

RESPONSE TO STOP THE LINES
REQUEST: STL-D-1
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PJM PLANNING

QUESTION:

Produce every document in PJM's possession regarding planning for the Susquehanna-Roseland transmission line.

ANSWER:

Please see RTEP and TEAC materials as noted in the response to STL-D-3. Information regarding the Susquehanna-Roseland line was presented at the following TEAC meetings: 3/14/07, 3/30/07, 4/5/07, 4/18/07, 5/9/07, 11/05/08, 1/21/09 and 3/13/09.

If additional documents become available in response to this request they will be provided.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-2
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

Produce the full PJM generation interconnection queue as of January 12, 2009.

ANSWER:

The following link provides the current status of all PJM generation interconnection projects:
<http://www.pjm.com/planning/generation-interconnection.aspx>

RESPONSE TO STOP THE LINES
REQUEST: STL-D-3
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP REPORTS

QUESTION:

Produce copies of all PJM RTEP reports from 2005-present, RTEP Sub-Region Committee meeting agendas, minutes, presentations and other RTEP reports 2005-present.

ANSWER:

RTEP reports since 2005 can be accessed at:

<http://www.pjm.com/documents/reports/rtep-report.aspx>

<http://www.pjm.com/documents/reports/rtep-report/2007-rtep.aspx>

<http://www.pjm.com/documents/reports/rtep-report/2006-rtep.aspx>

<http://www.pjm.com/documents/reports/rtep-report/2005-rtep.aspx>

TEAC materials can be accessed at:

<http://www.pjm.com/committees-and-groups/committees/teac.aspx> (select "Past Meeting Material")

RTEP Sub-Regional Committee information for the Mid-Atlantic, Southern and Western Regions can be accessed at:

<http://www.pjm.com/committees-and-groups/committees/srrtep-ma.aspx>

<http://www.pjm.com/committees-and-groups/committees/ssrtep-s.aspx>

<http://www.pjm.com/committees-and-groups/committees/ssrtep-w.aspx>

(Select "Past Meeting Material")

RESPONSE TO STOP THE LINES
REQUEST: STL-D-4
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ALTERNATIVES

QUESTION:

Provide all documentation of analysis of non-transmission alternatives considered for Susquehanna-Roseland line.

ANSWER:

See response to S-ENR-11. PJM includes non-transmission alternatives which have met the criteria for inclusion in the RTEP evaluation, i.e., generation projects which have progressed to the point of executing an Interconnection Service Agreement, and Demand Resource which has cleared in an RPM auction plus Interruptible Load for Reliability.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-5
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
NERC VIOLATIONS

QUESTION:

Provide PJM transmission map highlighting current NERC n-1 violations, and chart detailing those violations.

ANSWER:

It is assumed that this question refers to violations identified in the application.

See Map 3.3 (pages 58-59) of the 2007 RTEP Report

See Map 4.3 (page 64-65) of the 2008 RTEP Report

See response to STL-D-3 for links to these reports.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-6
WITNESS(S): HERLING
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
FERC DOCUMENT NO. AD-05-3-00

QUESTION:

Copies of all PJM documents, including but not limited to filings, comments, remarks, testimony, filings, agendas, reports, meeting preparation, communications within PJM and between PJM and FERC, etc. regarding FERC Docket No. AD-05-3-000, including those for FERC and/or PJM meetings, workgroups, technical conference and subsequent workgroups.

ANSWER:

Please refer to Exhibits STL-D-6 (a and b). This docket refers to the FERC Technical Conference in *Promoting Regional Transmission Planning and Expansion to Facilitate Fuel Diversity Including Expanded Uses of Coal-Fired Resources*. Mr. Karl Pfirrmann submitted testimony in Docket No. AD05-3-000 and testified at the FERC Technical Conference on May 13, 2005 on behalf of PJM.

Mr. Pfirrmann's testimony is attached as STL-D-6(a).

A transcript of the FERC Technical Conference is attached as STL-D-6(b).

A Working Group presentation can be accessed at:

<http://www.pjm.com/~media/committees-groups/stakeholder-meetings/pmsg/20050803-pmsg-presentation.ashx>

The 2006 RTEP Report summarizes this concept in Section 4.2, page 119, available at:

<http://www.pjm.com/documents/reports/rtep-report/2006-rtep.aspx>

If additional documents become available in response to this request they will be provided.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-7
WITNESS(S): HERLING
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PROJECT MOUNTAINEER

QUESTION:

Provide every document in PJM's possession regarding Project Mountaineer, including but not limited to FERC testimony, powerpoints, PJM planning and reliability studies, PJM policy documents, etc.

ANSWER:

See response to STL-D-6.

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
ECONOMIC DISPATCH

QUESTION:

Provide copies of all studies regarding benefits of economic dispatch and PJM planning for economic dispatch, including in-house and independent consultant studies commissioned by PJM.

ANSWER:

PJM does not perform “planning for economic dispatch.” Nor does PJM perform economic dispatch studies as part its reliability analyses to test compliance with NERC planning criteria, analyses which revealed the reliability need for the Susquehanna-Roseland line.

The aforementioned notwithstanding, PJM does administer RTO-wide markets one of which is a real-time energy market based on the concept of economic or “merit order” dispatch under the rubric of Locational Marginal Pricing (LMP). From this RTO perspective, PJM notes that Question STL-D-8, STL-D-20 and STL-D-25 similarly address the economic/market benefits of RTOs, including that associated with economic dispatch. The following documentation – including reports, studies and other relevant analyses - address economic/market benefits of RTOs including that associated with economic dispatch. These documents were internally generated by PJM, outside consultants as commissioned by PJM, or were supported by PJM research, management/staff interviews and/or participation. (Other relevant documents generated by parties outside PJM may exist about which PJM is unaware.)

1. “PJM Value Proposition” : <http://www.pjm.com/~media/documents/presentations/pjm-value-proposition.ashx>
2. Market performance metrics can be found in annual State of the Market Reports published by PJM’s Market Monitor, Monitoring Analytics. Those reports – back to 1999 - are accessible via the following URL link to the Monitoring Analytics web site:
http://www.monitoringanalytics.com/reports/PJM_State_of_the_Market/2008.shtml
3. “Progress of Organized Wholesale Electricity Markets in North America”
http://www.isorto.org/atf/cf/%7B5B4E85C6-7EAC-40A0-8DC3-003829518EBD%7D/IRC_State_of_the_Markets_Report_103007.pdf
4. “Electricity Prices in PJM: A Comparison of Wholesale Power Costs in the PJM Market to Indexed Generation Service Costs”
<http://www.synapse-energy.com/Downloads/SynapseReport.2004-06.PJM-ISO.PJM-Electricity-Prices.03-48.pdf>
5. “Uniform Price Auctions in Electric Markets”
<http://www.pjm.com/~media/documents/reports/spot-market-prices-j-chandley.ashx>
6. “Lessons Learned from Electric Restructuring”
<http://www.gao.gov/new.items/d03271.pdf>

RESPONSE TO STOP THE LINES
REQUEST: STL-D-8
WITNESS(S): HERLING / MCGLYNN
PAGE 2 OF 3
SUSQUEHANNA-ROSELAND

7. "THE VALUE OF ECONOMIC DISPATCH: A REPORT TO CONGRESS PURSUANT TO SECTION 1234 OF THE ENERGY POLICY ACT OF 2005"
<http://www.oe.energy.gov/DocumentsandMedia/value.pdf>
8. "Value of Independent Regional Grid Operators ISOs"
http://www.isorto.org/atf/cf/%7B5B4E85C6-7EAC-40A0-8DC3-003829518EBD%7D/Value_of_Independent_Regional_Grid_Operators.pdf
9. "Keeping the Power Flowing: Ensuring a Strong Transmission System to Support Consumer Needs for Cost-Effectiveness, Security and Reliability"
<http://www.cecarf.org/publications/finalreport01-25-05.pdf>
10. "How RTOs Establish Spot Market Prices" (And How This Helps To Keep The Lights On)
<http://www.pjm.com/~media/documents/reports/spot-market-prices-j-chandley.ashx>
11. "PJM's Reliability Pricing Mechanism: (Why It's Needed and How It Works)"
<http://www.pjm.com/~media/documents/reports/pjms-rpm-j-chandley.ashx>
12. "Review of PJM's Reliability Pricing Model"
<http://www.pjm.com/~media/committees-groups/committees/cmec/20080711-item-01-rpm-report-summary-brattle.ashx>
13. "Quantifying Demand Response Benefits "
<http://www.pjm.com/documents/~media/documents/reports/brattle-report-quantifying-demand-response-benefits-pjm.ashx>
14. "Analysis of the Impact of Coordinated Electricity Markets on Consumer Electricity Charges"
<http://www.pjm.com/~media/documents/reports/20061121-analysis-coordinated-elec-mkts.ashx>
15. "Ten Reasons ISOs/RTOs are Good for North America"
http://www.isorto.org/atf/cf/%7B5B4E85C6-7EAC-40A0-8DC3-003829518EBD%7D/10_Reasons_ISORTOs_Are_Good.pdf
16. "Myths and Facts About Competitive Wholesale Energy Markets"
http://www.isorto.org/atf/cf/%7B5B4E85C6-7EAC-40A0-8DC3-003829518EBD%7D/Myths_Facts_About_Competitive_Energy_Markets%20.pdf
17. "The Most Effective Way"
<http://www.pur.com/puftocs/oct06.cfm>
18. "FERC Conference Review of Wholesale Electricity Markets: Review of Wholesale Electricity Markets. " Docket No. AD08-9-000
TESTIMONY OF TERRY BOSTON, PRESIDENT AND CEO, PJM INTERCONNECTION, L.L.C.
<http://www.pjm.com/documents/~media/documents/presentations/wtb-ferc-written-testimony.ashx>
19. Testimony of Andrew Ott on Behalf of PJM Interconnection Pennsylvania Public Utility Commission En Banc Hearing
<http://www.pjm.com/documents/~media/documents/presentations/20081020-andy-ott-pa-puc-testimony.ashx>
20. Testimony of Andrew Ott on Behalf of PJM Interconnection Pennsylvania House Environmental Resources and Energy Committee
<http://www.pjm.com/documents/~media/documents/presentations/20080909-andy-ott-house-testimony.ashx>

RESPONSE TO STOP THE LINES
REQUEST: STL-D-8
WITNESS(S): HERLING / MCGLYNN
PAGE 3 OF 3
SUSQUEHANNA-ROSELAND

21. "2007 PJM Strategic Report": <http://www.pjm.com/documents/reports/member-responses.aspx>

RESPONSE TO STOP THE LINES
REQUEST: STL-D-9
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
IMPORT/EXPORT

QUESTION:

Provide data from 2005-present showing PJM, utilities' and states' monthly import/export; and showing energy surplus/deficit without import/export to other states.

ANSWER:

Please refer to Exhibit STL-D-9 which contains information regarding import/export data for the State of New Jersey for the years 2005 to present. PJM does not, in the ordinary course of business, prepare data regarding the utilities' monthly import or export information. Moreover, PJM does not have any data regarding “energy surplus/deficit without import/export to other states”.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-10
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
MARKET EFFICENCY

QUESTION:

Provide economic analysis and studies, including any Market Efficiency Analysis, regarding recipient markets for electricity sales in PJM, including, but not limited to, electricity transmitted over Susquehanna-Roseland line.

ANSWER:

The need for the Susquehanna-Roseland Project is justified on the basis of resolving NERC reliability criteria violations, not on the basis of any economic analysis. Notwithstanding, Market Efficiency presentations are available through TEAC Meeting presentations. See response to STL-D-3 for links to TEAC materials.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-11
WITNESS(S):
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RERSEVE MARGINS

QUESTION:

Provide documentation of PJM reserve margins from 2005 to present, including but not limited to NERC reports, PJM internal quarterly calculations, etc.

ANSWER:

The actual Installed Reserve Margins for the historic periods are as follows:

2004/05 – 36.9%
2005/06 – 23.4%
2006/07 – 12.4%
2007/08 – 15.1%
2008/09 – 27.2%

RESPONSE TO STOP THE LINES
REQUEST: STL-D-12
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DEMAND RESPONSE

QUESTION:

Provide documentation of demand response potential for PSE&G, New Jersey and PJM areas.

ANSWER:

PJM produces a forecast of demand response resources based on recent market-based activity, as determined through the clearing of the RPM auctions. The current demand response committed to PJM can be found in Table B-7 of the 2008 PJM Load Forecast Report at:

<http://www.pjm.com/documents/~/media/documents/reports/2009-pjm-load-report.ashx>

PJM has not performed any analysis of the demand response potential for PSE&G, New Jersey or the PJM area.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-13
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LINE LOSS

QUESTION:

Provide copies of FERC or other tariffs regarding line losses in the PJM system and documentation of annual cost of line loss from inception of tariff to present.

ANSWER:

The PJM Operating Agreement is available from PJM's web site and is accessible via the following URL link:

<http://www.pjm.com/documents/agreements/pjm-agreements.aspx>

The PJM Open Access Transmission Tariff is available from PJM's web site and is accessible via the following URL link:

<http://www.pjm.com/documents/agreements/pjm-agreements.aspx>

It should be noted that the Susquehanna-Roseland line was approved by PJM's Board to resolve identified NERC reliability criteria violations. Notwithstanding, PJM notes that on June 1, 2007, PJM implemented its methodology for determining nodal marginal transmission loss costs. Data from June 1, 2007 through December 31, 2007 and for 2008 can be found in annual State of the Market Reports published by PJM's Market Monitor, Monitoring Analytics. Those reports are accessible via the following URL link to the Monitoring Analytics web site:

http://www.monitoringanalytics.com/reports/PJM_State_of_the_Market/2008.shtml

RESPONSE TO STOP THE LINES
REQUEST: STL-D-14
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
NERC RELIABILITY ASSESSMENTS

QUESTION:

Provide copies of NERC Reliability Assessments, 2003-present.

ANSWER:

NERC Reliability Assessments can be accessed at:

<http://www.nerc.com/page.php?cid=4|61>

RESPONSE TO STOP THE LINES
REQUEST: STL-D-15
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PRIOR TESTIMONY

QUESTION:

Provide copies of all PJM Comments, Supplemental Comments, and Testimony to DOE regarding NIETC and all exhibits and attachments.

ANSWER:

Access DOE information at:

<http://nietc.anl.gov>

PJM Comments can be found at:

http://nietc.anl.gov/involve/draftcomment/EastCorridor/dsp_commentlist.cfm?region=East&organization=PJM%20Interconnection%2C%20L%2EL%2EC%2E

Draft DOE Corridor Designation Comments can be found at:

<http://www.pjm.com/~media/documents/ferc/doe/20070709-draf-doe-comments-part1.ashx>

ISO/RTO Comments can be found at:

<http://nietc.anl.gov/documents/index.cfm> see page 34 of "*Comments received on the plan presented at the Technical Conference*" for ISO/RTO comments.

PJM Supplemental Comments can be found at:

<http://www.pjm.com/~media/documents/ferc/doe/20070611-pjm-supplemental-filing.ashx>

RESPONSE TO STOP THE LINES
REQUEST: STL-D-16
WITNESS(S): HERLING
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
FERC FILINGS

QUESTION:

Provide copies of PJM filings with FERC, FERC Orders and PJM tariffs regarding any aspect of the Susquehanna-Roseland line.

ANSWER:

Please refer to Exhibits STL-D-16 (a, b, c, d). The relevant PJM filings, FERC Orders and PJM tariffs regarding any aspect of the Susquehanna-Roseland Project include:

- 7/23/07 PJM filing - see Exhibit STL-D-16(a), ER07-1186 Filing.pdf (3 MB)
10/18/07 FERC acceptance of 7/23/07 filing - see Exhibit STL-D-16(b), ER07-1186 Order.pdf (151 kb)
12/17/07 PJM filing – see Exhibit STL-D-16(c), ER07-1186 Compliance Filing.pdf (418 kb)
7/1/08 FERC acceptance of 12/17/07 filing may be accessed at:
<http://www.pjm.com/Media/documents/ferc/2008-orders/20080701-er07-1186-001.pdf>
11/14/08 PJM filing may be accessed at:
<http://www.pjm.com/Media/documents/ferc/2008-filings/20081114-er06-456-xxx-part-2a.pdf>
11/25/08 PJM filing (corrections to 11/14/08 filing) may be accessed at:
<http://www.pjm.com/Media/documents/ferc/2008-filings/20081125-er06-456-xxx.pdf>
12/30/08 PJM filing may be accessed at:
<http://www.pjm.com/Media/documents/ferc/2008-filings/20081230-er09-xxx-000.pdf>
1/28/09 FERC acceptance of 11/14/08 as amended on 11/25/08 – see Exhibit STL-D-16(d), ER06-456 Order (clean-up) 1/28/09.pdf (58 kb)

3/2/09 PJM filing may be accessed at:
<http://www.pjm.com/Media/documents/ferc/2009-filings/20090302-er09-585-000.pdf>
3/30/09 PJM filing may be accessed at:
<http://www.pjm.com/Media/documents/ferc/2009-filings/20090330-er09-xxx-000.pdf>
4/10/09 FERC acceptance of 3/2/09 filing may be accessed at:
<http://www.pjm.com/Media/documents/ferc/2009-orders/20090410-er06-456-019.pdf>

RESPONSE TO STOP THE LINES
REQUEST: STL-D-17
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
REALIBILITY STANDARDS

QUESTION:

Provide documentation of any and all violations of NERC reliability standards, including TLRs by category, and FERC Orders, Consent Agreements, fines, etc.

ANSWER:

PJM has had one confirmed violation of EOP-005, System Restoration Plans, which was of an administrative nature. As this violation occurred in May of 2007, prior to the implementation of the mandatory and enforceable NERC Reliability Standards in June 2007, there were no sanctions or fines imposed and the report is not publicly available. PJM notes that TLRs are not in and of themselves NERC Reliability Standards, but simply a means of complying with the NERC Standards, as directed in IRO-006-3, Reliability Coordination-Transmission Loading Relief. Documentation of PJM TLR events can be found in annual PJM State of the Market Reports published by PJM's Market Monitor, Monitoring Analytics. Those reports are accessible via the following URL link to the Monitoring Analytics web site:
[http://www.monitoringanalytics.com/reports/PJM State of the Market/2008.shtml](http://www.monitoringanalytics.com/reports/PJM%20State%20of%20the%20Market/2008.shtml)

RESPONSE TO STOP THE LINES
REQUEST: STL-D-18
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
CAPITAL COST RECOVERY

QUESTION:

Provide documentation of state New Jersey and Pennsylvania capital cost recovery mechanisms available for transmission.

ANSWER:

There is no documentation available of New Jersey capital cost recovery mechanisms available for transmission. The FERC has exclusive jurisdiction to establish the rates and terms and conditions of service for interstate transmission. PSE&G currently has a FERC-approved formula rate in effect to recover the costs of its transmission facilities through the PJM Open Access Transmission Tariff. Under this formula, rates are put into effect in January of each year based upon PSE&G's internal forecast of annual expenses and capital expenditures. Rates are then trued up the following year to reflect actual annual expenses and capital expenditures.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-19
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PLANNING

QUESTION:

Provide listing of the claimed 22,000MW of specific generation projects enabled by this planning process, identified by location (county and state) and fuel type.

ANSWER:

Generation project information can be found at:

<http://www.pjm.com/planning/generation-interconnection/generation-queue-active.aspx>

Select "ALL" in the alphabetic row and, separately, "In-Service" and "Partially In-Service" under "Status". Select the Excel icon for spreadsheet output.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-20
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
MARKET ANALYSIS

QUESTION:

Provide PJM market studies, including market analysis, benefits analysis, both prior to enactment of PJM market, and subsequent, showing economic benefits expected and economic benefits realized.

ANSWER:

Refer to STL-D-8 and STL-D-10.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-21
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
MARKET EFFICIENCY

QUESTION:

Provide copies of market efficiency studies related to Susquehanna-Roseland line and/or Pennsylvania, West Virginia *or* other generators west of New Jersey.

ANSWER:

See response to STL-D-10.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-22
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LOAD FORECAST

QUESTION:

Direct, p. 28, refers to January 2008 load forecast. Provide PJM January 2009 load forecast, and PJM actuals, by utility, for 2009 thus far (monthly, and daily if available).

ANSWER:

The 2008 PJM Load Forecast Report can be accessed at:

<http://www.pjm.com/documents/~media/documents/reports/2009-pjm-load-report.ashx>

PJM load data can be accessed at:

<http://www.pjm.com/markets-and-operations/compliance/nerc-standards/historical-load-data.aspx>

RESPONSE TO STOP THE LINES
REQUEST: STL-D-23
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

WIND

QUESTION:

Provide documentation of wind projects in queue in Mid-Atlantic area, including manufacturer rated capacity, PJM rated capacity, location and in-service date.

ANSWER:

Generation Interconnection Queue information can be found at:

<http://www.pjm.com/planning/generation-interconnection/generation-queue-active.aspx>

Select "Wind". If an Excel file is desired, select the Excel icon.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-24
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
NEED

QUESTION:

Provide PJM studies showing MW deficiencies in the region, identifying location of deficiencies and projected need.

ANSWER:

PJM does not understand what is meant by MW deficiencies in a region. Notwithstanding, PJM presumes that this question refers to deliverability analyses conducted as part of the PJM RTEP process and as further described in the direct testimony of PSE&G witness Paul McGlynn at pages 12-16. The Susquehanna-Roseland Project is the transmission solution which was selected due to the fact that reliability criteria violations were identified, notwithstanding existing MW levels.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-25
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
REGIONAL TRANSMISSION ORGANIZATION

QUESTION:

Provide all PJM economic studies of benefits of RTOs.

ANSWER:

See response to STL-D-8.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-26
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PLANNING

QUESTION:

Re: Direct, p. 36, "PJM's planning and expansion process was also specifically designed to encourage market-driven operating and investment actions for preventing and relieving congestion." Provide all documentation of market-driven initiatives and market benefits of Susquehanna-Roseland line.

ANSWER:

The Susquehanna-Roseland Project was directed to be built in order to address reliability criteria violations. It is not clear what is meant by market-driven initiatives and market benefits of Susquehanna Roseland line. Notwithstanding, market efficiency analyses for the Susquehanna-Roseland Project can be accessed on the TEAC website at: <http://www.pjm.com/committees-and-groups/committees/teac/teac-archive.aspx> . Select "Archived Postings".

It should be noted that market efficiency analyses were not conducted in order to justify backbone transmission facilities. A limited number of simulations were performed with respect to the Susquehanna-Roseland line when developing the initial market efficiency procedures during 2007. However, these results represent a very limited perspective on the range of reliability problems addressed by the RTEP in 2006 through 2008. See response to STL-25.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-27
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RELIABILITY STANDARDS

QUESTION:

Provide studies, TEAC group reports, and any other documents regarding reliability criteria violations resolved solely by Susquehanna-Roseland line.

ANSWER:

TEAC materials can be accessed at:

<http://www.pjm.com/committees-and-groups/committees/teac.aspx> (select "Past Meeting Material")

RTEP Reports can be accessed at:

<http://www.pjm.com/documents/reports/rtep-report.aspx> (beginning on page 63)

<http://www.pjm.com/documents/reports/rtep-report/2007-rtep.aspx> (beginning on page 57)

RESPONSE TO STOP THE LINES
REQUEST: STL-D-28
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PLANNING

QUESTION:

Provide maps, identifying source, showing transmission planned or in planning process which could or would connect with the Susquehanna substation.

ANSWER:

See response to STL-D-27. No other lines were or are contemplated to be connected to the Susquehanna substation.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-29
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PLANNING

QUESTION:

Provide maps, identifying source, showing transmission planned or in planning process which could or would connect with the Roseland substation.

ANSWER:

Please refer to Exhibit STL-D-29 which is a map from page 29 of the October 15, 2008 TEAC Meeting material. It shows the PJM Board-approved Branchburg-Roseland-Hudson 500 kV Project which includes a number of upgrades at Roseland. See response to STL-D-27 for a link to TEAC Meeting material.

There are also baseline and network upgrade projects associated with Roseland. These projects can be accessed from the following link:

<http://www.pjm.com/planning/rtep-upgrades-status/construct-status.aspx> . Sort on PSE&G for projects specific to Roseland substation.

RESPONSE TO STOP THE LINES
REQUEST: STL-D-30
WITNESS(S): HERLING / MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
COSTS

QUESTION:

Provide tariffs showing distribution of costs of the Susquehanna-Roseland line to the various participating utilities.

ANSWER:

See response to STL-D-16. Costs are not distributed to participating utilities. As a 500 kV backbone project, the costs of the Susquehanna-Roseland line will be allocated across all zones in PJM to the LSEs within each zone based on load ratio share per Schedule 12 filings.