



STATE OF NEW JERSEY
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

RELIABILITY & SECURITY

IN THE MATTER OF THE PETITION OF SOUTH) ORDER
JERSEY GAS COMPANY FOR AUTHORIZATION)
TO CONSTRUCT A 24" PIPELINE THROUGH)
MAURICE RIVER TOWNSHIP IN CUMBERLAND)
COUNTY, CITY OF ESTELL MANOR IN ATLANTIC)
COUNTY AND UPPER TOWNSHIP IN CAPE MAY)
COUNTY, NEW JERSEY) DOCKET NO. GO13030202

Parties of Record:

Ira G. Megdal, Esq., Cozen O'Connor, P.C., on behalf of South Jersey Gas Company
Stefanie A. Brand, Esq., Director, Division of Rate Counsel

BY THE BOARD: ¹

BACKGROUND:

On March 8, 2013, South Jersey Gas Company ("SJG"), a New Jersey public utility engaged in the business of purchasing, distributing, transporting, and selling natural gas to approximately 360,000 customers within its service areas in Cape May, Cumberland, Atlantic, and Salem counties, and parts of Gloucester, Camden and Burlington counties, filed a petition ("Original Petition") with the Board of Public Utilities ("Board") pursuant to N.J.A.C. 14:7-1.4. According to the Original Petition, SJG sought authorization and approval from the Board to construct and operate approximately 21.6 miles of twenty-four (24) inch natural gas transmission pipeline ("Pipeline") with an alignment that ran through Maurice River Township in Cumberland County, City of Estell Manor in Atlantic County and Upper Township in Cape May County. According to the Original Petition, SJG anticipated initiating construction of the Pipeline in the third quarter of 2013 and completing construction in November 2014. The Pipeline will allow for the use of in-line inspection equipment to assess its integrity and will be certified to a maximum allowable operating pressure ("MAOP") of 700 pounds per square inch gage ("psig").

¹ Commissioner Upendra J. Chivukula recused himself due to a potential conflict of interest and as such took no part in the discussion or deliberation of this matter.

Pursuant to N.J.A.C. 14:7-1.4, Board approval is required prior to the construction or operation of a natural gas pipeline that is intended to be operated in excess of 250 psig and is located within 100 feet of any building intended for human occupancy, and further requires that the pipeline satisfy the requirements of 49 C.F.R. 192 and N.J.A.C. 14:7 et seq. The proposed Pipeline alignment included one-hundred thirty-four (134) structures intended for human occupancy within one-hundred (100) feet of the Pipeline, of which one-hundred and fourteen (114) were residential, fifteen (15) were commercial, three were municipal buildings belonging to two (2) fire companies and a rescue squad, one (1) was a Methodist church and one (1) was a Masonic lodge. The closest inhabited buildings were a commercial structure and a residential structure, both of which will be twenty-five (25) feet from the Pipeline. SJG stated that the Pipeline was deemed necessary to provide service to the B.L. England Generating Station ("B.L. England") in Upper Township to support its conversion from a coal burning electrical generation power plant to one that burns natural gas and provide adequate supply and reliability to the southern and eastern portions of its service territory.

A public hearing was held on the Original Petition on May 1, 2013 at 7:00 p.m. at the Upper Township Municipal Building located in Petersburg, New Jersey, affording members of the public an opportunity to place a statement on the record regarding the Original Petition. James Kane, a legal specialist on Board Staff, served as the duly-designated Hearing Examiner. Michael Stonack, Bureau Chief, Bureau of Pipeline Safety, appeared and commented on behalf of the Staff of the Board. Henry M. Ogden, Esq. appeared on behalf of the Division of Rate Counsel ("Rate Counsel"), and Ira G. Megdal, Esq. appeared on behalf of SJG. Mr. Megdal introduced several exhibits, including the affidavit of notices of the public hearing to the affected property owners and government officials as well as two newspaper publications, which were accepted and made part of the record.

On May 9, 2013, Rate Counsel submitted a letter indicating that it did not object to granting the approval requested in the Original Petition, subject to certain conditions regarding ratemaking treatment.

Board Staff reviewed the Original Petition, including the project design, construction plans and specifications, the listing of structures within one-hundred (100) feet of the Pipeline and their distances from the proposed Pipeline alignment, and also conducted a full field inspection of the entire Pipeline route. According to the Original Petition, the proposed route for the Pipeline construction begins in Maurice River Township at a proposed in-line inspection ("ILI") station on Route 49 where it is tied into an existing twenty (20) inch transmission pipeline. One segment of the proposed Pipeline was to end at a proposed regulating facility on Marshall Avenue in Upper Township, according to the Original Petition, and included an interconnection to existing transmission and distribution systems. Another segment of the Pipeline serves B.L. England and starts at the proposed regulating facility.

In order to provide B.L. England adequate service, the Pipeline must interconnect at the proposed Route 49 ILI station. As described above, in addition to serving B.L. England, the Pipeline also increases reliability by interconnecting with an existing transmission line in Upper Township.

After the Original Petition was filed, Board staff worked with SJG on the Pipeline alignment to mitigate the number of human-occupied structures within 100 feet of the Pipeline. Agreed upon changes did not change the overall route of the Pipeline, but resulted in moving the Pipeline further away from certain buildings intended for human occupancy, where appropriate. In accordance with the requirements of the New Jersey Administrative Code, SJG will comply with

a minimum four (4) foot depth of cover over the Pipeline and the installation of twelve (12) inch wide warning tape as damage protection measures for the pipeline. In addition, the Pipeline will be constructed using higher strength steel pipe with a yield strength equal to 60,000 psig.

By Order dated June 21, 2013, the Board authorized the construction of the Pipeline pursuant to N.J.A.C. 14:7-14, subject to certain conditions.

On October 20, 2014, SJG filed a Petition for an Amended Order ("Petition for Amended Order"), wherein SJG requested that the following additional condition be added to the Board's Order of June 21, 2013:

Provided, however, that unless ordered to do so by this Board, or other governmental authority having jurisdiction, the Company will not connect any new customer to that portion of the Pipeline within the area designated as the Forest Area pursuant to the CMP.

See Petition for Amended Order at para. 6. The Petition for Amended Order also requests that the Board approve a change in the location of the point of interconnection and the regulator station from Marshall Avenue in Upper Township to Mount Pleasant–Tuckahoe Road in Upper Township. Id. at para. 7. The proposed Pipeline will tie into existing transmission and distribution systems at this location to increase system reliability.

After publication of notice in newspapers of general circulation in SJG's service territory, Commissioner Joseph L. Fiordaliso presided over public hearings held at the Upper Township Community Center in Tuckahoe, along with Commissioner Dianne Solomon, on June 17, 2015. The hearings were well attended by the public and municipal officials. The public hearings were transcribed and made part of the record in this proceeding. Mr. Ogden appeared on behalf of Rate Counsel and Mr. Megdal appeared on behalf of SJG. Mr. Megdal introduced several exhibits, including the affidavit of notices of the public hearing to the affected property owners and government officials. Mr. Megdal directly examined Joseph Schneider, the Company's General Manager of System Engineering and Planning, who described the need for the project and the proposed changes to the alignment. Mr. Schneider stated that the Company has proposed to relocate the alignment to a location within the Pinelands Village, as designated by the Pinelands Comprehensive Management Plan ("CMP"), and impose a condition in which SJG will not connect customers to the Pipeline in the Forest Area of the Pinelands.

Mr. Ogden provided an opening statement in which he indicated that, if the Pipeline were constructed and the Company seeks recovery of the costs associated with it in a future proceeding, Rate Counsel will conduct a complete investigation of the Company's petition based on the information supplied and updated by the Company. Paul Flanagan, the Board's Executive Director, appeared on behalf of Board Staff, but did not comment at the hearings.

Approximately thirty-four (34) members of the public provided statements on the record at the public hearings. Support for the Pipeline was expressed by the Cape May County Chamber of Commerce, the Southern New Jersey Chamber of Commerce and the Engineers Labor Employer Cooperative on the grounds that the Pipeline will create jobs and provide energy infrastructure that is relied upon by local residents and businesses. The Southern New Jersey Development Council also expressed support for the Pipeline route as the best option to protect the Pinelands and surrounding community, and spoke in favor of repowering B.L. England.

Also speaking in favor of the project were Dr. Edward Salmon and Richard Jackson, of the New Jersey Energy Coalition, to reduce costly electricity congestion charges on Atlantic City Electric's transmission system, and thereby avoid the need for many costly and environmentally intrusive electric system transmission improvements that are going to otherwise be needed, particularly after the Oyster Creek nuclear plant shuts down in four (4) years.

Charles Hill, the Business Manager of the local Union of the International Brotherhood of Electrical Workers 210 ("Local 210"), which currently represents about fifty-four (54) of the approximately seventy (70) employees at B.L. England, stated that, without the Pipeline the plant will surely close and those jobs will be lost. Mr. Hill further stated that the construction of the Pipeline will create additional jobs, improve gas reliability to Cape May County, result in the conversion of B.L. England to a clean gas-fired electric generating facility and will act as a source of electricity available in the event of weather or other unexpected emergencies with interstate transmission of electrical power. Ralph Clayton, a resident of Upper Township, stated that he was in favor of the Pipeline because the conversion of B.L. England will result in a reduction of pollution and further stated pipelines that are newly constructed have a far less chance of exploding because the materials used have more impact resistance and are less prone to leakage than materials used in previous years.

On behalf of themselves and the local governing body in Upper Township, Hobie Young and Jeff Pierson, members of the Upper Township Committee, spoke in favor of the Pipeline. Mr. Young stated that the baseball fields near the proposed location of the regulator station will be closed due to safety concerns stemming from the close proximity of the existing township public works building. Mr. Young stated that the baseball fields will be relocated to a safer location and, that he had suggested to SJG that it use the proposed location for the regulator station. Mr. Pierson indicated that Upper Township may lose an estimated \$6.2 million in taxes if B.L. England were to be closed. Mr. Pierson also stated that Upper Township's first responders are well-trained in the event of a pipeline failure and will continue to work with the Company in this regard. See also Resolution No. 37-2014 of the City of Estell Manor (March 12, 2014) (supporting project); see also Resolution No. 193-14 of the Board of Chosen Freeholders of Cape May County (March 11, 2014) (supporting project).

Opposition to the Pipeline because of environmental objections was expressed by representatives from the New Jersey Sierra Club, New Jersey Conservation Foundation, Citizens United for Renewable Energy, Pinelands Preservation Alliance, Environment New Jersey, Food and Water Watch, and South Jersey Surf Rider Foundation. These groups expressed concern about the pipeline's potential impacts on the Pineland's natural resources, and concern that the project would hamper offshore wind development, that fish would be killed and contaminated water would enter the bay, and the water would not be safe. Dr. Steve Fenichel, a member of Physicians for Social Responsibility, also expressed opposition to the project, citing to health issues that are purportedly caused by the use of fossil fuels. He advocated for New Jersey transitioning to entirely clean energy.

Seventeen (17) members of the public and/or organizations expressed opposition to the Pipeline due to its potential impact on the Pinelands and water in the region. Several members of the public also expressed their opposition to the project in their capacity as a New Jersey resident and/or taxpayer. These individuals included George Hay III, a Somers Point and Ocean City resident, Dr. Bob Allen, a citizen of Seaville, Marianne Clemente, Kittie Naegler, a resident of the Pinelands, Connie Higgins, Nathalie Neiss, a taxpayer in Upper Township, Glenn Constatine, a resident of Ocean City, Ann Kelly, Bill Wolfe, a resident of Bordentown, and Donna Henry. These citizens questioned the necessity of the project and each expressed

opposition to the Pipeline for various reasons, including reasons of general safety, health reasons, concern over potential fires, disagreement about the Pipeline's plan to run along the State's right-of-ways, concern about gas explosions, concern about exacerbating climate change, concern that the Pipeline may cause an increase in autism, claims that pipelines are toxic and could potentially cause cancer, and that job creation does not justify the project.

Following the public hearings, the Board received over 200 written comments from members of the public that generally expressed opposition to the Pipeline due to its potential impact on the Pinelands and other environmental concerns. Several of the comments expressed concerns about the Pipeline's conformity with the CMP. Additionally, questions were raised about the need for the pipeline.

DISCUSSION AND FINDINGS:

The Petition for Amended Order filed by SJG on October 20, 2014 requests that the Board modify its prior order of June 21, 2013. Administrative agencies have the inherent power to reopen or to modify and rehear prior decisions. See In re Trantino Parole Application, 89 N.J. 347, 364 (1982). The Board may order a rehearing, and/or extend, revoke, or modify any order made by it. N.J.S.A. 48:2-40. An administrative agency may invoke its inherent power to rehear a matter "to serve the ends of essential justice and the policy of the law." Handlon v. Town of Belleville, 4 N.J. 99, 107 (1950). Furthermore, in the event of changed circumstances, the Board is free to reconsider the matter and modify its order. Sudler and Steiner v. Env. Disp. Corp., et al., 219 N.J. Super. 52 (App. Div. 1987).

SJG made two (2) specific requests in the Petition for Amended Order. First, the Petition for Amended Order seeks the addition of a provision limiting SJG's ability to connect new customers within the Forest Area of the Pinelands, as designated in the Pinelands CMP, unless it receives explicit authority and approval from the Board or other authority with jurisdiction. See Petition for Amended Order at para. 6. Second, SJG seeks the Board's approval for an amendment of the route to allow the regulator station to be moved from Marshall Avenue in Upper Township to Mount Pleasant-Tuckahoe Road in Upper Township. Id. at para. 7. As set forth above, public hearings were held on the requests made in the Petition for an Amended Order.

The change in the route will move the regulator station from the Forest Area in the Pinelands to a less restrictive area of the Pinelands outside of the Forest Area. The change in the location of the regulator station and the project in general are supported by the Upper Township Council. See Transcript of Public Hearing at 55:14-59-18; 63:12-67:14 (June 17, 2015). This amendment will not impact the number of structures located within 100 feet of the Pipeline. The Board believes that this change is consistent with our prior approvals related to the Pipeline, and does not increase safety concerns for the Pipeline. N.J.A.C. 14:7-1.14. The second request asks the Board to ratify SJG's agreement not to connect any new customers within the Pinelands, absent approval from an appropriate agency. This language would serve to curtail development in the area around the Pipeline. Accordingly, there is no safety issue presented by this request. Ibid. As a result, the Board has no objection to these requests.

The Board has previously entered two (2) separate Orders in connection with this project. On April 29, 2013, the Board approved a stipulation entered into by Rate Counsel, Board Staff, SJG and R.C. Cape May Holdings, LLC ("RCCM"), which is the owner of B.L. England. The Board Order of April 29, 2013 stated:

Approval of this Stipulation and Agreement is a step in turning B.L. England generating Station to more productive use for the benefit of the State's electric customers. Conversion of the Station's two coal-diesel generators to natural gas should result in fewer emissions, and more efficient generation which should make the facility more competitive in the wholesale market.

See April 29, 2013 Order at page 4. Thereafter, the Board entered an Order dated June 21, 2013, which approved the proposed route for the Pipeline in light of the need for the Pipeline to repower B.L. England:

After consideration of all pertinent materials submitted in this matter, and review by Board Staff, the Board **HEREBY FINDS** that Petitioner's request to construct and operate a 24-inch Pipeline running through the Townships of Maurice River, Estell Manor, and Upper Township is reasonable and is in compliance with all relevant Federal and State requirements.

See June 21, 2013 Order at page 3. As set forth in the Board's prior orders, the Board supports the construction of the Pipeline as necessary to provide the gas needed to repower B.L. England.

B.L. England is administratively required to either repower or shut down. B.L. England currently utilizes three (3) generating units using coal and oil. B.L. England is required to comply with several air quality standards for air pollutant emissions under the federal Clean Air Act and applicable state rules. As a result, RCCM agreed with the New Jersey Department of Environmental Protection ("DEP") to repower B.L. England to natural gas or shut down. See Administrative Consent Order between DEP and RCCM (January 24, 2006); see also Amended Administrative Consent Order between DEP and RCCM (October 31, 2006). As a result of these Administrative Consent Orders, B.L. England ceased using one of its coal generating units in May 2014. Following consultation with the United States Environmental Protection Agency, a second amended consent order was entered effectively giving RCCM to May 1, 2017 to repower B.L. England or shut down. See Second Amended Administrative Consent Order between DEP and RCCM (July 11, 2014).

The repowering of B.L. England is consistent with the 2011 Energy Master Plan ("EMP") for the State of New Jersey. The purpose of the EMP is to set out the "strategic vision for the use, management, and development of energy in New Jersey over the next decade." See 2011 EMP at p. 1. To that end, the EMP sets forth five (5) overarching energy goals for the State of New Jersey to pursue. One (1) of those goals directly addresses fostering additional in-state generation:

2. Promote a diverse portfolio of new, clean, in-State generation – Developing efficient in-State generation while leveraging New Jersey's infrastructure will lessen dependence on imported oil, protect the State's environment, help grow the State's Economy, and lower energy rates. Energy diversity is essential . . .

See 2011 EMP at p. 1. Therefore, one of this State's energy policy goals is for New Jersey to foster in-state generation of energy. Ibid. B.L. England provides in-state generation of energy. Therefore, this Board supports the repowering of B.L. England to help meet one of the five

overarching goals of the 2011 EMP. N.J.S.A. 52:27F-15 (the actions of State departments, agencies and commissions “shall to the maximum extent practicable and feasible conform to the [EMP].”)

The failure of New Jersey to build new generation or repower existing sites will result in the need for additional distribution and transmission facilities to meet the energy needs of New Jersey. In addition, coal plants produce a significant portion of New Jersey’s greenhouse gas emissions. Natural gas power plants are less carbon-intensive than coal and other fossil fuels. See 2011 EMP at p. 76, 79. The mix of power that will supply the electricity, if not generated by B.L. England, will result in more pollution because it will include energy produced by out-of-state coal fired plants. See Minutes of the New Jersey Clean Air Council, page 3 (January 8, 2014); see also 2011 EMP at p. 3 (“coal is a major source of CO₂ emissions and will no longer be accepted as a new source of power in the State.”) This pollution will include the acid rain from Pennsylvania that will directly affect the Pinelands as well as the rest of New Jersey. See 2011 EMP at p. 32. It is expected that the draft 2015 EMP will reiterate the 2011 EMP’s emphasis on the necessity of additional in-state power resources. See 2011 EMP at p. 3-4.

Similarly, the Legislature has set forth policies that manifest the State’s strong support for in-state generation to meet New Jersey’s electricity needs:

... the construction of new, efficient generation must be fostered by State policy that ensures sufficient generation is available to the region, and thus the users in the State in a timely and orderly manner.

N.J.S.A. 48:3-98.2(d). Indeed, the Legislature set forth the reason why in-state generation should be supported:

As a result of a lack of new, efficient electric generation facilities, New Jersey has become more reliant on coal-fired power plants.

N.J.S.A. 48:3-98.2(f). Moreover, “New Jersey’s in-State fleet of electric generation facilities is aging,” N.J.S.A. 48:3-98.2(g), and sufficient capacity is needed to “stabilize power prices.” N.J.S.A. 48:3-98.2(i). Two (2) new power plants have been built in response to these policies. The Board considers the repowering of B.L. England consistent with these policies. The primary purpose of the Pipeline is to provide gas to B.L. England, which will advance these public policies.

As part of its prior approvals, Board staff reviewed the project design, construction plans and specifications of the proposed Pipeline to B.L. England and found them to be appropriate. See June 21, 2013 Order (finding the Pipeline to satisfy the requirements of 49 C.F.R. 192 and N.J.A.C. 14:7 et seq.). The proposed twenty-four (24) inch Pipeline would provide adequate gas supply to the B.L. England power plant to support its conversion. Id. at p. 2. Under the Board’s Main Extension Rules, B.L. England would be required to pay for the entire cost of the extension if it were only to serve B.L. England. N.J.A.C. 14:3-8.5(a). It would be inefficient system planning, however, to have a new transmission pipeline cross an existing gas distribution pipeline system and not interconnect them. Therefore, pursuant to the Board’s Main Extension Rules, SJG will pay for the cost of installations that serve existing customers. N.J.A.C. 14:3-8.5(h). Here, B.L. England is the only new customer that will be connected to the new pipeline, and that was the basis of the Board’s Order approving the cost allocation between SJG and the owners of B.L. England:

Therefore, the Board **HEREBY FINDS** that coupled with the other benefits that the Parties have agreed result from this transaction including the expected sufficient and reasonable return on capital investments made by SJG along with recovery of marginal embedded costs, this project qualifies for Special Provision (j) of SJG'S FES tariff.

See April 29, 2013 Order at page 4.

A large percentage of the municipalities located within the Pinelands receive their electricity from Atlantic City Electric ("ACE"). Thirty-nine (39) out of the fifty-three (53) municipalities in the Pinelands are served by ACE. See July 22, 1999 Board Order (Docket No. EO97070455, 56 & 57) (listing the municipalities served by ACE). Based upon the way that energy flows in the transmission system --to the nearest consumer unless redirected-- energy produced by B.L. England would ordinarily go through the grid to customers of ACE. See Environmental Protection Agency State Local Climate Appendix B, Section B.3 ("[t]he flow of electricity occurs in accordance with the laws of physics—along 'paths of least resistance,' in much the same way that water flows through a network of canals.") Accordingly, the Pinelands is served in part by power from B.L. England, with the rest coming from other generating facilities. As previously stated, if B.L. England ceases operation, these customers may be served by out-of-state generating facilities, including generating facilities powered by coal plants from Pennsylvania, with much higher emissions of air contaminants. See Minutes of the New Jersey Clean Air Council, page 3 (January 14, 2014). This may also require additional transmission and distribution lines other than those already identified for the region, including through the Pinelands, to provide the power currently supplied locally. See PJM Transmission Expansion Advisory Committee Minutes (April 10, 2014). The Board believes that repowering B.L. England is an appropriate choice at the present time and is consistent with State energy policies. The Pipeline is necessary to achieve that goal. Accordingly, the Board **FINDS** the Pipeline necessary to provide gas to repower B.L. England.

Pursuant to the provisions of N.J.A.C. 14:7-1.4, the Board **HEREBY APPROVES** the Petition filed by SJG for an Amended Order. In addition, based on the entire record before it, the Board **HEREBY FINDS** the following:

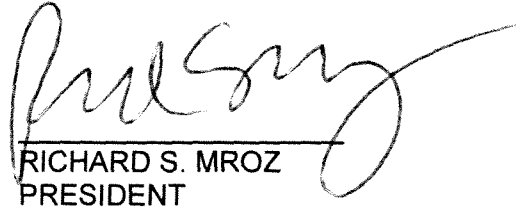
1. The request of SJG to relocate the point of interconnection and the regulator station from Marshall Avenue in Upper Township to Mount Pleasant – Tuckahoe Road in Upper Township is **APPROVED**;
2. The additional language prohibiting connection of new customers in the Pinelands to the Pipeline is **APPROVED**. A condition shall be imposed on this project as follows: Provided, however, that unless ordered to do so by this Board, or other governmental authority having jurisdiction, the Company will not connect any new customer to that portion of the Pipeline within the area designated as the Forest Area pursuant to the CMP;
3. The terms and conditions of the Board's prior orders, except as modified in this Order, shall remain in effect.

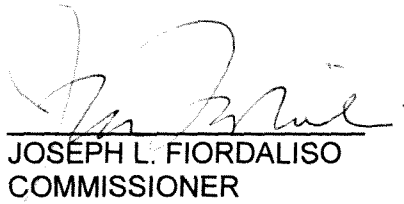
This Order shall be effective on August 1, 2015.

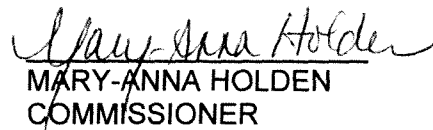
DATED:

July 23, 2015

BOARD OF PUBLIC UTILITIES
BY:


RICHARD S. MROZ
PRESIDENT


JOSEPH L. FIORDALISO
COMMISSIONER

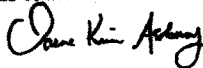

MARY-ANNA HOLDEN
COMMISSIONER


DIANNE SOLOMON
COMMISSIONER

ATTEST:


IRENE KIM ASBURY
SECRETARY

I HEREBY CERTIFY that the within
document is a true copy of the original
in the files of the Board of Public Utilities



IN THE MATTER OF THE PETITION OF SOUTH JERSEY GAS COMPANY FOR
AUTHORIZATION TO CONSTRUCT A 24" PIPELINE THROUGH MAURICE RIVER
TOWNSHIP IN CUMBERLAND COUNTY, CITY OF ESTELL MANOR IN ATLANTIC COUNTY,
AND UPPER TOWNSHIP IN CAPE MAY COUNTY, NEW JERSEY

DOCKET NO. GO13030202

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