

STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF  
PUBLIC SERVICE ELECTRIC AND GAS  
COMPANY FOR A DETERMINATION  
PURSUANT TO THE PROVISIONS  
OF N.J.S.A. 40:550-19  
(SUSQUEHANNA –ROSELAND  
TRANSMISSION LINE)

BPU Docket No. EMO9010035

**STOP THE LINES  
FIRST REQUEST FOR THE  
PRODUCTION OF DOCUMENTS AND  
INTERROGATORIES RE: TESTIMONY  
OF ROBERT J. MILLIES**

Stop the Lines hereby makes the following Interrogatories and Requests for the Production of Documents of Robert J. Millies, Commonwealth Associates, witness for Public Service Electric and Gas Company, pursuant to N.J.A.C. § 1:10-1 et seq.

**INSTRUCTIONS**

Stop the Lines requests that answers to these Interrogatories and Requests for Production of Documents be provided to Carol A. Overland and David Slaperud, Stop the Lines, at the addresses below. Stop the Lines requests that responses also be provided electronically to [overland@legalectric.org](mailto:overland@legalectric.org) and [info@stopthelines.com](mailto:info@stopthelines.com).

For each response, identify the party answering and the Interrogatory to which it is responsive.

When the following terms or names are used, the undersigned intends the meanings hereinafter described to be associated with such terms and names.

These Interrogatories and Request for Production of Documents are ongoing. If your answers should change, or if new information becomes available, please update these responses as soon as possible.

## DEFINITIONS

Stop the Lines adopts the following Definitions for the purposes of this Discovery:

1. The singular includes the plural and the plural includes the singular where appropriate to the sense of the Demand for Production.
2. "Identify" or "identity" when used in reference to:
  - A. an individual, shall mean to state his full name, present or last known residential address, and present or last known employment position or business affiliation, indicating name of company, job title, employment address, and telephone numbers;
  - B. a firm, partnership, corporation, proprietorship, association or other organization or entity shall mean to state its full name, present or last known address and telephone number (designating which, the legal form of such entity or organization, and the identity of its chief executive officer);
  - C. a "document" shall mean to state, if applicable, the date of the document, the name of the person who prepared the document, the name of the recipient of the document, and the subject matter of the document. A copy of the document may be provided, in lieu of an answer, to that portion of the Interrogatory that it answers, where labeled as to which Interrogatory it is responsive.
  - D. meetings and events, list all identifying features, including date, place and participants.
  - E. other information, means provide the information requested.
3. "Date" shall mean the exact date, month and year, if ascertainable, or if not, the best available approximation including relationship to other events.
4. "BPU" means the New Jersey Board of Public Utilities and its employees and Commissioners, and also includes the Division of the Ratepayer Advocate and its employees.
5. "Concerning" and "addressing" mean relating to, referring to, describing, evidencing or constituting.
6. "Applicants" means the PSE&G, a New Jersey public utility, and also includes where necessary PJM as witness for PSE&G, and PPL as Pennsylvania applicant, and all principals, partners, members, representatives, employees, agents, contractors, officers, directors, affiliates and related companies.
7. "Document" means writings, drawings, graphs, charts, photographs, phono-records, and other data compilations from which information can be obtained and translated, if

necessary, through electronic devices into reasonably usable form, and other tangible things within the scope of the discovery rules.

### **INTERROGATORIES**

1. Direct, p. 1, you work for Commonwealth Associates. Did you work on the SE Metro transmission line through South St. Paul, Sunfish Lake and Mendota Heights, Minnesota?
2. Direct, p. 3, l. 15-22, where will lattice towers be used?
3. Direct, p. 3, l. 15-22, compare costs of various foundation types, i.e., grillage, concrete caisson, rock anchors, per structure.
4. Direct, p. 4, l. 13-16, what happens if a high voltage transmission line faults with fiber optic shield wire?

### **REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

1. Direct, p. 2, l. 21-22, provide the construction feasibility study, including construction cost estimates and construction schedules for the project.
2. Direct, p. 4, l. 1-8, provide relevant NESC, PJM, and PSE&G code regarding design conditions referenced, including but not limited to wind loading, ice loading, longitudinal loading conditions.
3. Direct, p. 4, l. 13-16, provide any EPRI reports regarding fiber optic and transmission lines.
4. Provide copies of any and all other documents that are referenced in the responses to any of the Interrogatories set forth above or created or otherwise obtained to facilitate responses thereto.

These Interrogatories and Request for Production of Documents are ongoing. If your answers should change, or if new information becomes available, please update these responses as soon as possible.

Dated: May 13, 2009



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