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September 15, 2009

**VIA EMAIL**

Alexander C. Stern, Esq.  
PSEG Service Corporation  
80 Park Plaza, T5G  
Newark, New Jersey 07102

**Re: I/M/O THE PETITION OF PUBLIC SERVICE ELECTRIC  
AND GAS COMPANY FOR A DETERMINATION PURSUANT  
TO THE PROVISIONS OF N.J.S.A. 40:55D-19  
(SUSQUEHANNA-ROSELAND)  
BPU DOCKET NO. EM 09010035**

Dear Mr. Stern:

On behalf of the Municipal Intervenors (Townships of Andover, Byram, East Hanover, Fredon, Hardwick, Montville and Parsippany), and in accordance with N.J.A.C. 1:1-1 *et seq.*, we submit the enclosed Second Request for the Production of Documents.

Thank you for your attention.

Very truly yours,

**DeCotius, FitzPatrick, Cole & Wisler, LLP**

By: 

Catherine E. Tamasik

cc: Tamara L. Linde, Esq., V.P. Regulatory, PSEG Services Corporation (via email)  
All Parties Designated on the Attached Service List (by e-mail or regular mail as necessary)

STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF  
PUBLIC SERVICE ELECTRIC AND GAS  
COMPANY FOR A DETERMINATION  
PURSUANT TO THE PROVISIONS OF  
N.J.S.A. 40:55D-19 (SUSQUAHANNA-  
ROSELAND TRANSMISSION LINE)

BPU DOCKET NO. EMO9010035

**MUNICIPAL INTERVENOR'S SECOND  
REQUEST FOR PRODUCTION OF  
DOCUMENTS DIRECTED TO PUBLIC  
SERVICE ELECTRIC AND GAS  
COMPANY**

The Municipal Intervenors submit this Second Request for Production of Documents to Public Service Electric and Gas Co. pursuant to N.J.A.C. 1:10-1 *et seq.*

INSTRUCTIONS

1. You are to furnish all information available to you and to your agents and employees in responding to the following Requests for Documents. You are to designate which information is not within your personal knowledge, and as to that information you are to state the name and address of every person from whom it was received, or, if the source of the information is documentary, a full description of the document and its location.

2. If any information is withheld because you claim the information is privileged or is contained in a privileged document or communication:

- i. identify the document and/or communication; and
- ii. set forth the privilege and the factual basis upon which the privilege is claimed.

3. When used in the course of an enumeration of items for which documents or information are requested, the words "and" and "or" are to be construed as requesting documents or information as to each item in the enumeration, the same as if the entire request had been addressed solely to that item.

4. These Requests for Documents are intended to be continuing and you are requested to make prompt supplemental responses whenever additional, responsive information becomes available.

5. If you cannot provide the document(s) requested, identify the name and address of each person having possession, custody, or control of such document and, in all cases, identify the document in a form adequate to permit a demand for its production, including the author, addressee(s), title, date and subject.

6. Any term used in these Requests for Documents in the singular shall be deemed to include the plural where appropriate and vice versa.

7. Whenever a Request for Documents calls for information with respect to "each" one of a particular type or class of matters, events, persons, or entities, of which there is more than one, you are required to separately list, set forth, or identify for each thereof all of the information called for.

8. If you know of any documents, oral communications, or information but cannot give, either in whole or in part, the specific information called for by a particular Request, to the extent requested, so state and give the best information which you have on the subject.

### DEFINITIONS

1. "Document" or "Documents" means all writings of any kind, including the originals and non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, electronic mail, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, certificates, drawings, plans, records, interoffice and interoffice communications, or offers, notations in any form made of conversations, telephone calls, meetings or other communications, bulletins, printed matter (including newspapers, magazines and other publications, and articles and clippings therefrom), press releases, computer printouts, teletypes, telescopes, invoices, ledgers, worksheets (and all drafts, alterations, modifications, changes and amendments of any of the foregoing), graphic records or representations of any kind (including without limitation photographs, tables, charts, graphs, and microfilm, videotape or film recording) and electronic, mechanical or electrical records or representations of any kind (including without limitation tapes, cassettes, discs, recordings), or transcriptions thereof. The term "all documents" means every document, as defined above, which can be located, discovered or obtained by reasonably diligent efforts, including without limitation all documents possessed by you or your counsel, or any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

2. "Identify", "identification", and "identity", as used herein, mean:

a. with respect to a document:

- i. the type of document, whether a letter, memorandum, report, agreement, recording, computer record, notation, etc.;
- ii. the title, date and number of pages thereof;
- iii. any caption, heading and/or date shown on the face of the document;
- iv. the date of preparation, receipt and/or filing or other disposition;
- v. the identity of each individual who originated, initialed, signed, authored, prepared or received (and, if same was done on behalf of any person, the identity of each such person), or is in any way referred to in the document;

- vi. the identity of each addressee or recipient;
- vii. the number of pages, if written, or the approximate size or length if recorded;
- viii. the general subject matter of the document;
- ix. the location of the document.

b. with respect to a communication:

- i. the date and time when it occurred;
- ii. the place where it occurred;
- iii. the complete substance of the communication;
- iv. the identity of each person to whom and by whom the communication was made; and
- v. the identity of all documents memorializing, referring or relating in any way to the subject matter of the communication.

3. "Person" or "persons" means all natural persons, corporations, partnerships or other business associations, and all other legal entities, including all members, officers, employees, agents, representatives, attorneys, successors, predecessors, assigns, divisions, affiliates and subsidiaries.

4. Each Request for Documents shall be deemed to call for the production of the original Documents, to the extent that they are in or subject to, directly or indirectly, your control. In addition, each request should be considered as including all copies and, to the extent applicable, preliminary drafts of documents which, as to contents, differ in any respect from the original or final draft or from each other (e.g., by reason of handwritten notes or comments having been added to one copy of a document but not on the original or other copies thereto).

5. The term "relating to" (including any variant thereof), includes, but is not limited to, containing, referring to, alluding to, responding to, concerning, in connection with, commenting on, in respect of, showing, discussing, explaining, mentioning, analyzing, touching on, constituting, comprising, evidencing, setting forth, summarizing, and is not limited to contemporaneous events, actions, communications, or documents.

6. As used herein, any term in the singular shall be deemed to include the plural where appropriate and vice versa.

7. As used herein, all terms including "and" and "or" shall be construed either conjunctively or disjunctively as required by the context to include in the response any document that might be deemed non-responsive by any other construction.

8. As used herein, "You," "Your," "PSE&G" means Petitioner Public Service Electric & Gas Co and its agents, experts, professionals, counsel.

9. As used herein, "Project" means the proposed 500kv Susquahanna-Roseland Transmission Line that is the subject of this proceeding.

## REQUESTS FOR DOCUMENTS

1. Provide all documents concerning the installation of the Project through and across the Picatinny Arsenal.
2. Identify all communications between You and the United States Department of the Army regarding the installation of the Project through and across the Picatinny Arsenal.
3. Provide the Environmental Impact Statement and all underlying documents which were prepared by You in connection with the installation and operation of the Project through and across the Picatinny Arsenal.
4. Provide all documents concerning earthquake data in northern New Jersey (i.e., Sussex, Morris, Warren, Passaic, Bergen, Essex).
5. Provide all documents that illustrate the potential effects of earthquakes or earth tremors on the Project.
6. Provide all documents evidencing actual effects of earthquakes or earth tremors on transmission lines, transmission line towers, monopoles, and substations.
7. Provide the lists of property owners to whom You provided notice of any kind since January 1, 2007 regarding activity on the utility easements you own on the Roseland-Bushkill Right of Way.
8. Provide the title work for all easements You own on the Roseland-Bushkill Right of Way.
9. Provide the title work for any easements in addition to those on the Roseland-Bushkill Right of Way that You intend to utilize for the proposed Project.
10. Provide all documents and identify all communications since January 1, 2007, concerning Your purchase of access, construction or other easements, whether temporary or permanent, that You require for the installation, operation and maintenance of the Project, including the amounts you paid for the same.
11. Provide all documents evidencing payments to property owners made for purposes other than the purchase of access, construction or other easements. Such documents should include, but not be limited to, payments to compensate for actual or perceived loss of property value, aesthetics, noise, pollution, safety.
12. Provide all documents relating to the realignment of the Project through the Highlands, via the route evidenced by the maps entitled "Amended Highlands Applicability Plan – Susquehanna-Roseland Transmission Project – Highland Preservation and Planning Area," dated April 23, 2009, including, but not limited to, the documents You relied upon in configuring the realignment.

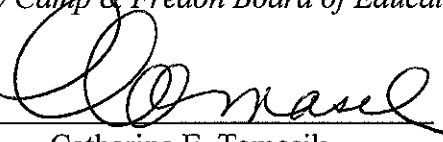
13. Provide all documents relating to the relocation of the switching station from Jefferson Township to Hopatcong Township, including, but not limited to, documents You relied upon in making the decision to relocate the switching station.

14. Provide all notices of, and testimony taken at, public hearings regarding the relocation of the switching station from Jefferson Township to Hopatcong Township.

15. Provide all public comments You or the BPU received in connection with the relocation of the switching station from Jefferson Township to Hopatcong Township.

16. Provide a site map showing all permanent and temporary construction and permanent access easements You own or are attempting to acquire for the Project.

**DeCotiis, FitzPatrick, Cole & Wisler, LLP**  
*Attorneys for Township of Parsippany, Willow Lake  
Day Camp & Fredon Board of Education*

By:   
Catherine E. Tamasik

Dated: September 15, 2009

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