

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 RICHARD F. CROUCH**

Stop the Lines hereby makes the following Interrogatories and Requests for the Production of Documents of Richard F. Crouch, 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 and 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. 3, l. 2-8, if you are deconstructing, re-configuring and re-constructing, will the 230kV lines be re-conducted?
2. Direct, p. 5, l. 11, was the last time 230kV line was re-conducted in the 1970s?
3. Direct, p. 5, l.11, what changes in conductor design have occurred since the 1970s? Was ACSS conductor available in the 1970s?
4. Direct, p. 5, l. 16, are the lattice structures in place now approximately 80 years old?
5. Direct, p. 6, l. 11-15, Exhibit 2A shows a tower ranging from 145-195 in height. Where the centerline of a 150 foot RoW is 75 feet, along the full length of the corridor, how many landowner structures (homes, garages, sheds, etc.) are within 70-120 feet of the RoW?
6. Direct, p. 6, l. 11-15, Exhibit 2B shows a tower ranging from 145-195 in height. Where the centerline of a 150 foot RoW is 75 feet, along the full length of the corridor, how many landowner structures (homes, garages, sheds, etc.) are within 70-120 feet of the centerline?
7. Direct, p. 6, l. 11-15, Exhibit 2C shows a tower ranging from 145-195 in height. Where the centerline of a 150 foot RoW is 75 feet, along the full length of the corridor, how many landowner structures (homes, garages, sheds, etc.) are within 70-120 feet of the centerline?
8. Direct, p. 6, l. 22, does this mean each of the three types of structures will be used?
9. Direct, p. 8, l. 15, regarding proper clearance to the ground, how much is required (cite source of requirement).
10. Direct, p. 8, l. 15, regarding proper clearance to the ground, how much is required for a 150' RoW? (cite source of requirement)
11. Direct, p. 8, l. 15, regarding proper clearance to the ground, how much is required for PSE&G's "preferred" 200' RoW? (cite source of requirement)
12. Direct, p. 9, l. 4, will the 230kV line be re-conducted?
13. Direct, p. 9, l. 9, will project have fiber optic in shield wires?

14. Direct, p. 9, l. 9, if fiber optic in shield wires, how many strands total?
15. Direct, p. 9, l. 9, if fiber optic in shield wires, how many strands are required for transmission line control?
16. Direct, p. 9, l. 9, will fiber optic lines not used for transmission line control be leased or sold or used for some other purpose? Explain in detail.
17. Direct, p. 9, l. 9, if fiber optic in shield wires is to be leased or sold or as some other type of revenue source, what is expected revenue annually, and provide basis for this estimate.
18. Direct, p. 9, l. 9, what happens if a fault occurs with high voltage line and fiber optic shield wires?
19. Direct, p. 9, l. 14-18, will 230kV part of line be reconducted with 1590 kcmil 54/19 ACSR Falcon conductor?
20. Direct, p. 10, l. 12-14, provide citations to the State of New Jersey's audible noise and electric field regulations.
21. Direct, p. 10, l. 14-15, explain what State of New Jersey audible noise and electrical field levels "requires a two-conductor bundle per electrical phase and the 500kv circuit requires a four-conductor bundle per electrical phase."
22. Direct, p. 11, l. 5-11, provide citations to NESC code and PJM safety criteria for minimum clearance to ground.
23. Direct, p. 11, l. 8-11, provide citations to NESC, OSHA and PSE&G work practices clearance requirements.
24. Direct, p. 11, l. 14-14, how would "installing the 500kV circuit in its own, separate right of way" minimize the height of the structures?
25. Direct, p. 12, l. 9-10, in what situations would the project be located "adjacent to the right of way?"
26. Direct, p. 13-14, does PJM plan any underground or underwater transmission in the RTEP, i.e., the line from Roseland to New York, or the MAPP line or others?
27. Direct, p. 13, l. 5-8, do underground lines require maintenance as often as overhead? If so, explain.
28. Direct, p. 13, l. 5-8, are underground lines toppled by tornadoes and high winds? If so, explain.

29. Direct, p. 13, l. 5-8, do underground lines gallop or become ice encrusted? If so, explain.
30. Direct, p. 13, l. 5-8, do underground lines sag with heat into nearby trees? If so, explain.
31. Direct, p. 13, l. 10-12, l. 33-35, how many conductors of what specifications would be required to have the same transfer capacity? That transfer capacity is what, expressed in MVA?
32. Direct, p. 14, l. 5-6, provide itemized cost estimate for: a) the \$750 million dollars of this project; b) the 6-10 times \$750 million for underground construction.
33. Direct, p. 14, l. 15, has PSE&G or its agents begun taking soil borings?
34. Direct, p. 14, l. 15; p. 17, l. 17-19, has PSE&G or its agents begun easement clearing?
35. Direct, p. 16, l. 1-2, explain what "necessary property rights" may not be included in easements.
36. Direct, p. 16, l. 1-2, explain how these rights may be acquired.
37. Direct, p. 18, l. 8-14, is this the schedule reflected in the GANTT chart?
38. Direct, l. 18, l. 15-21, how will PSE&G notify residents or tenants living on affected property?
39. Direct, l. 18, l. 15-21, how will PSE&G compensate residents or tenants living on affected property?

REQUESTS FOR THE PRODUCTION OF DOCUMENTS

1. Direct, p. 3, l. 16-17, provide copies of initial feasibility studies conducted by PSE&G and subsequent feasibility studies.
2. Direct, p. 3, l. 17-19, provide GANTT charts and other charts showing construction process and timeline
3. Direct, p. 3, l. 19, provide copies of all permit applications not included with testimony on PSE&G's Susquehanna-Roseland website.
4. Direct, p. 5, l. 17, provide itemized operational and maintenance costs over last 10 years.
5. Provide copies of any and all EPRI studies regarding fiber optic on transmission lines.

6. Provide copies or links to relevant NESC code and PJM safety criteria for minimum clearance to ground.
7. Provide copies or links to relevant NESC, OSHA and PSE&G work practices clearance requirements.
8. Direct, p. 13, l. 37-41, provide photos and plans of several typical 500kV AC/DC conversion stations.
9. Direct, p. 13, l. 10-12 - Provide construction plan for this project, including but not limited to GANTT charts.
10. Direct, p. 16, l. 1-2, provide copies of all easements that do "not include necessary property rights." If this is a case where easements do not exist, provide location, name and address of current fee owner.
11. Direct, p. 16, l.8-10, provide map showing needed access points and names and addresses of fee owners of that property.
12. Direct, p. 16, l. 11-17, provide map showing areas where access is limited by topography.
13. Direct, p. 17, provide map showing contemplated lay down yards.
14. 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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