

March 13, 2023

VIA E-MAIL (BOARD.SECRETARY@BPU.NJ.GOV)

Gregory Eisenstark

Direct Phone 973-200-7411

Direct Fax 973-200-7465

geisenstark@cozen.com

Acting Secretary Carmen Diaz
NJ Board of Public Utilities
44 South Clinton Street, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625

Re: **In the Matter of the Petition of Ocean Wind, LLC Pursuant to N.J.S.A. 48:3-87.1(f) for a Determination that Easements Across Green Acres Restricted Properties and Consents Needed for Certain Environmental Permits in, and with Respect to, the City of Ocean City are Reasonably Necessary for the Construction or Operation of the Ocean Wind 1 Qualified Offshore Wind Project
BPU Docket No. QO22020041
Appellate Docket No. A-000789-22T1**

Dear Acting Secretary Diaz:

This firm represents Ocean Wind LLC ("Ocean Wind") in the above-captioned matter. Please accept this letter brief on behalf of Ocean Wind in opposition to the Division of Rate Counsel's ("Rate Counsel") Motion to Settle the Record on Appeal dated March 1, 2023 ("Motion"). For the reasons discussed below, Rate Counsel's Motion is completely without merit and should be denied.

Introduction

Rate Counsel argues that two items included in the Board of Public Utilities' ("Board" or "BPU") Statement of Items Comprising the Record on Appeal ("SICRA") should be removed. These items are Rate Counsel's own set of informal discovery requests served on Ocean Wind in this matter (item #8) and Ocean Wind's responses to Rate Counsel's discovery requests (item #10). The documents in question are clearly part of the Board's record in the matter and are properly part of the SICRA, despite Rate Counsel's tortuous attempts to suggest otherwise.

LEGAL\61920152\3

Rate Counsel's Motion must be seen for what it is – an ill-conceived attempt to support its (apparently planned) argument on appeal that it was denied due process in this matter by, *inter alia*, not being permitted to engage in discovery. But, Rate Counsel did serve written discovery and Ocean Wind responded to it. The parties referred to the discovery and responses during the Board proceeding, and the Board referred to the documents in its Order. Rate Counsel's motion attempts to distort the record below by erasing what actually transpired. The Appellate Division has the right to review the complete record and the basis for the Board's decision. Accordingly, the Board should give short shrift to Rate Counsel's attempt to conceal part of the record from the Appellate Division.

Argument

Rate Counsel's argument is essentially that its own discovery requests and the responses thereto should not be included in the SICRA because they "were not filed with the Board nor incorporated into the Board's record at any point in the proceeding." *Motion*, p. 3. Rate Counsel's argument is wrong in two critical aspects: (1) Rate Counsel has misstated the standard for what is in the record of this matter; and (2) even if Rate Counsel's interpretation of the standard were correct, the documents in question clearly meet that standard.

As a threshold matter, this proceeding was not conducted with evidentiary hearings. Therefore, no documents were formally "introduced" or "moved into evidence" in this matter. Consequently, there is no list of exhibits, documents or other items that are "in evidence."¹ Moreover, the standard for including items in the SICRA does not require that documents be formally "filed" or "moved into evidence." As Rate Counsel admits, *R. 2:5-4(a)* states in relevant part that "the record on appeal shall consist of all papers on file in the . . . agencies below." Moreover, under the Uniform Rules of Administrative Procedure, "Record" is defined as "all

¹ In this regard, Rate Counsel's argument that items 8 and 10 are not listed on the Board's website is immaterial. *Motion*, p. 5. The Board's website is not an official docketing system.

decisions and rulings of the judge and all of the testimony, documents, and arguments presented before, during and after the hearing and accepted by the judge for consideration in the rendering of a decision.” N.J.A.C. 1:1-2.1. Neither R. 2:5-4 nor N.J.A.C. 1:1-2.1 requires that documents be formally “filed” or accepted into “evidence” as Rate Counsel suggests. Rather, if the documents in question were “on file” with the Board, or “presented before, during and after the hearing and accepted by the [Board] for consideration in the rendering of [the] decision” in this matter, they are properly part of the record on appeal.

It is clear that items 8 and 10 are on file with or were presented to the Board during this proceeding. Rate Counsel served copies of its discovery requests (item 8) on all parties to the matter and the Board Secretary. Ocean Wind served its responses (item 10) on all parties and the Board Secretary. Moreover, Rate Counsel’s own witness, Maximillian Chang, used Ocean Wind’s responses to Rate Counsel’s discovery and cited to them throughout his April 27, 2022 written direct testimony (item # 12 of the SICRA). See Direct Testimony of Maximilian Chang on Behalf of the New Jersey Division of Rate Counsel (April 27, 2022), at pp. 4, 5, 7, 8, 10, 11, 12, 14, 19 and 20. In addition, Rate Counsel referred to its informal discovery requests in its June 2, 2022 filed comments (item #29 of the SICRA). Ocean Wind referred to the responses to Rate Counsel’s informal discovery requests in its June 16, 2022 filed comments in this matter (item #30 of the SICRA). Finally, the Board clearly considered items 8 and 10 because it referred to Rate Counsel’s discovery requests several times in its September 28, 2022 Order in this matter.² In sum, it is clear that items 8 and 10 are part of the record in the proceeding and were properly included in the SICRA filed with the Appellate Division. See, *In re New Jersey Bell Telephone Co.*, Docket No. TT92030358, 1993 WL 562032 at *6-7 (Dec. 15, 1993)(finding documents

² *I/M/O THE PETITION OF OCEAN WIND LLC PURSUANT TO N.J.S.A. 48:3-87.1(f) FOR A DETERMINATION THAT EASEMENTS ACROSS GREEN ACRES-RESTRICTED PROPERTIES AND CONSENTS NEEDED FOR CERTAIN ENVIRONMENTAL PERMITS IN, AND WITH RESPECT TO, THE CITY OF OCEAN CITY ARE REASONABLY NECESSARY FOR THE CONSTRUCTION OR OPERATION OF THE OCEAN WIND 1 QUALIFIED OFFSHORE WIND PROJECT*, Dkt. No. QO22020041, Order dated 9/28/22 at pp. 3, 10, 17.

considered by the Board in reaching its determination are properly included within the SICRA); *I/M/O the Petition of Pub. Serv. Elec. & Gas Co.*, Docket Nos. ER91111698J and GR91101574J, 1996 WL 210681 (Mar. 27, 1996)(finding documents that were considered by the Board in reaching its decision and would more fully disclose what occurred below are properly included in a SICRA).

In addition, the string of cases Rate Counsel cites on p. 4 of the Motion actually support the inclusion of items 8 and 10 in the SICRA. As Rate Counsel states, “the purpose of the Statement of Items is to provide the reviewing court with a record that fully and truly discloses what occurred before an agency . . . (citing to *Taylor v. Jersey Cent. Power and Light Co.*, BPU Docket No. EC06020077U (Oct. 30, 2009) (citing *Mount Olive Complex v. Twp. of Mount Olive*, 340 N.J. Super. 511, 527 (2001)).” Here, it is clear that Rate Counsel served informal discovery requests on Ocean Wind during the proceeding and that Ocean Wind provided written responses. Both documents were provided to the Board and served on all parties. The parties used them during the proceeding and the Board considered them in rendering its Order. That is “what occurred before [the Board].” *Taylor, supra*. Rate Counsel, by attempting to hide what transpired before the Board from the Appellate Division, is the party that is attempting to provide the reviewing court with an incomplete and misleading record.

Rate Counsel’s reliance on the Board’s order in *In re the Long Term Capacity Agreement Pilot Program (“LCAPP”)*, BPU Docket No. EO11010026, (Nov. 9, 2011) is also misplaced. In that Order, the Board determined to exclude certain items from a SICRA because the Board had not considered them in rendering its decision or because they were protected by certain privileges. *Id.* Here, in contrast, Rate Counsel itself used and cited to the discovery responses

in its witness's testimony, Ocean Wind referred to them in filed comments, and the Board itself cited to them in rendering its Order.³

Finally, Rate Counsel's argument that Ocean Wind's inclusion of standard reservation of rights language in its responses to Rate Counsel's discovery removes the documents in question from the record of this matter, is simply incorrect. *Motion*, p. 5. Including reservation of rights language in responses to written discovery is standard practice and is just not relevant as to whether the document in question is part of the record before the Board. In this regard, it is worth noting that Rate Counsel did not object to the inclusion of Ocean Wind's responses to the Board's supplemental questions (item 7) in the SICRA, even though those responses were not "formally filed" or "moved into evidence" in this matter. As discussed above, there is no requirement under R. 2:5-4 or N.J.A.C. 1:1-2.1 that documents be formally moved into evidence or stamped as "filed" for them to be part of the record before the Board.

Conclusion

For all the foregoing reasons, Ocean Wind respectfully requests that the Board deny Rate Counsel's Motion.

Respectfully submitted,

COZEN O'CONNOR



By: Gregory Eisenstark

GE:lg

cc: Service list via electronic mail

³ It is also worth noting that, since the start of the Covid-19 pandemic in March 2020, the Board has accepted all filings via email. Hence, Rate Counsel's attempted distinction between documents stamped as "received" versus those stamped as "filed" (*Motion*, p. 5) is not relevant, because no documents in the record of this matter were "stamped" at all.

**IN THE MATTER OF THE PETITION OF OCEAN WIND LLC PURSUANT TO N.J.S.A. 48:3-87.1(f) FOR A DETERMINATION THAT EASEMENTS ACROSS GREEN ACRES-RESTRICTED PROPERTIES AND CONSENTS NEEDED FOR CERTAIN ENVIRONMENTAL PERMITS IN, AND WITH RESPECT TO, THE CITY OF OCEAN CITY ARE REASONABLY NECESSARY FOR THE CONSTRUCTION OR OPERATION OF THE OCEAN WIND 1 QUALIFIED OFFSHORE WIND PROJECT
BPU DOCKET NO.: QO22020041**

Service List

ORSTED	
<p>Aaron Bullwinkel Senior Legal Counsel Legal, Group Support Orsted Offshore North America 399 Boylston St., 12th Floor Boston, MA 02116 aarbu@orsted.com</p>	<p>Matthew Kaplan Orsted 437 Madison Avenue, 19th floor New York, NY-10022 MATKA@orsted.com</p>
<p>Gregory Eisenstark, Esq. Cozen O'Connor 1010 Kings Highway South Cherry Hill, NJ 08034 geisenstark@cozen.com</p>	<p><u>William Lesser, Esq.</u> <u>Cozen O'Connor PC</u> <u>3 WTC, 175 Greenwich Street – 55th Floor</u> <u>New York, NY 10007</u> wlesser@cozen.com</p>
<p>Michael J. Connolly, Esq. Cozen O'Connor PC 1010 Kings Highway South Cherry Hill, NJ 08034 mconnolly@cozen.com</p>	
BOARD OF PUBLIC UTILITIES	
<p>Carmen Diaz, Acting Board Secretary Board of Public Utilities 44 South Clinton Ave., Suite 314 PO Box 350 Trenton, NJ 08625 Aida.camacho@bpu.nj.gov</p>	<p>Robert Brabston Executive Director Board of Public Utilities 44 South Clinton Ave., 9th Floor P.O. Box 350 Trenton, NJ 08625 Robert.Brabston@bpu.nj.gov</p>
<p>Stacy Peterson Deputy Exec. Director Executive Director Office New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 stacy.peterson@bpu.nj.gov</p>	<p>Abe Silverman, Esq. Chief Counsel New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 abe.silverman@bpu.nj.gov</p>

BOARD OF PUBLIC UTILITIES (Cont'd)	
<p>Andrea Hart, Esq. New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 Andrea.Hart@bpu.nj.gov</p>	<p>Kelly Mooij Deputy Director Office of Clean Energy New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 Kelly.mooij@bpu.nj.gov</p>
<p>Jim Ferris Bureau Chief of New Technology New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 Jim.ferris@bpu.nj.gov</p>	<p>Véronique Oomen Project Manager Renewable Energy Division of Clean Energy New Jersey Board of Public Utilities 44 South Clinton Avenue Trenton, NJ 08625 Veronique.Oomen@bpu.nj.gov</p>
<p>Taryn Boland New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 Taryn.Boland@bpu.nj.gov</p>	
DIVISION OF RATE COUNSEL	
<p>Brian O. Lipman, Esq. Director Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 blipman@rpa.nj.gov</p>	<p>Maura Caroselli, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor PO Box 003 Trenton, NJ 08625 mcaroselli@rpa.nj.gov</p>
<p>Megan Lupo, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 mlupo@rpa.nj.gov</p>	<p>T. David Wand, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 dwand@rpa.nj.gov</p>
<p>Robert Glover, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 rglover@rpa.nj.gov</p>	<p>Carlana Morrison Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 cmorrison@rpa.nj.gov</p>

DIVISION OF RATE COUNSEL (Cont'd)	
Maximillian Chang Synapse Energy Economics, Inc. 485 Massachusetts Avenue, Suite 3 Cambridge, MA 02139 mchang@synapse-energy.com	
DIVISION OF LAW	
Pamela Owen, DAG Department of Law Hughes Justice Complex 25 Market Street PO Box 112 Trenton, NJ 08625 pamela.owen@law.njoag.gov	Daren Eppley, DAG Department of Law Hughes Justice Complex 25 Market Street PO Box 112 Trenton, NJ 08625 daren.eppley@law.njoag.gov
Paul Youchak, DAG Department of Law Hughes Justice Complex 25 Market Street PO Box 112 Trenton, NJ 08625 Paul.Youchak@law.njoag.gov	David Apy, Assistant Attorney General Environmental Practice Group Office of the Attorney General Richard J. Hughes Justice Complex 25 Market Street 7th Fl., P.O. Box 093 Trenton, New Jersey 08625 David.apy@law.njoag.gov
PSEG	
Cara Lewis, Esq. PSEG Service Corp. 80 Park Plaza, T5 Newark, NJ 07101 cara.lewis@pseg.com	Ana Murteira, Esq. PSEG Service Corp. 80 Park Plaza, T5 Newark, NJ 07101 Ana.Murteira@pseg.com
OCEAN CITY	
Melissa Rasner Municipal Clerk City of Ocean City 861 Asbury Avenue Ocean City NJ 08226 mrasner@ocnj.us	Dorothy F. McCrosson, Esq. City Solicitor McCrosson & Stanton, P.C. 200 Asbury Avenue Ocean City, New Jersey 08226 dmccrosson@ocnj.us
Hon. Jay Gillian, Mayor City of Ocean City 861 Asbury Avenue Ocean City, NJ 08226 mayor@ocnj.us	Bobby Barr Council President 118 Roosevelt Boulevard Ocean City, NJ 08226 rbarr@ocnj.us

OCEAN CITY (Cont'd)	
<p>Tomaso Rotondi Council Vice President 407 Bay Avenue Ocean City, NJ 08226 trotondi@ocnj.us</p>	<p>Karen Bergman City Council Member 39 Bayview Place Ocean City, NJ 08226 kbergman@ocnj.us</p>
<p>Tony Polcini City Council Member 2 Valmar Court Ocean City, NJ 08226 tpolcini@ocnj.us</p>	<p>Jody Levchuk City Council Member 2 Bayonne Place Ocean City, NJ 08226 jlevchuk@ocnj.us</p>
<p>Peter V. Madden City Council Member 47 Bay Road Ocean City, NJ 08226 pmadden@ocnj.us</p>	<p>Terrence Crowley Jr. City Council Member 123 Bay Avenue Ocean City, NJ 08226 tcrowley@ocnj.us</p>
<p>Jennifer B. Barr, Esq. Cooper Levenson, P.A. 1125 Atlantic Avenue Atlantic City, NJ 08401 jbarr@cooperlevenson.com</p>	
CAPE MAY COUNTY	
<p>Kevin Lare, Acting Administrator Board of County Commissioners, Cape May County 4 Moore Road Cape May Courthouse, NJ 08210 kevin.lare@co.cape-may.nj.us</p>	<p>Gerald M. Thornton, Commissioner Director Board of County Commissioners, Cape May County 4 Moore Road Cape May Courthouse, NJ 08210 gerald.thornton@co.cape-may.nj.us</p>
<p>Rita M. Rothberg County Clerk County of Cape May 7 N Main Street P.O. Box 5000 Cape May Court House, NJ 08210-5000 coclerk@co.cape-may.nj.us</p>	
NJDEP	
<p>Shawn M. LaTourette, Commissioner Department of Environmental Protection 401 E. State St. 7th Floor, East Wing P.O. Box 402 Trenton, NJ 08625-0402 commissioner@dep.nj.gov</p>	<p>Sean D. Moriarty, Deputy Commissioner Deputy Commissioner for Legal, Regulatory and Legislative Affairs 401 E. State St., 7th Floor, East Wing P.O. Box 402 Trenton, New Jersey 08625-0402 Sean.Moriarty@dep.nj.gov</p>

NJDEP (Cont'd)	
Martha Sullivan Sapp Director, Green Acres Program Green Acres Program Mail Code 501-01 P.O. Box 420 501 East State Street 1st floor Trenton, New Jersey 08625-0420 Martha.Sapp@dep.nj.gov	

**IN THE MATTER OF THE PETITION OF OCEAN WIND LLC PURSUANT TO N.J.S.A. 48:3-87.1(f) FOR A DETERMINATION THAT EASEMENTS ACROSS GREEN ACRES-RESTRICTED PROPERTIES AND CONSENTS NEEDED FOR CERTAIN ENVIRONMENTAL PERMITS IN, AND WITH RESPECT TO, THE CITY OF OCEAN CITY ARE REASONABLY NECESSARY FOR THE CONSTRUCTION OR OPERATION OF THE OCEAN WIND 1 QUALIFIED OFFSHORE WIND PROJECT
BPU DOCKET NO.: QO22020041**

Service List

ORSTED	
<p>Aaron Bullwinkel Senior Legal Counsel Legal, Group Support Orsted Offshore North America 399 Boylston St., 12th Floor Boston, MA 02116 aarbu@orsted.com</p>	<p>Matthew Kaplan Orsted 437 Madison Avenue, 19th floor New York, NY-10022 MATKA@orsted.com</p>
<p>Gregory Eisenstark, Esq. Cozen O'Connor 1010 Kings Highway South Cherry Hill, NJ 08034 geisenstark@cozen.com</p>	<p><u>William Lesser, Esq.</u> <u>Cozen O'Connor PC</u> <u>3 WTC, 175 Greenwich Street – 55th Floor</u> <u>New York, NY 10007</u> wlesser@cozen.com</p>
<p>Michael J. Connolly, Esq. Cozen O'Connor PC 1010 Kings Highway South Cherry Hill, NJ 08034 mconnolly@cozen.com</p>	
BOARD OF PUBLIC UTILITIES	
<p>Carmen Diaz, Acting Board Secretary Board of Public Utilities 44 South Clinton Ave., Suite 314 PO Box 350 Trenton, NJ 08625 Aida.camacho@bpu.nj.gov</p>	<p>Robert Brabston Executive Director Board of Public Utilities 44 South Clinton Ave., 9th Floor P.O. Box 350 Trenton, NJ 08625 Robert.Brabston@bpu.nj.gov</p>
<p>Stacy Peterson Deputy Exec. Director Executive Director Office New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 stacy.peterson@bpu.nj.gov</p>	<p>Abe Silverman, Esq. Chief Counsel New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 abe.silverman@bpu.nj.gov</p>

BOARD OF PUBLIC UTILITIES (Cont'd)	
<p>Andrea Hart, Esq. New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 Andrea.Hart@bpu.nj.gov</p>	<p>Kelly Mooij Deputy Director Office of Clean Energy New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 Kelly.mooij@bpu.nj.gov</p>
<p>Jim Ferris Bureau Chief of New Technology New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 Jim.ferris@bpu.nj.gov</p>	<p>Véronique Oomen Project Manager Renewable Energy Division of Clean Energy New Jersey Board of Public Utilities 44 South Clinton Avenue Trenton, NJ 08625 Veronique.Oomen@bpu.nj.gov</p>
<p>Taryn Boland New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor PO Box 350 Trenton, NJ 08625 Taryn.Boland@bpu.nj.gov</p>	
DIVISION OF RATE COUNSEL	
<p>Brian O. Lipman, Esq. Director Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 blipman@rpa.nj.gov</p>	<p>Maura Caroselli, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor PO Box 003 Trenton, NJ 08625 mcaroselli@rpa.nj.gov</p>
<p>Megan Lupo, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 mlupo@rpa.nj.gov</p>	<p>T. David Wand, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 dwand@rpa.nj.gov</p>
<p>Robert Glover, Esq. Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 rglover@rpa.nj.gov</p>	<p>Carlana Morrison Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, NJ 08625 cmorrison@rpa.nj.gov</p>

DIVISION OF RATE COUNSEL (Cont'd)	
Maximillian Chang Synapse Energy Economics, Inc. 485 Massachusetts Avenue, Suite 3 Cambridge, MA 02139 mchang@synapse-energy.com	
DIVISION OF LAW	
Pamela Owen, DAG Department of Law Hughes Justice Complex 25 Market Street PO Box 112 Trenton, NJ 08625 pamela.owen@law.njoag.gov	Daren Eppley, DAG Department of Law Hughes Justice Complex 25 Market Street PO Box 112 Trenton, NJ 08625 daren.eppley@law.njoag.gov
Paul Youchak, DAG Department of Law Hughes Justice Complex 25 Market Street PO Box 112 Trenton, NJ 08625 Paul.Youchak@law.njoag.gov	David Apy, Assistant Attorney General Environmental Practice Group Office of the Attorney General Richard J. Hughes Justice Complex 25 Market Street 7th Fl., P.O. Box 093 Trenton, New Jersey 08625 David.apy@law.njoag.gov
PSEG	
Cara Lewis, Esq. PSEG Service Corp. 80 Park Plaza, T5 Newark, NJ 07101 cara.lewis@pseg.com	Ana Murteira, Esq. PSEG Service Corp. 80 Park Plaza, T5 Newark, NJ 07101 Ana.Murteira@pseg.com
OCEAN CITY	
Melissa Rasner Municipal Clerk City of Ocean City 861 Asbury Avenue Ocean City NJ 08226 mrasner@ocnj.us	Dorothy F. McCrosson, Esq. City Solicitor McCrosson & Stanton, P.C. 200 Asbury Avenue Ocean City, New Jersey 08226 dmccrosson@ocnj.us
Hon. Jay Gillian, Mayor City of Ocean City 861 Asbury Avenue Ocean City, NJ 08226 mayor@ocnj.us	Bobby Barr Council President 118 Roosevelt Boulevard Ocean City, NJ 08226 rbarr@ocnj.us

OCEAN CITY (Cont'd)	
<p>Tomaso Rotondi Council Vice President 407 Bay Avenue Ocean City, NJ 08226 trotondi@ocnj.us</p>	<p>Karen Bergman City Council Member 39 Bayview Place Ocean City, NJ 08226 kbergman@ocnj.us</p>
<p>Tony Polcini City Council Member 2 Valmar Court Ocean City, NJ 08226 tpolcini@ocnj.us</p>	<p>Jody Levchuk City Council Member 2 Bayonne Place Ocean City, NJ 08226 jlevchuk@ocnj.us</p>
<p>Peter V. Madden City Council Member 47 Bay Road Ocean City, NJ 08226 pmadden@ocnj.us</p>	<p>Terrence Crowley Jr. City Council Member 123 Bay Avenue Ocean City, NJ 08226 tcrowley@ocnj.us</p>
<p>Jennifer B. Barr, Esq. Cooper Levenson, P.A. 1125 Atlantic Avenue Atlantic City, NJ 08401 jbarr@cooperlevenson.com</p>	
CAPE MAY COUNTY	
<p>Kevin Lare, Acting Administrator Board of County Commissioners, Cape May County 4 Moore Road Cape May Courthouse, NJ 08210 kevin.lare@co.cape-may.nj.us</p>	<p>Gerald M. Thornton, Commissioner Director Board of County Commissioners, Cape May County 4 Moore Road Cape May Courthouse, NJ 08210 gerald.thornton@co.cape-may.nj.us</p>
<p>Rita M. Rothberg County Clerk County of Cape May 7 N Main Street P.O. Box 5000 Cape May Court House, NJ 08210-5000 coclerk@co.cape-may.nj.us</p>	
NJDEP	
<p>Shawn M. LaTourette, Commissioner Department of Environmental Protection 401 E. State St. 7th Floor, East Wing P.O. Box 402 Trenton, NJ 08625-0402 commissioner@dep.nj.gov</p>	<p>Sean D. Moriarty, Deputy Commissioner Deputy Commissioner for Legal, Regulatory and Legislative Affairs 401 E. State St., 7th Floor, East Wing P.O. Box 402 Trenton, New Jersey 08625-0402 Sean.Moriarty@dep.nj.gov</p>

NJDEP (Cont'd)	
Martha Sullivan Sapp Director, Green Acres Program Green Acres Program Mail Code 501-01 P.O. Box 420 501 East State Street 1st floor Trenton, New Jersey 08625-0420 Martha.Sapp@dep.nj.gov	