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September 13, 2010

VIA FEDERAL EXPRESS

National Park Service
Attn: DEWA PPL EIS Planning Team
Denver Service Center – Planning Division
12795 West Alameda Parkway
Denver, CO 80225-0287

Re: Susquehanna-Roseland Line

Dear PPL EIS Planning Team:

On behalf of PPL Electric Utilities Corporation (“PPL”) and Public Service Electric and Gas Company (“PSE&G”) (collectively PPL and PSE&G are referred to as the “Applicants”), I am writing to the National Park Service (the “NPS”) to provide the Applicants’ comments related to the alternatives proposed to be assessed by the NPS that are set forth in Newsletter 2 of its “Susquehanna to Roseland Transmission Line Environmental Impact Statement” (“Alternatives Newsletter”) describing preliminary alternatives under consideration by the NPS related to the proposed Susquehanna-Roseland Transmission Line (the “S-R Line”) and its impacts on the Delaware Water Gap National Recreation Area (“DEWA”), the Appalachian National Scenic Trail (“APPA”) and the Middle Delaware National Scenic and Recreational River (“MDSR”) (collectively, DEWA, APPA and MDSR are referred to as “NPS Units”). The Applicants wish to provide additional information and their comments on the proposed alternatives to assist the NPS in its decision-making process. Specifically, the Applicants would like to (i) clarify the record as to the NPS assumed removal of the existing 230 kV line and the “criticality” of the existing line, the project need and reasonableness of alternatives; (ii) provide information on an additional alternative that should be considered; and (iii) convey the Applicants’ comments and concerns regarding the consideration of Alternatives 3 through 7 set out in the Alternatives Newsletter. As will be set forth in greater detail below, the Applicants firmly believe that Alternative 2 (the Applicants’ proposed alternative) is the most reasonable alternative taking into account the negative environmental, cost and timing factors associated with Alternatives 3 through 7. Further, the Applicants believe that Alternatives 3 through 7 have so many profound critical flaws that they are infeasible and should be immediately dismissed as unreasonable per NPS Director’s Order # 12.

1. GENERAL COMMENTS

A. CRITICALITY OF EXISTING 230 KV LINE

The Alternatives Newsletter inaccurately states that the Applicants' proposed route would make the S-R Line an "essential element to the transmission grid" while "currently it is not." The assumption by the NPS is that because of this presumed "non-criticality," a new line would be subject to more and faster maintenance and emergency repairs than the existing line, and that these activities would have a greater impact on NPS Units than if the new S-R Line is not constructed. There are two fundamental problems with this analysis. The first is the assumption that the existing line is not critical; it is critical and we will explain why. The second flaw reflects the mistaken assumption that the intensity of vegetation management along the transmission corridor will increase with a change in voltage carried on the lines. The fact is that vegetation management for high voltage lines, whether 230 or 500 kV, is governed by state and federal grid reliability rules, which, on the federal side, now carry significant potential penalties of up to \$1,000,000 per day for rules violations. The penalty increase rules arose as part of a rulemaking that was in part a response to the 2003 blackout that affected parts of the Northeast and Midwest and that was caused in part by contact between a tree and a transmission line.

After that blackout, Congress enacted the Energy Policy Act of 2005, which amended the Federal Power Act by requiring the creation and enforcement of new bulk power system reliability standards. In March 2007, pursuant to that statutory mandate, the Federal Energy Regulatory Commission ("FERC") approved strict new requirements for vegetation management along bulk power transmission lines, including the existing 230 kV line, to ensure greater reliability of the nation's interstate electric grid (the FAC-003-1 Transmission Vegetation Management Reliability Standard). These have been codified as mandatory federal regulations. The North American Electric Reliability Corporation (NERC) and regional reliability entities are responsible for overseeing and enforcing compliance with these standards. Utilities such as the Applicants are responsible for compliance and implementation.

There is nothing about the structural differences between the existing 230 kV transmission line and the proposed S-R Line that would cause the Applicants to change their vegetative maintenance standards as required by the applicable rules, emergency response times, or other maintenance standards. The federal rules governing vegetation management along transmission lines, and reliability in general, stand entirely apart from the permitting decision now before the NPS. Nor is there any result in aspect of the proposed S-R Line that would result in additional or more frequent maintenance and emergency repairs. The construction of the proposed new transmission line will not significantly affect the intensity or other relevant variables related to the Applicants' activities in the existing right of way. Simply put, the construction of the S-R Line would not result in a net increase in impacts to the NPS Units from a vegetation management or operational perspective, and arguably would even have fewer impacts.

Furthermore, assessment of the impacts of Alternatives 1, 4, 5, 6 and 7 must recognize that the existing 230 kV line is over 80 years old. Field investigations of similar vintage

facilities on the PPL system show significant signs of deterioration. Therefore, if one of these other alternatives is chosen, the existing 230 kV line through DEWA will remain in place and will need to be reconstructed within the next 10 years, so that construction impacts are likely within the ROW no matter which alternative is selected.

B. REMOVAL OF EXISTING 230 KV LINE.

On page 4 of the Alternatives Newsletter the NPS states:

Various actions are common to all of the action alternatives (except the Applicants' proposed alternative – Alternative 2) including the utilization of existing ROW and river crossings, removal of the existing 230 kV transmission line, and employment of a conservation-based strategy.

Approval of any action alternative would include surrender of current crossing of NPS lands to consolidate crossings of the NPS system.

These statements are incorrect. Only Alternative 3 allows for the removal of the existing 230 kV line. Therefore, the statement that removal of the existing Bushkill-Kittatinny 230 kV line is a common factor in all of the Alternatives other than Alternative 2 is inaccurate. The EIS analysis needs to include impacts from the continuing presence and maintenance of the existing line (as they will exist under the No Action Alternative which also of course does not include the removal of the existing 230 kV line) in its comparison of impacts among the alternatives.

PJM studied the Susquehanna-Roseland 500 kV Project under the assumption that the Bushkill-Kittatinny 230 kV line would remain in service. It should be understood that the Susquehanna-Roseland Project is required in addition to the existing 230 kV lines located in the eastern PA and Northern NJ areas, which includes the Bushkill-Kittatinny line section. The proposed Susquehanna-Roseland 500 kV line is not a replacement for any part of the existing electric power system.

As set forth in PJM's letter to the NPS dated September 13, 2010 ("PJM Letter"):

[T]he existing 230 kV transmission line that crosses the NPS lands is critical to the PJM bulk electric system, and the need for the Susquehanna-Roseland Project was recognized assuming that the existing 230 kV line remained in service. Additionally, the need for the Susquehanna-Roseland Project was identified because the existing transmission is inadequate. Thus, removal of an element of the transmission system, particularly the 230 kV Bushkill-Kittatinny line, would clearly worsen the transmission system. In addition, removal of the 230 kV line would negatively impact the planning and operation of the transmission system. Finally, the portion of the 230 kV line from Bushkill to Kittatinny is an integral piece of the existing 230 kV system and its elimination removes a

key interconnection for several regional stations, which include Shawnee, Blooming Grove, Peckville, Monroe and Fox Hill.

However, as we have discussed in the past, the Applicants are willing, as part of their mitigation, to discuss the release of those portions of their existing easement rights in DEWA that are not necessary for the construction and ongoing operation and maintenance of the S-R Line.

C. PROJECT NEED

The need for this project is simple – it is needed to maintain the stability of the electrical grid in the areas to be served by the S-R Line. PJM, the regional entity responsible for transmission reliability, determined that the need exists and that reliability issues could begin creating system failures if the S-R Line is not in service by June 2012. The need was first identified in the regional transmission expansion planning process (RTEP) in 2007 and has been confirmed in each RTEP thereafter, including the 2010 RTEP that was completed in September 2010. The latest NPS NEPA schedule provided to the applicants targets a date for the issuance of the Record of Decision in October 4, 2012, - well past the PJM determined in-service date. As a result of other regulatory agency requirements, the selection of any other alternative would mandate, at the very least, amendment procedures under the New Jersey and Pennsylvania utility siting processes, resulting in further delays of the in-service date. The additional timeframe necessary to receive the amended approvals, design the line, conduct required environmental studies and secure the appropriate ROWs, permits and approvals would double or triple the timeframe by which the project could be reasonably expected to be completed, thus leaving the region increasingly vulnerable to electrical reliability risks which could lead to higher prices for the consumer, operational restrictions and possible implementation of curtailment plans, which fails to serve the basic project purpose and need.

D. REASONABLENESS OF ALTERNATIVES

Section 2.7(A) of the NPS DO-12 Handbook provides that alternatives initially considered may be excluded from full analysis in the EIS as “reasonable alternatives” if it is clear they are not feasible alternatives. The Handbook references the CEQ definition of reasonable alternatives as those that are economically and technically feasible and that show common sense. Alternatives that could not be implemented if they were chosen, or that do not resolve the need for action and fulfill the stated purpose for taking action to a large degree, should be eliminated as unreasonable before impact analysis begins. Unreasonable alternatives also include alternatives that have severe environmental impacts. In applying these tests to the NPS alternatives, the Applicants believe that Alternatives 3, 4, 5, 6 and 7 fail this test and should not be carried forward into the EIS.

1. Significant Permitting Issues

As a preliminary matter, obtaining permits from other State or Federal environmental agencies for any of the alternatives other than Alternative 2 would be

extremely challenging. In many cases, the law governing environmental permits requires an analysis of alternatives that have the least impact on sensitive environmental areas, such as wetlands, riparian areas, and special protection areas such as the New Jersey Highlands. In addition to the Pennsylvania Utilities Commission (“PUC”) and the New Jersey Board of Public Utilities (“BPU”), the Applicants have also consulted with various other state, federal and local agencies, including the Pennsylvania Department of Environmental Protection (PADEP); the New Jersey Department of Environmental Protection (NJDEP); the New Jersey Highlands Council (Highlands Council); the United States Army Corps of Engineers; the United States Fish and Wildlife Service; the Pennsylvania Fish and Boat Commission; the Pennsylvania Game Commission; the Pennsylvania Historical and Museum Commission; and the Delaware River Basin Commission as part of their siting considerations. The following is a discussion of several of the permits and approvals, which would be required if any other alternative is chosen other than Alternative 2, that would have significant permitting hurdles. In this discussion we assume that the line route for each alternative is as shown in the Alternatives Newsletter. Although Alternatives Newsletter states that the routes outside the park are only shown as “examples of potentially viable and feasible alternative routes that these power companies could choose,” we have no reason to believe that there are any other routes that could be taken to avoid the problems described below.

a. HIGHLANDS ACT

Any project through the New Jersey Highlands Preservation Area or Planning Area requires review by the NJDEP and the Highlands Council. Alternative 2 is co-located with an existing ROW in both the Highlands Preservation and the Planning Areas. As a result, PSE&G received Highlands Applicability Determinations (“HADs”) from both the NJDEP and the Highlands Council, confirming that Alternative 2 is exempt from the Highlands Act as an upgrade to an existing utility system that is consistent with the goals and objectives of the Highlands Act. These determinations took into account the alternative routes considered for Alternative 2, and concluded that the exemption was applicable in part because Alternative 2 utilized the existing right of way to the fullest extent possible.

The NJDEP HAD, dated January 15, 2010, specifically provides that “[t]his determination shall be considered null and void if changes are made to the project that would increase the scope or area disturbed by the project.” The Highlands Council provided its exemption letter with regard to the Planning Area with the identical condition, *i.e.*, “[t]his determination shall be considered null and void if changes are made to the project that would increase the scope or area disturbed by the project.”

Alternatives 4, 5, 6 and 7 would pass through additional areas of the Highlands outside of the existing ROW. As a result, the HADs will be deemed null and void, and PSE&G would be required either to apply for new HADs or seek a Highlands Preservation Area Approval (“HPAA”) pursuant to N.J.A.C. 7:38. It would be difficult

for PSE&G to receive new HADs as the destruction of additional forested area that could be avoided by remaining in an existing right of way is not consistent with the goals and objectives of the Highlands Act, N.J.S.A. 13:20-1. See also N.J.A.C. 7:38-3.9(f).

As a result, it is highly likely that PSE&G would then be required to apply for a HPAA from NJDEP. However, NJDEP is precluded from issuing an HPAA for an activity that would have an impact on a forested area if there is an alternative that “would have less adverse impact on the upland forest or could be located outside the upland forest.” N.J.A.C. 7:38-3.9(f). In this case, the Applicants’ preferred alternative clearly has less adverse impact on upland forest than any of the other alternatives because it stays within existing right-of-way. However, NJDEP is precluded from issuing an HPAA for an activity that would have an impact on a forested area if there is an alternative that “would have less adverse impact on the upland forest or could be located outside the upland forest.” N.J.A.C. 7:38-3.9(f). In this case, the Applicants’ preferred alternative clearly has less adverse impact on upland forest than any of the other alternatives because it stays within existing right-of-way. Thus, not only would these alternatives void the HADs for the project, they would require PSE&G to apply for a HPAA for the activities that have greater impacts to the Highlands, a process that would take at least a year of additional permitting.

b. FRESHWATER WETLANDS

The S-R Line construction in New Jersey requires permits from the NJDEP under the Freshwater Wetlands Protection Act, N.J.S.A. 13:9B-1, *et seq.* Additionally, given the nature of the impacts, the wetlands permitting process may also be subject to the review of the United States Environmental Protection Agency. NJDEP rules specifically provide that NJDEP shall not process a wetlands application for an activity in the Highlands unless the applicant has received a HAD. However, if the HADs are deemed null and void because the NPS selects another alternative, as stated above, PSE&G would be required to apply for an HPAA stipulating that the S-R Line is subject to the Highlands Act. N.J.A.C. 7:38-2.4 (b).

More significantly, assuming that PSE&G obtains either a new HAD or a HPAA, it would be an extremely uncertain permitting process to receive a wetlands permit for any of the other alternatives. N.J.A.C. 7:7A-7.2(b) provides that NJDEP shall only issue a permit if the activity has no “practicable alternative” that would have a less adverse impact on the aquatic ecosystem or would not involve a freshwater wetland and the alternative would not have other significant adverse environmental consequences, that is, it shall not merely substitute other significant environmental consequences for those attendant on the original proposal.

“Practicable alternative” means other choices available and capable of being carried out after taking into consideration cost, existing technology, and logistics in light of overall project purposes, and may require an area not owned by the applicant which could reasonably have been or be obtained, utilized, expanded, or managed in order to fulfill the basic purpose of the proposed activity. N.J.A.C. 7:7A-1.4.

In addition to meeting the requirements of N.J.A.C. 7:7A-7.2, a non-water-dependent activity in a freshwater wetland, shall meet the requirements of N.J.A.C. 7:7A-7.4, set forth below:

(b) There shall be a rebuttable presumption that there is a practicable alternative to a non-water-dependent activity in a freshwater wetland or in a special aquatic site, which alternative does not involve a freshwater wetland or special aquatic site, and that such an alternative would have less of an impact on the aquatic ecosystem.

(c) In order to rebut the presumption established in (b) above, an applicant must demonstrate all of the following:

1. That the basic project purpose cannot reasonably be accomplished using one or more other sites in the general region that would avoid or reduce the adverse impact on an aquatic ecosystem;

2. That the basic project purpose cannot reasonably be accomplished if there is a reduction in the size, scope, configuration, or density of the project as proposed;

3. That the basic project purpose cannot reasonably be accomplished by an alternative design that would avoid or reduce the adverse impact on an aquatic ecosystem;

4. That in cases where the applicant has rejected alternatives to the project as proposed due to constraints such as inadequate zoning, infrastructure, or parcel size, the applicant has made reasonable attempts to remove or accommodate such constraints; and

5. If any portion of the proposed activity will take place in an exceptional resource value wetland or in trout production waters, that the requirements of N.J.A.C. 7:7A-7.5 are met.

This regulatory standard would present a significant permitting obstacle in obtaining a freshwater wetlands permit from the NJDEP.

c. FLOOD HAZARD AREA CONTROL

PSE&G also needs to obtain a Flood Hazard Area Control permit for the Project. As with the Wetlands and Highlands approvals, a Flood Hazard permit can only be issued if the applicant demonstrates to the NJDEP that it has minimized the environmental disturbance associated with the regulated activity. Specifically, under N.J.A.C. 7:13-10.2, NJDEP may only issue a permit for disturbance of a riparian zone based upon a demonstration that the purpose of the project cannot be accomplished without disturbing this zone, and that the disturbance to the riparian zone is eliminated where possible. Again, Alternative 2 accomplishes this, while the other alternatives do not.

As noted above, just this set of permits in New Jersey clearly demonstrates the difficulties associated with permitting alternatives other than Alternative 2. Other examples include the permits and right-of-way grants that would be required to cross and construct in the many state parks, such as Hickory Run, Lehigh Gorge, etc., and state forests, such as the Worthington State Forest, that would be required for the other alternatives.

d. **CHERRY VALLEY NATIONAL WILDLIFE REFUGE**

Alternatives 4 through 7 all would require a crossing of the Cherry Valley National Wildlife Refuge (CVNWR). These crossings would require significant expansions of existing ROWs, including widening ROW crossings not owned by the Applicants at APPA, which runs through portions of the CVNWR.

The CVNWR was created in December 2008 - in a move that was hailed by leaders in the conservation community and others - after an extensive environmental analysis (U.S. Fish and Wildlife Service Cherry Valley National Wildlife Refuge Final Environmental Assessment, December 2008). It is home to several threatened and endangered species, including bog turtles, the northwestern bulrush and the spreading globeflower. It is also part of an existing flyway for birds of prey, including bald eagles and broad winged hawks, which fly through the area by the thousands during their fall migration. In short, like DEWA itself, it is an important natural resource. The Alternatives that would cross the CVNWR would require from 1.1 miles to 6.6 miles of ROW expansion, which would require much more clearing than Alternative 2 route through DEWA. Additionally, it would result in a greater change in the character of the area.

In addition to the significant environmental impacts, any crossings of the CVNWR would require a special exception from the U.S. Fish & Wildlife Service. This, of course, would be a major federal action requiring its own NEPA review. The additional time to complete the process of completing a new NEPA review, or prepare a supplemental EIS to the NPS EIS, would add at least two to three years to the permitting process after the completion of the current EIS. For the reasons stated above with respect to how timing is a critical element of the proposed project's need, any alternatives that pass through the CVNWR are not consistent with this critical element of the project and should be immediately dismissed as unreasonable per NPS Director's Order # 12.

2. ADDITIONAL ALTERNATIVE

There is one alternative, the "Existing ROW Alternative," that was not mentioned in the Alternatives Newsletter that the Applicants believe must be assessed in the EIS. This is the alternative that would be constructed, maintained and operated entirely within PPL's and PSE&G's existing ROWs through DEWA (and with the use of the access and other rights granted by the ROW documents). First, it is important to note that PPL has only requested a ROW permit for 50 feet of ROW along an existing 0.8 mile length of ROW in Pennsylvania. No additional ROW has been requested to build the proposed line in any other portions of DEWA in either New Jersey or the remaining ROW in Pennsylvania.

As specifically set forth in Greg Smith's letter to John Donahue dated August 26, 2010 (a copy of which is attached), PPL has determined that the Existing ROW Alternative is technically feasible. While this is not the Applicants' preferred alternative, it is feasible and thus needs to be addressed in the EIS. In contrast to other alternatives under consideration, it is technically and economically feasible and would satisfy the project need.

The Existing ROW Alternative is, in all key respects, an approach that proposes nothing more than an assertion and application of the Applicants' existing legal rights. The Applicants are fully prepared to implement this alternative. NPS must recognize that the proposed construction, as well as ongoing operation and maintenance, could take place through the use of the Applicants' valid and enforceable pre-existing legal rights. Any action by the NPS that purports to limit the Applicants' existing property rights would constitute a taking of those rights. Willful disregard of those rights during the NEPA review process would be arbitrary and capricious – and inexplicable where, as here, the expertise and legal responsibility to determine whether the alternative is technically feasible lies with the Applicants, and not with the NPS. The Applicants believe that the NPS would fail to perform an appropriately informative NEPA analysis if it fails to give full consideration to this alternative. It would be a disservice to the public and the Applicants to omit thorough analysis of this Alternative in the EIS, and would discredit the NPS as a responsible decision-maker. The Applicants expect this alternative to be analyzed in the EIS.

3. CONSIDERATION OF ALTERNATIVE ROUTE IMPACTS

The Applicants conducted a thorough siting analysis, looking for routes that would be feasible and to the maximum extent would avoid wetlands, forested and vegetated areas, state and federal park lands, threatened and endangered species, cultural and historic resources, and impacts to residences or other structures. Based on an extensive siting analysis of those procedures, the Applicants determined that three alternative routes warranted further analysis. The applicants prepared Routing Reports and presented testimony on the three alternative routes to their respective state utility regulators, the PUC and BPU. *Alternative Route Identification Report for the Susquehanna to Roseland Project, New Jersey Portion, for PSE&G, 2008; Study Area and Route Development, PPL Electric Utilities Corporation Susquehanna-Roseland 500 kV Transmission Line Project, December 2008* (the "Routing Reports"). These Routing Reports concluded that Alternative 2 (Route B) was the preferable route for the S-R Line. The utility regulators of each state agreed. *Application of PPL Electric Utilities Corp. to the Pennsylvania Public Utility Commission for Approval of the Siting and Construction of the Pennsylvania Portion of the Proposed Susquehanna-Roseland 500 kV Transmission Line, Docket No. a-2009-2082652, December 30, 2008; Application of Public Service Electric and Gas Co. to the New Jersey Board of Public Utilities Pursuant to the Provisions of N.J.S.A. 40:55d-19 (Susquehanna-Roseland), Docket No. EM09010035, January 12, 2009*. The PUC approved Route B (Alternative 2) on January 14, 2010 (*Opinion and Order of the Pennsylvania Public Utility Commission, January 14, 2010*), and the BPU approved Alternative 2 on February 11, 2010 (*Decision and Order of the New Jersey Board of Public Utilities Pursuant to the Provisions of*

N.J.S.A. 40:55d-19, Susquehanna – Roseland Transmission Line, Docket No. Em09010035, February 11, 2010, and April 21, 2010).

In fact, after six days of hearings on the matter, the BPU stated in its April 21, 2010, Order that of the three routes:

[T]he evidence is clear that Route B is the most appropriate, primarily because PSE&G has shown that its existence along the current PSE&G ROW minimizes potential impacts to the environment and the community. The Board FINDS that there is no reasonable practicable alternative which would have less adverse impact upon the environment or upon the land use and zoning ordinances of the respective counties and municipalities. The testimony presented indicated that Route B would not require construction of the Project in a virgin ROW or substantial clearing, as opposed to Route A or C. It has the least amount of wooded wetland and forested land, and impacts the least amount of Highlands Preservation Area, among other things.

BPU Order p. 69.

Additionally, the BPU found that, in light of the reliability issues identified in that proceeding, there is no reasonable, practical, and permanent alternative to the construction and operation of the S-R Line that would have any less adverse impact upon the environment, surrounding community, or local land use ordinances; and that, as a result of PSE&G's analyses, there are no alternative routes that are reasonably available to achieve an equivalent public benefit and that would have any less adverse impact upon the environment, surrounding community. Order p. 77, Findings 14 and 16.

In Pennsylvania, the PUC, in issuing its order, found:

The ALJ found that PPL has provided substantial evidence that its route selection process satisfies the regulatory requirements in 52 Pa. Code §§ 57.75(e)(3) and 57.76(a)(3) and (4). Once PPL recognized the need for a 500 kV line, it considered all relevant regulatory elements in siting the line. The fact that Route B also incorporates additional benefits, including connection with the Lackawanna substation to relieve congestion in the northeast part of the state, and a project which is required anyway, i.e., the replacement of the Wallenpaupack-Bushkill 230 kV line due to its age, does not detract from the overall suitability of the choice of Route B. Accordingly, the ALJ found that PPL's process complied with the applicable regulatory requirements regarding the choice of routes.

Other than PPL Electric, no Party or witness presented any expert testimony or a comprehensive analysis of Routes A, B and C that even compares the three alternate routes. Similarly, no Party or witness presented any proposed alternative route for consideration by this Commission.

We agree with the ALJ on this issue. We believe that the record supports the ALJ's finding that PPL has provided substantial evidence that its route selection process satisfied the regulatory requirements in 52 Pa. Code §§ 57.75(e)(3) and 57.76 (a)(3) and (4). Additionally, we concur with the ALJ that once PPL recognized the need for a 500 kV line, it considered all relevant regulatory elements in siting the line. Accordingly, the ALJ's recommendation is adopted and the Exceptions of the ECC are denied.

PUC Order pp. 90-91.

In identifying its alternative routes, the NPS has proposed some routes, portions of which were considered and rejected due to technical, environmental or economic fatal flaws, identified by the Applicants in their thorough and intensive selection process. Upon receipt of the NPS Alternatives, the Applicants reviewed their files and studied available information to determine the potential impacts and feasibility of constructing the line along any of the various alternatives proposed by the NPS.

In this review of the NPS list of alternatives, the Applicants and their consultants reviewed information related to the same resources as they had in their initial route selection process, as well as information related to the rights-of-way that would be necessary to use to build the S-R Line along any of the NPS alternatives. In some instances these are rights-of-way owned by other utilities and the Applicants may or may not be able to acquire the necessary legal rights to construct, operate and maintain the S-R line. The Applicants conducted aerial and ground surveys for portions of the alternatives to further gather additional information about existing land use and ROW widths. The Applicants also reviewed land records, National Wetlands Inventory maps, state and federal lists of threatened and endangered species, and information related to cultural and historic resources, to develop information about potential impacts and issues that could be expected to arise with the construction, operation and maintenance of the various alternatives.

4. ADDITIONAL COMMENTS ON SPECIFIC ALTERNATIVE ROUTES

The Applicants' comments on specific alternatives are set forth below. The Applicants feel that Alternatives 3 - 7 are infeasible because they have so many fatal flaws and that should therefore be immediately dismissed as unreasonable per NPS Director's Order # 12. Other than Alternative 3, which was studied in depth last fall in cooperation with the NPS, the general descriptions of the other alternatives are largely based on the descriptions in the Alternatives Newsletter as corrected to reflect that the existing line will not be removed as assumed in the Alternatives Newsletter.

A. Alternative 3

General Route Description

As proposed, Alternative 3 would traverse a total of 14.2 miles between the existing Bushkill Switchyard in Pennsylvania and the point where it would join the existing transmission line east of the No-Be-Bo-Sco Boy Scout Camp in New Jersey. The distance is 9 miles longer than Alternative 2 that follows the existing ROW between these two points and would include the following:

- New or widened ROW along a total of 5.6 miles in Middle Smithfield and Smithfield Townships in PA and 8.6 miles in Hardwick and Blairstown Townships, NJ;
- 1.4 miles through DEWA in PA and NJ;
- A new crossing of the APPA and MDSR;
- A new crossing of the Kittatinny Ridge, a premiere bird watching and fall foliage viewing locale; and
- 2.5 miles through Worthington State Forest/Park in NJ.

The alignment of Alternative 3 southwest of Bushkill is generally congested with residential and commercial uses along and near Route 209 (Milford Road). As Alternative 3 and the existing 230 kV transmission line corridor diverge from Route 209 approximately 1.5 miles from the Bushkill switching station, the route crosses largely forested areas before taking a 90-degree turn to the southeast away from the existing 230 kV ROW. Alternative 3 would then pass through Great Bear Estates and Golf Course and Country Club, then near the Shawnee Mountain Ski Resort on an existing 34.5 kV transmission line corridor owned by First Energy (FE). The line route would then pass through DEWA property in Pennsylvania for 1.4 miles following the FE ROW, cross the Delaware River, pass through the DEWA in New Jersey, and continue along the FE ROW, through the Worthington State Forest and cross the Appalachian Trail, before joining and following the Roseland Bushkill-Yards Creek 230 kV transmission line corridor to the northeast toward its intersection with the proposed Susquehanna-Roseland line near Camp No-Be-Bo-Sco. This segment of Alternative 3 passes through the Yards Creek Hydroelectric Project property.

NPS Unit Impacts

- Alternative 3 would have a greater visual impact on the Appalachian Trail and the Delaware River corridor than Alternative 2 along the existing Roseland-Bushkill corridor through the DEWA. Alternative 3 would closely parallel the Appalachian Trail in New Jersey for a considerable stretch along the existing Roseland-Bushkill-Yards Creek 230 kv line – at a distance of approximately 1,000 feet for 1.7 miles – and would be clearly visible from points along the Trail with open vistas to the east (e.g., Raccoon Ridge).

- Alternative 3 would result in an expanded transmission line crossing of the approximately 1.4 miles through DEWA. The existing FE 34.5 kV right-of-way would require widening from 100 feet to a preferred width of 150 feet through this area.
- Alternative 3 would result in an expanded transmission line crossing of the APPA in New Jersey through Worthington State Forest. The existing 34.5 kV right-of-way would require widening to a required width of 150 feet across the Trail.

Significant Impacts/Flaws

- Alternative 3 is infeasible for several reasons including:
 - Would require right-of-way on non-condemnable properties. Pennsylvania law prohibits condemnation of property within 100 meters of a curtilage (15 Pa. C.S.A. § 1511(b)(1)). There are two contiguous time share developments along this line route, both owned by HaRa Corporation entities. These time share areas just south of the Bushkill Switchyard, as well as the Great Bear Estates residential subdivision further south and east of Route 209 also would be non-condemnable. Expansion of the ROW to 150 feet would put many of the residences within this 100 meter distance.
 - If the non-condemnable properties could not be acquired, it would be necessary to construct Alternative 3 within the existing 100 foot right-of-way through a heavily populated and congested residential area for a distance of more than 1.0 mile.
 - In order to remove the existing 230 kV line through DEWA, as postulated by the NPS, the existing Bushkill Switching Station would need to be relocated to a location either adjacent to or in FE's Shawnee Substation. Doing this would add to the costs, impacts, and time delay for project completion.
 - A section of the existing 34.5 kV FE line through the Great Bear Estates development is an underground line. Therefore, there may be no existing aerial easement through the development and a new easement would be required.
 - The rights-of-way of third party utilities (i.e., FE) are of inadequate widths, and they cannot be used by PPL for a new, higher voltage transmission line without acquiring additional rights from the adjacent property owners.
 - Even if FE grants PPL and PSE&G the rights to use their right-of-way, FE then would lose their ability for future expansion for their own lines. This would need to be discussed with and approved by FE. Also, rights-of-way owned by one electric utility can not typically be partially assigned to another separate electric utility.

Therefore, PPL would likely need to acquire rights-of-way from all property owners along the alternative route.

- Alternative 3 would be approximately 9 miles longer than Alternative 2. This not only increases the cost and construction duration, but also the aesthetic impacts and the number of people affected.
- Alternative 3 would require a substantial number of line angle changes, which would require constructing additional two-pole structures and larger foundations. This not only affects the cost, but also the aesthetics, of the transmission line.
- Alternative 3 would require crossing an additional 2.8 miles of NJ DEP open space and recreation areas than Alternative 2. This includes crossing 2.5 miles of the Worthington State Forest where the existing ROW is too narrow and would need to be widened, resulting in substantial new clearing along the Kittatinny Ridge, which was avoided by Alternative 2. Worthington State Forest offers similar natural resources and visitor experiences to that of the DEWA lands and the Kittatinny and Raccoon Ridges that would be in the vicinity of Alternative 3 are two premier bird watching and fall foliage viewing locales. A New Jersey State Green Acres diversion would be required for obtaining an easement through Worthington State Forest, which includes a New Jersey State House Commission ruling.
- The 34.5 kV FE transmission line corridor passes very closely to the southeastern slopes of the Shawnee Mountain Ski Resort, a well-known and heavily used regional recreation area. In this location, Alternative 3 would be located on Shawnee resort property. The existing FE cleared ROWs currently pass within approximately 100 feet of the easternmost ski run and within approximately 350 feet of the ski lodge. In addition, there appears to be electrical equipment located within the ROW in this area, probably related to snow-making equipment for the ski resort.
- Since the majority of the land use along the additional portion of the 14.2 mile proposed Alternative 3 is forested, substantial vegetative clearing would be required in order to accommodate the addition of the S-R Line. The ROWs that Alternative 3 would follow are typically no more than 100 feet wide and often considerably less. For example, the FE line between Great Bear Estates and Yards Creek is cleared generally to a width of between 30 and 70 feet, or an average width of 50 feet. At approximately 14.2 miles and an average width of 75 feet of trees, approximately 120 acres of forest land/trees, would need to be cleared, including substantial forest clearing in the Worthington State Forest. This compares to fewer than 5 acres under Alternative 2 across the DEWA (excluding access roads for either alternative).
- New or upgraded right-of-way through the FERC regulated Yards Creek area, such as would be required by Alternative 3, would require FERC approval before right-of-way could be granted, and such property may not be condemnable.

B. Alternative 4

General Description of Alternative 4

This alternative uses an existing utility corridor and would serve primarily as another way around most of the NPS land, crossing through DEWA lands for 1.6 miles. It would also cross APPA and portions of the CVNWR area. Alternative 4 is 21 miles longer than Alternative 2 and therefore would inherently cause greater environmental impact.

NPS Unit Impacts

- Alternative 4 would add a new overhead transmission line crossing of the Delaware River at the existing Delaware River Viaduct approximately 2 miles south of DEWA, as compared to crossing the Delaware at an existing transmission line ROW.
- Alternative 4 would require an expanded ROW at the existing crossing of APPA in the CVNWR.

Significant Impacts/Flaws

Alternative 4 is not feasible for several reasons, including:

- Alternative 4 would traverse through 10 more miles of the New Jersey Highlands than Alternative 2, including approximately 17 miles of Highlands Preservation Area and 19 miles of Highlands Planning Area – a total of 36 miles compared to 26 miles for Alternative 2. As previously noted, the additional impacts of Alternative 4 compared to Alternative 2 would require Applicants to obtain a HPAA, which cannot be done in the time required to meet the Project needs.
- Alternative 4 would require crossing a 1.9-mile portion of the CVNWR that was avoided by Alternative 2. The Cherry Valley area supports several federally endangered and threatened species, including the northeastern bulrush, spreading globeflower, Grass-of-Parnassus, and bog turtles. As previously mentioned, any crossings of the CVNWR would require a special exception from the U.S. Fish & Wildlife Service and would be a major federal action requiring its own NEPA review.
- Alternative 4 requires the most new clearing of all of the alternatives and would require clearing an additional 629 acres as compared to Alternative 2. This amount of additional clearing would most likely result in a compatible amount of additional forested wetland and rare species habitat alterations beyond that associated with Alternative 2.
- A potential critical flaw in Alternative 4 is that it follows approximately 20 miles along the Old Main Delaware Lackawanna and Western Railroad Cutoff Historic

District in NJ, which was avoided by Alternative 2. NJ Transit is considering restoring passenger rail service along this corridor, which would restrict the use of the rail corridor ROW for a transmission line.

C. Alternative 5

General Description of Alternative 5

Alternative 5, which parallels Interstate 80 (I-80), would share the corridor with the state highway lands of Pennsylvania and New Jersey. This alternative would cross DEWA lands for 0.9 miles at the southwestern-most tip of the park, in addition to crossing APPA and portions of the CVNWR in Monroe County, Pennsylvania. Alternative 5 is 33 miles shorter than Alternative 2; however, 30 miles of Alternative 2 in Pennsylvania will utilize existing structures and a transmission line constructed in 1983 that can be operated at 500 kV. Therefore, new construction of Alternative 2 would be approximately 117 miles and thus only 3 miles longer than Alternative 5.

This route was previously examined by the Applicants and was eliminated from further consideration early in the site selection process due to impossibility. The I-80 corridor, which runs generally east-west through the middle of the project study area in both Pennsylvania and New Jersey, was initially thought to be a potentially attractive route that could minimize the total distance of the S-R Line through both states while utilizing land where a linear right-of-way already exists. Upon subsequent review, it was determined that such a route would not be a viable alternative for the following reasons:

- Use of highway right-of-way itself was not allowed due to Pennsylvania Department of Transportation (Penn DOT) and New Jersey Department of Transportation (NJDOT) prohibitions.
- Accordingly, because there was a complete lack of right-of-way, PPL would be required to secure new easement along the length of the corridor.
- These are highway interchange challenges and development along many parts of the corridor. For example, the area around Stroudsburg is so congested that it would not be possible to pass through and cross to New Jersey.

Subsequent discussions and investigation of the possibility of using interstate highway rights-of-way were held. PPL assessed the policies of state transportation departments in four states regarding the use of limited access highway systems for transmission facilities. These included Pennsylvania, New Jersey, Virginia, and Illinois. It was found that longitudinal occupation of these limited access highways was not permitted. Perpendicular crossings and some very limited conditions for longitudinal occupancy were sanctioned under very specific criteria. PPL subsequently contacted PennDOT to discuss the potential occupancy of I-80 for this project. PennDOT indicated that their policy was clear in prohibiting such use, citing the PennDOT

Design Manual, Part 5 - Department Publication No. 16M, Chapter 7, containing current utility relocation and accommodation policies. NJDOT's regulations at Title 16, Chapter 25, for utility accommodation indicated similar policies. In addition, PPL contacted Real Estate Managers at other utilities, including PECO (Pennsylvania) and ComEd (Illinois) to verify their understanding of the state policies, both of which concurred with the earlier findings. Therefore, PPL concluded that the potential longitudinal occupation of the Susquehanna-Roseland 500 kV Transmission Line along the limited access interstate highway system in Pennsylvania, including I-80 and other highways in the project Study Area (i.e., I-84 and I-380) was not a viable routing alternative.

Therefore, for purposes of this discussion below, the Applicants are only considering the potential of paralleling I-80 outside of the DOT ROW.

NPS Unit Impacts

- Alternative 5 would cross through .9 miles of DEWA. As the existing line cannot be removed, this entire length would be additional impacts to the DEWA and MDSR. It would also require construction of an additional transmission line crossing of the Delaware River. This crossing would be at the Delaware River Viaduct which is a significant historic structure.
- Alternative 5 would require a significant expansion of an existing ROW at the crossing of APPA, which is located in the CVNWR.

Significant Impacts/Flaws

Alternative 5 is infeasible for several reasons, including:

- Alternative 5 would require approximately 99 miles more ROW acquisition than Alternative 2. It would not be possible to obtain that much new ROW within the time needed to meet the Project's fundamental purpose.
- Alternative 5 would traverse through 11 more miles of the New Jersey Highlands than Alternative 2, including approximately 8 miles of Highlands Preservation Area and 29 miles of Highlands Planning Area – a total of 37 miles compared to 26 miles for Alternative 2. This would require Applicants to obtain a new HPAA which cannot be received in the time needed to meet the Project's fundamental needs.
- Alternative 5 would require crossing a 1.1-mile portion of the CVNWR that was avoided by Alternative 2. The Cherry Valley area supports several federally endangered and threatened species, including the northeastern bulrush, spreading globeflower, Grass-of-Parnassus, and bog turtles. As previously mentioned, any crossings of the CVNWR would require a special exception from the U.S. Fish & Wildlife Service and would be a major federal action requiring its own NEPA review.

- Alternative 5 would require clearing approximately 876 acres of additional forest compared to Alternative 2. This amount of additional clearing would most likely result in a compatible amount of additional forested wetland and rare species habitat alterations beyond that associated with Alternative 2.
- Alternative 5 would cross through the following PA State Game Lands: 38 (Monroe County, approximately 1.1 miles), 40 (Luzerne County, approximately 1.1 miles), and 187 (Luzerne County, approximately 1.7 miles).
- Alternative 5 would traverse the Lehigh Gorge and Lehigh Trail. It would also cross the Lehigh River at the Gorge, which is a state scenic river and runs adjacent to both Nescopeck State Park and Hickory Run Park in Luzerne County.
- Alternative 5 would cross 1.9 miles more local park lands in New Jersey than Alternative 2, including Allamuchy Mountain State Park in Byram, Lurker Park, and Patterson Field.
- Alternative 5 would cross several large NJDEP-owned open space areas not affected by Alternative 2, including Berkshire Valley State Wildlife Management Area in Berkshire Valley (1.7 miles) and Allamuchy Mountain State Park in Byram, NJ (1.5 miles).

D. Alternative 6

General Description of Alternative 6

Alternative 6 would avoid crossing the DEWA by using an existing ROW south of I-80, running east to Roseland, NJ, from Susquehanna substation in Berwick, PA. It would cross the APPA and Delaware River using existing ROW. This alternative would require ROW acquisition for widening the corridor. It would also pass through boundaries of the CVNWR. Alternative 6 is 31 miles shorter than Alternative 2; however, 30 miles of Alternative 2 in Pennsylvania will utilize existing structures and a transmission line constructed in 1983 that can be operated at 500 kV. Therefore, new construction of Alternative 2 would be approximately 117 miles and thus cumulatively only 1 mile longer than Alternative 6.

NPS Unit Impacts

- Although Alternative 6 would avoid crossing the DEWA, it would require construction of an additional transmission line crossing of the Delaware River (as the existing crossing would remain) and the APPA where the existing ROW is less than 100 feet wide.

- Alternative 6 would require approximately 104 more miles of ROW acquisition compared to Alternative 2, encompassing an additional 712 parcels that would have to be acquired.

Significant Impacts/Flaws

Alternative 6 is infeasible for several reasons, including:

- Alternative 6 would require crossing a 6.6-mile portion of the CVNWR. The Cherry Valley area supports several federally endangered and threatened species, including the northeastern bulrush, spreading globeflower, Grass-of-Parnassus, and bog turtles. As previously mentioned, any crossings of the CVNWR would require a special exception from the U.S. Fish & Wildlife Service and would be a major federal action requiring its own NEPA review.
- Alternative 6 would traverse through 11 more miles of the New Jersey Highlands than Alternative 2, including approximately 15 miles of Highlands Preservation Area and 22 miles of Highlands Planning Area – a total of 37 miles compared to 26 miles for Alternative 2. As previously noted, the additional impacts of Alternative 6 compared to Alternative 2 would require Applicants to obtain a HPAA in the Highlands area which cannot be done within the time needed to meet the Project's fundamental purpose.
- Alternative 6 is unlikely to be approved by the New Jersey BPU. East of Route 629 in New Jersey, Alternative 6 follows the Applicants' proposed Route C along the existing Portland-Roseland 230 kV transmission line. Route C was ultimately dismissed by the NJ BPU due to the greater impacts and construction costs of this route compared to Route B, specifically the last 10 miles from Greystone to Roseland. Similar to the Applicants' Route C, Alternative 6 would result in significant impacts to the dense residential areas and increased costs associated with placing an existing 230 kV line underground through this restricted ROW.
- Alternative 6 would require an additional 550 acres of forest and vegetation clearing compared to Alternative 2. This amount of additional clearing would most likely result in a compatible amount of additional forested wetland and rare species habitat alterations beyond that associated with Alternative 2.
- Alternative 6 would traverse Lackawanna State Forest/State Game Land 187 for approximately 3.7 miles in Luzerne County, PA. Alternative 6 would traverse the following additional PA State Game Lands: 149 (Luzerne approximately 1.2 miles, including a Lehigh River Crossing).
- Alternative 6 would traverse the Lehigh Gorge and Lehigh Gorge Trail in Luzerne County, PA. The Lehigh River is a designated state wild and scenic river. Alternative 6 would traverse Hickory Run State Forest/Park for approximately 3.5 miles in Carbon County, PA. Alternative 6 would traverse

through or near Weiser State Forest (approximately 0.6 miles in Carbon County, PA).

- Alternative 6 would traverse 1.9 miles more local parks in NJ, including James Andrews Memorial Park in Randolph (1.5 miles) and Bee Meadow Park in Hanover (0.6 miles)

E. Alternative 7

General Description of Alternative 7

Alternative 7 would avoid crossing the DEWA by using an existing ROW south of I-80, running east to Roseland, NJ, from Susquehanna substation in Berwick, PA. This alternative would also cross new APPA lands and pass through the southern portion of the CVNWR area. Although Alternative 7 would avoid crossing the DEWA, it would require construction of an additional transmission line crossing of the Delaware River, MDSR and the APPA. Alternative 7 is 24 miles shorter than Alternative 2; however, 30 miles of Alternative 2 in Pennsylvania will utilize existing structures and a transmission line constructed in 1983 that can be operated at 500 kV. Therefore, new construction of Alternative 2 would be approximately 117 miles and thus cumulatively 6 miles shorter than Alternative 7.

NPS Unit Impacts

- This alternative would require an additional transmission line crossing of the APPA.
- The APPA existing crossing located in CVNWR would require a significant expansion to accommodate a new 500 kV transmission line.

Significant Impacts/Flaws

Alternative 7 is infeasible for several reasons, including:

- Alternative 7 would be unlikely to be approved by the New Jersey. East of Route 629 in New Jersey, Alternative 7 follows the Applicants' proposed Route C along the existing Portland-Roseland 230 kV transmission line. Route C was ultimately dismissed by the NJ BPU due to the greater impacts and construction costs of this route compared to Alternative 2, specifically the last 10 miles from Greystone to Roseland. Similar to the Applicants' Route C, Alternative 7 would result in significant impacts to the dense residential areas and increased costs unacceptable by the BPU. Pursuant to the BPU's April 21, 2010 order, the BPU agreed that Route B (Alternative 2) was a better alternative than Route C (Alternative 7). The BPU stated that Alternative 2 (Route B) would have a less adverse impact upon the environment and would be more consistent with the land use and zoning ordinances of the respective counties and municipalities than Alternative 7 (Route C). April 21, 2010, Order p. 69.

- Alternative 7 would require crossing a 1.9-mile portion of the CVNWR that was avoided by Alternative 2. The existing ROW would need to be substantially expanded if this alternative were to be constructed. As previously mentioned, any crossings of the CVNWR would require a special exception from the U.S. Fish & Wildlife Service and would be a major federal action requiring its own NEPA review.
- Alternative 7 would require clearing an additional 498 acres of forest compared to Alternative 2. This amount of additional clearing would most likely result in a compatible amount of additional forested wetland and rare species habitat alterations beyond that associated with Alternative 2.
- Alternative 7 would traverse Lackawanna State Forest/State Game Land 187 for approximately 3.7 miles in Luzerne County, PA. Alternative 7 would traverse the following additional PA State Game Lands: 149 (Luzerne approximately 1.2 miles), 141 (would traverse through or near), and 168 (approximately 0.6 miles in Northampton County).
- Alternative 7 would traverse the Lehigh Gorge and Lehigh Gorge Trail in Luzerne County, PA. Alternative 7 would traverse Hickory Run State Forest/Park for approximately 3.5 miles in Carbon County, PA. Alternative 7 would traverse through or near Weiser State Forest (approximately 0.6 miles in Carbon County, PA).
- Alternative 7 would traverse through 11 more miles of the New Jersey Highlands than Alternative 2, including approximately 15 miles of Highlands Preservation Area and 22 miles of Highlands Planning Area – a total of 37 miles compared to 26 miles for Alternative 2.
- Alternative 7 would traverse 1.9 miles more local parks in NJ including James Andrews Memorial Park in Randolph (1.5 miles) and Bee Meadow Park in Hanover (0.6 miles)

5. CONCLUSION

After a significant assessment of the alternatives and their associated, potential impacts not only within the NPS Units and the associated scope of the NEPA EIS, but beyond to Susquehanna and Roseland Substations, the Applicants, the NJ BPU and the PA PUC have all concluded that Alternative 2 is the most appropriate because it minimizes potential impacts to the environment and the community. Furthermore, the state utility regulators have determined that there is no reasonable practicable alternative which would have less adverse impact upon the environment or upon the land use and zoning ordinances of the respective counties and municipalities. As noted above in detail, all the other alternatives are infeasible for one or more reasons. Alternatives 3-7 have so many fatal flaws that they should be immediately dismissed as unreasonable per NPS Director's Order # 12.

It is important for the NPS and the public to understand the mandated utility siting process that the applicants have already conducted prior to the selection of their proposed Alternative 2. This process required the utilities to essentially achieve the intent of the NEPA EIS process, as well as addressing many other Federal, State, local concerns. Therefore, for areas beyond the NPS Units, the alternatives have not only been identified and evaluated, but have been reviewed and approved by the respective state agencies that oversee this process, after extensive evidentiary hearings. This process ensures that need, the environment, and public concerns, including public participation, are all considered and evaluated very similarly to the NEPA process. Again, any alternative that significantly strays from the currently Alternative 2 would not only conflict with the results of the associated states' siting processes, but would ultimately question their validity.

The Applicants fully understand and appreciate the very similar effort that the NPS must undertake. It is Applicants' desire to not only support this effort, but to ensure the NEPA EIS process is conducted efficiently and effectively. The Applicants' goal and hope is that:

- efforts already conducted will not be repeated;
- information already available will support the NPS in effectively eliminating alternatives from further, unnecessary studies and review;
- the impacts to the environment, that we all strive to protect, will be minimized; and
- ultimately both our primary customers, the public and future generations, will be properly served.

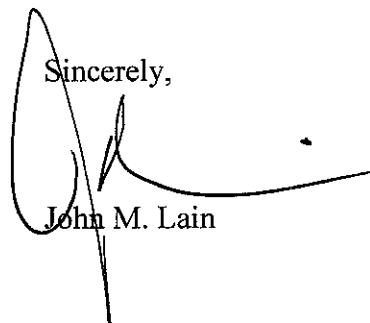
In the present case, there are no alternative corridors under consideration -- let alone approved -- by Pennsylvania or New Jersey. The use of any other alignments would require the Applicants to seek new approvals from the PUC and BPU, as well as new approvals from various federal, state and local entities that are not required by Alternative 2. The NPS is not being asked (nor would it be appropriate) to decide whether private, state or other federal land should be used to site the S-R Line. The NPS is being asked to set the reasonable terms and conditions for the Applicants' use of the corridor that they have legal rights to use and that crosses through lands that came under NPS jurisdiction long after the existing line was constructed.

September 13, 2010

Page 23

Thank you for the opportunity to provide these comments on the preliminary alternatives. As always, the Applicants will provide you with any additional information reasonably required that is related to these comments or generally related to the Applicants' request to construct the S-R Line as set forth in the SF-299.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Lain". The signature is stylized with a large, sweeping initial "J" and a long horizontal stroke extending to the right.

John M. Lain

JML/ymp

cc: Pamela Underhill (w/out attachment)
John Donahue (w/out attachment)
Donald McCloskey (w/out attachment)
Gregory J. Smith (w/out attachment)
John G. Valeri, Jr. (w/out attachment)
Ronald J. Reybitz (w/out attachment)
Andrew Tittler (w/out attachment)

Attachment: Table of References

Table of References

1. PJM RTEPs, 2007 – 2009: <http://www.pjm.com/documents/reports/rtep-report/2007-rtep.aspx>; <http://www.pjm.com/~media/documents/reports/2008-rtep/2008-rtep-report.ashx>; <http://www.pjm.com/~media/documents/reports/2009-rtep/2009-rtep-report.ashx> <http://www.pjm.com/planning/~media/documents/reports/20090611-rtep-foldout.ashx>
2. U.S. Fish and Wildlife Service Cherry Valley National Wildlife Refuge Final Environmental Assessment, December 2008, available at http://www.fws.gov/northeast/planning/Cherry%20Valley/final/01w_CVNWRStudy_FinalEA_All_Web.pdf
3. Greg Smith letter to John Donahue and Pamela Underhill, NPS, August 26, 2010 (copy attached)
4. Alternative Route Identification Report for the Susquehanna to Roseland Project, New Jersey Portion, for PSE&G, 2008 available at http://www.pseg.com/family/pseandg/powerline/pdf/PSEGAItRoute_082008.pdf
5. Study Area and Route Development, PPL Electric Utilities Corporation Susquehanna-Roseland 500 kV Transmission Line Project, December 2008 (copy attached to our March 12, 2010, letter)
6. Application of PPL Electric Utilities Corp. to the Pennsylvania Public Utility Commission for Approval of the Siting and Construction of the Pennsylvania Portion of the Proposed Susquehanna-Roseland 500 kV Transmission Line, Docket No. a-2009-2082652, December 30, 2008, available at <http://www.pplreliablepower.com/NR/rdonlyres/ED520FF4-8487-4462-AFF5-B5B8008C17A1/0/01SitingApplication.pdf>
7. Application of Public Service Electric and Gas Co. to the New Jersey Board of Public Utilities Pursuant to the Provisions of N.J.S.A. 40:55d-19 (Susquehanna-Roseland), Docket No. EM09010035, January 12, 2009, available at http://www.pseg.com/companies/pseandg/powerline/exhibits/susquehanna_bpu_petition.pdf
8. Opinion and Order of the Pennsylvania Public Utility Commission, January 14, 2010 (copy attached to our March 12, 2010, letter)
9. Decision and Order of the New Jersey Board of Public Utilities Pursuant to the Provisions of N.J.S.A. 40:55d-19, Susquehanna – Roseland Transmission Line, Docket No. Em09010035, February 11, 2010, and April 21, 2010, available at <http://www.pseg.com/family/pseandg/powerline/pdf/BPUwrittenorder.pdf>