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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY EMF;EPRI

QUESTION:

Provide copies of the numerous EMF EPRI handbooks and course materials you have authored and coauthored.

ANSWER:

Dr. Bailey has neither authored nor coauthored any EPRI course materials. Furthermore, no EPRI EMF handbooks were referenced in the application or in testimony.

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathsf{EMF}}; \underline{\mathsf{EPRI}}$

QUESTION:

Provide copies of all EPRI studies regarding EMF over the last 15 years.

ANSWER:

The following website provides a bibliography of publications that received some sponsorship from EPRI: http://emf.epri.com/EMF peer review.html

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathsf{EMF}}$

QUESTION:

Provide any and all studies regarding 60 hertz high harmonics and EMF.

ANSWER:

PSE&G objects to this request as overbroad, unduly burdensome and vague. No studies of harmonics of 60 hertz were referenced in the Application or testimony.

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathsf{EMF}}$

QUESTION:

Provide any and all comments of PSE&G on this rulemaking or other process establishing this electric field requirement.

ANSWER:

PSE&G objects to this request as vague, ambiguous, unduly burdensome and irrelevant.

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathsf{EMF}}$

QUESTION:

Direct, p. 8-9, provide copies of all studies with recommendations of precaution regarding any level of EMF.

ANSWER:

No specific recommendations of precaution were referenced in the Application or testimony, nor is it the purview of an individual study to provide precautionary recommendations. However, recommendations regarding precautionary approaches to EMF are reviewed in the WHO's 2007 report and in the report of NIEHS to Congress in 1999. Bibliographic citations to both reports are found at the end of the Bailey testimony.

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{ \text{EMF;HEALTH} }$

QUESTION:

Direct, p. 8-9, provide copies of all studies with findings of an association, weak or strong, with human health or disease regarding any level of EMF.

ANSWER:

PSE&G objects to this question as vague, ambiguous and unduly burdensome. Without waiving this objection, see response to PALS-195.

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathrm{EMF}}$

QUESTION:

Provide any and all EMF studies authored or coauthored by Dr. Magda Havas.

ANSWER:

PSE&G objects to this request as unduly burdensome. Without waiving this objection, see response to STL-Bailey-19.

RESPONSE TO STOP THE LINES REQUEST: STL-D-BAILEY-8 WITNESS(S): BAILEY PAGE 1 OF 1 SUSQUEHANNA-ROSELAND

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathrm{EMF}}$

QUESTION:

Provide any and all EMF studies authored or coauthored by Dr. Martin Graham.

ANSWER:

PSE&G objects to this request as unduly burdensome. Without waiving this objection, see response to STL-Bailey-20.

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathrm{EMF}}$

QUESTION:

Provide any and all EMF studies authored or coauthored by Dr, Martin Blank.

ANSWER:

PSE&G objects to this question as unduly burdensome. Without waiving this objection, see response to STL-Bailey-21.

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathrm{EMF}}$

QUESTION:

Provide any and all EMF studies authored or coauthored by Dr. Art Hughes.

ANSWER:

PSE&G objects to this request as unduly burdensome. Without waiving this objection, please see response to STL-Bailey-22.

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathsf{EMF}}$

QUESTION:

Provide copies of any and all studies showing an association between average exposure to greater than 3-4 mG and childhood leukemia.

ANSWER:

See response to PALS-195.

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

PUBLIC SERVICE ELECTRIC AND GAS COMPANY $\underline{\mathrm{EMF}}$

QUESTION:

Provide copies of any and all studies of exposure of pigs to EMF.

ANSWER:

No references to any studies of pigs were made in the Application or testimony. The production of such studies is burdensome.