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MEMORANDUM

To: File

From: Stacey P. Roth, Senior Counselor

Date: July 1, 2013

Subject: B.L. England: Proposed Gas Main Project to Repower the Facility

The following questions were developed from the questions and comments raised by Committee members and members of the public at the Pinelands Commission's Policy and Implementation Committee meeting on June 28, 2013. These questions were provided to the staff of the Board of Public Utilities to assist it with its preparation for the Commission's Policy and Implementation meeting on July 26, 2013.

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, and 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 than 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. 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.
14. Should not consider MOA because could evolve into using the Pinelands as a matter of convenience; precedent/slippery slope argument.
15. Lots of money generated by this project, so it should be done in a way that respects the Pinelands Area.
16. Need to look at more alternatives, especially alternative routes located outside of the Pinelands Area.
17. An independent alternatives analysis needs to be done prior to considering entering into an MOA.
18. 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?
19. To increase profits, the company will cut corners during installation, thus increasing risk of explosion. Need to evaluate the validity of this claim.
20. 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).
21. Authorizing construction of the pipeline in a Forest Area is a gross violation of the public trust to protect the Pinelands. (See #12 above).
22. Need to look at the impacts of B.L. England not operating at all.