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Board of Public Utilities

February 9, 2016

Clerk
Office of Administrative Law
33 Washington Street
Newark, NJ 07102

MAIL RECEIVED

Re: MOTION TO INTERVENE

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

OAL Docket No. PUC-08235-15

BPU Docket No. EO-15030383

Dear Clerk:

This office represents Wildlife Preserves, Inc. The captioned Transmission Project crosses 2 miles of wildlife habitat owned and managed by Wildlife Preserves, Inc.

Enclosed please find an original and one copy of Wildlife Preserves Notice of Motion to Intervene, Certification and form of Order. The matter may be heard on the papers unless the court or any interested party requests oral argument.

Kindly file same and return a copy stamped "filed" in the self-addressed stamped envelope provided for your convenience. Thank you.

Respectfully submitted,
MEYNER AND LANDIS LLP

Albert I. Telsey

Cc: Hon. Leland S. McGee (w/encl.)
Service List (w/encl.)

Case Management

MEYNER AND LANDIS LLP
Albert Telsey, Esq.
One Gateway Center, Suite 2500
Newark, New Jersey 07102
(973) 602-3439
Attorneys for Intervenor
Wildlife Preserves, Inc.

FEB 19 2016

CWS

OFFICE OF ADMINISTRATIVE LAW

OAL Docket No. PUC-08235-15
BPU Docket No. EO-15030383

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

**NOTICE OF MOTION
TO
INTERVENE AS A PARTY**

To:

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New Brunswick, NJ 08901

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Stephen J. Edelstein, Esq.
Schwartz Simon Edelstein & Celso
100 S. Jefferson Rd., Suite 200
Whippany, NJ 07981

ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that, pursuant to N.J.A.C. 1:1-16.1 et. seq., Meyner and Landis LLP, attorneys for Wildlife Preserves, Inc. ("Wildlife Preserves"), hereby moves before the Office of Administrative Law located at 33, Washington St., Newark, NJ 07102 for an Order permitting Wildlife Preserves to intervene as a party in the above entitled proceeding with all the rights provided therefore, under all applicable rules, codes and statutes, including, but not limited to, the right to be heard on all issues in this matter.

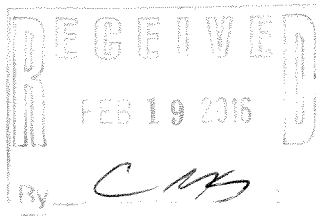
PLEASE TAKE FURTHER NOTICE that in support of its Motion, Wildlife Preserves shall rely upon the Certification of Len Fariello, Manager of Wildlife Preserves.

MEYNER AND LANDIS LLP
Attorneys for Wildlife Preserves

By:


Albert I. Telsey, Esq.

DATED: February 9, 2016



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OFFICE OF ADMINISTRATIVE LAW

OAL Docket No. PUC-08235-15
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CERTIFICATION OF SERVICE

Albert I. Telsey, Esq., an attorney at law of the State of New Jersey, hereby certifies that:

On February 9, 2016, I caused to be served by regular mail an original and copies of the enclosed Notice of Motion to Intervene as a Party and the supporting Certification on behalf of Wildlife Preserves, Inc. on the Clerk of the Office of Administrative Law and Leland S. McGee ALJ, 33 Washington St., Trenton, NJ 07102; and

On the same date, I also caused to be served by regular mail a copy of the enclosed Notice of Motion to Intervene and supporting Certification on each party on the Service List (attached).

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

MEYNER AND LANDIS LLP
Attorneys for Wildlife Preserves, Inc.

By: 

Albert I. Telsey, Esq.

DATED: February 9, 2016

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Wildlife Preserves, Inc.

OFFICE OF ADMINISTRATIVE LAW

OAL Docket No. PUC-08235-15
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IN THE MATTER OF THE PETITION OF
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**CERTIFICATION OF
LEN SUNCHILD-FARIELLO**

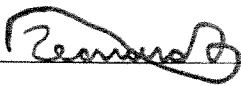
I, Len Sunchild-Fariello, of full age, do hereby certify as follows:

1. I am the Land Manager for Wildlife Preserves, Inc. ("Wildlife Preserves"). Wildlife Preserves owns a 2,000-acre wildlife sanctuary in Troy Meadows in Parsippany-Troy Hills. I am familiar with the facts and circumstances concerning this matter. Wildlife Preserves moves to intervene in this matter as a Party pursuant to N.J.S.A. 48:2- 32.2.
2. Jersey Central Power & Light Company ("JCP&L") electric transmission line currently traverses approximately 2 miles through the Wildlife Preserves Troy Meadows Wildlife Sanctuary. With regard to the referenced transmission project, JCP&L proposes to expand the width of its easement in order to run another transmission line parallel to its existing transmission line through the Troy Meadows Wildlife Sanctuary.

3. Wildlife Preserves opposes the proposed parallel transmission project and claims that the line as proposed is not reasonably necessary for the service, convenience or welfare of the public.
4. Wildlife Preserves submits that there are better routes and better ways to transmit electricity in the area than the proposed parallel route through the Troy Meadows Wildlife Preserve. For example, JCP&L could upgrade its existing transmission towers within its existing easements, run dual lines on new towers within the existing easement instead of expanded the easement for parallel towers and lines, or it could move the transmission line outside of the Wildlife Preserves Troy Meadows Wildlife Sanctuary altogether, among other alternatives.
5. For these reasons and others that will be presented in these proceedings, Wildlife Preserves respectfully requests intervenor status in this matter as a Party so that its interests are appropriately represented and it has the opportunity to be heard on significant issues that affect its and its wildlife sanctuary. Accordingly, Wildlife Preserves requests that the court designate it a Party with full rights and obligations to participate in conferences, discovery, testimony and cross-examination, and to be heard on all issues with regard to this matter.
6. All correspondence, filings, discovery, reports and documentation regarding this matter should be sent to the following person:

Albert I. Telsey, Esq.
Meyner and Landis LLP
One Gateway Center, Suite 2500
Newark, NJ 07102
Phone: 973-602-3439
Email: atelsey@meyner.com

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements by me are willfully false, I am subject to punishment.



Len (Sunchild) Fariello

DATED: February 9, 2016

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OFFICE OF ADMINISTRATIVE LAW

OAL Docket No. PUC-08235-15
BPU Docket No. EO-15030383

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

ORDER

THIS MATTER having been presented by Meyner and Landis LLP, attorneys for Wildlife Preserves, Inc., on notice to the Office of Administrative Law, the parties and person set forth on the attached Service List; and the Court having considered the Motion to Intervene and other documents on file in this matter; and for good cause shown;

IT IS on this ____ day of _____ 2016,

ORDERED that Wildlife Preserves, Inc. is hereby granted leave to intervene and fully participate in the above entitled matter as a Party and that it be placed on the Service List for receipt of all documents, papers, discovery materials, exhibits and notifications of all hearings, conferences, presentations and all of the proceedings in this matter.

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. ER15030383
OAL DOCKET NO. PUC 08235-2015N

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