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April 30, 2009

Via E-Mail and Regular Mail

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Kristi Izzo, Secretary of the Board
New Jersey Board of Public Utilities
2 Gateway Center
Newark, New Jersey 07102

**Re: I/M/O THE PETITION OF PUBLIC SERVICE ELECTRIC
AND GAS COMPANY FOR A DETERMINATION PURSUANT
TO THE PROVISIONS OF N.J.S.A. 40:55D-19
(SUSQUEHANNA-ROSELAND)
BPU DOCKET NO. EM 09010035**

Dear Mr. Sheehan, Ms. Linde and Ms. Izzo:

On behalf of our clients, Fredon Township School District, Willow Lake Day Camp, and the Township of Parsippany-Troy Hills (the "Intervenors"), we hereby request that the Board extend the Last Date for Discovery Requests on Initial Testimony from May 15 to June 15, 2009.

The Schedule contained in the Board's March 12, 2009 Prehearing Order need be only minimally adjusted to accommodate an extension of the May 15, 2009 discovery end-date, which was made necessary by the Board's decision earlier this week to defer until May 14, 2009, its ruling on the Intervenors' motion for an escrow account. Until the Board's ruling is announced, the Intervenors' retention of experts and consultants must also be postponed. Even assuming the Board's ruling is favorable to the Intervenors, it would be untenable for them to retain experts on the day prior to the due date for discovery requests.

—LAW OFFICES—
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COLE & WISLER, LLP

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The Intervenors appreciate the Board's reflection on the motions requesting the escrow fund, and ask also that the Board consider the potential unfairness of leaving the many interested parties and Intervenors in this matter with virtually no time (and, therefore, no ability) to employ consultants and avail themselves of expert advice and assistance.

If you have any questions concerning this request or wish to discuss it, please do not hesitate to contact me. Thank you for your attention.

DeCotiis, FitzPatrick, Cole & Wisler, LLP

By: 

Catherine E. Tamasik

cc: All Parties Designated on the Attached Service List

**In the Matter of the Petition of Public Service Electric and
Gas Company For a Determination Pursuant
to the Provisions of N.J.S.A. 40:55D-19**

**(SUSQUEHANNA- ROSELAND)
BPU DOCEKT NO. EM09010035**

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