

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

IN THE MATTER OF THE PETITION :	
OF JERSEY CENTRAL POWER & :	
LIGHT COMPANY FOR A :	
DETERMINATION CONCERNING :	PETITION
THE ALLENHURST-OCEANVIEW :	
34.5 KILOVOLT TRANSMISSION :	DOCKET NO. _____
LINE PROJECT LOCATED IN :	
ALLENHURST BOROUGH, NEW :	
JERSEY PURSUANT TO N.J.S.A. :	
40:55D-19 :	

**TO: THE HONORABLE COMMISSIONERS
OF THE NEW JERSEY BOARD OF PUBLIC UTILITIES**

Petitioner, Jersey Central Power & Light Company (“Petitioner,” “JCP&L,” or the “Company”), respectfully petitions the New Jersey Board of Public Utilities (the “Board” or “BPU”) pursuant to N.J.S.A. 40:55D-19, as follows:

1. JCP&L appeals to the Board from a decision of the Borough of Allenhurst Planning Board (“Planning Board”) denying the Company’s application for approval of a zoning variance concerning two steel utility poles (“Poles”) located on Block 31, Lot 3, in the Borough of Allenhurst (“Allenhurst”) in Monmouth County, New Jersey.

2. Construction of the Poles is part of the Allenhurst-Oceanview 34.5 kilovolt (“kV”) Transmission Line Project (“Project”). The Poles will replace two wooden poles. A concrete foundation would be installed for each of the Poles.

3. The Project is one component of a larger network of projects that will remedy reliability criteria violations (“RCVs”) identified by PJM Interconnection, LLC (“PJM”).

4. In turn, the Poles are an integral part of the Project.

5. JCP&L respectfully requests that the Board issue an Order pursuant to N.J.S.A. 40:55D-19 and N.J.S.A. 4:8:2-23, determining that the construction of the Poles is necessary for

the benefit of the residents of Allenhurst *and* the Company's customers in surrounding municipalities.

6. Specifically, and as set forth in greater detail herein, JCP&L requests that the Board determine that:

- a. construction of the Poles is necessary to provide adequate and reliable electricity service for the Company's ratepayers;
- b. construction of the Poles is necessary for public safety and to enhance and maintain reliability of the electric grid; and
- c. no alternative site or sites are reasonably available to achieve an equivalent public benefit.

7. JCP&L therefore respectfully requests that the Board issue an Order as it is empowered to do under the Municipal Land Use Law ("MLUL"), N.J.S.A. 40:55D-19, concluding that the zoning, planning, site plan review, and all other municipal land use ordinances, regulations, rules, guidelines, and the like promulgated under the MLUL shall not apply to the proposed Poles or Project, and that JCP&L may proceed with construction of the Poles as described in this Petition and the accompanying exhibits and testimony.

I. FACTUAL BACKGROUND.

8. JCP&L is a corporation duly organized under the laws of the State of New Jersey and a New Jersey electric public utility primarily engaged in the purchase, transmission, distribution, and sale of electric energy and related utility services to roughly 1.1 million residential, commercial, and industrial customers in 13 counties and 236 municipalities in the State of New Jersey. JCP&L's status as a New Jersey electric public utility means that it is subject to the Board's jurisdiction.

9. All communications, correspondence, and notices concerning this Petition should be sent to:

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10. This Petition is accompanied by information concerning the construction of the proposed Poles and the following Exhibits and Testimony, which are attached hereto and incorporated by reference into this Petition:

JCP&L Statement No. 1: Direct Testimony of Lawrence A. Hozempa. Mr. Hozempa discusses the need for the Project, transmission alternatives considered, and benefits to ratepayers.

JCP&L Statement No. 2: Direct Testimony of Daniel Summerhill. Mr. Summerhill provides a general overview of the Project and its specifications, discusses the multitude of alternatives considered and rejected by the Company as unfeasible, and aspects of engineering and transmission line design.

Exhibit P-1: First Review PJM Slides concerning the Project;

Exhibit P-2: Second Review PJM Slides concerning the Project;

Exhibit P-3: PJM Slides concerning Costs of the Project;

Exhibit P-4: General Layout of Proposed Alignment for Project in Allenhurst;

Exhibit P-5: Depiction of Typical 34.5 Kilovolt Double Circuit Steel Pole Dead End Structure;

Exhibit P-6: Depiction of Typical 34.5 Kilovolt Double Circuit Wood Pole Tangent Structure;

Exhibit P-7: Depiction of a Typical 34.5 Kilovolt Double Circuit Wood Pole Running Angle Structure;

Exhibit P-8: Depiction of a Typical 34.5 Kilovolt Double Circuit Wood 2-Pole Running Angle Structure;

Exhibit P-9: Depiction of a Typical 34.5 Kilovolt Single Circuit Laminate Riser Structure; and

Exhibit P-10: Depiction of a Typical 34.5 Kilovolt Single Circuit Wood Pole Tangent Structure without a Shield Wire.

11. The Company is providing notice and a copy of this Petition, together with copies of the Exhibits and Testimony annexed hereto, upon those individuals identified in the attached service list, including: the Director, Division of Rate Counsel; Director, Division of Law – Office of the New Jersey Attorney General; the Clerk of the Borough of Allenhurst, and the Borough of Allenhurst Planning Board Attorney.

12. By virtue of its status as an electric “public utility” as that term is defined under N.J.S.A. 2-13, JCP&L is obligated to provide safe, adequate and proper electric service to its customers pursuant to N.J.S.A. 48:2-23.

13. As part of its obligation to provide safe, adequate and proper electric service, JCP&L must maintain its public utility infrastructure—including its transmission lines—in a condition that will allow the Company to satisfy its statutory and regulatory obligations to provide service to its customers and comply with all applicable regulatory requirements.

14. In furtherance of its commitment to providing safe, adequate and proper service and maintaining the reliability of its public utility infrastructure, JCP&L requests that the Board issue an order pursuant to N.J.S.A. 40:55D-19 setting forth a determination that the construction of the Poles and completion of the Project is necessary for the service, convenience or welfare of the public, including public safety and reliability, and that no alternative site or sites are reasonably available to JCP&L for the Project that would achieve an equivalent public benefit.

15. As demonstrated in this Petition and the accompanying Exhibits and Testimony, the Project is necessary for JCP&L to correct RCVs of North American Electric Reliability

Corporation (“NERC”) Category P7 contingencies identified in the 2011 Regional Transmission Expansion Plan (“RTEP”) issued by PJM.

16. The RCVs concerned an outage of the Atlantic-Red Bank 230 kV lines S1033 and T2020 because of the failure of a common structure containing both 230 kV circuits. The Company confirmed that this contingency may result in more than 500 megawatts (“MW”) of load loss, significantly above the 300 MW of load loss criterion limit which violates JCP&L Planning Criteria and PJM Planning Criteria.

17. PJM has already confirmed that the Project adequately addresses the RCVs identified in the 2011 PJM RTEP.

18. The first proposed Pole, identified as JC184, would be placed in almost the same location as the existing wooden pole. The location of the second proposed Pole, JC188, would be slightly southeast of the current wooden pole. Replacing the existing 50-year-old wooden poles with new steel poles at these two locations is necessary to support the addition of the second 34.5 kV circuit given the surrounding constraints in the area, which make utilizing wood poles with guying not feasible.

19. The proposed locations for the replacement Poles were carefully considered by JCP&L. There are no reasonable alternative locations for the Proposed Poles. Forcing JCP&L to relocate the Poles to an alternative, inadequate site would significantly impact JCP&L’s reliability plans, create an exorbitant expense for ratepayers, and unreasonably and indefinitely delay the much-needed construction of these critical infrastructure improvements necessary to address RCVs. JCP&L will demonstrate through this Petition and the accompanying Exhibits and Testimony that no reasonable alternative site is available for the Poles.

20. JCP&L is filing this Petition as a necessary last resort. The process of seeking approval for the Poles before the Planning Board began on September 20, 2022,¹ when JCP&L filed its Site Plan and Variance Application (“Application”), and culminated on May 22, 2024—610 days later—after two hearings, when the Planning Board voted to deny the Application.²

21. JCP&L went to great lengths to ensure that the Poles would not create a significant aesthetic disruption in Allenhurst. To that end, JCP&L planned to utilize a Natina® finish on the Poles, which will allow the Poles to match the color of wood. Further, the Natina® finish is maintenance free (unlike paint) and is a non-toxic, environmentally safe colorant. JCP&L also proposed a landscaping plan with respect to the Project to further minimize visual impact.

22. JCP&L took an extra step to appease Allenhurst by redesigning and reconfiguring the proposed Poles by reducing their overall height and visual impact to the maximum extent possible while still maintaining the necessary strength and safety requirements set forth in the National Electrical Safety Code (“NESC”).

23. As another concession to Allenhurst, JCP&L opted to place the wires connected to the Poles on horizontal arms, rather than stacking the wires vertically. This reduces overall height by twenty-five (25) feet.

¹ Engagement with Allenhurst concerning the Company’s overall reliability plans actually began earlier – in 2021.

² JCP&L has not received a Resolution from Allenhurst memorializing the denial of the Application, but a formal Resolution is not a condition precedent to JCP&L filing this Petition. In re New Jersey Natural Gas Company, Docket Nos. A-3666-15, A-3752-15, 2021 WL 1688028, at *1 (App. Div. Apr. 29, 2021); In re Jersey Cent. Power & Light Co., Docket No. A-2183-17T3, 2019 WL 5681460, at *1 (App. Div. Nov. 1, 2019) (affirming Board order granting petition seeking determination that proposed transmission line project was not subject to ordinances, permits, and regulations made under the authority of the MLUL).

24. Further, under the Project as currently planned, there is one less pole needed along Deal Lake and Lake Drive in Allenhurst Borough. Thus, the Project will actually *reduce* the overall number of structures at this location.

25. While JCP&L would have rather worked with the Planning Board to resolve any issues, the Project has now been significantly delayed. Now, JCP&L reluctantly comes before the Board as a final avenue to secure relief in an effort to finally commence work on the Project to remedy the RCVs.

26. Allenhurst's stated opposition to the Project—and the reason for the denial of the Application—was based solely on aesthetic reasons. The denial was not based on any legitimate concerns about alternatives, safety, or environmental impact.

27. Granting this Petition will protect ratepayers from having to pay for a more costly version on the Project by ensuring that the Project can proceed as planned, in an ideal location, with known costs, and not having to develop an unfeasible alternative—which are all that has been suggested by the Planning Board.

28. Approximately 2.9 miles of the Project's 3.9-mile total length is already rebuilt, with work fully completed in Neptune Township and partially complete in Ocean Township. An order from the Board approving this Petition will permit JCP&L to continue and complete the Project on the shortest possible timeline. This will allow the Company to remedy the RCV identified by PJM and minimize the potential of a disruption in service, outages, and reliability issues while ensuring that it continues to provide safe, reliable and adequate service to its ratepayers.

II. PROJECT DESCRIPTION.

29. The Project is a new 34.5 kV transmission line connecting two substations on the Company's existing 34.5 kV transmission network.

30. One end of the line will connect to the Oceanview Substation in Neptune City, and the other end connects to the Allenhurst Substation in the Borough of Allenhurst.

31. As noted above, the Project is necessary as part of a plan to resolve RCVs identified by PJM in 2011.

32. The Project is part of a series of projects which, taken together, address the RCVs identified by PJM.

33. The Project, along with its constituent parts, will also enhance the resilience of the Company's electric system against severe weather—which is becoming an all-too-frequent occurrence in Monmouth County and throughout the State of New Jersey. The end goal of the Project is to reduce the frequency and duration of power outages, which will benefit all of JCP&L's ratepayers throughout the State.

34. PJM was involved in planning the Project.

35. Simply stated, the Project will address potential voltage collapse and corresponding loss of load in Allenhurst and neighboring municipalities.

36. JCP&L's Application sought only a variance concerning the two Poles.

37. The relevant property is on Lake Drive approximately between the intersections of Corlies Avenue and Allen Avenue in Allenhurst, identified as Lot 3, Block 31 ("Property").

38. The Property abuts Deal Lake.

39. The Application sought to replace two wooden utility poles (existing Structures JC183 and JC187) with stronger steel poles (proposed Structures JC184 and JC188).

40. The Poles would be located within the Company's existing right-of-way.

41. The Poles support the Company's 34.5 kV lines as they traverse Allenhurst.

42. A visual depiction of the lines and proposed Poles is shown in Exhibit P-4.

43. A concrete foundation would be installed for each of the new Poles.

44. JC188, which would replace existing Structure JC187, would result in a positive height change of one (1) foot, due to the size of the concrete foundation.

45. JC184, which would replace JC183, would result in a positive height change of twenty-five (25) feet.

III. NEED FOR THE PROJECT.

46. The need for the Project is clear and driven by the RCVs identified by PJM in 2011.

47. As noted above, PJM identified RCVs of NERC Category P7 contingencies for the outage of the Atlantic-Red Bank (S1033) 230 kV line and the No. 2, 230-34.5 kV transformer with the loss of the Atlantic-Red Bank (T2020) 230 kV line and the No. 8, 230-34.5 kV transformer due to failure of a common structure containing both circuits. This contingency may result in more than 500 MW of load loss, well above the 300 MW loss of load criterion limit which violates the JCP&L Planning Criteria as well as PJM planning criteria.

48. The Project is one component of a larger, interconnected effort to enhance the resilience of the Company's electric system in an effort to combat the increasing severity of weather events and reduce the occurrence of power outages.

49. Once completed, the Project, along with its component parts, will resolve the RCVs identified by PJM. If the Project is not completed, the RCVs will not be resolved. The installation of the Poles is an integral part of the overall Project.

IV. SITE SELECTION AND ALTERNATIVE SITE ANALYSIS.

50. There is no reasonably available alternative site for the Poles that is better suited based on every reasonable consideration.

51. The proposed Poles are located in the vicinity of existing wooden poles.

52. Further, the overall Project will actually result in one fewer pole in the relevant area in Allenhurst.

53. JCP&L studiously considered and evaluated several alternative routes and variants as part of the planning process.

54. For example, JCP&L first considered rerouting a portion of the transmission line on Lake Drive to utilize a nearby New Jersey Transit (“NJT”) corridor in connection with existing transmission infrastructure.

55. However, this alternative was rejected for several reasons, including that it would necessitate the replacement of a distribution conductor in a lengthened span of transmission line, would require replacement of several existing transmission structures along the rail corridor with taller poles, and would require a larger steel pole and concrete foundation be placed within NJT right-of-way. The option to use the NJT corridor also presented significant reliability issues, not to mention the fact that installing a concrete foundation within an NJT right-of-way is a non-permitted activity.

56. The Company also considered several underground routes. These options were ruled out as unreasonable due to the significant excavation and construction efforts they would require, including traffic interruptions and stoppages along Corlies Avenue and Main Street for a minimum of 6 months, and undergrounding would also have significant impacts on other underground utilities that are currently in place along this route.

57. The Board and the courts have previously noted the serious concerns with underground transmission lines. See In re Pub. Serv. Elec. & Gas Co., 35 N.J. at 379 n.6 (“It was also pointed out at oral argument that underground line breaks, while less frequent, are much more difficult to locate and require much more time to repair and restore to service than in the case of

overhead transmission.”); In re Petition of Jersey Cent. Power & Light Co. Pursuant to N.J.S.A. 40:55d-19 for A Determination That the Monmouth Cnty. Reliability Project Is Reasonably Necessary for the Serv., Convenience or Welfare of the Pub., 2018 WL 1519039, at *96 (N.J. O.A.L. Mar. 8, 2018) (“It is clear that environmental impacts associated with overhead transmission lines are limited to the footprint of the monopole foundations, while impacts associated with underground transmission lines would occur over the entire length of the Project.”).

58. Further, studies performed by the Company show that even the most feasible underground route will be substantially more expensive and impactful to the surrounding area than the equivalent overhead route.

59. The Company also considered various other alternatives, including carrying the below grade transmission wires on conduits supported beneath the Corlies Avenue bridge and scenarios with varying riser structure locations and options for crossing Deal Lake. These options were also ruled out after extensive evaluation as not reasonably feasible. For example, as described in JCP&L Statement No. 2, the Direct Testimony of Daniel Summerhill, the Company considered what essentially amounts to tunneling beneath Deal Lake—but abandoned that possibility because of (among other issues) prohibitive costs and negative environmental impact.

60. In short, the plan proposed in the Application and in this Petition is the most feasible, least costly, and most beneficial option.

V. JURISDICTION AND REGULATORY STANDARD FOR APPROVAL.

61. The first Planning Board hearing on the Application occurred on June 28, 2023.

62. The second Planning Board hearing on the Application occurred on May 22, 2024.

63. Transcripts from the hearings on the Application will be provided to the Board upon request.

64. The Planning Board denied the Application via voice vote at the conclusion of the May 22, 2024 Planning Board hearing.

65. JCP&L has therefore been “aggrieved” by the Planning Board’s denial of its Application and therefore files this Petition with the Board, seeking the BPU’s approval of the Project and an Order concluding that all zoning, planning, site plan review, and any other municipal land use ordinances or regulations promulgated under the MLUL shall not apply to the Project.

66. Salient to this Petition, N.J.S.A. 40:55D-19 provides, in pertinent part:

If a public utility . . . is aggrieved by the action of a municipal agency through said agency’s exercise of its powers under this act, with respect to any action in which the public utility or electric power generator has an interest, an appeal to the Board of Public Utilities of the State of New Jersey may be taken within 35 days after such action without appeal to the municipal governing body pursuant to section 8 of this act unless such public utility . . . so chooses. In such case appeal to the Board of Public Utilities may be taken within 35 days after action by the governing body. A hearing on the appeal of a public utility to the Board of Public Utilities shall be had on notice to the agency from which the appeal is taken and to all parties primarily concerned, all of whom shall be afforded an opportunity to be heard. **If, after such hearing, the Board of Public Utilities shall find that the present or proposed use by the public utility or electric power generator of the land described in the petition is necessary for the service, convenience or welfare of the public,** including, but not limited to, in the case of an electric power generator, a finding by the board that the present or proposed use of the land is necessary to maintain reliable electric or natural gas supply service for the general public **and that no alternative site or sites are reasonably available to achieve an equivalent public benefit,** the public utility or electric power generator may proceed in accordance with such decision of the Board of Public Utilities, any ordinance or regulation made under the authority of this act notwithstanding.

(emphasis added).

67. To demonstrate its entitlement to an exemption from local regulation enacted pursuant to the MLUL, a public utility must demonstrate that the utility’s proposed use of land is “necessary for the service, convenience, or welfare of the public ... and that no alternative site or sites are reasonably available to achieve an equivalent public benefit[.]” In re Jersey Cent. Power & Light Co., Docket No. A-2183-17T3, 2019 WL 5681460, at *4 (App. Div. Nov. 1, 2019).

68. The Appellate Division has concluded that the “necessary for the service, convenience, or welfare of the public” standard was adopted by the legislature so as to empower the Board to approve projects that are in the public interest, despite the fact that such projects might compete with local interests “as expressed through prohibiting provisions of a municipal zoning ordinance.” In re Hackensack Water Co., 41 N.J. Super. 408, 419-20 (App. Div. 1956).

69. While the Appellate Division recognized the importance of municipal zoning regulation, the court prioritized the necessity of public utility projects over such regulation, noting that municipal ordinances are “from the local aspect for a local public purpose,” while the MLUL ensures that “such local regulation, however beneficent and important, is of secondary importance to the broader public interest involved in assuring adequate service to a much larger area.” In re Hackensack Water Co., 41 N.J. at 423.

70. Thus, the courts have explained that the use of the term “public” in the statute refers “to the whole ‘public’ served by the utility and not the limited local group benefitting by the zoning ordinance.” In re New Jersey Nat. Gas Co., Docket Nos. A-3666-15, A-3752-15, 2021 WL 1688028, at *4 (App. Div. Apr. 29, 2021); see also In re Pub. Serv. Elec. & Gas Co., 35 N.J. 358, 376-77 (1961).

71. Further, a utility must only show that the proposed use is “reasonably, not absolutely or indispensably, necessary for public service, convenience and welfare at some

location.” In re New Jersey Nat. Gas Co., 2021 WL 1688028, at *14 (quoting In re Pub. Serv. Elec. & Gas Co., 35 N.J. at 376-77).

72. The Board is also obligated to consider “[a]lternative sites or methods and their comparative advantages and disadvantages to all interests involved, including cost” when making a determination concerning reasonable necessity. In re Pub. Serv. Elec. & Gas Co., 35 N.J. at 377.

73. As stated by the New Jersey Supreme Court, “[t]he factor of cost differences was considered by the Board to be an important one, ultimately reflected in the consumer’s service bill.” In re Pub. Serv. Elec. & Gas Co., 35 N.J. at 378.

74. The Board must “weigh all interests and factors in the light of the entire factual picture and adjudicate the existence or non-existence of reasonable necessity therefrom[,]” but “[i]f the balance is equal, the utility is entitled to the preference, because the legislative intent is clear that the broad public interest to be served is greater than local considerations.” Id.

75. Through this Petition, JCP&L has presented compelling evidence sufficient to permit the Board to issue the Order requested under N.J.S.A. 40:55D-19.

VI. REASONABLE NECESSITY AND BEST AVAILABLE SITE.

76. As demonstrated above and in the Testimony and Exhibits accompanying this Petition, the Poles are required to maintain the safety and reliability of JCP&L’s electrical transmission system. The Poles are a necessary component of the Project, and the Project is one part of the Company’s PJM-approved plan to remedy documented reliability issues. The installation of the Poles is essential to ensure the safety and reliability of electricity service not only in Allenhurst, but in the surrounding municipalities.

77. The Company has presented *exhaustive, compelling, and uncontroverted* evidence demonstrating that no *reasonably* available alternatives could achieve an equivalent public benefit. As detailed above and in the evidence submitted in support of this Petition, the Company undertook

a thorough review of reasonably available alternatives—including underground routes, under Deal Lake, along an NJT corridor, beneath the Corlies Avenue bridge, and others.

78. However, the Company's review determined that each of these alternatives were more expensive, more problematic (for various and multifaceted reasons), and provided fewer benefits to ratepayers. Notwithstanding this evidence, the Planning Board denied the Application based solely on aesthetic reasons and the pretext that JCP&L had not appropriately evaluated alternative options. The Company is therefore left with no option but this appeal to the Board.

VII. OTHER APPROVALS.

79. The Company has applied for, or will shortly apply for, the necessary construction-related permits and approvals from other agencies and entities, including PJM and Monmouth County. If this Petition is granted, the Company will be prepared to commence construction on the Project in short order upon securing the ministerial approvals.

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

- (1) Determine that the location and construction of the Project, as more specifically described herein, is reasonably necessary for the service, safety and welfare of the public;
- (2) Determine that no alternative site or sites are reasonably available for the Project to achieve an equivalent public benefit;
- (3) Order that the zoning, site plan review, and all other Municipal Land Use ordinances or regulations promulgated under the MLUL, including specifically any zoning, planning, and/or land use ordinances and all regulations promulgated thereunder by the Borough of Allenhurst, shall have no application to the Project, and authorize the Company to proceed with the Project as set forth in the Petition and accompanying exhibits; and

(4) Grant any such other and further relief as may be necessary and required for the Company to complete the Project.

DATED: June 26, 2024

Respectfully submitted,

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**In re Petition of Jersey Central Power & Light Company for a Determination Concerning
the Allenhurst-Oceanview 34.5 Kilovolt Transmission Line Project Located in Allenhurst
Borough, New Jersey Pursuant to N.J.S.A. 40:55D-19**

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