



August 15, 2024

Via Electronic Mail

Therese Harrison
Office of the Clerk
Office of Administrative Law
33 Washington Street, 15th Floor
Newark, New Jersey 07102
Therese.Harrison@oal.nj.gov

**Re: In the Matter of the Petition of Public Service Electric and Gas Company
Pursuant to N.J.S.A. 40:55D-19 to Appeal a Decision of the Pennsauken
Township Committee Reversing a Decision by the Pennsauken Township
Zoning Board of Adjustment Authorizing the Construction of an Electric
Substation (Pennsauken Substation)
BPU Docket No.: EO24070535
OAL Docket No.: Not Yet Assigned**

Dear Ms. Harrison,

Public Service Electric and Gas Company ("PSE&G" or the "Company") submits this letter in response to the Motion to Intervene ("Motion") of the Township of Pennsauken ("Township") dated as of August 5, 2024 in the above proceeding.¹ PSE&G does not oppose the Township's Motion.

While PSE&G does not oppose granting the Township's Motion, the Company takes issue with the Township's claim that the relief requested by PSE&G in this proceeding is contrary to the intent or purpose of the Township's zoning ordinance, redevelopment plan and/or master plan.² The Company maintains, for the reasons stated in its Petition, that the proposed Pennsauken Substation is necessary for the service, convenience, and welfare of the public in Pennsauken and the surrounding communities and that there are no reasonably available alternatives that achieve an equivalent public benefit. However, the Company respectfully submits that it is both premature and unnecessary for the Administrative Law Judge assigned to this matter to resolve these issues at this time, when the only relief presently requested by the Township is the granting of its Motion.

¹ Counsel for PSE&G was served with the Motion by Certified Mail on August 7, 2024. The Proof of Service attached to the Motion states that the Motion was "served via email on the individuals listed on the attached Service List." However, neither the Company's internal personnel nor its outside legal counsel listed on the Service List received a copy of the Motion via email. PSE&G submits that electronic service via email to all parties is the most rapid and efficient way to effectuate service and should be used for all future submissions that require service.

² See Motion at para. 15, 16 and 17.

Accordingly, PSE&G respectfully requests the Presiding Judge to limit any ruling issued at this time to action on the Township's Motion.

Please contact the undersigned if you require further information.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Joseph F. Accardo Jr.", written in a cursive style.

Joseph F. Accardo Jr., Esq.

cc: Attached Service List (via email)

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