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JUN 17 2015
BOARD OF PUBLIC UTILITIES
MAIL ROOM

DORSEY & SEMRAU

JOHN H. DORSEY
FRED SEMRAU
TRACY W. SCHNURR
JEFFREY J. PASEK
JOSEPH E. BOCK, JR.
DAWN M. SULLIVAN

ATTORNEYS AT LAW
714 MAIN STREET
P.O. BOX 228
BOONTON, NJ 07005
973-334-1900
FACSIMILE 973-334-3408
TSCHNURR@DORSEYSEMRAU.COM

NANETTE S. THOMAS
OF COUNSEL

June 16, 2015

Via Facsimile Only 973-648-2358

Honorable Leland S. McGee
Office of Administrative Law
33 Washington Street
Newark, New Jersey 07102

Re: **In the Matter of the Petition of Jersey Central Power & Light Company
Pursuant to N.J.S.A. 40:55D-19 for a Determination that the Montville-
Whippany 230 kV Transmission Project is Reasonably Necessary for the
Service, Convenience of Welfare of the Public**
OAL Docket No. PUC-08235-15
BPU Docket No. EO-15030383

Dear Judge McGee:

This office serves as Municipal Counsel for the Township of Montville. In conformance with our office's telephone conversation today with your chambers, enclosed please find a copy of the Township of Montville's Motion to Intervene in this matter, which was previously filed with the Board of Public Utilities. We respectfully request that our Motion be addressed by Your Honor during the telephone conference for this matter, which we understand is scheduled for July 21, 2015 at 4:00 p.m. Prior to that telephone conference, please include our office on any correspondence regarding this matter.

Thank you for your kind courtesies.

Respectfully submitted,


Tracy W. Schnurr, Esq.

Enclosure

cc: Scott C. Gallopo, Mayor (via email, w/encl.)
Montville Township Committee (via email, w/encl.)
Victor Canning, Township Administrator (via email, w/encl.)
Attached Service List (via email, w/encl.)

SERVICE LIST

In the Matter of the Petition of **Jersey Central Power & Light Company**
Pursuant to N.J.S.A. 40:55D-19 for a Determination that the Montville-Whippany 230 kV
Transmission Project is Reasonably Necessary for the Service,
Convenience or Welfare of the Public

BPU Docket No: EO-15030383

<u>JCP&L</u>		
Gregory Eisenstark, Esq. Windels Marx Lane & Mittendorf, LLP 120 Albany Street Plaza New Brunswick, New Jersey 08901 geisenstark@windelsmarx.com	Lauren M. Lepkoski, Esq. FirstEnergy Service Company Legal Department 2800 Pottsville Pike Reading, PA 19612-6001 llepkoski@firstenergycorp.com	John T. Toth FirstEnergy Service Company 76 South Main Street Akron, Ohio 44308 johnthoth@firstenergycorp.com
Kevin Connelly Jersey Central Power & Light Company 300 Madison Avenue P.O. Box 1911 Morristown, New Jersey 07980 kconnelly@firstenergycorp.com		
<u>BPU</u>		
Kenneth Sheehan, Secretary Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Kristi.Izzo@bpu.state.nj.us	Jerome May, Director Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Jerome.may@bpu.state.nj.us	Carl Dzlerawiec Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Carl.dzlerawiec@bpu.state.nj.us
Bethany Rocque-Romaine Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Bethany.rocque-romaine@bpu.state.nj.us	Paul Flanagan Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Paul.flanagan@bpu.state.nj.us	Megan Lupo Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Megan.lupo@bpu.state.nj.us
Cynthia Covle Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Cynthia.covle@bpu.state.nj.us		
<u>DAG</u>		
Caroline Vachler, DAG Division of Law 124 Halsey Street, 5 th Floor P.O. Box 45029 Newark, NJ 07101 Caroline.vachler@doj.lps.state.nj.us	Alex Moreau, DAG Division of Law 124 Halsey Street, 5 th Floor P.O. Box 45029 Newark, NJ 07101 alex.moreau@doj.lps.state.nj.us	Carolyn McIntosh, DAG Division of Law 124 Halsey Street, 5 th Floor P.O. Box 45029 Newark, NJ 07101 carolyn.mcintosh@doj.lps.state.nj.us

Rate Counsel		
<p>Stefanie A. Brand, Director Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625-0003 sbrand@rpa.state.nj.us</p>	<p>Ami Morita, DRA Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625-0003 amorita@rpa.state.nj.us</p>	<p>James Glassen, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625-0003 jglassen@rpa.state.nj.us</p>
<p>Lisa Gurkas Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625-0003 lgurkas@rpa.state.nj.us</p>		
Board of Chosen Freeholders		
<p>Clerk, Morris County Board of Chosen Freeholders Morris County Administration & Records Building P.O. Box 900 Morristown, NJ 07963-0900 dketchum@co.morris.nj.us</p>		
Morris County Administrator		
<p>County Administrator Morris County Administration & Records Building P.O. Box 900 Morristown, NJ 07963-0900 jbonanni@co.morris.nj.us</p>		
East Hanover Township		
<p>Clerk Township of East Hanover 411 Ridgedale Avenue East Hanover, NJ 07936 paulam@easthanovertownship.com</p>		
Parsippany-Troy Hills Township		
<p>Clerk Parsippany-Troy Hills Township Parsippany-Troy Hills Town Hall 1001 Parsippany Boulevard Parsippany-Troy Hills, NJ 07054 ywazirmas@parsippany.net</p>		
Montville Township		
<p>Clerk Montville Township Municipal Building 195 Changebridge Road Montville, NJ 07045-9498 tatkinson@montvilleni.org</p>		



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973-334-1900
FACSIMILE 973-334-3408
FSEMRAU@DORSEYSEMRAU.COM

NANETTE S. THOMAS
OF COUNSEL

April 30, 2015

Via Federal Express

Kenneth Sheehan, Secretary
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

Re: **In the Matter of the Petition of Jersey Central Power & Light Company
Pursuant to N.J.S.A. 40:55D-19 for a Determination that the Montville-
Whippany 230 kV Transmission Project is Reasonably Necessary for the
Service, Convenience of Welfare of the Public
BPU Docket No. EO-15030383**

Dear Secretary Sheehan:

This office serves as Municipal Counsel for the Township of Montville. Enclosed for filing with the Board of Public Utilities, please find an original and eleven (11) copies of the following documents in connection with the above-referenced matter:

1. Notice of Motion to Intervene as a Party to this Action;
2. Certification of Service;
3. Certification of Mayor Scott C. Gallopo in Support of the Township's Motion to Intervene; and
4. Proposed Order.

Kindly endorse the extra copy as "filed" and return same to me in the enclosed pre-stamped envelope.

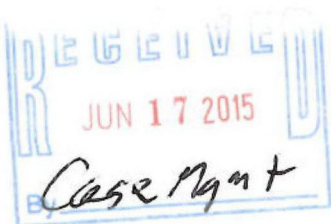
Should you have any questions or concerns, do not hesitate to contact me. Thank you for your kind courtesies.

Respectfully submitted,

Fred Semrau, Esq.

Enclosures

cc: Scott C. Gallopo, Mayor (via email, w/encls.)
Montville Township Committee (via email, w/encls.)
Victor Canning, Township Administrator (via email, w/encls.)
Attached Service List (w/encls.)



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Fred Semrau, Esq. (017871993)
DORSEY & SEMRAU, LLC
714 Main Street
P.O. Box 228
Boonton, NJ 07005
973-334-1900
Attorneys for Township of Montville, New Jersey

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF
JERSEY CENTRAL POWER & LIGHT
COMPANY PURSUANT TO N.J.S.A. 40:55D-19
FOR A DETERMINATION THAT THE
MONTVILLE-WHIPpany 230kV
TRANSMISSION PROJECT IS REASONABLY
NECESSARY FOR THE SERVICE,
CONVENIENCE OR WELFARE OF THE
PUBLIC

BPU DOCKET: EO-15030383

NOTICE OF MOTION TO
INTERVENE AS A PARTY

TO: Gregory Eisenstark, Esq.
Windels Marx Lane & Mittendorf, LLP
120 Albany Street Plaza
New Brunswick, New Jersey 08901

Lauren M. Lepkoski, Esq.
FirstEnergy Service Company
Legal Department
2800 Pottsville Pike
Reading, PA 19612-6001

John T. Toth
FirstEnergy Service Company
76 South Main Street
Akron, Ohio 44308

ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that, pursuant to N.J.A.C. 1:1-16.1, *et seq.*, Dorsey & Semrau, LLC, attorneys for the Township of Montville, New Jersey ("Montville"), hereby moves before the Board of Public Utilities located at 44 South Clinton Avenue, Ninth Floor, Trenton, New Jersey, for an Order permitting the Township of Montville to intervene as a party in the above-entitled proceeding with all the rights provided therefore, under all applicable rules, codes and statutes, including, but not limited to, the right to be heard on all issues before the Board.

PLEASE TAKE FURTHER NOTICE that, in support of its Motion, Montville shall rely upon the Certification of Scott C. Gallopo, Mayor of the Township of Montville, dated April 27, 2015.

DORSEY & SEMRAU, LLC

Attorneys for Township of Montville, New Jersey

By: 

Fred Semrau, Esq.

DATED: April 30, 2015



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DORSEY & SEMRAU, LLC
714 Main Street
P.O. Box 228
Boonton, NJ 07005
973-334-1900
Attorneys for Township of Montville, New Jersey

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF
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CERTIFICATION OF
SERVICE

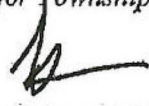
Fred Semrau, Esq., an Attorney at Law of the State of New Jersey, hereby certifies that:

On April 30, 2015, I caused to be served by Federal Express an original and eleven copies of the enclosed Notice of Motion on behalf of the Township of Montville, New Jersey, to Intervene as a Party, and the supporting Certification, on Board of Public Utilities, 44 South Clinton Avenue, Ninth Floor, Trenton, New Jersey 08625-0350; and

On the same date, I also caused to be served by regular mail a copy of the enclosed Notice of Motion to Intervene and supporting Certification on each party on the Service List.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

DORSEY & SEMRAU, LLC
Attorneys for Township of Montville, New Jersey

By: 
Fred Semrau, Esq.

Dated: April 30, 2015

SERVICE LIST

In the Matter of the Petition of **Jersey Central Power & Light Company**
Pursuant to N.J.S.A. 40:65D-19 for a Determination that the Montville-Whippany 230 kV
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BPU Docket No: EO-15030383

<u>JCP&L</u>		
Gregory Eisenstark, Esq. Windels Marx Lane & Miltendorf, LLP 120 Albany Street Plaza New Brunswick, New Jersey 08901 geisenstark@windelsmarx.com	Lauren M. Lepkoski, Esq. FirstEnergy Service Company Legal Department 2800 Pottsville Pike Reading, PA 19612-6001 llepkoski@firstenergycorp.com	John T. Toth FirstEnergy Service Company 76 South Main Street Akron, Ohio 44308 john.toth@firstenergycorp.com
Kevin Connelly Jersey Central Power & Light Company 300 Madison Avenue P.O. Box 1911 Morristown, New Jersey 07960 kconnelly@firstenergycorp.com		
<u>BPU</u>		
Kenneth Sheehan, Secretary Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Krisel.izzo@bpu.state.nj.us	Jerome May, Director Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Jerome.may@bpu.state.nj.us	Carl Dzierawiec Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Carl.dzierawiec@bpu.state.nj.us
Bethany Rocque-Romaine Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Bethany.rocque-romaine@bpu.state.nj.us	Paul Flanagan Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Paul.flanagan@bpu.state.nj.us	Megan Lupo Board of Public Utilities 44 South Clinton Avenue, 9 th Fl P.O. Box 350 Trenton, NJ 08625 Megan.lupo@bpu.state.nj.us
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<u>DAG</u>		
Caroline Vachler, DAG Division of Law 124 Halsey Street, 5 th Floor P.O. Box 45028 Newark, NJ 07101 Caroline.vachler@dol.lps.state.nj.us	Alex Moreau, DAG Division of Law 124 Halsey Street, 5 th Floor P.O. Box 45028 Newark, NJ 07101 alex.moreau@dol.lps.state.nj.us	Carolyn McIntosh, DAG Division of Law 124 Halsey Street, 5 th Floor P.O. Box 45028 Newark, NJ 07101 carolyn.mcintosh@dol.lps.state.nj.us

<u>Rate Counsel</u>		
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<p>Lisa Gurkas Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625-0003 lgurkas@rpa.state.nj.us</p>		
<u>Board of Chosen Freeholders</u>		
<p>Clerk, Morris County Board of Chosen Freeholders Morris County Administration & Records Building P.O. Box 900 Morristown, NJ 07963-0900</p>		
<u>Morris County Administrator</u>		
<p>County Administrator Morris County Administration & Records Building P.O. Box 900 Morristown, NJ 07963-0900</p>		
<u>East Hanover Township</u>		
<p>Clerk Township of East Hanover 411 Ridgedale Avenue East Hanover, NJ 07936 paulam@easthanovertownship.com</p>		
<u>Parsippany-Troy Hills Township</u>		
<p>Clerk Parsippany-Troy Hills Township Parsippany-Troy Hills Town Hall 1001 Parsippany Boulevard Parsippany-Troy Hills, NJ 07054</p>		
<u>Montville Township</u>		
<p>Clerk Montville Township Municipal Building 195 Changebridge Road Montville, NJ 07045-9498 talkinson@montvillienj.org</p>		

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714 Main Street
P.O. Box 228
Boonton, NJ 07005
973-334-1900
Attorneys for Township of Montville, New Jersey

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF
JERSEY CENTRAL POWER & LIGHT
COMPANY PURSUANT TO N.J.S.A. 40:55D-19
FOR A DETERMINATION THAT THE
MONTVILLE-WHIPpany 230kV
TRANSMISSION PROJECT IS REASONABLY
NECESSARY FOR THE SERVICE,
CONVENIENCE OR WELFARE OF THE
PUBLIC

BPU DOCKET: EO-15030383

CERTIFICATION IN
SUPPORT OF MOTION
TO INTERVENE

I, Scott C. Gallopo, of full age, do hereby certify as follows:

1. I am the Mayor of the Township of Montville, Morris County, New Jersey ("Montville" or the "Township"), located at 195 Changebridge Road, Montville, New Jersey 07045. The Township of Montville moves to intervene in this matter as a Party pursuant to N.J.S.A. 48:2-32.2. I am familiar with the facts and circumstances concerning this matter and I make this Certification in support of the Township of Montville's Motion to Intervene.

2. Montville is a duly organized municipal corporation of the State of New Jersey. Montville operates under New Jersey's Optional Municipal Charter Law, Mayor-

Committee-Administrator Plan. The Council is comprised of five members.

3. Jersey Central Power & Light Company ("JCP&L") provides electric power to the Township of Montville. Within the Township, JCP&L services approximately 10,893 meters.

4. Montville wishes to intervene as a party in this matter because it opposes JCP&L's Verified Petition for a determination by the NJ Board of Public Utilities that its proposed Montville-Whippany 230 kV Transmission Project is reasonably necessary for the service, convenience or welfare of the public.

5. The Township seeks to intervene on the basis that 3.1 miles of the proposed transmission line is to be built within the Township of Montville.

6. For all of these reasons, and others that will be presented in these proceedings, Montville Township respectfully requests intervenor status in this matter as a party so that its interests are appropriately represented and it has the opportunity to be heard on significant issues that affect it and its residents and taxpayers. Accordingly, Montville requests that the Board designate it a party, with full rights and obligations to participate in conferences, discovery, testimony and cross-examination, and to be heard on all issues before the Board.

7. All correspondence, filings, discovery, reports, and documentation generally regarding this matter should be sent to the following persons:

Fred Semrau, Esq.
Dorsey & Semrau, LLC
714 Main Street
P.O. Box 228
Boonton, NJ 07005
Email: fsemrau@dorseysemrau.com

Victor Canning, Township Administrator

Township of Montville
195 Changebridge Road
Montville, NJ 07045
Email: VCanning@montvillenj.org

I hereby certify that the foregoing statements made by me are true. I am aware
that if any of the foregoing statements are willfully false, I am subject to punishment.



SCOTT C. GALLOPO, MAYOR
Township of Montville

Dated: April 27, 2015

JUN 17 2015

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Fred Semrau, Esq. (017871993)
DORSEY & SEMRAU, LLC
714 Main Street
P.O. Box 228
Boonton, NJ 07005
973-334-1900
Attorneys for Township of Montville, New Jersey

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF
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ORDER

THIS MATTER having been presented by Dorsey & Semrau, LLC, attorneys for the Township of Montville, on notice to the Board of Public Utilities and the parties and persons set forth on the attached Service List; and the Board of Public Utilities having considered the Motion to Intervene and other documents on file in this matter; and for good cause shown:

IT IS on this ____ day of _____, 2015,

ORDERED that the Township of Montville is hereby granted leave to intervene and fully participate in the above-entitled matter as a Party, and that it be placed on the Service List for receipt of all documents, papers, discovery materials, exhibits, and notifications of all hearings, conferences, presentations and all other proceedings in this matter.