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November 30, 2015

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VIA EMAIL AND REGULAR MAIL

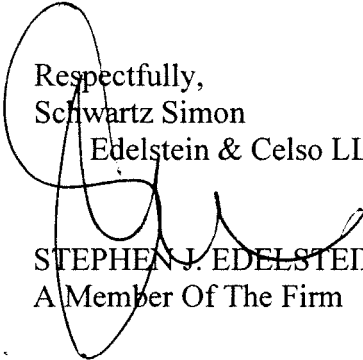
Honorable Leland S. McGee, A.L.J.
Office of Administrative Law
33 Washington Street
Newark, New Jersey 07102

**Re: I/M/O Petition of Jersey Central Power & Light Company
OAL Docket No. PUC 8235-15
BPU Docket No. EO15030383**

Dear Judge McGee:

This office represents the Montville Township Board of Education (the "Board"). On behalf of the Board, enclosed please find the original and two (2) copies of the Summary of Pre-filed Direct Testimony of Dr. Karen Cortellino. This testimony is being submitted today based on our understanding that all intervenors including the Board, and not just Montville Township, had an extension to submit direct testimony by **November 30, 2015**.

Respectfully,
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Honorable Leland S. McGee, A.L.J.
November 30, 2015
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IN THE MATTER OF THE PETITION
OF JERSEY CENTRAL POWER &
LIGHT COMPANY PURSUANT TO
N.J.S.A. 40:55D-19 FOR A
DETERMINATION REGARDING
THE MONTVILLE-WHIPpany 230
KV TRANSMISSION PROJECT

STATE OF NEW JERSEY
OFFICE OF ADMINISTRATIVE LAW
OAL DOCKET NO. PUC 8235-15

BOARD OF PUBLIC UTILITIES
BPU DOCKET NO. EO15030383

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STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

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IN THE MATTER OF THE PETITION
OF JERSEY CENTRAL POWER &
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N.J.S.A. 40:55D-19 FOR A
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OFFICE OF ADMINISTRATIVE LAW
OAL DOCKET NO. PUC 8235-15

BOARD OF PUBLIC UTILITIES
BPU DOCKET NO. EO15030383

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

**SUMMARY OF PRE-FILED DIRECT TESTIMONY OF
DR. KAREN CORTELLINO ON BEHALF OF
MONTVILLE TOWNSHIP BOARD OF EDUCATION**

Dr. Karen Cortellino testifies on behalf of Montville Township Board of Education (the "Board") in this proceeding. Dr. Cortellino is the President of the Board which is the governing body of the Montville School district consisting of a high school, middle school and five elementary schools. The Board has concerns about the impact of the Montville-Whippany 230kV Transmission Project (the "Transmission Project") on multiple schools under the Board's control.

Dr. Cortellino files direct testimony discussing the Board's concerns about the Transmission Project. Specifically the Board has concerns about the safety of the proposed transmission tower heights due to their proximity to school property, health issues, negative impacts on the Board's

land use and expansion plans for affected schools, electromagnetic field levels, noise and pollution issues, and the Projects aesthetic implications on school property.

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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 REGARDING
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STATE OF NEW JERSEY
OFFICE OF ADMINISTRATIVE LAW
OAL DOCKET NO. PUC 8235-15

BOARD OF PUBLIC UTILITIES
BPU DOCKET NO. EO15030383

**PRE-FILED DIRECT TESTIMONY OF DR. KAREN CORTELLINO
ON BEHALF OF MONTVILLE TOWNSHIP BOARD OF EDUCATION**

I. BACKGROUND

Q. What is your full name and business address?

A. My name is Dr. Karen Cortellino. My business address is c/o Montville Township Board of Education (“Board”), 86 River Road, Montville, NJ 07045.

Q. What is you relationship to the Board?

A. I am the Board President.

Q. What is the Board’s responsibility?

A. The Board is the governing body of the Montville Township School District, which

1 consists of a high school, a middle school, and five elementary schools.

2 **Q. Please describe the purpose of your testimony.**

3 **A.** To express the Board’s concern about multiple schools under its control as a result of the
4 the Montville-Whippany 230 kV Transmission Project (“Transmission Project”).

5 **II. THE TRANSMISSION PROJECT**

6 **Q. What is your understanding of the Transmission Project?**

7 **A.** The proposed Transmission Project seeks approval to construct a new 230 kV
8 transmission line between Jersey Central Power & Light Company’s (“JCP&L”) Whippany
9 substation located in East Hanover, New Jersey and its Montville substation located in
10 Montville, New Jersey.

11 The Transmission Project intends to utilize steel monopoles ranging in height from 110
12 feet to 150 feet high [Segment 8 identified in the Petition (“Segment”), and Exhibits DRK-
13 08, DRK Exhibits 14h & 14i], 130 feet to 170 feet high [Segment 9 and Exhibits DRK-09
14 and DRK Exhibit 14i] and 110 feet to 150 feet high [Segment 10 and Exhibits DRK-10 and
15 DRK Exhibit 14j].

16 The Transmission Project is proposed to be constructed in part on property adjacent to the
17 Board’s Robert R. Lazar Middle School located at 123 Changebridge Road, Montville
18 Township, Morris County. In this area, the new 230 kV will be constructed parallel to the
19 existing 34.5 kV circuits [Segment 10 and Exhibits DRK-10 and DRK Exhibit 14j]. Here,
20 the monopoles rising to a height of 110 feet to 150 feet will be located approximately 70 feet
21 from the east side of the existing ROW which abuts the Lazar Middle School property. The
22 Transmission Project is also proposed to be constructed in part on property located in the
23 general proximity of the Board’s Montville High School, located at 100 Horseneck Road,

1 Montville Township, Morris County. In this area, it appears that new monopoles rising 110
2 feet to 170 feet will be constructed in a currently-undeveloped JCP&L easement [Segment 8
3 and Exhibits DRK-08, DRK Exhibits 14h & 14i] and existing double circuit wood pole
4 structures currently carrying the 34.5 kV circuits will be removed and replaced with
5 monopoles that will carry the new 230 kV circuit, as well as the existing 34.5 kV circuits
6 [Segment 9 and Exhibits DRK-09 and DRK Exhibit 14i].

7 **III. THE BOARD'S CONCERNS ABOUT THE TRANSMISSION PROJECT**

8 **Q. Briefly what are the Board's concerns regarding the Transmission Project?**

9 **A.** The Transmission Project will have a significant impact to the height of the existing
10 power lines and pole structures, along with an increase in voltage to 230,000 volts. Such
11 matters create safety, health, land use and aesthetic concerns to the Board and its students,
12 teachers and parents. As such, the Board has objections to the Transmission Project.

13 **Q. What is the nature of the Board's safety concerns?**

14 **A.** Safety concerns arise in part because the Transmission Project is proposed to be
15 constructed along a JCP&L easement that is located along and within the school property and
16 encroaches upon the athletic fields of the Robert R. Lazar Middle School. The existing 34.5
17 kV monopole is located 120 feet west of the easterly line of the ROW and stands only 50 to
18 70 feet high. The proposed 110 to 150 feet high monopole for the 230 kV is to be located a
19 mere 70 feet from the easterly line of the easement and offers potential danger to students,
20 faculty or anyone utilizing the athletic fields, such as pole collapse or downed wires.

21 **Q. What is the nature of the Board's health concerns?**

22 **A.** Health concerns relate to the potential affect on the students and faculty arising from
23 exposure to certain levels of electric and magnetic fields. The Board seeks more information

1 regarding the levels, particularly in light of the 500 kV circuits from Public Service Electric
2 & Gas Company (“PSE&G”) to the west of the JCP&L easement along the Robert R. Lazar
3 Middle School property and the 34.5 kV circuits with said easement.

4 **Q. Does the Board have any additional health and safety concerns?**

5 **A.** Construction access will be required. This will result in a physical change to the areas.
6 Heavy construction equipment will bring physical danger, noise and pollution issues that
7 may result in added health and safety risks to the students and faculty.

8 **Q. What is the nature of the Board’s aesthetic concerns?**

9 **A.** Vegetation clearance may be necessary along the land of the Robert R. Lazar Middle
10 School and may affect the aesthetics. Also the higher monopoles containing the 230 kV
11 circuits will be visible from locations where the 34.5 kV circuits were not. The new
12 poles are expected to be seen from the Montville High School and certainly
13 will be visible from the Middle School.

14 **Q. What the nature of the Board’s concerns regarding impact on expansion and land**
15 **use?**

16 **A.** Land use may be impacted to the extent that the Transmission Project will have a negative
17 impact on the ability for expansion at the Robert R. Lazar Middle School. Due to the
18 proximity of these towers to school property, should the school want to expand in the future,
19 which is likely, the place for expansion would be through the rear of the school property.
20 This is precisely the area where the towers are located. Any expansion of the school in the
21 rear would put the expansion even closer to the power lines, and therefore create more of a
22 dangerous condition for the school and the children.

23 **Q. Does the Board have any other concerns about the Transmission Project?**

1 A. There may also be increase in noise, electromagnetic interference and the like that affects
2 the students and faculty at the Middle School.

3 **Q. Does this conclude your testimony?**

4 A. Yes.

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