



Board of Public Utilities

JUN 09 2016

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June 6, 2016

VIA NEW JERSEY LAWYERS SERVICE / E-MAIL

The Honorable Leland McGee, ALJ
Office of Administrative Law
33 Washington Street
Newark, NJ 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 230kV Transmission Project is Reasonably Necessary for the Service, or Welfare of the Public*
OAL Docket No. PUC-08235-15
BPU Docket No. EO-15030383

Dear Judge McGee:

This firm represents Wildlife Preserves, Inc., a New Jersey Non-Profit Land Conservation Corporation ("WP") and a participant in the referenced proceedings despite its application to intervene as an intervenor. Last week the court set June 17, 2016 as the date for briefs and June 27, 2016 for reply briefs.

We request an adjournment of the briefing dates so that the record can be supplemented by additional testimony and cross-examination with regard to the necessity of Jersey Central Power & Light ("JCP&L") running a line of transmission towers next to its existing 2-mile stretch of easements within the WP conservation property instead of within its existing easements. WP submits that the plan to cut another 2-mile long stretch of easements through the wetlands is not practical or necessary but destructive to a large section of the WP property and its wetland habitats and species.

This was brought up at the public hearing on December 8, 2015 and on numerous occasions with JCP&L directly. Public Service Electric & Gas ("PSE&G") recently upgraded its line through WP property and did so within its existing easements. JCP&L has provided no explanation for why it needs to run a second 2-mile long line through WP property.

Case mgmt
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WP requests the opportunity to present the testimony of Len Fariello, manager of WP and to cross examine Peter W. Sparhawk, the JCP&L representative responsible for the Route Selection Study to explain why the parallel line is or is not necessary for the feasibility of the project. Time required -- one half day. See N.J.A.C. 1:1-14.6 (Administrative Law Judge power includes scheduling additional hearing dates depending on the needs of the case). We can make ourselves available at the court's convenience. Thank you.

Respectfully submitted,

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cc: BPU Commissioners
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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. ER15030383
OAL DOCKET NO. PUC 08235-2015N

Board of Public Utilities

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