifically, for customers within the municipalities affected by this Project. This Project has been identified by PJM through its RTEP process to address eight (8) projected NERC reliability criteria violations. It is needed to maintain reliability in the region and was not planned for economic purposes.

15. PJM, the FERC-approved independent entity responsible for operating and planning the transmission grid within its footprint in a reliable manner, has determined that the Project is needed to maintain reliability in New Jersey. As explained in the testimony of Paul McGlynn, and Esam Khadr, the studies supporting the need for this Project were based on a 5-year planning analysis. This analysis follows documented and well-established procedures to maintain the reliability of the transmission system. Based on system studies, PJM, in its role as regional transmission planner, has determined that there are eight (8) projected NERC Category C reliability criteria violations that are expected to occur in 2014.

16. As explained by Mr. McGlynn and Mr. Khadr, should the identified reliability criteria violations not be adequately addressed, critical circuits and substations would be in danger of voltage drops or voltage instability. Voltage is used to maintain the pressure on a

transmission line and is similar to the pressure in a water pipe. The consequences of inadequate transmission system voltages or too much instability on a transmission system include degraded electric service to customers, risk to customer equipment, and a greatly increased risk that customers will need to be curtailed in order to forestall uncontrolled system blackouts. PJM and transmission owner system operators have a range of emergency procedures at their disposal with which to manage operating circumstances involving the potential for inadequate transmission system voltages. However, these operating procedures, which are short-term “fixes” only, include the need to curtail service to DR customers, to reduce transmission system voltage (referred to as a “brown-out”), and to implement rolling blackouts for network transmission service customers.

17. Further, PJM is required to take action to address potential voltage drops in order to avoid violation of applicable NERC reliability standards. Under the Energy Policy Act of 2005, NERC has been designated by FERC as the Electric Reliability Organization (“ERO”) for the United States. Congress and the FERC have established a mandatory compliance regime with respect to NERC’s Reliability Standards, and all owners, users and operators of the bulk electric system, including PJM and its transmission owner members such as PSE&G, must comply with applicable NERC Reliability Standards or risk exposure to significant (up to \$1 million per day per violation) penalties. As a NERC registered Transmission Planner, PJM must comply with NERC Reliability Standard TPL-003 which requires that the Transmission Planner operates the system within specified voltage limits.

18. Since the planning process is a dynamic one, considering changes in generation (retirements and additions), load growth, demand response, merchant transmission projects, and changes in transmission topology, PJM conducts a periodic “retool,” where it re-examines and updates the data underlying its RTEP analysis to determine whether the RTEP projects are still

needed in a particular year. The Project was included in PJM's December 2009 RTEP and will be retooled later in 2011. Moreover, as explained in the testimony of Mr. McGlynn, PJM has conducted an initial re-assessment of the Project incorporating its updated 2011 load forecast, and the identified voltage violations remain. Nonetheless, PSE&G will abide by any changes that PJM ultimately determines are necessary regarding the timing for this Project, or the underlying need for the Project itself, and will only construct this Project if it continues to be needed to maintain reliability. Because of the long lead-time required to build this Project and because PSE&G is legally required to have this line in operation by June 2014, it is vital to move forward to gain the needed approvals now.

19. As discussed in the testimony of Mr. McGlynn the recently-enacted LCAPP Legislation should have no impact on this Project given the in-service date of the Project and the nature and location of the voltage violations identified in the RTEP analysis.

20. As explained by Mr. Khadr, alternatives to this Project were considered, specifically (i) new generation; (ii) the construction a new 138kV transmission line; and (iii) the installation of additional capacitor banks. None of these alternatives, however, represent the most effective and/or practical solution to the identified voltage violations.

PSE&G'S OBLIGATION TO BUILD

21. Under Section 4.2.1 of the PJM TOA, PSE&G was designated by PJM as responsible for constructing the Project. Section 4.2.1 of the PJM TOA makes clear that, subject to obtaining necessary approvals, such designated entity "shall construct and own or finance such [RTEP] facilities or enter into appropriate contracts to fulfill such obligations." Thus, PSE&G has a legal obligation to either construct their respective portions of the Project or "enter into appropriate contracts to fulfill such obligations."

22. PJM directed PSE&G by notice dated June 16, 2010 to have the Project in service by June 2014. PSE&G accepted responsibility via letter dated September 22, 2010. PSE&G has determined that construction of the Project will take approximately 24 months (2 years). Given the lengthy construction process for the Project, it is critical that the Board act on the Petition by February 2012.

REPLACEMENT OF AGING INFRASTRUCTURE

23. As explained in the testimony of Mr. Khadr, transformers serving the area are near the end of their useful life, including some that are over 40 years old. The age of these transformers poses an increased risk of failure. Replacement transformers along this corridor will be required in the near future.

24. As explained further in the testimony of Richard Crouch and Stephen Czajka, transmission structures along most of this Project were built in 1928. An analysis of the foundations indicates a need to either replace the existing structure or reinforce the foundations in the near future.

PROPERTY RIGHTS

25. As explained in the testimony of Lynne DelTosto, there are certain properties for which easement modifications, and/or the acquisition of additional easement rights, will be necessary to construct the Project. PSE&G intends to negotiate with these property owners to obtain such easement rights. To the extent that any such negotiations are not successful, PSE&G will initiate a separate condemnation proceeding with the Board pursuant to N.J.S.A. 48:3-17.6 and 48:3-17.7.

UNDERGROUNDING

26. As discussed in the testimony of Jay Williams, of Power Delivery Consultants, Inc., constructing the 230kV upgrades associated with the Project underground would increase

costs, cause significant environmental impacts and extend outages associated with maintenance or repair of the line, which could impact reliability.

ELECTROMAGNETIC FIELDS (EMF)

27. The Project and appurtenant facilities, as proposed by PSE&G, comply with the New Jersey guidelines for electric field levels at the edge of the right-of-way.

28. As discussed in the testimony of Kyle G. King, upon completion of the Project and based on the estimated load flows, PSE&G expects to be able to reduce existing magnetic fields levels on segments where PSE&G is replacing the structures.

29. As discussed in the testimony of Meghan Mitchell, MPH, a Managing Epidemiologist for Exponent, the conclusions of multi-disciplinary scientific review panels have been consistent and no panel has concluded that long-term exposure to magnetic fields is known or likely to cause any adverse health effects.

ECONOMIC BENEFITS

30. PSE&G hired Rutgers University, Edward J. Bloustein School of Planning and Public Policy, to provide an analysis of the impacts the construction of the Project will have on the New Jersey economy. Pursuant to the testimony of Dr. Joseph J. Seneca, the Project construction alone will add over 1,600 job years, \$183 million in gross domestic product and another \$137 million in labor compensation to the New Jersey economy.

JURISDICTION AND REGULATORY STANDARD FOR APPROVAL

31. The Municipal Land Use Ordinances, the Site Plan Review Ordinances and other Ordinances and regulations affecting the use of land within said municipalities and counties through which the proposed Project will pass, have been enacted pursuant to the authority of N.J.S.A. 40:55D-1 et seq., the Municipal Land Use Law of the State of New Jersey.

32. N.J.S.A. 40:55D-19 provides, inter alia, that a Municipal Land Use Act, and any Ordinance or regulations made under the authority thereof, shall not apply to a project development proposed by a public utility for installation in more than one municipality for the furnishing of service if, upon petition to this Honorable Board, this Board shall, after hearing, decide the proposed installation of the development in question is reasonably necessary for the service, convenience or welfare of the public. Moreover, the determination as to the welfare of the public generally which transcends the municipal borders, has been well established by case law within this jurisdiction. Case law emphasizes that the "public" in question is the body of customers and not the residents of the various municipalities in question.

33. The terms of the respective Land Use Ordinances and regulations enacted by each of the municipalities make provision, in certain instances, for public utility facilities, public service infrastructures, electric transmission lines, public purpose uses, and public improvements. In certain instances, such uses are permitted. In other instances they are conditional uses. In others, the Ordinances are either silent or the use is not permitted in a particular zone and require a use variance pursuant to N.J.S.A. 40:55D-70(d). Each of the Land Use Ordinances and Master Plans does, however, provide for a planned scheme of growth and development and permits uses which, by necessity, require electrical service.

34. The Project is reasonable and necessary to allow PSE&G to provide for the service, convenience and welfare of the public and to enable PSE&G to provide safe, adequate and proper service to its customers, while also, to the greatest extent possible, conserving and preserving the quality of the environment. As noted, pursuant to N.J.A.C. 14:5-7.1, the Project will use the existing ROW for the entire length of the Project

SUPPORTING TESTIMONY

35. Attached hereto as Exhibits P-1 through P-13 are testimonies and supporting reports of the following witnesses as well as maps, drawings and other exhibits in support of this request for approval which, subject to possible supplementation in response to positions, inquiries and issues set forth in the filings by other parties or in interim orders of the Board, will comprise PSE&G's case-in-chief.

(a) **Exhibit P-1:** Esam A.F. Khadr, Director, Electric Delivery Planning of PSE&G, has provided testimony to explain the need for the construction of the Project. Mr. Khadr explains how and why this Project is needed to maintain reliability and to upgrade aging infrastructure. Specifically, Mr. Khadr explains that the Project is required to address projected reliability criteria violations identified by PJM in 2014. Mr. Khadr also explains that the existing infrastructure has reached the end of its useful life cycle. He indicates that PSE&G would likely have to replace this aging infrastructure in the near future. Mr. Khadr further explains why alternatives would be inadequate to address these PJM-identified reliability criteria violations. Finally, Mr. Khadr explains how he derived estimates of transmission line loadings that he provided to PSE&G witness Kyle King to support Mr. King's testimony on magnetic field levels across the Project.

(b) **Exhibit P-2:** Thomas Brauchle, Director, Transmission Projects in the Delivery Projects & Construction Department of PSE&G, is overall project director for the Project and is responsible for permitting and constructing the Project in the time required by PJM. Mr. Brauchle's testimony describes an overview of the Project and PSE&G's public outreach associated with the Project.

(c) **Exhibit P-3:** Robert Pollock, Manager-Transmission Permitting, testifies on behalf of PSE&G concerning the management of PSE&G's environmental and construction

permitting efforts for this Project and the coordination with associated permitting agencies. Mr. Pollock explains how locating the Project within an existing, disturbed overhead transmission line right-of-way requires the least amount of new disturbance to natural resources. Mr. Pollock also testifies that underground construction would increase the potential for serious adverse environmental impacts and would require PSE&G to cause greater disturbance to potentially environmentally sensitive areas. Finally, Mr. Pollock explains that the Project does not traverse the federally protected Great Swamp Wildlife Refuge.

(d) **Exhibit P-4:** Lynne DelTosto, Lead Real Estate Representative for the Project, is responsible for obtaining all of the necessary land rights for the Project. In this role, Ms. DelTosto has provided testimony that PSE&G will construct the Project within PSE&G's existing right-of-way and thus will not need to acquire any additional property for the construction of the Project. Ms. DelTosto has also provided testimony that PSE&G will need to acquire additional easement rights from approximately five (5) property owners along the route of the Project and will need to acquire 7-10 additional temporary and permanent access rights for construction.

(e) **Exhibit P-5:** Richard F. Crouch, Senior Project Manager, Transmission Outside Plant Construction PSE&G, is responsible for the management of all transmission line work associated with the Project. In this role, Mr. Crouch has responsibility for and has provided testimony concerning the overall execution of the transmission design, engineering, and construction for the Project within approved scope, budget, and schedule. Mr. Crouch's testimony supports the design and engineering of the transmission structures associated with the outside plant of the Project. Mr. Crouch identifies the preliminary location within the existing right-of-way where each of the new structures will be constructed and why these locations were selected. He also discusses the anticipated height of the transmission facilities, how and where

PSE&G plans to access the right-of-way to construct the facilities and how construction will be completed and how long it will take to complete construction. Finally, Mr. Crouch explains what precautions are taken when constructing monopoles near gas transmission lines.

(f) **Exhibit P-6:** Matthew Brown, Project Director in the URS Corporation Electric Power System Group, testifies on behalf of PSE&G concerning the conceptual design of the upgrades at the PSE&G switching and substations.

(g) **Exhibit P-7:** Stephen G. Czajka, Supervising Civil/Structural Engineer for URS Corporation, has provided testimony supporting the preliminary design and engineering testimony of Mr. Crouch and describing further the design and engineering of the transmission line and the associated structure foundations. In addition, Mr. Czajka testifies to the preliminary engineering review indicating that the existing foundations are in need of repair.

(h) **Exhibit P-8:** Barry Baker, URS Corporation, has provided testimony concerning the alternative routes evaluated by PSE&G for the Project as well as the basis for the independent analysis by URS supporting the Selected Route. Mr. Baker sponsors the Siting Study Report, which codifies the comprehensive alternative route evaluation process utilized by Mr. Baker to make his recommendations, and concludes that the existing route will have the least impact on the environment and the least impact on surrounding property owners.

(i) **Exhibit P-9:** Kyle G. King, President of K&R Consulting, has provided testimony on behalf of PSE&G describing and quantifying the electric and magnetic field levels associated with the Project. These include the levels of 60-hertz electric and magnetic fields ("EMF"), and corona effects and noise produced by the Project. He also testifies as to how PSE&G follows the prudent avoidance policy to minimize magnetic field levels.

(j) **Exhibit P-10:** Meghan E. Mitchell, M.P.H., an epidemiologist in Exponent's Health Sciences Center for Epidemiology, Biostatistics, and Computational Biology,

has provided testimony on behalf of PSE&G concerning the research regarding health effects and EMF. In addition to providing an overview of current research on EMF and health impacts, Ms. Mitchell also provides testimony concerning Exponent's studies of the effect of the operation of the Project on EMF levels based on calculations performed by Mr. King.

(j) **Exhibit P-11:** Jay Williams, of Power Delivery Consultants, Inc., has provided testimony on behalf of PSE&G explaining that undergrounding of the Project would increase costs, cause significant environmental impacts and extend outages associated with maintenance or repair of the line which could impact reliability.

(1) **Exhibit P-12:** Paul F. McGlynn, Manager of Transmission Planning Department from PJM has provided testimony to describe PJM's responsibility to ensure the reliability of the transmission grid in the PJM territory and to comply with NERC reliability standards. He discusses PJM's role in transmission planning and operation, as well as the mechanics of PJM's RTEP process. In particular, Mr. McGlynn discusses the Project in the context of the PJM RTEP and the identified electrical need for the construction of the Project which shows that the Project by June 2014 is needed to address eight (8) voltage violations.

(m) **Exhibit P-13:** Dr. Joseph J. Seneca, University Professor at the Edward J. Bloustein School of Planning and Public Policy of Rutgers University, testifies to the impacts that the construction of the Project will have on the New Jersey economy. Dr. Seneca estimates that over 1,600 job years, \$183 million in gross domestic product and another \$137 million in labor compensation will be added to the New Jersey economy by the construction of the Project.

REQUEST FOR EXPEDITED TREATMENT

37. PJM, in its role as regional transmission planner, has determined that there are eight (8) projected electric reliability criteria violations that are expected to occur in 2014. The

Project was identified as the most effective solution to address these violations. Construction of the Project is anticipated to take approximately two years. Thus, timing is critical with respect to the need for, and construction of, this Project. With this in mind and in accordance with prior Board procedure in transmission line cases of this size, scope and exigency, PSE&G requests that the Board retain jurisdiction over this matter. Retention of the matter for direct case management and hearing by a Board Commissioner would not only be consistent with prior Board procedure in matters such as this, but, it is respectfully submitted, will help streamline the review process, broaden and deepen the Board's understanding of the issues, and allow the Board to retain a greater degree of control over the substantive and procedural issues that may arise.

NOTICE AND COMMUNICATIONS

38. A copy of this Petition will be served upon the Clerks of the Municipalities traversed by the Project.

39. All correspondence and communications in connection with this proceeding are to be addressed to the following:

Tamara L. Linde, Esq.
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WHEREFORE, Petitioner requests that this Honorable Board:

(i) Retain jurisdiction over this matter, establish an expedited hearing date, and designate the time and manner of notice and persons in interest to be given such notice;

(ii) Upon such hearing, to determine that the construction of the Project within Petitioner's Right-of-Way, as more specifically described herein, and all facilities appurtenant thereto, are reasonably necessary for the service, convenience or welfare of the public;

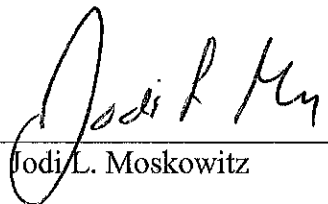
(iii) Specifically find and determine that the Zoning and Land Use Ordinances and all regulations promulgated thereunder by West Orange Township, Livingston Township, Roseland Borough, Florham Park Borough, Chatham Borough, Chatham Township, New Providence Borough, Berkeley Heights Township, Watchung Borough, Scotch Plains Township, Fanwood Borough, Clark Township, Edison Township, Metuchen Borough and Woodbridge Township shall have no application to the Project;

(iv) Authorize Petitioner to construct and energize the Project and the facilities appurtenant thereto in a timely manner, in order to permit Petitioner to satisfy its obligation to continue to provide safe, adequate and proper service to Petitioner's customers, and to enable Petitioner to construct and energize the proposed facilities not later than June 1, 2014; with such authorization requested by February 2012 so as to enable PSE&G to begin its construction process in a timely manner;

(v) Such other and further relief as the Board may deem appropriate or necessary.

Respectfully submitted,

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

BY: 
Jodi L. Moskowitz

DATED: May 26, 2011