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**Morgan Lewis**

C O U N S E L O R S   A T   L A W

A Pennsylvania Limited Liability Partnership

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Partner-in-Charge

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March 25, 2014

**VIA HAND DELIVERY**

Kristi Izzo, Secretary  
Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

Re: 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 Oceanview  
230 kV Transmission Project is Reasonably Necessary for the Service,  
Convenience or Welfare of the Public  
**BPU Docket No.**

Dear Secretary Izzo:

On behalf of the Petitioner, Jersey Central Power & Light Company (“JCP&L” or the “Company”), enclosed herewith for filing with the Board of Public Utilities (“Board”) are the original and 11 copies of JCP&L’s Verified Petition, exhibits, and supporting schedules in the above-referenced matter.

I hereby confirm that copies of this letter, the Petition and all supporting documents are being duly served upon the Director, Division of Rate Counsel, upon the Department of Law & Public Safety, Division of Law, upon the Clerk of the Township of Colts Neck, upon the Clerk of the Township of Howell, upon the Clerk of the Township of Neptune, upon the Clerk of the Borough of Tinton Falls, upon the Clerk of the Township of Wall, and upon the Clerk of the Board of Chosen Freeholders of the County of Monmouth.

Kindly endorse the extra copy as “filed”, indicating the assigned BPU Docket Number, and return it to me in the enclosed, postage-paid return envelope.

Kristi Izzo, Secretary  
March 25, 2014  
Page 2

Your anticipated courtesies and cooperation are deeply appreciated.

Respectfully submitted,



Gregory Eisenstark

Enclosures

c: Service List (attached)  
(w/enclosures)

## SERVICE LIST

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 Oceanview  
230 kV Transmission Project is Reasonably Necessary for the Service,  
Convenience or Welfare of the Public

### BPU Docket No.

<b>BPU</b>		
Kristi Izzo, Secretary Board of Public Utilities 44 South Clinton Avenue, 9th Fl P.O. Box 350 Trenton, NJ 08625 <a href="mailto:Kristi.Izzo@bpu.state.nj.us">Kristi.Izzo@bpu.state.nj.us</a>	Jerome May, Director Board of Public Utilities 44 South Clinton Avenue, 9th Fl P.O. Box 350 Trenton, NJ 08625 <a href="mailto:jerome.may@bpu.state.nj.us">jerome.may@bpu.state.nj.us</a>	Thomas Walker Board of Public Utilities 44 South Clinton Avenue, 9th Fl P.O. Box 350 Trenton, NJ 08625 <a href="mailto:thomas.walker@bpu.state.nj.us">thomas.walker@bpu.state.nj.us</a>
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<b>Rate Counsel</b>		
Stefanie A. Brand, Director Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, N.J. 08625-0003 <a href="mailto:sbrand@rpa.state.nj.us">sbrand@rpa.state.nj.us</a>	Ami Morita, DRA Division of Rate Counsel 140 East Front Street, 4th Floor P.O. Box 003 Trenton, N.J. 08625-0003 <a href="mailto:amorita@rpa.state.nj.us">amorita@rpa.state.nj.us</a>	
<b>JCP&amp;L</b>		
Gregory Eisenstark Morgan, Lewis & Bockius LLP 502 Carnegie Center Princeton, NJ 08540 <a href="mailto:geisenstark@morganlewis.com">geisenstark@morganlewis.com</a>	Mr. Kevin Connelly Jersey Central Power & Light Company 300 Madison Avenue P.O. Box 1911 Morristown, New Jersey 07960 <a href="mailto:kconnelly@firstenergycorp.com">kconnelly@firstenergycorp.com</a>	Lauren M. Lepkoski, Esq. FirstEnergy Service Company Legal Department 2800 Pottsville Pike Reading, PA 19612-6001 <a href="mailto:llepkoski@firstenergycorp.com">llepkoski@firstenergycorp.com</a>

<b>JCP&amp;L (Con't)</b>		
<p>John T. Toth            First Energy Service Company            76 South Main Street            Akron, OH 44308  <a href="mailto:johntoth@firstenergycorp.com">johntoth@firstenergycorp.com</a></p>		
<b>Board of Chosen Freeholders</b>		
<p>Marion Masnick            Clerk of the Board of Chosen            Freeholders            Monmouth County Hall of Records            One East Main Street            P.O. Box 1255            Freehold, NJ 07728  <a href="mailto:mmasnick@co.monmouth.nj.us">mmasnick@co.monmouth.nj.us</a></p>		
<b>Colts Neck Township</b>		
<p>Robert Bowden, RMC            Municipal Clerk            Township of Colts Neck            Town Hall            124 Cedar Drive            Colts Neck, NJ 07722  <a href="mailto:rbowden@colts-neck.nj.us">rbowden@colts-neck.nj.us</a></p>		
<b>Howell Township</b>		
<p>Howell Township Municipal Clerk            Howell Township            4567 Route 9 North            P.O. Box 580            Howell, NJ 07731</p>		
<b>Neptune Township</b>		
<p>Clerk            Neptune Township Clerk's Office            25 Neptune Blvd.            P.O. Box 1125            Neptune, NJ 07753</p>		
<b>Borough of Tinton Falls</b>		
<p>Maureen L. Murphy, Borough Clerk            Borough of Tinton Falls            Municipal Building            556 Tinton Avenue            Tinton Falls, NJ 07724  <a href="mailto:boroughclerk@tintonfalls.com">boroughclerk@tintonfalls.com</a></p>		

**Township of Wall**

Clerk  
Township of Wall  
2700 Allaire Road  
Wall, NJ 07719

**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  
OCEANVIEW 230 KV TRANSMISSION PROJECT IS  
REASONABLY NECESSARY FOR THE SERVICE, CONVENIENCE  
OR WELFARE OF THE PUBLIC**

**VERIFIED PETITION**

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

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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 Oceanview 230 kV Transmission Project is Reasonably Necessary for the Service, Convenience or Welfare of the Public

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**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 Oceanview 230 kV Transmission Project, which involves the construction of a new 230 kV transmission line between JCP&L’s Larrabee substation, located in Howell, New Jersey, and its Oceanview substation, located in Neptune, 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 Monmouth County and surrounding areas; 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 more than 1,000,000 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 reliability 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 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>

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<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. 25, 38-39 (Oct. 24, 2013), available at <http://www.pjm.com/~media/documents/manuals/m14b.ashx> (“PJM Manual 14B”).

<sup>5</sup> PJM Manual 14B, at 36-38.

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

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

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

7. The Project entails the construction of a new 230 kV transmission line from JCP&L's Larrabee substation, located in Howell, New Jersey, to its Oceanview substation, located in Neptune, New Jersey, along with the associated upgrades to these substations. The Oceanview substation is currently supplied by two 230 kV circuits (T-2020/S-1033) from the Atlantic substation, which is located approximately four miles northwest of the Oceanview substation in Colts Neck, New Jersey. Both circuits are located on a single set of double-circuit wooden H-frame structures between the Atlantic and Oceanview substations.

8. As discussed in more detail in the testimony of Timothy B. Gaul (Exhibit JC-5), the proposed route for the Project (referred to herein after at the "Preferred Route") begins in a northerly direction from JCP&L's Larrabee substation in Howell, New Jersey, and continues within the existing Larrabee-Atlantic 230 kV and Smithburg-Atlantic 230 kV transmission Right of Way ("ROW") for approximately 11.6 miles. The Preferred Route traverses approximately 2.5 miles through Allaire State Park, within the same ROW, before reaching a point just east of the Atlantic substation. From the Atlantic substation, the Preferred Route heads southeast within the existing Oceanview-Atlantic 230 kV transmission corridor for approximately 4.5 miles into the Oceanview Substation. The Project will pass through sections of the municipalities of Colts Neck Township, Howell Township, Neptune Township, Borough of Tinton Falls, and Wall Township, all in Monmouth County.

9. The entire 16.1-mile-long route will be constructed within existing JCP&L transmission ROW. From an engineering and design perspective, the Project is divided into three major segments. The first two segments are between Larrabee substation in Howell Township heading north towards Atlantic substation in Colts Neck Township. Segment 1 is the ROW portion south of Herbertsville Road in Howell Township, and Segment 2 is the ROW

portion north of Herbertsville Road. In Segments 1 and 2, the Project will be constructed adjacent to an existing transmission line. In these segments, the new 230 kV line will be constructed on steel monopoles that will be between 80 and 160 feet high. Segment 3 of the Project will be constructed in the existing 100 foot wide ROW between Atlantic substation in Colts Neck and the Oceanview substation in Neptune Township. For Segment 3, the route will be constructed by rebuilding an existing transmission line (currently on H-frame structures) on steel monopoles and constructing the Oceanview 230 kV Transmission Line on an adjacent set of steel monopole structures. In this section of the Project, the monopoles will be between 80 and 115 feet high.

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 and design.

10. The Oceanview 230 kV substation will be reconfigured as part of the Project. In order to accommodate the new Larrabee – Oceanview 230 kV line, the Oceanview 230 kV substation will be converted to a six breaker ring bus with five breakers initially. The five Oceanview 230 kV ring bus positions will be occupied by two existing Atlantic-Oceanview 230 kV lines, two existing Oceanview 230-34.5 kV transformers, and the one new Larrabee-Oceanview 230 kV line.

11. The Larrabee 230 kV substation reconfiguration is also part of the Project. In order to accommodate the new Larrabee – Oceanview 230 kV line, the Larrabee 230 kV substation will be converted from a ring bus configuration with 8 breakers to a breaker-and-a-half configuration with 11 breakers.

12. As discussed in the testimony of Timothy B. Gaul, 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 three full alternative routes for additional study. Ultimately, the Routing Study team selected Alternative Route C as the Preferred Route for the Project. Alternative Route C was chosen because it had the least cumulative human, environmental, and financial impacts compared to the other alternative routes. In addition, the Preferred Route can be constructed entirely within JCP&L's existing transmission ROW, and thereby is in accord with *N.J.A.C. 14:5-7.1(a)(1)*.

13. 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-8.*

14. Based on the Preferred Route, JCP&L estimates that the Project (including the substation upgrades) will have a total cost of approximately \$64 million. The in-service date for the Project, as specified by PJM, is June 1, 2017.

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

15. The Project is a PJM baseline RTEP project 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 two Atlantic-Oceanview 230 kV lines (known as the X2024 and Y2025) that are on common double circuit towers. If this were to occur, JCP&L would experience the loss of all 230 kV sources into the Oceanview 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 X2024 and

Y2025 230 kV lines would create a local area voltage collapse on the underlying 34.5 kV system centered at Oceanview Substation, with loss of load exceeding 300 MW. There are approximately 103,025 customers served by the affected substations based on active connected customer meters in December 2013. Accordingly, the Project will provide additional reinforcement and redundancy to JCP&L's transmission system, thereby enhancing service quality and reliability.

16. 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.

17. 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.

18. In 2011 as part of its RTEP process, PJM identified a planning criteria violation in regard to the Atlantic – Oceanview 230 kV lines. More specifically, during the 2011

RTEP process, PJM identified a reliability criteria violation of a NERC Category C contingency for the N-1-1 outage of the Atlantic - Oceanview (X2024 and Y2025) 230 kV lines. Both PJM and JCP&L identified a potential voltage collapse on the system near the Oceanview substation with a potential loss of load exceeding criteria resulting from NERC Category C contingencies. During the PJM 2011 RTEP N-1-1 analysis for study year 2016, an 8.46 % voltage drop violation was seen at the Atlantic 230 kV bus. In collaboration with PJM, JCP&L confirmed the potential violation and proposed to construct the Project as a solution the NERC Category C planning criteria contingency.

19. PJM has assigned RTEP number b2015 to the Project as a baseline upgrade in the JCP&L zone. PJM presented the Project at the June 14, 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.

20. PJM originally recommended a June 1, 2016 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.

21. The need for the Project is addressed in greater detail in the testimony of Jeffrey A. Goldberg (Exhibit JC-4).

### **Consideration of Alternatives**

22. In considering ways to address the reliability issues that led to the decision to construct the Project, JCP&L considered several electrical alternatives. These alternatives were:

- (i) Adding three new 34.5 kV lines from Larrabee to Oceanview; or

(ii) Adding a new 230 kV line from Atlantic to Oceanview; or

(iii) Adding a new 230 kV line from Red Bank to Oceanview.

23. Alternative (i) was rejected for several reasons. First, the required three 34.5 kV lines would create issues of greater line loss and low voltage due to the circuit length, and create excessive fault duty at the Larrabee and Oceanview 34.5 kV buses beyond the equipment ratings. Second, finding feasible routes for the three new 34.5 kV lines would also be more difficult than routing than the Project's single 230 kV line. After consideration, a 34.5 kV solution was dismissed as infeasible from both a construction and community impact perspective

24. Alternative (ii) was considered but rejected as an inadequate solution. While adding a 230 kV line from the Atlantic substation to the Oceanview substation would address the planning criteria violation of the loss of the Atlantic – Oceanview (X2024 and Y2025) 230 kV lines, this alternative is not a desirable solution because all three 230 kV lines serving Oceanview would emanate from Atlantic substation. Introducing an additional source from the Larrabee substation provides a stronger and more reliable network solution.

25. Alternative (iii) was considered, but rejected because it is not a desirable solution from a transmission line siting perspective. A more detailed discussion of these other alternatives is set forth in the testimony of Jeffrey A. Goldberg (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-9).

27. As discussed in the testimony of Dr. William H. Bailey (Exhibit JC-10) 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 represents the most environmentally responsible route, maximizing the use of existing ROW.

32. As also discussed in this Petition and supporting testimony, the Project will be constructed entirely within an existing ROW. As explained in the testimony of Tracey J. Janis (Exhibit JC-7), there are certain properties for which easement 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 and the New Jersey Department of Transportation, are discussed in more detail in the testimony of Kirsty M. Cronin (Exhibit JC-6).

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

34. As discussed in the testimony of Jeffrey A. Goldberg, 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**

35. 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 and Construction of the Project
JC-4	Jeffrey A. Goldberg	Need for the Project
JC-5	Timothy B. Gaul	Route Selection and Routing Study
JC-6	Kirsty M. Cronin	Environmental Impacts and Permitting Process
JC-7	Tracey J. Janis	Real Estate and Property Rights
JC-8	Jerome J. McHale	Real Estate Property Analysis
JC-9	Kyle G. King	Electric Fields, Magnetic Fields, Audible Noise, and Radio Noise associated with the Project
JC-10	William H. Bailey	EMF and Health Impacts

**X. SERVICE OF PAPERS**

36. 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 Colts Neck, the Clerk of the Township of Howell, the Clerk of the Township of Neptune, the Clerk of the Borough of Tinton Falls, the Clerk of the Township of Wall, and the Clerk of the Board of Chosen Freeholders of the County of Monmouth, 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).

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

**Gregory Eisenstark, Esq.  
Morgan, Lewis & Bockius LLP  
502 Carnegie Center  
Princeton, New Jersey 08540**

**- 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 Colts Neck, the Township of Howell, the Township of Neptune, the Borough of Tinton Falls, the Township of Wall, and the County of Monmouth shall have no application to the proposed transmission line and appurtenant facilities;

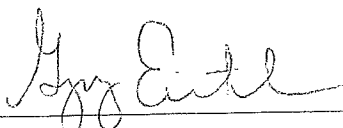
(iv) Authorize Petitioner to construct and energize the Project and the facilities appurtenant thereto in a timely manner, in order to permit Petitioner to satisfy its obligation to continue to provide safe, adequate and proper service to Petitioner's customers, and to enable Petitioner to construct and energize the proposed facilities not later than June 1, 2017; with such authorization requested by December 31, 2014 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,

MORGAN, LEWIS & BOCKIUS LLP  
Attorneys for Jersey Central Power & Light Company

Dated: March 25, 2014

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

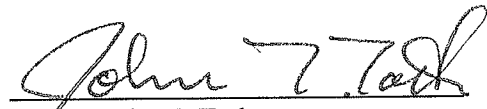
Gregory Eisenstark  
502 Carnegie Center  
Princeton, New Jersey 08540  
(609) 919-3134

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

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

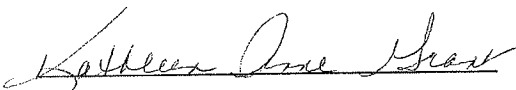
1. I am employed by FirstEnergy Service Company as a Supervisor in the Transmission Engineering Department, and I am duly authorized to make this Affidavit of Verification on behalf of Jersey Central Power & Light Company.

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 7<sup>th</sup> day of March, 2014.

  
\_\_\_\_\_  
(Notary Public)

Kathleen Anne Grant  
Resident Summit County  
Notary Public, State of Ohio  
My Commission Expires: 11/08/2014

# **Attachment A**

March 27, 2014

Dear Property Owner:

On March 25, 2014, Jersey Central Power & Light Company (“JCP&L”), a FirstEnergy company, submitted its Petition to the New Jersey Board of Public Utilities (“BPU”) for approval of the Oceanview Reinforcement Project (“Project”).

You are receiving this letter because the transmission corridor is within a right-of-way easement on your property or within 200 feet of your property. The Project will add a new 230 kV (kilovolt) transmission line between JCP&L's Larrabee Substation in Howell and the Oceanview Substation in Neptune. The Project will reinforce the existing 230 kV transmission system, provide redundancy and is intended to reduce the likelihood of potential outages to lower voltage circuits and substations in this portion of JCP&L's service area.

Please visit the Project web page -

[https://www.firstenergycorp.com/content/firstenergy/about/transmission\\_projects/new\\_jersey/oceanview-reinforcement-project.html](https://www.firstenergycorp.com/content/firstenergy/about/transmission_projects/new_jersey/oceanview-reinforcement-project.html) - to view the BPU petition, learn more about the Project and to leave a comment.

You can reach the JCP&L Project team by sending an email to [transmissionprojects@firstenergycorp.com](mailto:transmissionprojects@firstenergycorp.com) or contact a company representative at 1-800-589-2837.

Sincerely,