

**BEFORE THE  
NEW JERSEY BOARD OF PUBLIC UTILITIES**

**IN THE MATTER OF THE PETITION OF  
JERSEY CENTRAL POWER & LIGHT COMPANY  
PURSUANT TO N.J.S.A. 40:55D-19 FOR A  
DETERMINATION THAT THE  
MONTVILLE - WHIPPANY 230 KV TRANSMISSION PROJECT  
IS REASONABLY NECESSARY FOR THE SERVICE,  
CONVENIENCE OR WELFARE OF THE PUBLIC**

**VERIFIED PETITION**

**Filed March 27, 2015**

**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

---

In the Matter of the Petition of **Jersey Central Power & Light Company** Pursuant to *N.J.S.A.* 40:55D-19 for a Determination that the Montville-Whippany 230 kV Transmission Project is Reasonably Necessary for the Service, Convenience or Welfare of the Public

---

:  
:  
:  
:  
:  
:  
:  
:  
:  
:

BPU Docket No. \_\_\_\_\_

**VERIFIED PETITION**

**TO THE HONORABLE BOARD OF PUBLIC UTILITIES:**

Jersey Central Power & Light Company (“JCP&L” or the “Company”), a public utility, as defined in *N.J.S.A.* 48:2-13, of the State of New Jersey, and subject to the regulatory jurisdiction of the Board of Public Utilities (the “Board”), and maintaining offices at 300 Madison Avenue, Morristown, New Jersey 07962-1911 and 331 Newman Springs Road, Suite 325, Red Bank, New Jersey 07701, files this Petition pursuant to *N.J.S.A.* 40:55D-19. This Petition seeks approval of the Montville-Whippany 230 kV Transmission Project, which involves the construction of a new 230 kV transmission line between JCP&L’s Whippany substation, located in East Hanover, New Jersey, and its Montville substation, located in Montville, New Jersey, along with the associated upgrades to these substations (the “Project”). The Project is necessary to address reliability issues that have been identified by JCP&L and PJM Interconnection, LLC (“PJM”). Construction and energization of the Project will enhance the reliability and redundancy of JCP&L’s transmission and distribution system in Morris and Sussex Counties; therefore, a decision by the Board finding that the Project is reasonably

necessary for the service, convenience or welfare of the public is warranted. In support of this Petition, the Company respectfully shows:

## **I. BACKGROUND**

1. JCP&L is a New Jersey electric public utility primarily engaged in the purchase, transmission, distribution and sale of electric energy and related utility services to approximately 1.1 million residential, commercial and industrial customers located within 13 counties and 236 municipalities of the State of New Jersey.

2. PJM, a FERC-approved Regional Transmission Organization (“RTO”), is responsible for ensuring the reliability of the electric transmission system under its functional control and coordinating the movement of wholesale electricity in all or parts of 13 states, including New Jersey. PJM is responsible for assuring compliance with the North American Electric Reliability Corporation (“NERC”) planning and operating standards for the bulk electric system (*i.e.*, above 100 kV) within its control area.

3. JCP&L is committed to providing safe and reliable service to its customers. As part of this commitment, JCP&L, in coordination with PJM, engages in planning for its transmission system.

## **II. PJM REGIONAL TRANSMISSION EXPANSION PLANNING PROCESS**

4. PJM is responsible for planning the region’s transmission grid to maintain reliability within the standards that NERC has established. PJM conducts such planning through its Regional Transmission Expansion Planning (“RTEP”) process. PJM conducts the necessary studies and identifies transmission system upgrades, expansions and enhancements that are

needed to ensure the reliability of the PJM transmission system.<sup>1</sup> JCP&L is a transmission owner in PJM and a signatory to the PJM Consolidated Transmission Owners Agreement (“TOA”).<sup>2</sup>

5. As part of its RTEP process, each year PJM performs a system-wide analysis to determine the ability of the PJM transmission grid to meet all applicable reliability standards and operational requirements. The RTEP process accounts for forecasted firm loads in PJM, firm imports from, and exports to, neighboring systems, existing generation and transmission assets in PJM, and anticipated new generation and transmission facilities.<sup>3</sup> Using this baseline reliability analysis, PJM identifies future reliability violations and transmission expansions and upgrades that are needed to resolve any anticipated violations.<sup>4</sup>

6. The RTEP process includes a mechanism by which PJM considers input from all interested stakeholders. PJM solicits input during a series of meetings with the Transmission Expansion Advisory Committee (“TEAC”), at which PJM presents its analyses and provides descriptions of the baseline projects to address any identified reliability problems.<sup>5</sup> During this process, stakeholders have an opportunity to provide feedback to PJM. Interested stakeholders are also given an opportunity to provide written comments to both the TEAC and the PJM

---

<sup>1</sup> PJM Interconnection, L.L.C., Rate Schedule No. FERC 24, PJM Operating Agreement at Schedule 6.

<sup>2</sup> Consolidated Transmission Owners Agreement, Rate Schedule FERC No. 42 (June 12, 2013), available at <http://www.pjm.com/~media/documents/agreements/toa.ashx>

<sup>3</sup> PJM Operating Agreement at Schedule 6.

<sup>4</sup> PJM Manual 14B: Regional Planning Process, Rev. 29, pp. 35-36 (Nov. 21, 2014), available at <http://www.pjm.com/~media/documents/manuals/m14b.ashx> (“PJM Manual 14B”).

<sup>5</sup> PJM Manual 14B, at 35.

Board.<sup>6</sup> After review and approval by the TEAC, projects included in the RTEP are presented to the PJM Board for final approval.<sup>7</sup>

### **III. DESCRIPTION AND ROUTE OF THE PROJECT**

7. The Project entails the construction of a new 230 kV transmission line from JCP&L's Whippany substation, located in East Hanover, New Jersey, to its Montville substation, located in Montville, New Jersey, along with the associated upgrades to these substations. The Montville substation is currently supplied by two 230 kV circuits: the Montville-Roseland (E2205) 230 kV line and the Newton-Montville (N2214) 230 kV line. The Project will add a third 230 kV source into Montville substation.

8. As discussed in the testimony of Peter W. Sparhawk (Exhibit JC-6), the proposed route for the Project (referred to herein after at the "Preferred Route" or "Route A3") begins at the Whippany Substation and heads north along the existing Montville – Whippany 34.5 kV transmission corridor for approximately 3 miles, including 2.1 miles through the Troy Meadows natural area. The first approximately 0.8 mile of the route is also parallel to the Stoneybrook – Whippany and Greystone – Whippany lines, which both turn west to connect to the Stoneybrook and Greystone Substations. In this area, JCP&L will rebuild the existing 34.5 kV line within the existing transmission ROW at the same time it constructs the Project. After the existing 230 kV lines divert to the west, Route A3 will be constructed parallel to the existing 34.5 kV transmission line until crossing I-80 and Route 46.

9. After crossing Route 46, the Preferred Route diverges to the east of the existing transmission line through a forested/wetland area for approximately 1.6 miles to avoid

---

<sup>6</sup> PJM Operating Agreement, Schedule 6 at Section 1.5.6.

<sup>7</sup> *Id.*

development adjacent to the existing Susquehanna – Roseland 500/230 kV circuits. Approximately 1.1 miles of this diversion uses a currently-undeveloped JCP&L easement or property JCP&L owns in fee. Just south of John Henry Drive, Route A3 continues north, paralleling the existing 34.5 kV circuits for approximately 1,500 feet. At this point, the Preferred Route diverges again east of the existing transmission line to use a partially developed JCP&L easement and avoid development for approximately 0.6 mile. Finally, Route A3 continues north, paralleling the existing 34.5 kV circuits into the Montville Substation.

10. The Project will pass through sections of the municipalities of East Hanover, Parsippany-Troy Hills and Montville, all in Morris County.

11. The majority of the approximate seven mile-long route will be constructed within existing JCP&L transmission ROW. However, some additional ROW will be necessary along the Preferred Route. Approximately 0.4 miles of entirely new ROW will be needed. In addition, certain sections of the existing ROW totaling approximately 1.4 miles in length will need to be expanded. *See* Testimony of Tracey J. Janis, Exhibit JC-8.

12. From an engineering and design perspective, the Project is divided into thirteen segments. Segment 1 begins at the existing Whippany substation located in East Hanover Township and heads north to Troy Road in Parsippany-Troy Hills Township, a distance of approximately 0.5 miles. In this Segment, JCP&L plans to rebuild the existing 34.5 kV circuits in the ROW on the new monopoles for the new 230 kV circuit. The existing wood two pole, double circuit H-Frame structures currently in use for the 34.5 kV circuits will be removed.

Segment 2 begins at Troy Road in Parsippany Township and runs approximately 0.2 miles north of Troy Road. As with Segment 1, JCP&L plans to remove the two pole, double circuit H-Frame structures supporting the existing 34.5 kV circuits in this ROW and install a

single row of steel monopoles. The steel monopoles will carry both the new 230 kV line and the 34.5 kV circuits in an “underbuild” configuration.

Segment 3 starts at the end of Segment 2 and runs approximately 2.2 miles north to Interstate Route 80. In this segment, new steel monopoles will be constructed to carry the new 230 kV line and will run parallel to the double circuit steel lattice tower structures carrying the existing 34.5 kV subtransmission circuits.

Segment 4 runs from Route 80 in a northerly direction to State Route 46, a distance of approximately 0.3 miles. The construction will be similar to that in Segment 3.

Segment 5 starts at Route 46 and heads north/northeast for approximately 0.8 miles to Vail Road/Stiles Lane, where the route enters Montville Township. In this Segment, new monopoles will be constructed in the center of a 120 foot wide easement on a new ROW.

Segment 6 is located between Vail Road/Stiles Lane and John Henry Drive, a distance of approximately 0.9 miles. In this Segment, the new monopoles will be constructed in currently-undeveloped JCP&L easement or property JCP&L owns in fee.

Segment 7 begins at John Henry Drive and runs approximately 0.3 miles in a northerly direction. Segment 7 will be built within JCP&L’s existing ROW that is approximately 170 feet wide. The new steel monopoles will be located on the east side of existing ROW and adjacent to the existing single pole, double circuit wooden structures for the 34.5 kV circuits.

Segment 8 starts approximately 0.3 miles north of John Henry drive in Montville Township, and continues to the Company’s Changebridge Substation. In this Segment, the new monopoles will be constructed in currently-undeveloped JCP&L easement.

Segment 9 begins at the Changebridge Substation and will run approximately 0.2 miles north of Old Changebridge Road. Segment 9 will be built within JCP&L's existing ROW that is approximately 100 feet wide. The Company plans to remove the existing double circuit wood pole structures currently carrying the 34.5 kV circuits and replace them with one row of steel monopoles. The steel monopoles will carry the new 230 kV circuit as well as the existing 34.5 kV circuits, in an "underbuild" configuration.

Segment 10 runs for approximately 0.3 miles from the end of Segment 9 to just south of Church Lane. In this Segment, the new monopoles will be constructed parallel to the existing 34.5 kV circuits.

Segment 11 starts at the south of Church Lane and runs in a northerly direction for approximately 0.3 miles to north of Springbrook Road East. This segment is adjacent to an Algonquin Gas easement in which underground gas pipelines are present. The new steel monopoles will be located approximately 55 feet from the eastern edge of the existing ROW, and adjacent to the two pole, double circuit wood pole structures carrying the existing 34.5 kV circuits.

Segment 12 begins to the north of Springbrook Road East and continues for approximately 0.3 miles to the south of Schneider Lane. This segment is also adjacent to an Algonquin Gas easement. Segment 12 will be built within JCP&L's existing ROW that varies from approximately 160 to 210 feet wide. The new steel monopoles will be located approximately 55 feet from the eastern edge of the existing ROW, and adjacent to the single wood pole structures carrying the existing 34.5 kV circuits.

Segment 13 will run from the south of Schneider Lane to the existing Montville Substation in Montville Township. Segment 13 will be built within JCP&L's existing ROW,



which is approximately 170 feet wide in this area. The new steel monopoles will be located approximately 70 feet from the eastern edge of the existing ROW, and adjacent to the single wood pole structures carrying the existing 34.5 kV circuits.

The monopoles will be installed on foundations. The foundations will be reinforced concrete drilled piers. Please refer to the Direct Testimony of Dave Kozy, Jr., Exhibit JC-3, for additional details concerning the Project engineering, design, and construction, and monopole heights, including more specific details about each of the segments.

13. The Whippany 230 kV substation will be reconfigured as part of the Project. In order to accommodate the new Montville - Whippany 230 kV line, the Whippany 230 kV substation will add one 230 kV breaker, along with carrier equipment that includes a wave trap, CVT and carrier cabinet. The cost associated with the work at the Whippany substation is approximately \$1,187,100, including applicable overhead costs.

14. The Montville 230 kV substation reconfiguration is also part of the Project. In order to accommodate the new Montville - Whippany 230 kV line, the Montville 230 kV substation will add one 230 kV breaker, along with carrier equipment that includes a wave trap, CVT and carrier cabinet. The cost associated with the work at the Montville substation is approximately \$1,132,600, including applicable overheads.

15. As discussed in the testimony and exhibits of Peter W. Sparhawk, JCP&L conducted a comprehensive Routing Study to determine the best route for the Project. After extensive field work and analysis, the Routing Study selected five alternative routes for additional study. Ultimately, the Routing Study team selected Route A3 as the Preferred Route for the Project. Route A3 was chosen because the cumulative social, environmental, and financial impacts associated with constructing it will be less than any other Alternative Route. In

addition, the Preferred Route can be constructed largely within existing ROW, and thereby is in accord with *N.J.A.C. 14:5-7.1(a)(1)*. *See* Exhibit JC-6.

16. In regard to potential impact on the value of nearby properties, JCP&L retained a licensed real estate appraiser. As discussed in the Testimony and Real Estate Property Analysis of Jerome J. McHale, the Project will create no further diminution in value to the properties adjacent to the ROW. *See* Exhibit JC-9.

17. Based on the Preferred Route, JCP&L estimates that the Project (including the substation upgrades) will have a total cost of approximately \$35,463,300, including overheads. The in-service date for the Project, as specified by PJM, is June 1, 2017.

#### **IV. NEED FOR THE PROJECT**

18. The Project is a PJM baseline RTEP project (number b2003) that is needed to resolve planning criteria violations for electrical reliability purposes. Specifically, the Project is needed to address an identified criteria violation that can occur for the simultaneous loss of the existing Montville to Roseland 230 kV line (known as E2205) and the loss of either the existing Kittatinny to Newton 230 kV line (known as T2298) with the 230-34.5 kV transformer and the 34.5 kV capacitor at Newton or the Newton-Montville (N2214) 230 kV line. If this were to occur, JCP&L would experience the loss of all 230 kV sources into the Montville substation, which would result in significant customer load loss (*i.e.*, an outage that would affect thousands of JCP&L customers). More specifically, the loss of the E2205 and T2298 or N2214 230 kV lines would create a local area voltage collapse on the underlying 34.5 kV system centered at Montville substation, with loss of load exceeding 400 MW. There are approximately 86,719 customers served by the affected substations based on active connected customer meters as of

August, 2014. Accordingly, the Project will provide additional reinforcement and redundancy to JCP&L's transmission system, thereby enhancing service quality and reliability.

19. PJM, as a FERC-approved Regional Transmission Organization ("RTO"), is responsible for ensuring the reliability of the electric transmission system under its functional control and coordinating the movement of wholesale electricity in all or parts of 13 states, including New Jersey. PJM is responsible for assuring compliance with NERC planning and operating standards for the bulk electric system (*i.e.*, above 100 kV) within its control area. NERC reliability standards require that the bulk electric system be designed to operate under approved thermal and voltage criteria during anticipated peak loading conditions and in consideration of credible outages of elements on the bulk electric system. *See Exhibit JC-5 (Testimony of Paul F. McGlynn).*

20. Through its RTEP process PJM performs multiple analyses, including a five-year baseline analysis, to assess compliance with PJM and Transmission Owner reliability criteria and identifies transmission upgrades needed to meet near-term demand growth for customers' electricity needs. The RTEP process uses the PJM load forecasts, which take into consideration existing generation, new resources stemming from interconnection requests for new generating plants and merchant transmission facilities, as well as demand response and energy efficiency levels.

21. In 2012 as part of its RTEP process, PJM identified a planning criteria violation in regard to the transmission lines supplying the Montville substation. More specifically, during the 2012 RTEP process, PJM identified reliability criteria violations of NERC Category C contingencies for the N-1-1 outage of the Montville-Roseland (E2205) 230 kV line followed by the loss of either the Kittatinny-Newton (T2298) 230 kV line with the 230-

34.5 kV transformer and the 34.5 kV capacitor at Newton or the Newton-Montville (N2214) 230 kV line. JCP&L confirmed this contingency may result in more than 400 MW of load loss, which would violate the TO Planning Criteria. PJM confirmed that the JCP&L-proposed Project will adequately address the reliability criteria violation.

22. PJM has assigned RTEP number b2003 to the Project as a baseline upgrade in the JCP&L zone. PJM presented the Project at the April 27, 2012 TEAC meeting. The TEAC approved the Project on June 14, 2012 and the PJM Board of Managers approved it as part of the 2012 PJM Baseline Reliability Assessment issued January 4, 2013.

23. PJM originally recommended a June 1, 2015 in-service date for the Project. After consultation between JCP&L and PJM, the in-service date was established at June 1, 2017, which will allow sufficient time for JCP&L to receive all the necessary approvals for the Project and to complete its construction.

24. The need for the Project is addressed in greater detail in the testimony of Lawrence A. Hozempa (Exhibit JC-4) and testimony of Paul F. McGlynn (Exhibit JC-5).

### **Consideration of Electrical Alternatives**

25. In considering ways to address the reliability issues that led to the decision to construct the Project, JCP&L considered an electrical alternative. Specifically, the alternative JCP&L evaluated was the possibility of constructing a Montville-Whippany 115 kV line. This alternative was rejected for several reasons. First, the Montville substation presently does not have any 115 kV facilities. Therefore, (1) a new 115 kV yard would need to be developed and (2) a 230/115 kV transformer would need to be installed at Montville substation. In addition, the 115 kV facilities at Whippany substation are not presently designed for an additional 115 kV circuit so the 115 kV yard would need to be expanded.

26. These two items make the 115 kV alternative slightly more complicated to construct and does not provide the same level of network support as the 230 kV alternative. Accordingly, the 230 kV Montville-Whippany Project was judged to be a superior electrical alternative. The 115 kV electrical alternative considered is discussed in the testimony of Lawrence A. Hozempa (Exhibit JC-4).

## **V. ELECTRIC AND MAGNETIC FIELDS (EMF)**

26. The Project and appurtenant facilities will comply with the New Jersey guidelines for electric field levels at edge of right-of-way and are substantially similar to other 230kV transmission lines already in operation within New Jersey and across the United States. Please refer to the testimony of Kyle G. King regarding the Project and EMF (Exhibit JC-10). Moreover, the Company has employed the technique of prudent avoidance in its Project design to help reduce the magnetic fields at the edge of the right-of-way. *See* Exhibit JC-10.

27. As discussed in the testimony of Dr. William H. Bailey (Exhibit JC-11) regarding EMF and related potential health effects: (1) the Project will meet the New Jersey interim guidelines for managing electric fields associated with the proposed transmission line; (2) the calculated levels of EMF are below international health-based exposure limits; and (3) the weight of the scientific evidence from research studies does not support the conclusion that electric fields or magnetic fields are harmful at the levels to which people are exposed under transmission lines, in homes, or near machines and electrical appliances.

## **VI. JURISDICTION AND REGULATORY STANDARD FOR APPROVAL**

28. The land use ordinances, the site plan review ordinances, and other ordinances and regulations affecting the use of land within the five municipalities and county

through which the proposed Project will pass, have been enacted pursuant to the authority of *N.J.S.A. 40:55D-1 et seq.*, the Municipal Land Use Law of the State of New Jersey.

29. *N.J.S.A. 40:55D-19* provides, *inter alia*, that the Municipal Land Use Act, and any ordinance or regulations made under the authority thereof, shall not apply to a project development proposed by a public utility for installation in more than one municipality for the furnishing of service if, upon petition to the Board, the Board shall, after hearing, conclude that the proposed installation of the development in question is reasonably necessary for the service, convenience or welfare of the public. Moreover, the determination that the welfare of the public generally transcends the municipal borders has been well established by case law in this State. New Jersey case law emphasizes that the “public” in question is the body of the utility’s customers and not the residents of the various municipalities in question. As explained by the New Jersey Supreme Court in *Petition of Monmouth Consolidated Water Company*, 47 N.J. 251, 258 (1966), the Board’s jurisdiction is appropriate and important because local zoning officials cannot be expected to balance local interests against the greater good of the consuming public.

30. The terms of the respective land use ordinances and regulations enacted by each of the municipalities and the aforementioned county make provision, in certain instances, for public utility facilities, public service infrastructures, electric transmission lines, public purpose uses, and public improvements. In certain instances, such uses are permitted. In other instances they are conditional. In others, the ordinances are silent. However, each of the land use ordinances and master plans does, in general, provide for a planned scheme of growth and development and permits uses which, by necessity, require electrical service.

31. The Project is reasonable and necessary to allow JCP&L to provide for the service, convenience and welfare of the public and to enable JCP&L to provide safe, adequate and

proper service to its customers, while also, to the greatest extent possible, conserving and preserving the quality of the environment. As discussed in this Petition and supporting testimony, the route ultimately selected for this Project is environmentally responsible and makes significant use of existing ROW.

32. As also discussed in this Petition and supporting testimony, the majority of the Project will be constructed within existing ROW. As explained in the testimony of Tracey J. Janis (Exhibit JC-8), approximately 0.8 miles of the Project will require new ROW, and there are certain properties for which easement expansions, modifications, and/or the acquisition of additional easement rights, will be necessary to construct the Project. JCP&L intends to negotiate with these property owners to obtain such easement rights. To the extent that any such negotiations are not successful, JCP&L will initiate a separate proceeding with the Board seeking approval to exercise the right of eminent domain pursuant to *N.J.S.A.* 48:3-17.6 and 48:3-17.7.

## **VII. STATUS OF OTHER REQUIRED PERMITS/APPROVALS**

33. The Project will require various other permits and approvals. JCP&L is in the process of planning for and/or applying for all such permits and approvals. The status of other required permits and approvals from, among others, the New Jersey Department of Environmental Protection, the New Jersey Department of Transportation, and the Morris County Soil Conservation District are discussed in more detail in the testimony of Kirsty M. Cronin (Exhibit JC-7).

## **VIII. REQUEST FOR BOARD TO RETAIN THIS MATTER**

34. As discussed in the testimony of Lawrence A. Hozempa, Exhibit JC-4, PJM has specified an in-service date of June 1, 2017 for the Project. Given that JCP&L cannot apply for certain other permits until the route is approved by the Board, as well as the time needed to

construct the Project after all approvals and permits are issued, the Company requests that the Board retain this matter and not refer it to the Office of Administrative Law for hearings and an initial decision. The Board itself can hold any requisite hearings before a designated Commissioner.

#### **IX. PRE-FILED TESTIMONY**

Attached hereto and made part hereof is the following pre-filed testimony:

<u>Exhibit No.</u>	<u>Witness</u>	<u>Subject Matter of Testimony</u>
JC-2	John T. Toth	Overview of the Project and the Filing
JC-3	Dave Kozy, Jr.	Design, Engineering, Construction, Operation and Maintenance of the Project, and Issues Associated with Underground Installation of 230 kV Transmission Lines
JC-4	Lawrence A. Hozempa	Need for the Project
JC-5	Paul M. McGlynn	PJM Transmission Planning Process and Need for the Project
JC-6	Peter W. Sparhawk	Route Selection and Routing Study
JC-7	Kirsty M. Cronin	Environmental Impacts and Permitting Process
JC-8	Tracey J. Janis	Real Estate and Property Rights
JC-9	Jerome J. McHale	Real Estate Property Analysis
JC-10	Kyle G. King	Electric Fields, Magnetic Fields, Audible Noise, and Radio Noise associated with the Project
JC-11	William H. Bailey	EMF and Health Impacts

#### **X. SERVICE OF PAPERS**

35. Notice of this filing, including a copy of the filing and all pre-filed testimony, is being served on the Clerk of the Township of East Hanover, the Clerk of the



Township of Parsippany-Troy Hills, the Clerk of the Township of Montville, the Clerk of the Board of Chosen Freeholders of the County of Morris, the Morris County Administrator, the Department of Law & Public Safety, Division of Law, and on the Director of the Division of Rate Counsel. In addition, a notice of the filing is also being served on all property owners within 200 feet of the Preferred Route of the Project (a copy of the notice is attached hereto as Attachment A).

36. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

**Gregory Eisenstark, Esq.  
Windels Marx Lane & Mittendorf, LLP  
120 Albany Street Plaza  
New Brunswick, New Jersey 08901**

**- and -**

**Lauren M. Lepkoski, Esq.  
FirstEnergy Service Company  
Legal Department  
2800 Pottsville Pike  
Reading, PA 19612-6001**

**- and -**

**John T. Toth  
FirstEnergy Service Company  
76 South Main Street  
Akron, Ohio 44308**

## **CONCLUSION**

**WHEREFORE**, Jersey Central Power & Light Company respectfully requests that the Board:

(i) Retain jurisdiction over this matter, establish a hearing date, and designate the time and manner of notice and persons in interest to be given such notice;

(ii) Upon such hearing, to determine that the construction of the Project, as more specifically described herein, and all facilities appurtenant thereto, is reasonably necessary for the service, convenience or welfare of the public;

(iii) Specifically find and determine that the zoning and land use ordinances and all regulations or requirements promulgated thereunder by the Township of East Hanover, the Township of Parsippany-Troy Hills, the Township of Montville, and the County of Morris shall have no application to the proposed transmission line, substation upgrades and appurtenant facilities;

(iv) Authorize Petitioner to construct and energize the Project and the facilities appurtenant thereto in a timely manner, in order to permit Petitioner to satisfy its obligation to continue to provide safe, adequate and proper service to Petitioner's customers, and to enable Petitioner to construct and energize the proposed facilities not later than June 1, 2017; with such authorization requested by December 31, 2015 so as to enable JCP&L to complete the permitting for the Project and commence construction in a timely manner; and

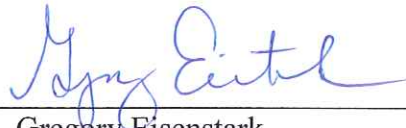
- (v) Such other and further relief as the Board may deem appropriate or necessary.

Respectfully submitted,

**WINDELS MARX LANE & MITTENDORF, LLP**  
Attorneys for Jersey Central Power & Light Company

Dated: Mar. 27, 2015

By: \_\_\_\_\_



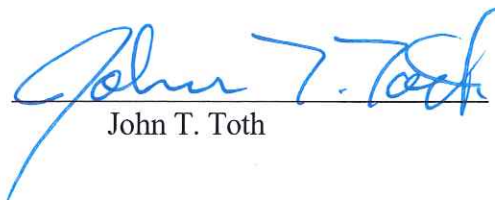
Gregory Eisenstark  
120 Albany Street Plaza  
New Brunswick, New Jersey 08901  
(732) 448-2537

**AFFIDAVIT**  
**OF**  
**VERIFICATION**

John T. Toth, being duly sworn upon his oath, deposes and says:

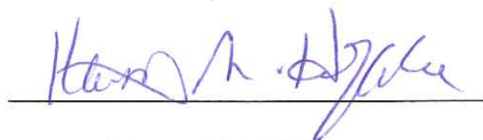
1. I am employed by FirstEnergy Service Company as a Supervisor in the Transmission Engineering Department, and I am duly authorized to make this Affidavit of Verification on behalf of Jersey Central Power & Light Company.

2. I have read the contents of the foregoing Petition, and I hereby verify that the statements of fact and other information contained therein are true and correct to the best of my knowledge, information and belief.

  
John T. Toth

Sworn to and subscribed before me

this 17<sup>th</sup> day of March, 2015.



(Notary Public)



KATHLEEN M. HOFACRE  
NOTARY PUBLIC  
STATE OF OHIO  
Recorded in  
Stark County  
My Comm. Exp. 3/28/2020