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REPLY TO ROSELAND OFFICE

Rec'd 12/2/15
NOV 30 2015

November 25, 2015

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NOV 30 2015

BOARD OF PUBLIC UTILITIES
MAIL ROOM

VIA LAWYERS SERVICE

Office of Administrative Law
33 Washington Street
Newark, NJ 07102

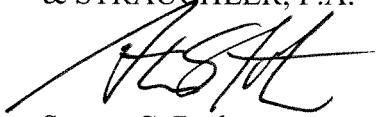
RE: OAL DOCKET NO. PUC 17727-2015N
Township of South Orange Village v. Public Service Electric and Gas
Company
PPGMS File No. 4160.00124

Dear Sir/Madam:

Enclosed please find a certification in opposition to a Motion to Dismiss filed by Public Service Electric and Gas Company with the New Jersey Board of Public Utilities under BPU Docket No. E015070805.

Very truly yours,

POST, POLAK, GOODSSELL, MACNEILL
& STRAUCHLER, P.A.



Steven C. Rother

SCR/ksr
Enclosures

cc: Irene Kim Asbury, Secretary of NJBPU (w/enclosures)
Alexander C. Stern, Esq. (w/enclosures)

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Attorneys for Petitioner, Township of South Orange Village

Our File No. 4160.00124

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

In the Matter of the **TOWNSHIP OF SOUTH ORANGE VILLAGE** Seeking Approval to Mount Automated License Plate Reader Cameras on Light Poles Owned by PSE&G as an "Unmetered Service" Pursuant to B.P.U.N.J. 15- Electric Tariff for Services

OAL DOCKET NO.PUC 17727-2015N

**CERTIFICATION RESPONDING TO
PSE&G'S DISPOSITIVE MOTION
UNDER N.J.A.C. 1:1-12.5**

I, **Steven C. Rother**, of full age certifies as follows:

1. I am the duly appointed Village counsel for the Township of south Orange Village (the "Village") and make this certification in opposition to PSE&G's Motion to Dismiss.

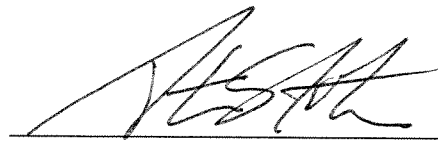
2. PES&G has previously permitted the Village to connect the subject license plate readers to one of its light poles.

3. PSE&G has procedures for the attachment of "surveillance technology" equipment to its light poles. (See Exhibit A attached, found on PSE&G's website.)

4. Given PSE&G's previous approval and published procedures for attachment of "surveillance technology", an evidentiary hearing is necessary to resolve the denial of service alleged by the Village.

5. I am aware that if this certification contains misrepresentations of false statement that I am subject to punishment.

Dated: Nov, 25, 2015



Steven C. Rother, Esq.
Attorney for Petitioner, Township
of South Orange Village