

# DORSEY & SEMRAU

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714 MAIN STREET  
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NANETTE S. THOMAS  
OF COUNSEL

April 30, 2015

## Via Federal Express

Kenneth Sheehan, Secretary  
Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
P.O. Box 350  
Trenton, New Jersey 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 Montville-Whippany 230 kV Transmission Project is Reasonably Necessary for the Service, Convenience of Welfare of the Public  
BPU Docket No. EO-15030383

Dear Secretary Sheehan:

This office serves as Municipal Counsel for the Township of Montville. Enclosed for filing with the Board of Public Utilities, please find an original and eleven (11) copies of the following documents in connection with the above-referenced matter:

1. Notice of Motion to Intervene as a Party to this Action;
2. Certification of Service;
3. Certification of Mayor Scott C. Gallopo in Support of the Township's Motion to Intervene; and
4. Proposed Order.

Kindly endorse the extra copy as "filed" and return same to me in the enclosed pre-stamped envelope.

Should you have any questions or concerns, do not hesitate to contact me. Thank you for your kind courtesies.

Respectfully submitted,



Fred Semrau, Esq.

## Enclosures

cc: Scott C. Gallopo, Mayor (via email, w/encls.)  
Montville Township Committee (via email, w/encls.)  
Victor Canning, Township Administrator (via email, w/encls.)  
Attached Service List (w/encls.)

**Fred Semrau, Esq. (017871993)**  
**DORSEY & SEMRAU, LLC**  
**714 Main Street**  
**P.O. Box 228**  
**Boonton, NJ 07005**  
**973-334-1900**  
**Attorneys for Township of Montville, New Jersey**

**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  
MONTVILLE-WHIPpany 230kV  
TRANSMISSION PROJECT IS REASONABLY  
NECESSARY FOR THE SERVICE,  
CONVENIENCE OR WELFARE OF THE  
PUBLIC

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BPU DOCKET: EO-15030383

NOTICE OF MOTION TO  
INTERVENE AS A PARTY

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

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

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

ALL PARTIES ON THE ATTACHED SERVICE LIST

**PLEASE TAKE NOTICE** that, pursuant to N.J.A.C. 1:1-16.1, *et seq.*, Dorsey & Semrau, LLC, attorneys for the Township of Montville, New Jersey ("Montville"), hereby moves before the Board of Public Utilities located at 44 South Clinton Avenue, Ninth Floor, Trenton, New Jersey, for an Order permitting the Township of Montville 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 before the Board.

**PLEASE TAKE FURTHER NOTICE** that, in support of its Motion, Montville shall rely upon the Certification of Scott C. Gallopo, Mayor of the Township of Montville, dated April 27, 2015.

**DORSEY & SEMRAU, LLC**  
*Attorneys for Township of Montville, New Jersey*

By: 

\_\_\_\_\_  
Fred Semrau, Esq.

DATED: April 30, 2015

**Fred Semrau, Esq. (017871993)**  
**DORSEY & SEMRAU, LLC**  
714 Main Street  
P.O. Box 228  
Boonton, NJ 07005  
973-334-1900  
Attorneys for Township of Montville, New Jersey

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

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IN THE MATTER OF THE PETITION OF  
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BPU DOCKET: EO-15030383

CERTIFICATION OF  
SERVICE

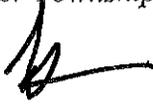
Fred Semrau, Esq., an Attorney at Law of the State of New Jersey, hereby certifies that:

On April 30, 2015, I caused to be served by Federal Express an original and eleven copies of the enclosed Notice of Motion on behalf of the Township of Montville, New Jersey, to Intervene as a Party, and the supporting Certification, on Board of Public Utilities, 44 South Clinton Avenue, Ninth Floor, Trenton, New Jersey 08625-0350; 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.

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

**DORSEY & SEMRAU, LLC**  
*Attorneys for Township of Montville, New Jersey*

By: 

\_\_\_\_\_  
Fred Semrau, Esq.

Dated: April 30, 2015

## 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 Montville-Whippany 230 kV  
Transmission Project is Reasonably Necessary for the Service,  
Convenience or Welfare of the Public

BPU Docket No: EO-15030383

<b>JCP&amp;L</b>		
Gregory Eisenstark, Esq. Windels Marx Lane & Mittendorf, LLP 120 Albany Street Plaza New Brunswick, New Jersey 08901 <a href="mailto:geisenstark@windelsmarx.com">geisenstark@windelsmarx.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>	John T. Toth FirstEnergy Service Company 76 South Main Street Akron, Ohio 44308 <a href="mailto:johnthoth@firstenergycorp.com">johnthoth@firstenergycorp.com</a>
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>		
<b>BPU</b>		
Kenneth Sheehan, Secretary Board of Public Utilities 44 South Clinton Avenue, 9 <sup>th</sup> 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, 9 <sup>th</sup> Fl P.O. Box 350 Trenton, NJ 08625 <a href="mailto:Jerome.may@bpu.state.nj.us">Jerome.may@bpu.state.nj.us</a>	Carl Dzierawiec Board of Public Utilities 44 South Clinton Avenue, 9 <sup>th</sup> Fl P.O. Box 350 Trenton, NJ 08625 <a href="mailto:Carl.dzierawiec@bpu.state.nj.us">Carl.dzierawiec@bpu.state.nj.us</a>
Bethany Rocque-Romaine Board of Public Utilities 44 South Clinton Avenue, 9 <sup>th</sup> Fl P.O. Box 350 Trenton, NJ 08625 <a href="mailto:Bethany.rocque-romaine@bpu.state.nj.us">Bethany.rocque-romaine@bpu.state.nj.us</a>	Paul Flanagan Board of Public Utilities 44 South Clinton Avenue, 9 <sup>th</sup> Fl P.O. Box 350 Trenton, NJ 08625 <a href="mailto:Paul.flanagan@bpu.state.nj.us">Paul.flanagan@bpu.state.nj.us</a>	Megan Lupo Board of Public Utilities 44 South Clinton Avenue, 9 <sup>th</sup> Fl P.O. Box 350 Trenton, NJ 08625 <a href="mailto:Megan.lupo@bpu.state.nj.us">Megan.lupo@bpu.state.nj.us</a>
Cynthia Covie Board of Public Utilities 44 South Clinton Avenue, 9 <sup>th</sup> Fl P.O. Box 350 Trenton, NJ 08625 <a href="mailto:Cynthia.covie@bpu.state.nj.us">Cynthia.covie@bpu.state.nj.us</a>		
<b>DAG</b>		
Caroline Vachier, DAG Division of Law 124 Halsey Street, 5 <sup>th</sup> Floor P.O. Box 45029 Newark, NJ 07101 <a href="mailto:Caroline.vachier@dol.lps.state.nj.us">Caroline.vachier@dol.lps.state.nj.us</a>	Alex Moreau, DAG Division of Law 124 Halsey Street, 5 <sup>th</sup> Floor P.O. Box 45029 Newark, NJ 07101 <a href="mailto:alex.moreau@dol.lps.state.nj.us">alex.moreau@dol.lps.state.nj.us</a>	Carolyn McIntosh, DAG Division of Law 124 Halsey Street, 5 <sup>th</sup> Floor P.O. Box 45029 Newark, NJ 07101 <a href="mailto:carolyn.mcintosh@dol.lps.state.nj.us">carolyn.mcintosh@dol.lps.state.nj.us</a>

<b><u>Rate Counsel</u></b>		
<p>Stefanie A. Brand, Director            Division of Rate Counsel            140 East Front Street, 4<sup>th</sup> Floor            P.O. Box 003            Trenton, NJ 08625-0003  <a href="mailto:sbrand@rpa.state.nj.us">sbrand@rpa.state.nj.us</a></p>	<p>Ami Morita, DRA            Division of Rate Counsel            140 East Front Street, 4<sup>th</sup> Floor            P.O. Box 003            Trenton, NJ 08625-0003  <a href="mailto:amorita@rpa.state.nj.us">amorita@rpa.state.nj.us</a></p>	<p>James Glassen, Esq.            Division of Rate Counsel            140 East Front Street, 4<sup>th</sup> Floor            P.O. Box 003            Trenton, NJ 08625-0003  <a href="mailto:iglassen@rpa.state.nj.us">iglassen@rpa.state.nj.us</a></p>
<p>Lisa Gurkas            Division of Rate Counsel            140 East Front Street, 4<sup>th</sup> Floor            P.O. Box 003            Trenton, NJ 08625-0003  <a href="mailto:lgurkas@rpa.state.nj.us">lgurkas@rpa.state.nj.us</a></p>		
<b><u>Board of Chosen Freeholders</u></b>		
<p>Clerk, Morris County Board of            Chosen Freeholders            Morris County Administration &amp;            Records Building            P.O. Box 900            Morristown, NJ 07963-0900</p>		
<b><u>Morris County Administrator</u></b>		
<p>County Administrator            Morris County Administration &amp;            Records Building            P.O. Box 900            Morristown, NJ 07963-0900</p>		
<b><u>East Hanover Township</u></b>		
<p>Clerk            Township of East Hanover            411 Ridgedale Avenue            East Hanover, NJ 07936  <a href="mailto:paulam@easthanovertownship.com">paulam@easthanovertownship.com</a></p>		
<b><u>Parsippany-Troy Hills Township</u></b>		
<p>Clerk            Parsippany-Troy Hills Township            Parsippany-Troy Hills Town Hall            1001 Parsippany Boulevard            Parsippany-Troy Hills, NJ 07054</p>		
<b><u>Montville Township</u></b>		
<p>Clerk            Montville Township            Municipal Building            195 Changebridge Road            Montville, NJ 07045-9498  <a href="mailto:tatkinson@montvillenj.org">tatkinson@montvillenj.org</a></p>		

**Fred Semrau, Esq. (017871993)**  
**DORSEY & SEMRAU, LLC**  
**714 Main Street**  
**P.O. Box 228**  
**Boonton, NJ 07005**  
**973-334-1900**  
**Attorneys for Township of Montville, New Jersey**

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

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IN THE MATTER OF THE PETITION OF	:	
<b>JERSEY CENTRAL POWER &amp; LIGHT</b>	:	
<b>COMPANY PURSUANT TO N.J.S.A. 40:55D-19</b>	:	BPU DOCKET: EO-15030383
FOR A DETERMINATION THAT THE	:	
MONTVILLE-WHIPpany 230kV	:	
TRANSMISSION PROJECT IS REASONABLY	:	CERTIFICATION IN
NECESSARY FOR THE SERVICE,	:	SUPPORT OF MOTION
CONVENIENCE OR WELFARE OF THE	:	TO INTERVENE
PUBLIC	:	

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I, Scott C. Gallopo, of full age, do hereby certify as follows:

1. I am the Mayor of the Township of Montville, Morris County, New Jersey ("Montville" or the "Township"), located at 195 Changebridge Road, Montville, New Jersey 07045. The Township of Montville moves to intervene in this matter as a Party pursuant to N.J.S.A. 48:2-32.2. I am familiar with the facts and circumstances concerning this matter and I make this Certification in support of the Township of Montville's Motion to Intervene.

2. Montville is a duly organized municipal corporation of the State of New Jersey. Montville operates under New Jersey's Optional Municipal Charter Law, Mayor-

Committee-Administrator Plan. The Council is comprised of five members.

3. Jersey Central Power & Light Company ("JCP&L") provides electric power to the Township of Montville. Within the Township, JCP&L services approximately 10,893 meters.

4. Montville wishes to intervene as a party in this matter because it opposes JCP&L's Verified Petition for a determination by the NJ Board of Public Utilities that its proposed Montville-Whippany 230 kV Transmission Project is reasonably necessary for the service, convenience or welfare of the public.

5. The Township seeks to intervene on the basis that 3.1 miles of the proposed transmission line is to be built within the Township of Montville.

6. For all of these reasons, and others that will be presented in these proceedings, Montville Township 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 it and its residents and taxpayers. Accordingly, Montville requests that the Board 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 before the Board.

7. All correspondence, filings, discovery, reports, and documentation generally regarding this matter should be sent to the following persons:

Fred Semrau, Esq.  
Dorsey & Semrau, LLC  
714 Main Street  
P.O. Box 228  
Boonton, NJ 07005  
Email: [fsemrau@dorseysemrau.com](mailto:fsemrau@dorseysemrau.com)

Victor Canning, Township Administrator

Township of Montville  
195 Changebridge Road  
Montville, NJ 07045  
Email: [VCanning@montvillenj.org](mailto:VCanning@montvillenj.org)

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

  
\_\_\_\_\_  
SCOTT C. GALLOPO, MAYOR  
Township of Montville

Dated: April 27, 2015

**Fred Semrau, Esq. (017871993)**  
**DORSEY & SEMRAU, LLC**  
**714 Main Street**  
**P.O. Box 228**  
**Boonton, NJ 07005**  
**973-334-1900**  
**Attorneys for Township of Montville, New Jersey**

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

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IN THE MATTER OF THE PETITION OF  
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BPU DOCKET: EO-15030383

ORDER

THIS MATTER having been presented by Dorsey & Semrau, LLC, attorneys for the Township of Montville, on notice to the Board of Public Utilities and the parties and persons set forth on the attached Service List; and the Board of Public Utilities 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 \_\_\_\_\_, 2015,

ORDERED that the Township of Montville 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 other proceedings in this matter.

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