

January 25, 2010

## VIA EMAIL AND U.S. MAIL

Ms. Kristi Izzo Secretary of the Board New Jersey Board of Public Utilities 2 Gateway Center Newark, New Jersey 07102

Re: PJM Interconnection, LLC's Response to Secretary's Letter, dated January 21, 2010

I/M/O THE PETITION OF PUBLIC SERVICE ELECTRIC AND GAS COMPANY FOR A DETERMINATION PURSUANT TO THE PROVISIONS OF N.J.S.A. 40:55D-19 (SUSQUEHANNA-ROSELAND) BPU DOCKET NO. EM 09010035

Dear Ms. Izzo:

Please accept this letter on behalf of Environment New Jersey, the Sierra Club – New Jersey Chapter, the New Jersey Highlands Coalition, and New Jersey Environmental Federation (the "Environmental Intervenors") in the above-captioned case.

The Environmental Intervenors join in the objections made by the Municipal Intervenors, dated January 22, 2010. The Environmental Intervenors also join in the request that the Board schedule a conference to determine the type and timing of any additional proceedings under this docket.

The Environmental Intervenors also respectfully renew their request that the Board order PSE&G to provide revised and updated sensitivity analyses. The substance of this request was identified as early as January 6, 2010 in the reply briefs of the Environmental Intervenors and Stop the Lines! It was also set forth in detail in the letters of January 14, 2010 and January 18, 2010 filed by the Environmental Intervenors, the Municipal Intervenors, Stop the Lines! and the Montville Board of Education, and is set forth below in its entirety.

Specifically, the sensitivity analyses should include, but not be limited to those scenarios ordered in the PATH docket:

1. Susquehanna-Roseland load flow analyses updated to reflect the following changes in generation: (i) all existing generation as of January 7, 2010, which is not scheduled to be retired before 2014; (ii)

all proposed generation that cleared the May 2009 PRM Auction; and (iii) all proposed generation with a signed ISA as of January 7, 2010 ("Scenario 1 generation");

- 2. Susquehanna-Roseland load flow analyses updated for the changes in Scenario 1 generation, and updated to reflect PJM's 2010 load forecast ("Scenario 2");
- 3. Susquehanna-Roseland load flow analyses updated for the changes in Scenario 1 generation, and updated to reflect the demand response and energy efficiency resources that cleared the May 2009 RPM Auction;
- 4. Susquehanna-Roseland load flow analyses updated for the changes in Scenario 1 generation, and PJM's 2010 load forecast (i.e., Scenario 2) and updated to reflect the demand response and energy efficiency resources that cleared the May 2009 RPM Auction;
- 5. Susquehanna-Roseland load flow analyses updated for the changes in Scenario 1 generation, PJM's 2010 load forecast, and to reflect the demand response and energy efficiency resources that cleared the May 2009 RPM Auction (i.e. Scenario 4), and updated to reflect the forecasted additional demand response and energy resource reasonably available for 2014, 2015 and 2016 (i.e. using MW identified in the testimony of Mr. Fagan, that was made attached to the Certification of Julia LeMense, dated January 14, 2010); and
- 6. Susquehanna-Roseland load flow analyses updated for the changes in Scenario 1 generation, PJM's 2010 load forecast, the demand response and energy efficiency resources that cleared the May 2009 RPM Auction, the forecasted additional demand response and energy resource reasonably available for 2014, 2015 and 2016; and updated to reflect additional demand response and energy efficiency projected (i.e. using MW identified in the testimony of Mr. Fagan, that was made attached to the Certification of Julia LeMense, dated January 14, 2010).

Thank you for your consideration.

Sincerely,

Julia LeMense, Esq. Executive Director

Eastern Environmental Law Center

Attorneys for Environmental Intervenors

Cyle Leuhix