



facilities necessary to successfully deliver 7.5 gigawatts (“GW”) of OSW generation to New Jersey customers.<sup>3</sup> One of the predominant projects under the Board’s SAA award was Mid-Atlantic Offshore Development, LLC’s (“MAOD”) and Jersey Central Power & Light Company’s (“JCP&L”) jointly submitted Larrabee Tri-Collector Solution (“Larrabee Tri-Collector Solution”). The Larrabee Tri-Collector Solution includes a new substation (“Larrabee Collector Station”) adjacent to the existing JCP&L Larrabee substation and sufficient land for the future installation of up to four High Voltage Direct Current (“HVDC” or “DC”) converter stations. The transmission cables delivering the energy output of certain future OSW generators will interconnect at this new Larrabee Collector Station.

The SAA Order noted that future Board-selected OSW generators that are awarded SAA Capability and that will be utilizing the Larrabee Collector Station, must construct and maintain their own individual DC converter stations on the MAOD-acquired land.<sup>4</sup> The Board directed MAOD to coordinate with Board Staff (“Staff”) and the future generators awarded SAA capability to ensure these projects have adequate and equal access to the land as is reasonably necessary to develop their individual projects according to the generator’s project schedule.<sup>5</sup> The Board encouraged MAOD to engage with Staff subsequent to the project award to design site layouts on the land that would ensure access to up to four HVDC converters at the site.<sup>6</sup>

In the SAA Order, the Board recognized that the development of transmission projects requires years of planning and coordination. Further, the Board found that “future revisions to the awarded projects herein under the Larrabee Tri-Collector Solution may be required depending on changed circumstances unknowable as of the time of award.”<sup>7</sup> With the appreciation that some flexibility is necessary, the Board retained the right to enter further orders to reflect “significant updates” to the scope, configuration, and/or costs to the awarded SAA projects on the basis of any future changed circumstances.<sup>8</sup> The Board also authorized Staff to review and accept routine “changes to elements of any awarded projects that would increase the benefits to New Jersey ratepayers.”<sup>9</sup>

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<sup>3</sup> Id. at 14. A GW is the equivalent of 1,000 megawatts (“MW”). The SAA Order’s reference to 7,500 MW of OSW-generated power is the equivalent to 7.5 GW of OSW-generated power. Id.

<sup>4</sup> In this context, “SAA Capability” means, as set out in the Federal Energy Regulatory Commission (“FERC”)-approved PJM Interconnection, LLC (“PJM”)Rate Schedule 49 §1.2, all transmission capability created by the combination of approved packages of separate SAA proposals as studied by PJM, including the capability to integrate resources injecting energy up to their maximum facility output, capability which may become Capacity Interconnection Rights, or “CIRs” (the rights to input generation as a capacity resource into the transmission system at the point of interconnection where the facility connect to the PJM transmission system) the through the PJM Interconnection process, and any other capability consistent with studies performed by PJM for the SAA. Id. at 5, 8.

<sup>5</sup> Id. at 71.

<sup>6</sup> Ibid.

<sup>7</sup> Id. at 73.

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

## Scope Change Work

Changes to the scope of several of the awarded SAA projects (“Scope Change Work”) have been identified as described below.

### Interconnection Work

On March 6, 2023, the Board opened the application window for the New Jersey Third OSW Solicitation (“Third Solicitation”), inviting all interested parties to submit applications for proposed offshore wind facilities to the Board for consideration.<sup>10</sup> In addition to opening the Third Solicitation application window, the Board also issued the Solicitation Guidance Document for the Third Solicitation (“SGD”).<sup>11</sup> The SGD provided the timeline and mechanics for the Third Solicitation, the application requirements, and the criteria for evaluating applications.<sup>12</sup>

The SGD also included specifics regarding the prebuild infrastructure (“Prebuild Infrastructure”). As originally outlined in the SAA Order, the Prebuild Infrastructure is a concept that requires a single developer to construct the necessary duct banks and access cable vaults for all OSW generator projects that will be utilizing the Larrabee Collector Station.<sup>13</sup> For clarity, the “Prebuild” involves only the necessary infrastructure (duct banks and cable vaults) to house the transmission cables, but not the cables themselves.<sup>14</sup>

While the SGD outlined many of the requirements each generator must include in its application relating to interconnecting at the Larrabee Collector Station and the Prebuild Infrastructure, the SGD did not indicate which entity—MAOD or the OSW generator—would be responsible for constructing certain interconnection work:

1. The un-energized infrastructure from the end of the Prebuild Infrastructure to the direct current (“DC”) converter stations (“Prebuild Extension Work”). More specifically, this work includes the engineering, procurement, and construction of civil work to accommodate four (4) HVDC circuits from the Prebuild Point of Demarcation to each individual generator’s DC converter station area within the MAOD parcel awarded under the SAA (each such area, a “Generator Converter Station Area”);<sup>15</sup> and
2. The alternating current (“AC”) collector lines that run from the generator’s DC converter station area to the Larrabee Collector Station’s AC interface (“AC Collector Lines Work”). More specifically, this work includes the engineering, procurement, and construction of

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<sup>10</sup> In re the Opening of New Jersey’s Third Solicitation for Offshore Wind Renewable Energy Certifications (OREC), BPU Docket No. QO22080481, March 6, 2023 (“Third Solicitation Order”).

<sup>11</sup> The SGD can be accessed at the following location: <https://njoffshorewind.com/third-solicitation/solicitation-documents/Final-Solicitation-Guidance-Document-with-attachments.pdf>.

<sup>12</sup> See generally SGD.

<sup>13</sup> SAA Order at 8.

<sup>14</sup> Ibid. For further information regarding the Prebuild concept, see the definition of “Prebuild” in the SAA Order.

<sup>15</sup> The “Prebuild Point of Demarcation” is the location where the change of ownership occurs between owning entities for an electrical line and/or supporting ancillary infrastructure. Conceptually, this location represents the terminus of the Prebuild Infrastructure, which will be at or near the Larrabee Collector Station. See SGD at A10-1.

civil works for three (3) separate trenches to accommodate AC collector lines and three (3) sets of AC collector lines that will connect each Generator Converter Station Area's AC interface to the Larrabee Collector Station. The three (3) sets of AC collector lines will consist of a total of 12 230 kilovolt ("kV") AC circuits. MAOD is currently considering underground cables to maximize HVDC converter station installation space within each Generator Converter Station Area; however, MAOD will continue to explore various options through engineering efforts, in coordination with PJM Interconnection L.L.C. ("PJM"), the Board, and OSW generators utilizing the Larrabee Collector Station, to provide a reliable and optimal solution.

The work described above (collectively, "Interconnection Work"), represents a small portion of the total work necessary to interconnect qualified OSW projects to the Larrabee Collector Station and must be done regardless of whether it is constructed by each OSW generator separately, or by MAOD.

Since the SAA Order was issued, Staff, Staff's consultant, The Brattle Group ("Brattle"), PJM, and MAOD routinely meet to discuss ongoing development of the Larrabee Collector Station. In following the Board's direction, MAOD has engaged with Staff to explore the optimal design of the site layouts for the HVDC converter stations at their Generator Converter Station Area, including the Interconnection Work. Through this engagement, Staff determined that there are significant benefits if MAOD constructs the Interconnection Work.

First, by having MAOD take on responsibility for this work now, construction of the Interconnection Work can begin and likely be completed well before it would have been if an OSW generator were to complete it. The enhanced timing provides numerous benefits, including reduction of project-on-project risk and increased certainty to OSW generators that this work will be completed and ready for them to utilize when needed. This will also likely result in lower costs for completion of the Interconnection Work now at one time, compared to each OSW generator completing the Interconnection Work at a series of later dates.

Second, there are numerous operational benefits of having MAOD complete the Interconnection Work, rather than it being done by each individual OSW generator, including:

- Mitigating potential outages and disruptions to the operations of OSW generators already connected to the Larrabee Collector Station;
- Increasing safety by avoiding underground construction near other underground construction and energized facilities;
- Mitigating potential interface issues by having a single entity design for interconnection at the Larrabee Collector Station;
- Optimizing layout of the property where the Generator Converter Station Areas will be, which may be utilized by up to five different entities (MAOD, plus four (4) OSW generators);
- Reducing the footprint of the AC collector lines by using a single construction effort; and
- Maximizing space available for generator HVDC converter stations.

With MAOD constructing the Prebuild Extension, MAOD would be responsible for designing, engineering, permitting, and constructing the civil works from the Prebuild Point of Demarcation to each individual OSW generator's DC converter station area for up to four (4) circuits; and excludes the supply and installation of HVDC cables, which would be performed by the OSW generators. As such, the OSW generators would be responsible for their individual cable supply

and cable installation.

With MAOD constructing the AC Collector Lines Work, MAOD would be responsible for the engineering, procurement, and construction of the civil works for three (3) separate trenches to accommodate AC collector lines and the engineering, procurement, construction, and installation of the AC collector lines.<sup>16</sup> As such, the OSW generators would be responsible for all scope up to the AC interface, consistent with MAOD's modified scope beginning at the AC interface.

After engagement between MAOD and Staff, MAOD provided an update to their project should their scope be modified to accommodate the Interconnection Work. MAOD estimated the cost to construct the Interconnection Work to be \$23 million, and stated that it would be constructed on a schedule that would accommodate the expected schedule of all OSW generators anticipated to connect to the Larrabee Collector Station.

The SAA Order detailed the specific work to be included in MAOD's scope under its SAA award. The Interconnection Work was not originally included in MAOD's SAA award; therefore, Staff recommends that MAOD's scope of work under the SAA Order be modified to include the Interconnection Work.

#### Prebuild Infrastructure Study

The SGD indicated that the awarded SAA projects may be modified to include the Prebuild Infrastructure, and that Staff, PJM, and the awarded SAA projects were exploring this option.<sup>17</sup> In order to further explore this option, MAOD proposed to PJM that it conduct a study to determine the feasibility of including this work as a modification to MAOD's SAA project ("Prebuild Infrastructure Study"). MAOD estimated that the cost to perform the study is \$290,000. Staff recommends that MAOD's scope of work under the SAA Order be modified to include the Prebuild Infrastructure Study. With this recommendation, Staff notes that MAOD's study does not negate the requirement for Solicitation 3 proposals to include a proposed prebuild infrastructure.

#### JCP&L Project Scope Changes

JCP&L has provided information to PJM that identified changes in scope of the SAA project awarded to JCP&L. PJM advises that the new scope involves the removal of a 115kV line and a 230 kV line to accommodate the installation of new larger lines from the MAOD Larrabee tri-collector substation to Smithburg Substation. JCP&L estimated that each effort will cost \$8.47 million. Additionally, JCP&L identified the need to replace certain equipment at the Middlesex substation to support the PJM-identified upgrades to the Lake Nelson 11023 230 kV line, costing approximately \$0.53 million. PJM has conducted reliability studies indicating that these scope changes are needed, and PJM presented these scope changes at the May 9, 2023 PJM Transmission Expansion Advisory Committee ("TEAC") meeting ("May 9 TEAC Meeting").<sup>18</sup>

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<sup>16</sup> Note, while MAOD would be responsible for the AC Collector Lines Work, MAOD intends to coordinate with individual OSW generators and defer the electrical equipment supply, including cables, to align with individual generator projects and construction schedules.

<sup>17</sup> SGD at 40.

<sup>18</sup> PJM Reliability Analysis Update, Sami Abdulsalam, Transmission Expansion Advisory Committee, May 9, 2023 ("May 9, 2023 TEAC").

<https://www.pjm.com/-/media/committees-groups/committees/teac/2023/20230509/20230509-item-10--->

JCP&L estimated that the total cost increase for the additional scope total \$17.47 million. Staff recommends that JCP&L's scope of work under the SAA Order be modified to include these project scope changes.

The total cost of all Scope Change Work identified above is \$40.76 million.<sup>19</sup>

### Scope-Related Cost Estimate Adjustments

As noted in the SAA Order, Staff relied on a robust record to support its SAA recommendation to the Board. Part of the record included Brattle's evaluation report ("Evaluation Report"), which provided an in-depth overview and analysis of the SAA evaluation.<sup>20</sup>

Regarding project cost estimates, the Evaluation Report noted that the SAA bidders, including those that were awarded projects by the Board, provided uncertainty ranges for their SAA proposals' cost estimates.<sup>21</sup> Brattle noted that most cost estimates provided by the bidders carried an uncertainty range of -20% to +30% of the submitted estimate.<sup>22</sup> PJM also modeled, in its final financial analysis report, a scenario with an across-the-board 25% project cost increase, noting that the use of scenarios assist in providing insight into the impact of potential cost increases.<sup>23</sup>

New Jersey's awarded SAA projects are included in PJM's Regional Transmission Expansion Plan ("RTEP"), and SAA projects are required to follow the RTEP guidelines and process, including those established for cost estimate adjustments.<sup>24</sup> The RTEP process does not require Board approval for scope-related cost estimate adjustments for approved RTEP projects.<sup>25</sup> Rather, these adjustments will follow PJM's standard RTEP process and be subject to the same safeguards.<sup>26</sup>

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[reliability-analysis-update.ashx](#)

<sup>19</sup> The Interconnection Work of \$23 million + the Prebuild Infrastructure Study of \$0.29 million + the JCP&L Project Scope Changes of \$17.47 million.

<sup>20</sup> Brattle SAA Evaluation Report Final – Public, October, 26, 2022  
[https://publicaccess.bpu.state.nj.us/CaseSummary.aspx?case\\_id=2109468](https://publicaccess.bpu.state.nj.us/CaseSummary.aspx?case_id=2109468)

<sup>21</sup> Evaluation Report at page 8.

<sup>22</sup> Evaluation Report at page 81.

<sup>23</sup> Financial Analysis Report: 2021 SAA Proposal Window to Support NJ OSW, September 19, 2022, [nj-osw-financial-analysis-report-september-final.ashx \(pjm.com\)](#)

<sup>24</sup> PJM Operating Agreement, Schedule 6; PJM Tariff, Schedule 12.

<sup>25</sup> PJM Operating Agreement, Schedule 6, Section 1.6; PJM Tariff, Schedule 12.

<sup>26</sup> See PJM Operating Agreement, Schedule 6, which sets forth the rules and procedures for the RTEP. The TEAC is a committee established under the PJM Operating Agreement to aid in the development of the RTEP and provides advice and recommendations to the PJM Board of Managers ("PJM Board") for review of RTEP projects, including cost estimate adjustments. Cost estimate adjustments are routinely submitted to PJM by the project developer and then presented to the TEAC where TEAC members can review the cost estimate adjustments, ask questions and state their positions. TEAC members include transmission customers (as defined in the PJM Tariff), any other entity proposing to provide transmission facilities, agencies and offices of customer advocates who exercise regulatory authority over the rates, terms or conditions of electric service; and any other interested entities or persons. PJM Board retains discretion to formally review RTEP cost estimate adjustments. FERC can also review all costs included in transmission rates, including SAA-related costs, and change the resulting transmission rates if it finds that

However, one of the many benefits of the SAA is that it allows for greater transparency and Board involvement than would otherwise be provided under the standard RTEP process.

Since the SAA Order was issued, Staff and PJM regularly meet to discuss ongoing updates related to the awarded projects. As part of these meetings, PJM continues to provide updates to Staff when PJM receives cost estimate adjustments from the awarded SAA projects. PJM has indicated that these updates are not uncommon. In fact, PJM notes that it anticipates future cost estimate adjustments (both increases and decreases) across all the SAA projects, primarily as each project goes through its detailed engineering phase from which it will get more accurate labor and material costs. Further, while typically the Board would not be specifically presented with these common cost estimate adjustments for RTEP projects, the SAA process allows for this additional engagement. Also, unlike with standard RTEP projects, Staff separately meets with SAA project developers to discuss the ongoing development of the projects. This close coordination and engagement provides a greater level of transparency than if the project had been awarded under the standard RTEP process. The coordination also ensures that the Board may exercise its retained right to review and approve “significant updates to the scope, configuration and/or cost,”<sup>27</sup> and Staff’s ability to review and accept routine changes.<sup>28</sup>

In light of this, PJM alerted Staff of ongoing cost estimate adjustments and presented this updated information at the May 9 TEAC Meeting where PJM described the specifics of SAA projects’ cost adjustments.<sup>29</sup> More specifically, PJM presented a total cost estimate increase to the TEAC of \$127.34 million across multiple SAA projects.<sup>30</sup> Subsequent to the TEAC meeting, PJM informed Staff that the MAOD Prebuild Infrastructure Study and the JCP&L Project Scope Changes described above previously considered scope-related cost estimate adjustments should be considered scope changes, reducing the scope-related cost estimate adjustments to \$109.58 million.

The scope-related cost estimate updates can be categorized into three (3) areas. The first is a \$27.1 million cost increase associated with the reconductor of a small section of Raritan River-Kilmer I 230 kV line reflects updated communication between the developer and PJM.<sup>31</sup> The second is a \$71.9 million cost increase resulting from the additional refinement of MAOD’s cost estimates for their awarded scope. Such refinements were expected, as at the time of the SAA Order, the Board understood that some of MAOD’s proposed cost estimates for their awarded scope would require updating. As such, the SAA Order noted that MAOD was to “perform further assessments to improve its refinement of the estimate and scope of work as requested by the NJBPU.”<sup>32</sup> The third includes the remaining \$10.58 million of cost estimate updates that reflect common changes to individual components of the projects.

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the inclusion of these costs renders those rates unjust and unreasonable. See 16 U.S.C. § 824e(a)

<sup>27</sup> SAA Order at 73.

<sup>28</sup> Ibid. See also PJM Rate Schedule 49, paragraphs 3, 4, 5, and 7.

<sup>29</sup> See May 9, 2023 TEAC.

<https://www.pjm.com/-/media/committees-groups/committees/teac/2023/20230509/20230509-item-10---reliability-analysis-update.ashx>

<sup>30</sup> Id.

<sup>31</sup> See May 9, 2023 TEAC.

<sup>32</sup> SAA Order at 76.

With an increase in SAA project costs, Staff appreciates the significance of ratepayer impacts. Of critical importance throughout the SAA process was the baseline scenario, or the cost of the transmission facilities that would be necessary to achieve New Jersey's 7,500 MW OSW goal in the absence of the SAA solicitation ("Baseline Scenario"). As outlined in the SAA Order, the Baseline Scenario included the estimated costs and processes associated with the bundled procurement of all offshore and onshore transmission facilities, constructed by or paid for by a generator, necessary to interconnect up to 7,500 MW without an SAA solution. Under the Baseline Scenario, the full costs of building and operating the onshore and offshore transmission facilities would be recovered through the fixed-price Offshore Wind Renewable Energy Certificate ("OREC") payments at the price proposed by the winning generators and approved by the Board, with a true-up mechanism for transmission upgrade costs.

Using the Baseline Scenario cost estimates and the SAA project cost estimates, Brattle and Staff were able to determine that, at the time of the SAA award, New Jersey ratepayers would realize an estimated savings of over \$900 million dollars with the awarded SAA projects, compared to the Baseline Scenario. The SAA Order also noted that the SAA solution was tailored to maximize federal tax incentives existing or anticipated at the time, preserving an additional \$2.2 billion of ratepayer benefits.

Due to the recent SAA project cost estimate adjustments, Staff requested that Brattle provide an updated comparison between the Baseline Scenario and the SAA projects with the new cost estimate adjustments to determine the current estimated ratepayer savings under the SAA. Brattle found that like the SAA projects' cost estimate adjustments, Baseline Scenario facilities would face similar cost adjustments.<sup>33</sup> Brattle also noted, and PJM agreed, that the SAA projects' cost estimate adjustments are similar to the type expected during this phase of project development.<sup>34</sup> Simply put, while the SAA project costs have increased since the date of the SAA Order, New Jersey ratepayers will nonetheless still receive an estimated \$900 million in savings by utilizing the SAA rather than utilizing the Baseline Scenario.<sup>35</sup>

Lastly, as transmission projects develop, it is common, if not expected, for cost estimate adjustments to occur. In fact, PJM typically sees a range of cost estimate adjustments beginning at the time a project is bid into the RTEP until the time of that project's final construction. As such, additional cost estimate adjustments, in addition to the cost estimate adjustments noted herein, may be anticipated in the future. Staff believes that any future SAA project cost estimate adjustments would likely impact Baseline Scenario facilities somewhat equally, as shown for these current cost estimate adjustments. Staff remains committed to closely engaging with PJM and the awarded SAA project developers to ensure all cost estimate adjustments are reasonable, while continuing to prioritize the interests of New Jersey ratepayers.

### **Rate Counsel Correspondence**

By correspondence dated June 5, 2023, the New Jersey Division of Rate Counsel ("Rate Counsel") sought notice and an opportunity to be heard on any proposed "project scope modifications" that the Board might consider. Rate Counsel indicated in its letter that it was aware

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<sup>33</sup> Brattle Updated Baseline Costs and SAA Cost Savings Memorandum, June 2, 2023, at 1-2 ("Updated Baseline Memo") [https://publicaccess.bpu.state.nj.us/CaseSummary.aspx?case\\_id=2109468](https://publicaccess.bpu.state.nj.us/CaseSummary.aspx?case_id=2109468)

<sup>34</sup> Updated Baseline Memo at 3.

<sup>35</sup> Updated Baseline Memo at 1 and 8.

that the winning bidders in the SAA docket had already increased the overall cost of the project by over \$127 million as described at the May 9, 2023 TEAC meeting, but was unaware how the Board intended to address the cost increase or whether additional changes were proposed. Following Rate Counsel's correspondence, Staff discussed the Interconnection Work, Prebuild Infrastructure Study, JCP&L Project Scope Changes, and the Scope-Related Cost Estimate Adjustments with Rate Counsel. Rate Counsel did not object to Staff's assessment of the Scope Change Work as necessary to effectively and reliably complete the SAA projects. Rate Counsel requested that Staff regularly communicate with Rate Counsel's office in order to consider the potential ratepayer impact of future changes in cost or scope.

### **DISCUSSION AND FINDINGS**

Based on thorough review of the Scope Change Work, and in consultation with Brattle and PJM, the Board agrees with Staff's recommendation that there are significant benefits to MAOD completing the Interconnection Work rather than the OSW generators each individually completing the Interconnection Work, and that a Prebuild Infrastructure Study will help to inform Staff of the feasibility of including this work as a modification to MAOD's SAA project. As such, the Board **HEREBY APPROVES** the modification and expansion of MAOD's designated scope of work to include the Interconnection Work and the Prebuild Infrastructure Study, and **DIRECTS** MAOD to engage with PJM so that it may take the necessary steps to effectuate the modification on a timely basis. The Board **FURTHER DIRECTS** MAOD to update Staff regularly on the PJM modification process, including, but not limited to, schedule updates and any cost estimate adjustments.

The Board also **HEREBY APPROVES** the modification and expansion of JCP&L's designated scope of work as discussed above and **DIRECTS** JCP&L to engage with PJM so that it may take the necessary steps to effectuate the modification on a timely basis. The Board **FURTHER DIRECTS** JCP&L to update Staff regularly on the PJM modification process, including, but not limited to, schedule updates and any cost estimate adjustments.

The Board **FURTHER DIRECTS** MAOD to engage and coordinate with Staff, Brattle, PJM and if appropriate, OSW generators to optimize the scope of the Interconnection Work to ensure all aspects of the Interconnection Work are aligned with New Jersey's OSW goals and provide the greatest benefits to New Jersey ratepayers while maintaining safe and reliable service. This engagement and coordination may include non-material adjustments to the scope of the Interconnection Work, at Staff's discretion and without the need for Board approval, including, but not limited to, technology selection and site configuration.

For the scope-related adjustments presented at the May 9 TEAC meeting, the Board **HEREBY ACKNOWLEDGES** those scope-related cost estimate adjustments to the SAA projects. The Board also **HEREBY REAFFIRMS** that all of the benefits associated with the Larrabee Tri-Collector Solution will continue to be realized by the residents of New Jersey, and that New Jersey's ratepayers will continue to see a savings of approximately \$900 million as a result of the SAA projects being utilized to achieve New Jersey's OSW public policy.

As stated in the SAA Order and again here, the Board finds that future revisions to the projects awarded under the SAA may be required. The Board **HEREBY RETAINS THE RIGHT** to enter further orders in this docket as deemed necessary to reflect significant updates to the scope, configuration and/or cost of projects on the basis of any future changed circumstances. In addition, should PJM or Staff identify routine changes to elements of any awarded projects that would increase the benefits to New Jersey ratepayers, the Board **HEREBY AUTHORIZES** Staff

to review and accept these revisions, and notify PJM of the same.  
The effective date of this Order is July 6, 2023.

DATED: June 29, 2023

BOARD OF PUBLIC UTILITIES  
BY:

  
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ATTEST:

  
\_\_\_\_\_  
SHERRIL L. GOLDEN  
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 DECLARING TRANSMISSION TO SUPPORT OFFSHORE WIND A PUBLIC POLICY OF THE  
STATE OF NEW JERSEY

DOCKET NO. QO20100630

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