

From: Stacey Roth
To: Fontaine, Peter
CC: brian.lipman@dol.lps.state.nj.us
Date: 7/12/2013 9:09 AM
Subject: Re: Q&A on Offshore Wind

Good Morning Pete,

Below is the summary of the comments made at the June 28, 2013 Policy and Implementation Committee meeting regarding the proposed gas main project. Thank you for the information concerning off shore wind.

Thanks,

Stacey

The following issues were raised regarding the proposed at the Pinelands Commission's June 28, 2013 Policy and Implementation Committee Meeting:

1. Is there truly a need for the B.L. England plant that cannot be addressed through some other means or alternative energy generation approach?
2. B.L. England is a peaker plant, i.e. it is barely operating.
3. Because B.L. England is operating at a fraction of its existing capacity, there are no air pollution control benefits to be obtained from repowering the plant; there will still be significant air emissions from the repowered plant operating as a base plant.
4. There is a glut of electricity currently available in NJ or about to come on-line, which makes the repowering of B.L. England unnecessary.
5. B.L. England Plant only has 1 cooling tower and not going to change its NPDES permit, concern about thermal pollution generated by the repowered plant.
6. Where are the compressor stations going along the 22-mile pipeline?
7. The pipe appears to be oversized, i.e. 24" pipe not needed to address B.L. England Plant, main is sized for future development.
8. Alternatives exist to the current route through the Pinelands; e.g. do a loop of the existing line.
9. Also, are there viable, albeit more expensive routes located completely outside of the Pinelands Area that will achieve the goal of repowering the B.L. England Plant and providing redundancy in the Cape May line.
10. There are reasons other than B.L. England and redundancy for the proposed pipeline.
11. The proposed pipeline seems to have more to do with redundancy and servicing the needs of Cape May then it does about repowering B.L. England. Why can't the redundancy be addressed via a route outside of the Pinelands?
12. If there is a connection at Marshall Avenue to the Cape May main, why does the pipeline need to be routed through the Forest Area at all? Couldn't B.L. England be repowered from the Cape May line?

13. SGS is going to be making significant profit at the expense of the Pinelands Area. Per newspaper article, B.L. England plant will easily become SJG's largest single provider at a projected 20 million dekatherms annually. The MOA is not intended to be used for private profit.

14. Installation of the proposed pipeline goes against the foundations for which the Pinelands Protection Act and the Federal Pinelands Act were passed, namely to prevent energy infrastructure from being installed through the Pinelands to bring gas and other resources from the Ocean to the Delaware Bay/River. This proposal, therefore, should be denied for that very reason.

15. The Commission should not consider entering into a MOA for the proposed pipeline, because this could evolve into using the Pinelands as a matter of convenience; precedent/slippery slope argument.

16. Lots of money generated by this project, so it should be done in a way that respects the Pinelands Area and the standards of the Pinelands Comprehensive Management Plan.

17. Need to look at more alternatives, especially alternative routes located outside of the Pinelands Area.

18. An independent alternatives analysis needs to be done prior to considering entering into an MOA.

19. Risk of leakage of natural gas; potential harm to Pinelands Forest Area if 24", 700 psig pipeline explodes. Have to address real risk to Pinelands resources, how likely is it the pipeline will explode in the future?

20. To increase profits, the company will cut corners during installation, thus increasing risk of explosion. Need to evaluate the validity of this claim.

21. Only benefit associated with pipeline project and repowering of BL England, because of increase in greenhouse gases as a result of going from a peaker plant to a base plant, is to the shareholders of RC Cape May Holdings, LLC (Rockland Capital).

22. Authorizing construction of the pipeline in a Forest Area is a gross violation of the public trust to protect the Pinelands. (See #12 above).

23. Need to look at the impacts of B.L. England not operating at all.

>>> "Fontaine, Peter" <PFontaine@cozen.com> 7/11/2013 5:53 PM >>>

Dear Stacey & Brian:

I enclose our response to the suggestion that offshore wind power can be a substitute for the repowering of the BL England facility.

As discussed, please provide us with the list of follow-up questions and/or information needs arising from the last P&I Committee meeting.

Best regards,

Pete

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