



A PHI Company

June 10, 2014

**VIA FEDERAL EXPRESS and
ELECTRONIC MAIL**

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Re: In the Matter of the Board's Review of N.J.A.C. 14:5-9 Vegetation Management Rules
BPU Docket No. EX14010104

Dear Ms. Serapiglia:

On or about June 9, 2014, the New Jersey Electric Distribution Companies, Public Service Electric and Gas Company, Atlantic City Electric Company ("ACE" or the "Company"), Jersey Central Power & Light Company, and Rockland Electric Company (collectively referred to as the "EDCs"), provided joint comments in connection with the above-referenced matter (the "EDC Comments"). The EDC Comments were submitted in response to your request at the stakeholder meeting held at the Board of Public Utilities (the "Board") on May 12, 2014. At that meeting, you requested that the EDCs provide, to the extent possible, a set of joint comments regarding Board Staff's then latest draft version of proposed changes to the Board's vegetation management rules at N.J.A.C. 14:5-9 *et seq.*, which will eventually be considered by the Board for possible amendment and re-adoption as part of the above-referenced rulemaking proceeding.

As explained in a footnote of page 2 of the EDC Comments, despite unanimity of views in all other respects, ACE is proposing an alternative approach with respect to certain select aspects of N.J.A.C. 14:5-9.8(b) regarding Distribution Line Vegetation Management. The Company's alternative proposal would restate subsection (b) as follows:

- “(b) Distribution lines shall be inspected, and trimmed as necessary, to maintain the horizontal clearance distance appropriate for the operating voltage and other factors as specified by the EDC's vegetation management standards and guidelines as required by N.J.A.C. 14:5-9.5. and all vegetation removed above the elevation of the energized conductors (no overhanging vegetation) in the following areas:

Rosalie Serapiglia, Manager

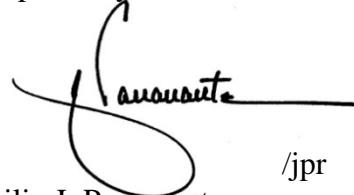
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1. all sub-transmission voltages ($> 12\text{kV}$); and
2. on 12 kV three-phase distribution circuits, from the substation to first protective device.
3. For lower voltages, the following lesser overhanging clearance requirement would apply:
 - i. 12 kV three-phase distribution after the first protective device, 15 feet vertical clearance;
 - ii. less than 12kV but greater than 600 volts single-phase, 6 feet vertical clearance.
4. Mature trees may be exempt from the above minimum overhang clearance requirements at the utility VM's reasonable discretion at voltages below 34kV. "¹

Feel free to contact the undersigned with any questions or if we can be of further assistance. In the interim, the EDCs look forward to continuing to work within and through the stakeholder process with respect to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Passanante", with a long horizontal line extending to the right. The signature is written over the text "Respectfully submitted," and the initials "/jpr" are written below it.

Philip J. Passanante
An Attorney at Law of the
State of New Jersey

cc: Jerome May, Director, BPU Division of Energy
Geoffrey R. Gersten, Deputy Attorney General
Sheree L. Kelly, Esquire
Donald W. Weyant, PSE&G
Roger Pedersen, PHI Regulatory Services for ACE
Michael J. Connolly, Esquire
Kevin F. Connelly, JCP&L
John L. Carley, Esquire
Angelo Regan, RECO

¹ As noted in the EDC Comments, the other EDCs do not support either Board Staff's or the Company's proposals.