

**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
INTERROGATORIES AND
REQUEST FOR THE PRODUCTION OF
DOCUMENTS REGARDING PJM
LETTER OF JANUARY 21, 2010**

Stop the Lines hereby makes the following Interrogatories and Requests for the Production of Documents of PSE&G and PJM, to be answered by whatever witness present at the reopening hearing who will be able and qualified to testify about these matters, 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 electronically to overland@legalelectric.org and info@stopthelines.com and the service list.

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.

Some answer to the Interrogatories may be contained within PJM documents. If the answer is available in PJM document, provide copy of document and specific citation as response.

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. "Date" shall mean the exact date, month and year, if ascertainable, or if not, the best available approximation including relationship to other events.
- 3. "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.
 - 4. "Concerning" and "addressing" mean relating to, referring to, describing, evidencing or constituting.
 - 5. "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.
 - 6. "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.
 - 7. "Identify" means (1) for a person, list the name, title, business affiliation(s), business address(es), telephone(s) and fax number(s), (2) for meetings and events, list all identifying features, including date, place and participants and (3) for other information, means provide the information requested.

INTERROGATORIES BASED ON JANUARY 21, 2010 LETTER

- 1. Identify and provide copies of all documents to be presented by the PSE&G witness at the hearing scheduled for the week of February 1, 2010.
- 2. Identify all areas of testimony to be provided by each witness and provide copy of pre-filed testimony for each witness.

3. Letter, p. 1, A, para. 1 states that "...the most significant factor affecting the need for the PATH project appears to be the impact of additional amounts of Demand Response resources concentrated in the PJM Mid-Atlantic area.
 - a. Provide citation for this statement and document cited.
 - b. Identify all factors affecting the need for the PATH project, whether deemed significant or not.
 - c. Was Demand Response modeled before or after load was taken into consideration?
 - d. What is the amount of Demand Response deemed to have an impact?
 - e. What is the threshold at which Demand Response would be deemed to have an impact for PATH?
 - f. What is the amount of Demand Response modeled regarding the Susquehanna-Roseland project?
 - g. What is the threshold at which Demand Response would be deemed to have an impact for PATH?
4. Was load (demand) one of the other factors were present that affected the need for the PATH project?
 - a. What were the input assumptions regarding load (demand) for the PATH analysis? Identify source of load information and provide copy of documents, reports or other source.
 - b. What is the threshold at which load (demand) would be deemed to have an impact for PATH?
 - c. What is the amount of load (demand) modeled regarding the Susquehanna-Roseland project:
 - i. In 2009 RTEP/retooling analysis
 - ii. To be used in 2010 RTEP analysis.
 - d. What is the threshold at which load (demand) would be deemed to have an impact for Susquehanna-Roseland?
 - e. At what point would decreased load/demand justify extension of the in-service date proposed for Susquehanna-Roseland?
5. Letter, p. 1, A, para. 2 states that:

The analysis underlying the testimony... in support of the MAPP project was based, in large part, on the same body of criteria tests that were the basis for the analysis supporting the PATH project.

- a. Identify the "same body of criteria tests" referred to above.
 - b. Identify the analysis that was not within the "large part" of the same body of criteria tests.
6. Id, goes on to state:

Specifically, both projects are largely driven by the analysis of load deliverability related to the PJM Mid-Atlantic area and both are similarly

impacted by the additional amount of Demand Response resources in that area.

- a. What other drivers are present for MAPP and PATH beyond analysis of load deliverability, including but not limited to those listed in the 2007 RTEP, p. 20?
- Operational performance of system facilities
 - Requests to interconnect new generation and merchant transmission facilities
 - Transmission owners' plans to modify or expand their transmission facilities
 - Interregional transmission development plans generation deactivation activity
 - PJM-developed load forecasts
 - Generation, demand side response and self-generation developments
 - Requests for long-term firm transmission service
 - Market-based proposals and PJM-developed alternatives to resolve persistent and costly congestion

Provide documents and citations supporting your response.

- b. Define "area" in which impacts of additional amount of Demand Response resources are present. Provide documents and citations supporting your response.
- c. What is impact of additional amount of Demand Response resources in the Susquehanna-Roseland "area." Provide documents and citations supporting your response.
- d. Regarding deliverability as a driver, is it correct that deliverability is the primary driver of the Susquehanna-Roseland project? Explain answer and provide documents.
- e. Regarding load deliverability, referring to Exhibits PFM-1, PRM-2, and PFM-3:
- i. For PFM-1, which of the violations were analyzed using PJM deliverability criteria?
 - ii. For PJM-1, which of the violations were identified as deliverability issues?
 - iii. For PFM-2, which of the violations were analyzed using PJM deliverability criteria?
 - iv. For PJM-2, which of the violations were identified as deliverability issues?
 - v. For PFM-3, which of the violations were analyzed using PJM deliverability criteria?
 - vi. For PJM-3, which of the violations were identified as deliverability issues?
 - vii. Have subsequent iterations of PFM-1, 2 and 3 been performed? If yes, provide inputs and results. If no, explain.
 - viii. For subsequent iterations of PFM-1, 2, and 3, which of the violations were analyzed using PJM deliverability criteria?
 - ix. For subsequent iterations of PFM-1, 2, and 3, which of the violations were identified as deliverability issues?
7. The above paragraph from the January 21, 2010 letter, Id., goes on to state:

In addition, the analysis submitted in support of the MAPP project assumed that the PATH project would be in service in 2014.

- a. Provide citation to documents or studies relied on for this statement.
 - b. Was MAPP assumed in service in the analysis for PATH?
 - c. For the Susquehanna-Roseland analysis, was MAPP assumed to be in-service on any date? Provide citation and documentation.
 - d. For the Susquehanna-Roseland analysis, was PATH assumed to be in-service on any date? Provide citation and documentation.
8. The January 21, 2010 Letter's answer to B.1. is not responsive, stating that the "nature, scope and depth of PJM's upcoming analyses of PATH and MAPP will be evaluated in the course of PJM's normal periodic review..." Again, please describe whether and how the nature, scope and depth of PJM's upcoming analysis of PATH and MAPP **differ materially** from the normal periodic reviews.
9. Regarding the response to B(1)(b) stating that "the factors impacting the need for the PATH and MAPP projects will not impact the need for the Susquehanna-Roseland project" please:
- a. Specify "factors impacting the need."
 - b. Specify how and why each of those factors will not have an impact on need for Susquehanna-Roseland. Provide citations and documentation.
10. Regarding the response to B(2)(a):
- a. Provide citations to "PJM's testimony in this proceeding" that are responsive to the issue of whether the factors driving the delays of the PATH and MAPP projects will "in any way change the need for the Susquehanna-Roseland project in New Jersey."
 - b. Regarding the factors cited in your response to 3(b) above, what is the impact of these factors on the need for the Susquehanna-Roseland project in New Jersey? Provide citations and documentation supporting your response.
11. What planned system upgrades are included in the modeling of PFM-1, 2, 3 and subsequent iterations, i.e., is the b0174 upgrade of Portland-Greystone 230kV line (see PJM Manual 14b, Attachment A, p. 31-32) included and if so, would it not eliminate PFM-1's outage 20 from the list of violations? What other "violations" are eliminated when planned upgrades are considered?
12. Delays and withdrawal of PATH and MAPP occurred after review by PJM and Ordered sensitivity analysis. What post-Petition study of Susquehanna-Roseland has occurred that includes new generation, historical demand, updated load forecasts, updated Demand Response? Provide studies responsive to this question. If there are none, provide them as soon as possible, but not later than the hearing scheduled for February 4, 2010.

REQUESTS FOR THE PRODUCTION OF DOCUMENTS

1. Produce pre-filed testimony for each witness who will testify at the reopened hearing.
2. Provide every document upon which such testimony will rely.
3. Provide 4th Quarter PJM demand, load, price, generation, constraint and reactive power details as found in the Monitoring Analytics 3Q State of the Market Report.
4. Provide the Monitoring Analytics 2010 year end State of the Market Report.
5. Produce all studies that are further iterations of PFM-1, PJF-2 and PFM-3.
6. Provide all documentation of analysis of optimization alternatives considered to address reliability criteria at reduced cost.
7. Provide all documents responsive to Interrogatories above.
8. Provide for this record a sensitivity analysis for Susquehanna-Roseland as was Ordered in the PATH docket.
9. Provide for this record PJM's responses to Order Points 10 and 11, FERC Order 1/21/10, Docket EL05-121-006.

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: January 25, 2010



Carol A. Overland MN 254617
P.O. Box 176
Red Wing, MN 55066
(612) 227-8638 and (302) 834-3466
overland@legalelectric.org
Pro Hac Vice for Stop the Lines



Julia LeMense, Esq.
744 Broad Street – Suite 1525
Newark, NJ 07102
(973) 424-1166
jlemense@easternenvironmental.org
Sponsor – Pro Hac Vice