

RESPONSE TO EASTERN ENVIRONMENTAL
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REQUEST: ENV-115
WITNESS(S): MCGLYNN
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SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; INTERCONNECTION

QUESTION:

Why does PJM wait until a generator progresses through PJM's queue until it has a signed Interconnection Services Agreement before counting them in the modeling for purposes of providing solutions? Where does this requirement come from? Please produce the document.

ANSWER:

See Mr. Herling's testimony beginning at page 39. See Mr. McGlynn's testimony beginning at page 9. Criteria for inclusion of generation can be found in Attachment C of PJM Manual M-14-B, available on PJM's web site via the following URL link:
<http://www.pjm.com/documents/~/media/documents/manuals/m14b.ashx>

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; INTERCONNECTION

QUESTION:

For each year from 2000 – present, what percentage of generation has dropped out of PJM’s queue, or not been built, after having a signed Interconnection Services Agreement? Does the percentage differ by type of generation - such as coal fired, wind, hydro, gas-fired, or nuclear? Please explain the differences.

ANSWER:

See the direct testimony of Steven R. McGlynn beginning at page 9. The table on page 10 provides the most up-to-date information on generation interconnection request drop-out rates. PJM does not maintain data with sufficient specificity to calculate drop-out rate percentages year-by-year. In addition, PJM has not analyzed drop-out rate percentage differences by fuel type. The aforementioned notwithstanding, PJM experience over time has revealed that generation interconnection queue request withdrawal activity can vary based on a number of business decisions by developers, including decisions based on fuel type.
<http://www.pjm.com/planning/generation-interconnection/generation-queuewithdraw.ashx>

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; INTERCONNECTION

QUESTION:

For each year from 2000 – present, what percentage of generation has dropped out of PJM's queue, or not been built, after having a signed Facilities Study Agreement? Does the percentage differ by type of generation - such as coal fired, wind, hydro, gas-fired, or nuclear? Please explain the differences.

ANSWER:

See response to ENV-116.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; INTERCONNECTION

QUESTION:

Are generators with signed Interconnection Services Agreements allowed to contribute to, and help resolve, reliability violations in PJM's tests?

ANSWER:

Yes. See Mr. McGlynn's testimony beginning at page 9. Criteria for inclusion of generation can be found in Attachment C of PJM Manual M-14-B, available on PJM's web site via the following URL link: <http://www.pjm.com/documents/~media/documents/manuals/m14b.ashx>

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; INTERCONNECTION; RELIABILITY

QUESTION:

Is generation with a signed Facilities Study Agreement modeled off-line (or not dispatched) in PJM's planning tests? What about the other reliability tests you rely upon?

ANSWER:

See Mr. McGlynn's testimony beginning at page 9. Criteria for inclusion of generation can be found in Attachment C of PJM Manual M-14-B, available on PJM's web site via the following URL link: <http://www.pjm.com/documents/~media/documents/manuals/m14b.ashx>

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; DELIVERABILITY

QUESTION:

In PJM's generator deliverability test, is generation with a signed Facilities Study Agreement allowed to contribute to problems but not solutions? Why is this? Please explain, and produce the document where this requirement comes from.

ANSWER:

See Mr. McGlynn's testimony beginning at page 9. Criteria for inclusion of generation can be found in Attachment C of PJM Manual M-14-B, available on PJM's web site via the following URL link: <http://www.pjm.com/documents/~media/documents/manuals/m14b.ashx>

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; DELIVERABILITY

QUESTION:

Please identify the number of different zones used in PJM's load deliverability test, and produce a map showing each of these zones.

ANSWER:

PJM presumes that the term "zones" refers to the 23 Capacity Emergency Transfer Limit (CETL) study areas – also known as Locational Deliverability Areas (LDAs) - as described in Section 3.3 of PJM Manual 14B Attachment C, available on PJM's web site via the following URL link:
<http://www.pjm.com/documents/~/media/documents/manuals/m14b.ashx>

A map of these areas can be found in Appendix A of the PJM Market Monitor annual report available via the following URL link:
http://www.monitoringanalytics.com/reports/PJM_State_of_the_Market/2008.shtml

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP; RELIABILITY

QUESTION:

Was the Susquehanna to Roseland line approved by PJM in the 2007 RTEP process solely for reliability reasons?

ANSWER:

Yes.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP; RELIABILITY

QUESTION:

Did PJM have the authority to approve proposed facilities in the 2007 RTEP process that were not solely intended to address reliability issues? Please explain.

ANSWER:

Yes. Pursuant to the PJM Amended and Restated Operating Agreement at Schedule 6, section 1.5.7, PJM possessed the authority to approve proposed market efficiency transmission facilities in the 2007 RTEP process.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP; RELIABILITY; DISPATCH

QUESTION:

Was transmission or security constrained dispatch used in any of the planning tests you rely upon? Please explain.

ANSWER:

Dispatch patterns used to determine the need for the S-R project were established in accordance with the PJM deliverability criteria defined in PJM Manual 14B Attachment C, available on PJM's web site via the following URL link:

<http://www.pjm.com/documents/~/media/documents/manuals/m14b.ashx>

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP

QUESTION:

Please identify, describe, and produce all documents showing any changes to the base case used in the 2007 RTEP process, including any errors in line ratings, impedance, load forecasts, or other alleged problems. How many different versions of the base case were used? Please identify them and describe their differences.

ANSWER:

PJM annually develops base case power flow models. The starting point case for the 2007 RTEP was developed by the Multiregional Modeling Working Group (MMWG) pursuant to the NERC modeling, data and analysis standards (MOD). The case was then updated to include the most recent modeling information for the PJM RTO such as load, PJM interchange, generation, and transmission topology. The MMWG case was developed during 2006 while the 2006 RTEP was in progress. As a result, the starting point case needed to be updated to include projects that were approved as part of the 2006 RTEP. In addition, information concerning interconnection customers that had recently signed Facility Study Agreements and Interconnection Service Agreements was also incorporated into the base case. The load model was also updated based on the 2007 PJM Load Forecast Report.

Additional information regarding the projects that were added as a result of the 2006 RTEP can be found at the following link: <http://www.pjm.com/documents/reports/rtep-report/2006-rtep.aspx>

See response to ENV-113 for additional information regarding generation modeling information.

The 2007 PJM Load Forecast Report is available at the following link:
<http://www.pjm.com/~media/planning/res-adeq/load-forecast/2007-load-report.ashx>

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
TRAIL; PATH; MAPP

QUESTION:

Which RPM auctions included the TrAIL line in them? Which included the Susquehanna to Roseland line? Were the PATH or MAPP lines assumed to be in service for any of the RPM auctions to date? Please explain.

ANSWER:

TRAIL was modeled in the case used to determine the planning parameters for the 2011/12 Base Residual Auction. The case used to calculate the planning parameters for the 2012/13 Base Residual Auction included both the TrAIL and Susquehanna – Roseland Projects. Neither PATH nor MAPP has been included in any of the auctions to date.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RPM; TRAIL; PATH; MAPP

QUESTION:

Explain how the different RPM auctions affected the “need” evaluation for the TrAIL, PATH, MAPP or Susquehanna to Roseland lines, or the expected in-service dates for the lines. Please explain.

ANSWER:

RPM auction results are factored in to subsequent RTEP process retool and baseline analyses. In particular, Mr. McGlynn’s testimony at pages 2-5 and 22 – 25, and Mr. Herling’s testimony at pages 28-31, 34-36 and 39-40, describes how RTEP process analyses consider generation and demand response resources.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RPM; NEED

QUESTION:

What was the effect of the latest RPM auction? Please produce the results. Does it change the necessary in-service date, or the need analysis, for the Susquehanna to Roseland line? How? Please explain.

ANSWER:

The testimony filed with this application is based on analysis that was updated after the 2011/12 Base Residual Auction. PJM has not analyzed the results from the May 4-8, 2009 2012/2013 Base Residual Auction. Those auction results were released May 15, 2009.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PATH; RTEP

QUESTION:

Why did the route and construction of the PATH line change? Please explain and produce documents regarding the reasons for that change. Was the revised PATH line (that is now all 765 kV) included in the 2007 RTEP modeling? The 2008 RTEP modeling? How do the changes to the PATH line route or construction affect the need for the Susquehanna to Roseland line, or its expected in-service date? Please explain.

ANSWER:

The route and construction change of the PATH line has no relevance to the Susquehanna-Roseland transmission line proceeding. The aforementioned notwithstanding, the PATH line was not included in 2007 RTEP process power flow case modeling. PJM's 2008 RTEP process power flow case modeling did include the PATH line configuration change. Doing so had no effect on the need for the Susquehanna-Roseland line and the June 1, 2012 required in-service date.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
FINANCIALS

QUESTION:

Please produce all presentations to Wall Street, investors and/or shareholders, that discuss the financial or other impact of the Susquehanna to Roseland line and/or other high voltage transmission line projects.

ANSWER:

See Exhibit ENV-130.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; DELIVERABILITY

QUESTION:

Please identify the number of different zones used in PJM's generator deliverability test, and produce a map showing each of these zones. If the zones change, explain how and why?

ANSWER:

PJM's generator deliverability tests do not consider transmission owner zones modeled in the power flow cases.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
VIRGINIA AND PENNSYLVANIA RATE CAPS

QUESTION:

What effect did the upcoming removal of the rate caps in Virginia have, if any, on the load forecasts used in the modeling? Or the upcoming removal of the rate caps in Pennsylvania? The expiration of rate caps in New Jersey in 2003?

ANSWER:

The upcoming removal of rate caps in Virginia and Pennsylvania was not separately considered by PJM in the load forecast, but was subsumed in the econometric data which is an input to that process.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DSM; PEPCO

QUESTION:

Are there currently any demand side management (DSM) or load management programs in PEPCo? Describe these programs, their effectiveness, and penetration levels of such programs into homes and businesses in Pennsylvania and other states serviced by PEPCo. Are they changing? If so, how? Since 2005, how have they changed, and when?

ANSWER:

PSE&G objects to this question as beyond the scope of this proceeding. Without waiving this objection, PSE&G has no information regarding demand side management (DSM) or load management programs in PEPCo.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DSM

QUESTION:

Are any additional demand side management programs planned for the mid-Atlantic region, eastern Pennsylvania, or New Jersey? Please describe them in detail.

ANSWER:

Currently, no new demand side management programs are under development through the PJM stakeholder process. PJM stakeholders, through various committees and task forces, continue to work on potential enhancements to the incorporation of Demand Resources into PJM Markets.

Currently, Demand Resources can participate in the following PJM Markets: Day-ahead and Real-time Energy Markets; Day-ahead Scheduling Reserves Market; Synchronized Reserve Market ; Regulation Market; and the Reliability Pricing Model Capacity Market. Demand Resources are bid into PJM's Markets through Curtailment Service Providers ("CSPs") who are required to be PJM Members. A CSP is a PJM Member which acts on behalf of itself, or other Members or non-Members, including end-use customers, to submit demand reductions into PJM's Markets. Potentially any PJM Member, whether they are an Electricity Distribution Company, Load Serving Entity, a large industrial customer, or any company that specializes in demand reductions can be a CSP. Functionally, CSPs aggregate and/or manage the load reduction capability of Demand Resources in PJM's Markets. CSPs are responsible for registering Demand Resources and submitting settlements through PJM's Load Response Web Services eTool application.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DSM

QUESTION:

Were any demand side management reductions assumed in the load flow cases used in determining the alleged “reliability criteria violations?” Please describe.

ANSWER:

Demand side reductions were assumed in load flow cases consistent with established RTEP processes. See Mr. Herling’s testimony at pages 34 – 39 and page 43; and, see Mr. McGlynn’s testimony a pages 7- 9 and pages 23- 25. Also see PJM Manual 14B, Attachment C, which can be accessed at: <http://www.pjm.com/documents/~media/documents/manuals/m14b.ashx>

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; DELIVERABILITY

QUESTION:

Did the load flow studies of Category C3 contingencies use generation schedules based on the PJM Load Deliverability and Generation Deliverability Procedures?

ANSWER:

No. Testing NERC Category C3 contingencies initially employs a uniform dispatch with all in-service generation and all generation with a signed Interconnection Service Agreement having their output reduced to equal system load plus interchange. See also PJM Manual M-14-B, Attachment C, accessible from PJM's website via the following URL link:
<http://www.pjm.com/documents/~/media/documents/manuals/m14b.ashx>

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION; DELIVERABILITY

QUESTION:

Do the PJM Load Deliverability and Generation Deliverability Procedures require Category C3 contingency testing?

ANSWER:

No. The PJM load deliverability test evaluates NERC Category A and B contingencies. The PJM generator deliverability test evaluates NERC Category A, B, C1, C2 and C5.

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DISPATCH

QUESTION:

Please identify and describe the existing generating facilities that will be able to send power through the proposed PSE&G power line, and the ten largest generators (and their summer peak capacity) that will benefit the most from the line.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

In actual operations, PJM dispatches generation from all areas of PJM to serve load in all areas of PJM. As a result, power flows across all parts of the transmission system based on the laws of physics. Thus, inherently, PJM's planning process can make no presumption nor assessment as to how or whether any generator will benefit from the Susquehanna – Roseland transmission line.

The Susquehanna-Roseland Project was identified to resolve a number of reliability criteria violations. In doing so, the Susquehanna-Roseland Project will enhance the ability of all generating resources in PJM, in aggregate, to be delivered to the aggregate customer load on the PJM system. The Susquehanna-Roseland Project is neither intended to deliver any one specific generating resource or class of generating resources, nor is it designed to promote the future development of any class of new generation.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DESIGN AND CONSTRUCTION

QUESTION:

Describe how the route and size of the proposed facilities differs, or coincides, with the 500 kV line proposed to run from Pennsylvania into New Jersey in the late 1990s, including a description of why it was not installed, where it was to run, and please produce all documents that refer or relate to said project and/or the reasons it did not proceed.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G is unable to discern what line is being referenced in this interrogatory as PSE&G is unaware of a previous proposal to construct a new line from Pennsylvania to New Jersey.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
PJM TEAC

QUESTION:

Please identify, describe and produce all documents and studies that refer or relate to any portion of the proposed PSE&G power line and the 2007 transmission expansion advisory committee (“TEAC”) meeting(s).

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

See TEAC presentations which can be accessed at the following link:

<http://www.pjm.com/committees-and-groups/committees/teac.aspx> (Select “Past Meeting Material”.) In particular, the Susquehanna-Roseland line was discussed at the following TEAC meetings: 3/14/07, 3/30/07, 4/5/07, 4/18/07, 5/9/07, 11/5/08, 1/21/09 and 3/13/09.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RTEP

QUESTION:

Please identify and describe all documents that refer or relate to the RTEP for 2007 and any portion of the PSE&G power line.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

See the response to ENV-142.

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
NEED

QUESTION:

Please identify and describe all data, documentation, studies, evaluations, and/or other items that refer or relate to the alleged need, business case, and/or other justification for any portion of the proposed PSE&G power line or related facilities.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PJM 2007 and 2008 TEAC Presentations can be found on PJM's web site via the following URL link, then click on Past Meeting Materials:

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

Related annual RTEP reports can be found on PJM's web site via the following URL links:

PJM 2008 Regional Transmission Expansion Plan Report:

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

PJM 2007 Regional Transmission Expansion Plan Report:

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

Related RTEP Baseline reports can be found on PJM's web site via the following URL links:

2007 Baseline Report: <http://www.pjm.com/planning/rtep-development/~//media/planning/rtep-dev/baseline-reports/2007-rtep-baseline-assessment.ashx>

2008 Baseline Report: <http://www.pjm.com/planning/rtep-development/~//media/planning/rtep-dev/baseline-reports/2008-rtep-baseline-assessment.ashx>

PJM is also presently performing a complete document search of all e-mail and related files and will provide any additional material as it is compiled.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

Will the building of the PSE&G line allow for the construction of additional generation facilities? If so, please describe how many additional facilities can be built, their generating capacity (in megawatts), what types of facilities are being considered, and produce all documents that refer or relate to such additional generation.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G objects to this question as beyond the scope of this proceeding, irrelevant and unduly burdensome.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

What effect will the PSE&G line have on PPL's nuclear generating facility located in Susquehanna? Please identify, describe and produce all documents relating to the expansion of PPL's nuclear generating facility in Susquehanna, including, but not limited to, its desire to add a third reactor, new transmission that would be or may be required for any expansion of that generating capacity, and also the effect of the proposed new line and facilities on PPL's ability to get the new or additional generating capacity to eastern loads.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G objects to this question as irrelevant and beyond the scope of this proceeding. Without waiving this objection, PSE&G is not in possession of the information requested.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

What effect will the PSE&G line have on PSE&G's nuclear generating facilities located in New Jersey (Salem and Hope Creek) and in Pennsylvania (Peach Bottom)? Please identify, describe and produce all documents relating to any expansion of PSE&G's nuclear generating facilities in New Jersey and Pennsylvania, including, but not limited to, desires to add additional reactors, any new transmission that would be or may be required for any expansion of that generating capacity, and also the effect of the proposed new line and facilities on PSE&G's ability to get the new or additional generating capacity to eastern loads.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G objects to this question as irrelevant and beyond the scope of this proceeding. Without waiving this objection, PSE&G does not own or operate any nuclear generating facilities and is not in possession of the information requested.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

What effect will the PSE&G line have on Exelon's nuclear generating facility located at Oyster Creek? Please identify, describe and produce all documents relating to any expansion or renewed operating period of Exelon's nuclear generating facility at Oyster Creek, including, but not limited to, new transmission that would be or may be required for any expansion of that generating capacity, and also the effect of the proposed new line and facilities on Exelon's ability to get the new or additional generating capacity to eastern loads.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G objects to this question as irrelevant and beyond the scope of this proceeding. Without waiving this objection, PSE&G is not in possession of the information requested.

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

Will the building of the PSE&G line allow for the increased generation at existing facilities? If so, please describe how much additional capacity can be used at each facility, their generating capacity (in megawatts), what facilities are currently underutilized and could increase their capacity, and produce all documents that refer or relate to such additional generation.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

Project impact on generation dispatch was not analyzed by PSE&G. The project could cause redispatch of generation. However, it is expected that the impact of redispatch would not be significant.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-148
WITNESS(S): CROUCH
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
EXISTING 230 KV LINE

QUESTION:

Please identify and describe the amount of power, in megawatts, that can flow through the proposed new 230 kV lines.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

See response to ENV-91.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-149
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
TRANSFER CAPABILITY

QUESTION:

What is the increase in transfer capability, from western PJM to eastern PJM, as a result of this project (in MW)?

ANSWER:

The increase in transfer capability has not been determined.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-150
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LINE RATINGS

QUESTION:

Please identify and describe the transformers that will be installed, their locations, and how many megawatts can be transferred to the lines that are proposed to be connected to the new proposed 500 kV lines and, separately, for the 230 kV lines.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G objects to the question as vague and ambiguous. Without waiving this objection, the ratings are as follows

<u>Transformer</u>	<u>Location</u>	<u>SNR</u>
#1	near existing Roseland Station	1500MVA
#2	near existing Roseland Station	1500MVA

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-151
WITNESS(S): CROUCH
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
FIBER OPTIC

QUESTION:

Please identify and describe all potential uses for the fiber optic line proposed as part of the PSE&G line.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

Please see response to STL-Crouch-15 and STL-Crouch-16.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-152
WITNESS(S): CROUCH
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
COMMUNICATION

QUESTION:

Please identify and describe the current methods of communication to the substations located in PSE&G's service zone, including, but not limited to, a specific and separate description of the substation communication methods and technologies currently used for communication with substations elsewhere in New Jersey and Pennsylvania.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G objects to this question as irrelevant, unduly burdensome, unlikely to lead to the discovery of admissible evidence and improperly seeks the disclosure of confidential and/or proprietary information that may compromise the system security.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-153
WITNESS(S): CROUCH / CROUCH
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
POWER

QUESTION:

Please identify and describe how much power, in megawatts, can be sent through the proposed 500 kV line.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

Rating of a circuit is not measured in megawatts, rather it is measured in mega-volt ampere ("MVA"). At this point, PSE&G has not determined the exact circuit rating for the proposed 500 kV circuit. However, a typical 500 kV circuit in PJM is around 3,000 MVA normal summer rating.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-154
WITNESS(S): HERLING
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
CAPACITY

QUESTION:

Please identify, describe, and produce documents showing the capacity factors for the power plants that will benefit from installation of these lines from 2004 to present.

- a. If you rely upon any documents in support of your response, please identify the documents.\
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

See answer to ENV-138.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-155
WITNESS(S): MCGLYNN / HERLING
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
GENERATION

QUESTION:

Please identify and describe and produce copies of all current grid maps showing existing and planned generation capabilities in Eastern Pennsylvania and New Jersey.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PJM does not maintain one overall map that shows both existing and planned generation. Planned generation, per PJM's queue-based generation interconnection process, changes daily. The aforementioned notwithstanding, the map included as Attachment 1 shows currently in-service generation. The most current maps of planned generation can be found in the Section 8 RTEP overviews included in the 2008 PJM RTEP report, available on-line via the following URL: <http://www.pjm.com/documents/reports/rtep-report.aspx>

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-156
WITNESS(S): MCGLYNN / HERLING
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
TRANSMISSION

QUESTION:

Please identify and describe and produce copies of all current grid maps showing transmission capabilities in Eastern Pennsylvania and New Jersey.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

See response to ENV-155.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-157
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LINE LOSSES

QUESTION:

Please identify and describe the amount of line loss, in megawatts and as a percentage of overall load, for electricity that would flow across the proposed 500 kV lines in Pennsylvania and New Jersey.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

Losses have not been calculated. Losses would vary depending on the current flow.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-158
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LINE LOSSES

QUESTION:

Please identify and describe the amount of total losses, in megawatts and as a percentage of overall load, for electricity that would flow across the proposed 500 kV lines in Pennsylvania and New Jersey.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

See response to ENV-157.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-159
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LINE LOSSES

QUESTION:

Please identify and describe the amount of line loss, in megawatts and as a percentage of overall load, for electricity that would flow across the proposed 230 kV lines in Pennsylvania and New Jersey.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

Please see answer to ENV-157.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-160
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LINE LOSSES

QUESTION:

Please identify and describe the amount of total losses, in megawatts and as a percentage of overall load, for electricity that would flow across the proposed 230 kV lines in Pennsylvania and New Jersey.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

Please refer to ENV-157.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-161
WITNESS(S):
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
WITNESSES

QUESTION:

Please identify, describe and produce all correspondence to and from witnesses that provided testimony in your New Jersey BPU filing regarding their testimony or your Application.

ANSWER:

PSE&G objects to this request as ambiguous, overbroad, unduly burdensome and privileged.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-162
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
NEED

QUESTION:

Please identify and describe any operational procedures that were put into place, or implemented during operation of the system, that specifically refer or relate to the alleged need for the PSE&G line.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.
- c. Was it a 90/10 peak occurrence? Something else? What does a 90/10 peak and a 50/50 peak mean? What about 80/20? Which were used in the different base cases and modeling tests?

ANSWER:

No such operational procedures presently exist.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-163
WITNESS(S):
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DOCUMENTS

QUESTION:

Please identify and describe and produce any internal report to company management or others that analyzes, discusses, and/or comments on the alleged need, use, or justification for any portion of the proposed line, and/or the underlying data or studies regarding the alleged need, reason, or justification for the line.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G objects to this question on the grounds that the information sought is ambiguous, overbroad, unduly burdensome and privileged. Notwithstanding, please see the supporting testimony and exhibits attached thereto filed with the Petition in this matter at P-1 through P-13. Additionally, please see all interrogatory responses provided in this matter.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-164
WITNESS(S):
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
EMPLOYEES

QUESTION:

Please identify, describe and produce a copy of any employee compensation, bonus, or reward plan in effect at PSE&G for district managers or higher level management that refers or relates to the design, construction, or installation of any transmission lines or the revenue received from any additional transmission lines.

- a. If you rely upon any documents in support of your response, please identify the documents.
- b. If you rely upon the statement or expected testimony of any person in support of your response, please identify the person and describe their statement or expected testimony.

ANSWER:

PSE&G objects to this question as irrelevant and beyond the scope of this proceeding.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-165
WITNESS(S): KHADR
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LOAD FORECAST

QUESTION:

Please identify, describe and produce copies of any evaluation conducted by PSE&G, or any related entity or consultant regarding the projected growth in from 2000 forward, or the actual demand, projected demand and/or load requirements or needs for PSE&G's service territory and/or JCPL's and/or Rockland Electric's and/or Atlantic City Electric's service territory in New Jersey from 2000 forward.

a. If you rely upon any documents in support of your response, please identify the documents.

ANSWER:

Load forecast reports

<http://www.pjm.com/planning/resource-adequacy-planning/load-forecast-dev-process/prev-load-reports.aspx>

Load data

<http://www.pjm.com/markets-and-operations/ops-analysis.aspx>

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-166
WITNESS(S): MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
TRANSFER CAPABILITIES

QUESTION:

Describe and provide all criteria and/or standards used in determining the Transmission Transfer Capabilities (TTCs) in all studies cited in support of the need for the proposed new facilities; this includes NERC, RFC, and PJM criteria and/or standards.

ANSWER:

PJM does not determine TTCs in the course of the planning process and did not determine TTCs in the studies in support of the need for the proposed new facilities. PJM has calculated FCITCs (First Contingency Incremental Transfer Capability) as a screening tool during RTEP analyses. However, there are no criteria and/or standards related to these calculations.

The criteria and/or standards used in determining Transmission Transfer Capability are described in Section 3 of PJM Manual 4. Section 3 of PJM Manual 4, "PJM OASIS Operation", defines the term "Transmission Transfer Capability". Manual 4 can be found via the following URL link: <http://www.pjm.com/documents/~media/documents/manuals/m04.ashx>

As Section 3 of Manual 4 indicates, the term Transmission Transfer Capability is used to refer to several types of information posted on PJM's OASIS, including Available Transfer Capability (ATC) and Total Transfer Capability, for which PJM uses the acronym "TTC." However, these operational concepts are not employed in the PJM RTEP baseline analyses to identify the need for transmission upgrades. Rather, reliability criteria violations drive the need for RTEP transmission upgrades.

PJM Available Transfer Capability ("ATC" in PJM taxonomy) and PJM Total Transfer Capability ("TTC" in PJM taxonomy) are defined and described in Section 2 of PJM Manual 02, "Transmission Service Request", available via the following URL: <http://www.pjm.com/documents/~media/documents/manuals/m02.ashx>

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-167
WITNESS(S): MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RESOURCE ADEQUACY

QUESTION:

Describe and provide all NERC, RFC, and PJM criteria and/or standards having to do with Resource Adequacy.

ANSWER:

The RFC Resource Adequacy standard is BAL-502-RFC-02, which can be accessed at:
<http://www.rfirst.org/Standards/ApprovedStandards.aspx>.

NERC standards that address resource adequacy are TPL-005 and TPL-006, which can be accessed (at Page 650 and Page 652, respectively) at:

http://www.nerc.com/files/Reliability_Standards_Complete_Set_2009April27.pdf

PJM has no resource adequacy standards independent of RFC or NERC.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-168
WITNESS(S): MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
OPERATING CRITERIA

QUESTION:

Describe and provide all applicable operating criteria and/or standards that are used within PJM for determining TTCs in the actual, minute-to-minute operation of the system.

ANSWER:

See response to ENV-166.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-169
WITNESS(S): MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
VOLTAGE RATINGS

QUESTION:

Describe and identify facility ratings used or assumed for all critical facilities cited in testimony, and/or used in calculating TTCs. These should include normal (N), long term emergency (LTE), and short term emergency (STE) ratings of transmission lines and transformers, and pre- and post-contingency voltage ratings.

ANSWER:

See answer to ENV-166 regarding “TTCs”. That answer regarding “TTCs” notwithstanding, please see Exhibit ENV-169 which is an Overload Chart with Ratings provides the applicable normal or emergency ratings used in the planning studies for the facilities cited in Mr. McGlynn’s testimony.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-170
WITNESS(S): MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
MVA

QUESTION:

Identify the megawatt (MW) or megavolt-ampere (MVA) ratings of all critical facilities cited in testimony – as N, LTE, and STE as above.

ANSWER:

See response to ENV-169.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-171
WITNESS(S): MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
RATINGS

QUESTION:

Explain how these ratings are used in pre- and post-contingency analysis, for normal and emergency conditions.

ANSWER:

See Section 2 of PJM Manual M-03, Transmission Operations, accessible from PJM's web site via the following URL: <http://www.pjm.com/documents/~/media/documents/manuals/m03.ashx>

See also Section 5 of PJM Manual M-13, "Emergency Operations", accessible from PJM's web site via the following URL:

<http://www.pjm.com/documents/~/media/documents/manuals/m13.ashx>

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-172
WITNESS(S): MCGLYNN / HERLING
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
NEED

QUESTION:

Describe and provide any other applicable criteria and/or standards used in analyses of the proposed new facilities. This includes NERC, RFC, and PJM criteria and/or standards.

ANSWER:

See direct testimony of Steven R. Herling at pages 20-22 and 32-33; and see the direct testimony of Paul of McGlynn pages 3-9.

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-173
WITNESS(S): MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
LOAD LOSSES

QUESTION:

Describe and provide reports and/or results of Loss of Load Expectation (LOLE) studies for the PJM area for the 2009-2018 time period. This should include base conditions without the proposed new facilities, and with the proposed new facilities. Multi-Area LOLE studies especially should be included.

ANSWER:

PJM performs a two-area LOLE Study annually that models PJM in one area and the rest of the Eastern Interconnection in the other area. The following urls and attached documents are the Study Reports for the LOLE studies that examined any or all of the 2009-2018 time period.

Reports:

2008 – <http://www.pjm.com/planning/resource-adequacyplanning/~media/documents/reports/20081015-item-04-2008-pjm-reserverequirement-study.ashx>

2007 – <http://www.pjm.com/Media/committees-groups/committees/pc/20070822-item-03-2007-reserve-requirement-report.pdf>

2006 – See Exhibit ENV-173, attachments 1 and 2

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-174
WITNESS(S): MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
NEED

QUESTION:

If Multi-Area LOLE studies were not utilized for determining resource adequacy on a multi-area basis, including required transmission capabilities to maintain a 0.1 days-per-year criterion, describe how the required transmission capabilities were determined.

ANSWER:

PJM presumes that the phrase “required transmission capabilities” refers to PJM’s Capacity Emergency Transfer Objective (CETO), described in PJM Manual 14B, Attachment C, which can be accessed at: <http://www.pjm.com/documents/~media/documents/manuals/m14b.ashx>

RESPONSE TO EASTERN ENVIRONMENTAL
LAW CENTER
REQUEST: ENV-175
WITNESS(S): MCGLYNN
PAGE 1 OF 1
SUSQUEHANNA-ROSELAND(2)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
TRANSMISSION

QUESTION:

Identify all critical transmission interfaces or flowgates (e.g., as used in the Open Access Same Time Information System [OASIS]) which will be impacted by the proposed new facilities.

ANSWER:

The addition of the Susquehanna-Roseland line will, as dictated by the laws of physics, alter the flows on most other transmission facilities in the transmission network. The extent to which flows on critical transmission interfaces or flowgates will be impacted, either by increasing or decreasing flows on those facilities, will depend on the operating conditions at any given time.