

Robert S. Daniel  
2-B Buckingham Road  
West Orange, NJ 07052-1184

July 21, 2024

Mr. Brian O. Lipman, Esq., Director  
Division of Rate Counsel  
PO Box 003  
Trenton, NJ 08625

Dear Director Lipman

Subject: PSE&G Street lighting – Base Rate Case  
Reference: My letter of February 14, 2024, and yours of March 4, 2024  
BPU docket ER23120924

I am submitting additional information for the review of our State's Rate Counsel as background to PSEG's rate case filing of December 29, 2023. I understand this would increase the monthly charges for street lighting by 10% at some point in 2024 – 2025.

As an observant citizen with a passion for street lighting I bring the attached letter to your attention. Street lighting in our state is not being maintained to the standards detailed in NJAC 14:15-2.9(b) which requires that.

*“All routine streetlight repairs are to be made within three business days after notice that a repair is necessary.” “Other more extensive repairs including, but not limited to, those requiring excavation, shall be handled on a best-efforts basis in order to ensure the restoration of safe, adequate and proper service as quickly as reasonably possible.”*

Frankly, PSEG is distant from meeting the three-business day's goal for routine repairs. Furthermore, anything requiring *“more extensive repairs”* extends months if not years. Those are the facts. At issue is the manner and magnitude of these *“best-efforts basis”* which is clearly a consequence of the (non) allocation of resources by the petitioner. The attached correspondence and updated tracking table reflects the inadequacy of current *“best-efforts basis”*.

I respectfully request that this factor and additional information be included among the considerations before the Counsel and BPU when considering PSEG's latest request.

For clarifications and discussion, I can be reached at [robertdaniel1921@gmail.com](mailto:robertdaniel1921@gmail.com) or on my cellphone at 201.303.3554.

Respectfully submitted. Thank you.



Robert Daniel

Attached:  
Letter to PSEG's Joseph DePinto and CEO Hanemann of July 18, 2024



State of New Jersey  
DIVISION OF RATE COUNSEL  
140 EAST FRONT STREET, 4<sup>TH</sup> FL.  
P.O. Box 003  
TRENTON, NEW JERSEY 08625

PHIL MURPHY  
*Governor*

TAHESHA L. WAY  
*Lt. Governor*

BRIAN O. LIPMAN  
*Director*

March 4, 2024

Mr. Robert Daniel  
2-B Buckingham Road  
West Orange, NJ 07052-1184  
[Robertdaniel11921@gmail.com](mailto:Robertdaniel11921@gmail.com)

RE: Inquiry regarding PSE&G Street Lighting request- Base Rate Case

Dear Mr. Daniel,

The Division of Rate Counsel ("Rate Counsel") is responding to your letter dated February 14, 2024 regarding street lighting in PSE&G's territory.

The Division of Rate Counsel is statutorily mandated to represent and protect the interests of utility consumers, as a class, with regard to regulated electricity, natural gas, water, wastewater, cable, and telephone services. Rate Counsel also represents consumers in setting energy and telecommunication policies that affect the provision of services. Our mission is to ensure that consumers receive safe, adequate, and proper utility service at affordable rates. Although we do not represent individual customers, provide individual legal advice, or process consumers' complaints, we respond to all inquiries by providing useful general information about public utility rates and we direct consumers to the appropriate resource or agency when they have more individualized questions about their specific utility bills or usage.

Rate Counsel is actively involved in the PSE&G base rate case and examining the merits of the proposed rates and tariff changes set forth in PSE&G's filing, including any street lighting proposals. PSE&G is required to hold a public hearing wherein members of the public are invited to participate and express their views on the proposed rate increase. Such comments will be made a part of the final record in the proceeding. The virtual public hearings for this matter have not yet been scheduled. Once the public notice of the hearings is filed and published, the public notice containing the hearing date and times will be posted on the Board of Public Utilities ("BPU or "Board") website at <https://www.nj.gov/bpu/index.shtml>. Please click on the Newsroom and public notices tab on the top of the page and then click Utility Hearings. The public is invited and encouraged to participate. Written comments may be submitted to the Honorable Irene Jones, Office of Administrative Law, 33 Washington Street, Newark, New Jersey 07102. Members of the public are advised to reference the Superior Court Docket number- OAL Docket No. PUC 00926-2024 N in their comment letter.

Rate Counsel hopes the information provided will be useful.

Sincerely,

*Bethany Rocque-Romaine*

Bethany Rocque-Romaine  
Assistant Deputy Rate Counsel

Robert S. Daniel  
2-B Buckingham Road  
West Orange, NJ 07052-1184

July 18, 2024

Joseph DePinto, Distribution Manager, Engineering  
PSEG,  
150 Circle Avenue  
Clifton, NJ 07011

Dear Mr. DePinto

Subject: Repair of Streetlight outages in Metropolitan Division  
Reference: Your letter of March 15, 2024, and Chandra Ledford's of May 23, 2024

Thank you for your detailed letter of March 15<sup>th</sup> which included projected repair dates. Nevertheless, I remind you of the timelines set forth in the regulations which frame PSEG's operation.

"All routine streetlight repairs are to be made within three business days after notice that a repair is necessary." "Other more extensive repairs including, but not limited to, those requiring excavation, shall be handled on a best-efforts basis in order to ensure the restoration of safe, adequate and proper service as quickly as reasonably possible."<sup>1</sup>

It has become increasingly apparent that the resources being dedicated by PSEG corporate to street lighting maintenance are woefully inadequate. The extended duration of repairs, and the inability to stock basic decorative lamppost components reflects the focus and quantity of resources (trucks, manpower), quality of technology and tools that are made available to you and your people<sup>2</sup> for these tasks on a day-to-day basis.

While I completely understand that restoring power to every customer is the utmost priority, as it should be, there must be a "floor" a foundation of continual street lighting work that carries forward routinely.

Sadly, many of the completion dates cited in the attached letters have passed without the work being completed. That is sixty days later! Furthermore, the information that is being reported to you includes "false positives", or misunderstandings. Specifically, a lamp is reported as being repaired, when in fact it was not. (See pole 46231 at Broad and Market in Newark).

A copy of this correspondence will be forwarded to the BPU, Rate Counsel and OAL for consideration in the upcoming Base Rate adjudication.

My sincerest thanks,



Robert Daniel

Attached:

Correspondence referenced above.

Tracking table with updates – current to July 18, 2024

Copy:

Ms. Kim Hanemann, President & Chief Operating Officer

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<sup>1</sup> NJAC 14:15-2.9(b)

<sup>2</sup> Bobby Pluchinsky is doing fantastic work and updating me constantly, but entire lighting system cannot be based on the efforts of one man.



March 15, 2024

Mr. Robert Daniel  
2-B Buckingham Road  
West Orange, NJ 07052-1184

Dear Mr. Daniel,

*This letter supersedes the one sent to you dated March 6, 2024. A misprint was found in reference to street light pole 6291 below. The correction has been made.*

Thank you for your February 9, 2024 letter to PSE&G's President and COO, Kim Hanemann, regarding street light repairs in Newark and Trenton.

Listed below are the Newark street lights you reported out that have been repaired and time estimates for the repair of the remaining street lights.

- The following lights have been repaired and are working:
  - Pole-#44459, bulbs (2) were replaced on February 26
  - Pole-#44458, bulbs (2) were replaced on February 26
  - Pole-#5254, connections were re-made on February 29
  - Pole-#5149, replaced pole, on February 26
  - Pole-#46231, replaced ballast, on February 26
  - Pole-#6291, installed new wire to pole, on February 29
  - Pole-#6293, installed new wire, on February 26
  - Pole-#46300, installed new wire, on February 26
  - Pole-#44447, installed new wire, on February 26
  - Pole-#41050, rewired pole, on March 4
  - Pole-#44449, replaced two heads, on March 4
  - Pole-#47455, rewired pole, on March 4
  
- PSE&G anticipates repairing the following Newark street lights by March 22:
  - Pole-#47348
  - Pole-#33058
  - Pole-#1165
  - Pole-#46307
  - Pole-#44387

- To repair the following four lights, a City permit is required to allow PSE&G's contractor to repair the ductwork. PSE&G will then complete the work. The permit process can take up to six weeks. PSE&G will submit the permit applications to the City of Newark, by March 11. It is estimated all the work will be completed by May 17.
  - Pole-#1895
  - Pole-#33060
  - Pole-#47467
  - Pole-#48582


In reviewing your letter, PSE&G has identified two specific areas of improvement. The first area of improvement is increasing oversight on streetlight work that has been sub-contracted. The second improvement is to ensure a stricter approach when determining and canceling duplicate jobs. A recent review of this process has revealed that some jobs were closed out inadvertently thinking them to be duplicates, but they were not.

These improvements have resulted from your inquiry, and I want to thank you for your follow through and providing the opportunity for PSE&G to review our processes to ensure PSE&G is delivering the best service possible to its customers.

If you have additional questions, or have additional street light outages in Newark that you wish to report, please contact PSE&G Engineering Technician, Robert Plucinsky on his work cell phone, 973-713-5008 or at his email address, [Robert.Plucinsky@pseg.com](mailto:Robert.Plucinsky@pseg.com) for immediate assistance.

Please note that five of the six street light outages you referred to in Trenton have been repaired. The dusk to dawn light on pole 10638 will be removed at the request of the customer.

Very truly yours,



Joseph DePinto  
Distribution Manager- Engineering & Resources





Mr. Robert Daniel  
2-B Buckingham Rd.  
West Orange, NJ 07052

05/23/24

Dear Mr. Daniel:

My name is Chandra Ledford and I am with the Customer Relations Executive Office at PSE&G. Our office is in receipt of your letter to Ms. Kim Hanemann, PSE&G's President & COO, dated 05/05/24 regarding streetlights in the Newark area that still need repair. Your original letter dated 02/19/24 listed a total of 21 lights that required attention and repair. Of those 21 lights, PSE&G has repaired 16, leaving 5 lights that still require repair (4 on Raymond Boulevard; 1 on Orange Street). Our Electric Division recently obtained the necessary permit from the City of Newark to make the repairs on Raymond Boulevard and is currently doing a due diligence review before we begin work to repair the bases and conduit. The bases should be repaired by contractors no later than 05/31/24 and then PSE&G will install the cable and street lights during the first week of June. The permit for the Orange Street light was applied for on 05/20/24 and once we receive the permit from the City of Newark we will begin the repairs. It is my understanding that you spoke with one of PSE&G's engineers, Myriam Ramirez, on 05/15/24 and she also provided you with this information as well.

If you have further questions or concerns, you can reach me at 1-800-304-3118, ext. 3656. Mr. Robert Plucinsky at 973-365-2822 also remains available as a contact as well.

Sincerely,

Chandra Ledford  
Customer Relations Consultant  
1-800-304-3118, ext. 3656

Date reported	Location	City	Pole #	Order #	Current date	Comments	Days elapsed
<b>Lamps on First Street in Newark</b>							
1/24/2017	First Street southbound at Central (northwest corner)	Newark	44459?		7/18/2024	One of two bulbs out	2732
1/24/2017	First Street southbound at Central (southwest corner)	Newark	44458		7/18/2024	One of two bulbs out	2732
2/17/2024	"9 First Street" corner of New Street	Newark	44446	3685862	7/18/2024	Lamp is at corner of NEW Street. When clicking to report the pole it returns with address of 111 Hartford Street.	152
2/17/2024	First Street Northbound. 2nd lamp BEFORE Central Avenue at sliding gate	Newark	52600	3685863	7/18/2024	Lamp is ON FIRST STREET northbound. When clicking to report the pole 44443 it returns with the address of 398 Central Avenue. [POLE # VERIFIED on June 5, 2024.It is 52600. Absolute verification	152
<b>Other places in Newark</b>							
10/16/2023	433 Orange Street between 3rd & 4th	Newark	1895	3550257	7/18/2024	ED1016230481. Per Michelle 10/20/2023. Per Bobby, 6/25/2024, this is between Kemsco, City of Newark, permit and check issuance	276
11/29/2023	North 6th Street South behind Horton School	Newark	65749	3600135	7/18/2024	"this issue has been referred", Lamp is fed with a wire. <b>STILL OFF OFFLINE ON SUNDAY JULY 7TH. Per Myriam this was fixed on July 12th!!!</b>	232
5/14/2024	1086 McCarter Highway (Northbound by Ignite Church) North of Bridge St.	Newark	44524	3774586	7/18/2024	Was informed, 5/17, that it may take PSEG up to eight (8) months to receive the replacement decorative pole. No change in field as of 6/18/2024	65
5/14/2024	1100 McCarter Highway (Northbound by Ignite Church) North of Bridge St.	Newark	44533	3774587	7/18/2024	Was informed, 5/17, that it may take PSEG up to eight (8) months to receive the replacement decorative pole. No change in field as of 6/18/2024	65
2/2/2018	Mulberry at Center Street	Newark	41050	#40003686 4527 and 3595314	7/18/2024	Reported under previous system. Four lamps 2 or more out. Different wattages. Now completely dark. Reported 11/15/2023	2358



Date reported	Location	City	Pole #	Order #	Current date	Comments	Days elapsed
<b>Lamps on Raymond Boulevard in Newark</b>							
12/6/2022	Raymond Plaza WEST across from Newark Penn Station in new landscaping	Newark	48582		7/18/2024	Reported under previous system and again on October 23, 2023. M. Ramirez. Underground conduit repair needed 3/20/2023. Customer facing web system had this light unreported. I re-reported it on May 25, 2024. Per Bobby, 6/25/2024, Kemsco has permit. Street excavation work - THIS WEEK. <b><u>NO SIGNS OF EXCAVATION AS OF JULY 17TH</u></b>	590
12/11/2021	Raymond Boulevard westbound at Commerce Place	Newark	47322	3458160 or 3629971	7/18/2024	Also confused with 47324. Was on. Then off. Two adjacent poles. Mapping is inaccurate. "68-92 Park place". Per Bobby, 6/25/2024, Kemsco did work. This is finally repaired and back on.	950
2/25/2023	Raymond Boulevard Eastbound at Doubletree BEFORE overhead bridge.	Newark	47348	3633415	7/18/2024	UPPER lamp of three is out. Two lowers are WORKING! Need to re-wire the lamp that's not working (per Bobby 5-Mar-24)	509
1/19/2023	Raymond Boulevard Westbound just before Halsey Street	Newark	47467	3569618	7/18/2024	Current system has this as 11/1/2023. I reported this on January 19, 2023. In June 2024 there are markouts on the sidewalk. Per Robby the underground work was done. Wires need to be pulled. Per Bobby. This was completed and turned ON TODAY. 6/25/2024	546
11/22/2023	Raymond Boulevard Westbound near 185 Washington Street, next to NJ Transit's elevator	Newark	47455	3593632	7/18/2024	Two of three lamps are working. One lamp remains off	239
4/8/2024	Raymond Boulevard Westbound between Washington and University. Address set to "180 Washington Street"	Newark	47463	3740300	7/18/2024	Pole gone. Only base remains. ED 0063284582	101
11/9/2023	Raymond Boulevard WESTBOUND, aka "23 67 Jersey Avenue". Three lamps. One pole missing.	Newark	33058	3580085	7/18/2024	ED1109230436 from Michele on 11/16/2023. STILL NOT FIXED AS OF 6/18/2024. Per Bobby, 6/25/24 pole erected, awaiting wiring	252

Date reported	Location	City	Pole #	Order #	Current date	Comments	Days elapsed
11/9/2023	Raymond Boulevard WESTBOUND, aka "23 67 Jersey Avenue". Three lamps	Newark	33060	3580076	7/18/2024	ED1109230436 from Michele on 11/16/2023. One of these is the twisted boom . STILL NOT FIXED AS OF 6/18/2024. Per Bobby this was repaired by 6/25/24	252
11/9/2023	Raymond Boulevard WESTBOUND, aka "23 67 Jersey Avenue". Three lamps. One pole dark	Newark	1165	3580076	7/18/2024	ED1109230436 from Michele on 11/16/2023. STILL NOT FIXED AS OF 6/18/2024. Per Bobby, 6/25/24 light is back on.	252
<b>Lamps on Market Street in Newark</b>							
11/12/2023	Market and Broad	Newark	46231	3582522	7/18/2024	Northeast corner of Broad & Market Streets. [The "heart" of downtown Newark]. <b><u>This is on DePinto's letter of March 15, 2024 as if it was fixed. "replaced ballast". It was not.</u></b>	249
7/10/2023	Market Street Eastbound adjacent to 777 McCarter Highway "Iconiq"	Newark	46307	3456102	7/18/2024	Market Street Eastbound. <b><u>Was a construction site. Construction is done.</u></b> Conduit was possibly damaged. (New material needed 5-Mar-24)	374
1/5/2024	Corner of Market Street & Raymond Plaza West. ("Gateway" side)	Newark	241	3635380	7/18/2024	Lower lamps are out. Adjacent to car lanes.	195
1/5/2024	Corner of Market Street & Raymond Plaza EAST. (Ironbound side)	Newark	48575	3635385	7/18/2024	I think this is still completely OUT 5/2024. Or one of the two are out?	195
12/12/2022	Raymond Plaza EAST (Ironbound side), Adjacent to Station's bus lane 1 door and wall.	Newark	48570		7/18/2024	two lower lamps are off. Reported on 2024 01 03	195
12/12/2022	Raymond Plaza EAST (Ironbound side). Adjacent to wrought Iron fence of Edison Parkfast parking lot	Newark	48571		7/18/2024	Two of three lamps are working. One lamp remains off	584
2/17/2024	Market at Halsey Street. Northwest corner. "176 Halsey Street"	Newark	47484	3685864	7/18/2024	Aluminum pole at northwest corner of Market and Halsey. ON MARKET street	152
1/4/2024	Mulberry at Market Street. Southeastern corner next to Edison ParkFast	Newark	46300	3633250	7/18/2024	I had reported this lamp, it got "pencil whipped" and someone ELSE has reported it on January 4, 2024. <b><u>This is on DePinto's letter of March 15, 2024 as if it was fixed. "Installed new wire". It was not.</u></b>	196

Date reported	Location	City	Pole #	Order #	Current date	Comments	Days elapsed
2/22/2024	55 West Market Street, West Market Street, Westbound	Newark	"unknown" on PSEG map	3685867	7/18/2024	Across from Shopping center, specifically "Botanica" store	147
6/28/2024	West Market at Norfolk, NorthEAST corner.	Newark	5626D	3810932	7/18/2024	Base without pole. Orange cone	20
6/28/2024	West Market at Wickliffe. Northwest corner. "108 Callahan Court"	Newark	5606	3810933	7/18/2024	Boom missing from high mast traffic signal pole	20
6/5/2024	91 West Market Street, Westbound in front of Essex County Vo-Tech	Newark	6284	3794400	7/18/2024	Pole gone. Pole is visible in Google Street view. Only base remains. Assigned ED0063866598 on June 7, 2024	43
<b>Lamps in West Orange</b>							
10/20/2023	1155 Pleasant Valley Way, at entrance to Daughters of Israel	West Orange	None	3685868		Looks like PSEG's lamp but it is <b>not</b> . <b>So why isn't PSEG's system capable of informing customers that we should direct our complaint to NJDOT, private property owner or Port Authority? Current system just tells us that it is FIXED!!!</b>	
<b>Lamps in Cedar Grove</b>							
12/16/2023 6/9/2024	Pompton Avenue Northbound, at corner	Cedar Grove		3797159		Previously reported on December 16, 2023. Reported by Myriam & system as resolved on June 12, 2024	3
12/16/2023 6/9/2024	Pompton Avenue Northbound	Cedar Grove		3797160		Previously reported on December 16, 2023. Reported by Myriam & system as resolved on June 12, 2024	3
<b>Lamps in Trenton</b>							
12/26/2023	S Warren at new Treasury Building near John Fitch Way.	Trenton	11241	3626278	7/18/2024	Reported in system 12/26/2023 but there's a <u>newly repaired base</u> awaiting a lampost for longer than that	205
12/26/2023	S Warren & Livingston Street. Court Parking lot side	Trenton	"unknown" on PSEG map	3626272	7/18/2024	Reported in system 12/26/2023 but there's a base awaiting a lampost for longer than that	205
12/26/2023	S Warren & Livingston Street. Old Agriculture HQ side	Trenton	"unknown" on PSEG map	3626277	7/18/2024	Reported in system 12/26/2023 but there's a base awaiting a lampost for longer than that	205

Date reported	Location	City	Pole #	Order #	Current date	Comments	Days elapsed
7/8/2024	144 West State Street. In front of State Capitol. Base without pole	Trenton	15991	3818412	7/18/2024	Got email that this has been resolved on July 11th. Simply not correct	10
7/15/2024	144 West State Street. In front of State Capitol. Pole w busted lamp head	Trenton	15990	3823628	7/18/2024		3
						<i>Rough, "average" duration of repair was 441 days</i>	15459