



South Hunterdon Regional School District

301 Mt. Airy -- Harbourton Road, Lambertville, New Jersey 08530
www.shrsd.org

Louis T. Muenker, D.Ed., Superintendent of Schools
Kerry Sevilis, Business Administrator/Board Secretary

(609) 397-1888 (609) 397-6495 Fax
(609) 397-0323 (609) 397-2508 Fax

October 3, 2016

Kimberly D. Bose, secretary

Federal Energy Regulatory Commission
888 First St, N.E.
Washington, D.C, 20426

Re: In the Matter of Penn East Pipeline, docket No. CP15-558

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION
2016 OCT 11 A 11:32
FEDERAL ENERGY
REGULATORY COMMISSION

Dear Ms. Bose;

Please see attach resolution to authorize motion to intervene with respect to "Applications of Penneast Pipeline Company, LLC for Certificates of Public Convenience and Necessity and Related Authorizations"

Sincerely,

Kerry Sevilis
School Business Administrator/Board Secretary

Via Regualr mail and FedEx

Lambertville Public School -- Geoff Hewitt, Principal
South Hunterdon Regional High School -- Jennifer Beresh MacKnight, Principal
Stockton Borough Elementary School -- Geoff Hewitt, Principal
West Amwell Township Elementary School -- David Miller, Principal

(609) 397-0183 (609) 397-4607 Fax
(609) 397-2060 (609) 397-2366 Fax
(609) 397-9023 (609) 397-2012 Fax
(609) 397-0819 (609) 397-4350 Fax



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EXTRACT FROM THE MINUTES OF A MEETING OF THE SOUTH HUNTERDON REGIONAL SCHOOL DISTRICT BOARD OF EDUCATION AS RECORDED IN THE OFFICIAL MINUTE BOOK

The Board of Education of South Hunterdon Regional School District in the County of Hunterdon, New Jersey, convened in public session **September 26, 2016** in the High School Commons, Lambertville, New Jersey.

The following members of the Board of Education were present: Jim Gallagher, Boyd Hartpence, Celeste Mosby, Anne Nicolas, Craig Reading, Emily Rich, Derek Roseman, and Dan Seiter.

The following members of the Board of Education were absent: Nicole Claus

Other Business

Motion by Derek Roseman , Seconded by Celeste Mosby

To approve Items A.

All items are under the recommendation of the Superintendent.

Motion Approved by unanimous Roll Call Vote

- A. To approve the attached resolution to authorize motion to **Attachment OB1** intervene with respect to “Applications of Penneast Pipeline Company, LLC for Certificates of Public Convenience and Necessity and Related Authorizations”

STATE OF NEW JERSEY, COUNTY OF HUNTERDON

I, Kerry Sevilis, Secretary of the South Hunterdon Regional School District Board of Education in the County of Hunterdon, State of New Jersey, hereby certify that the foregoing extract from the minutes of the meeting of the Board of Education of said district duly called and held **September 24, 2016** has been compared by me with the original minutes as officially recorded in my office in the minute book of said South Hunterdon Regional School District Board of Education and is a true, complete copy thereof and of the whole of said original minutes so far as the same relate to the subject matter referred to in said extract in witness I have hereunto set my hand and affixed the corporate seal of said Board of Education this **3rd day of October 2016**.

Kerry Sevilis, Business Administrator/Board Secretary

Lambertville Public School – Geoff Hewitt, Principal	(609) 397-0183	(609) 397-4607 Fax
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West Amwell Township Elementary School – David Miller, Principal	(609) 397-0819	(609) 397-4350 Fax

**SOUTH HUNTERDON REGIONAL SCHOOL DISTRICT BOARD
OF EDUCATION RESOLUTION TO AUTHORIZE MOTION TO
INTERVENE WITH RESPECT TO “APPLICATION OF
PENNEAST PIPELINE COMPANY, LLC FOR CERTIFICATES
OF PUBLIC CONVENIENCE AND NECESSITY AND RELATED
AUTHORIZATIONS”**

Motion by Derek Roseman , seconded by Celeste Mosby , upon recommendation of the Superintendent, that the business administrator, through legal counsel, is hereby authorized to file a motion with the Federal Energy Regulatory Commission to intervene out of time in the matter known as the “Application of PennEast Pipeline Company, LLC for Certificates of Public Convenience and Necessity and Related Authorizations.”

Basis for Motion to Intervene:

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission ("FERC"), 18 C.F.R. §§385.212 and 385.214, the South Hunterdon Regional School District Board of Education (the "District" or "Board") files this motion to intervene out-of-time in response and objection to PennEast Pipeline Company, LLC's ("PennEast") Application for Certificates of Public Convenience and Necessity and Related Authorizations (the "Application"). The District is an owner of real property that would be affected by the Application and the improvements proposed, specifically, the installation of the PennEast's pipeline.

I. Communications and Service:

All communications, pleadings and orders associated with this proceeding should be sent to:

Kerry Sevilis
Business Administrator/Board Secretary
South Hunterdon Regional School District
Board of Education
301 Mt. Airy Harbourn Rd.
Lambertville, NJ 08530

-and-

Allan P. Dzwilewski, Esq.
Board Attorney
Schwartz Simon Edelstein & Celso, LLC
100 South Jefferson Rd., Suite 200
Whippany, NJ 07981

II. Description of Movant and Its Interests:

The District requests that FERC grant intervenor status on Docket No.: CP15-558, In the Matter of PennEast Pipeline, because as a New Jersey State Public Board of Education and real property owner, this project would deleteriously impact public lands owned by the District. The District will attempt to demonstrate that the proposed application would adversely affect environmental resources and could have unforeseen negative consequences upon the real property owned by the Board.

The Board operates four separate schools that will be potentially affected by the Application. Two schools, South Hunterdon Regional High School, the Lambertville Public School are located in the City of Lambertville, NJ. It should be noted that the City of Lambertville has filed a separate application to intervene in an effort to object to the Application. The third and fourth school, the West Amwell School and the

Stockton Borough School, are located in the Township of West Amwell and the Borough of Stockton, NJ, respectively.

The District, and all of the students at its four schools, depend on the drinking water emanating from a reservoir, maintained by SUEZ water, which is located on the proposed route of the PennEast Pipeline. The Application proposes the removal of trees and the degradation of other environmental resources along the pipeline route which would have a negative impact on an already hard to manage stormwater runoff problem. Additional stormwater runoff could cause flash flooding and potentially damage the dam at SUEZ water which could lead to flooding of the Board's real property and the improvements thereon.

Further, the proposed pipeline will cross the Delaware River upstream from the City of Lambertville posing a significant threat to the City's natural environment and water source if a rupture in the pipeline were to occur. The taxpayers of the City of Lambertville and Stockton are stakeholders in the real property and improvements owned by the District.

The District is uniquely qualified to comment on the Application and its potentially far reaching effects. The District submits that no other intervenor or party is able to adequately represent its interests in this matter.

III. Good Cause for Intervention Out-of-Time:

The Board submits that it has good cause to intervene out-of-time as PennEast has continually amended its application, including route and design changes. The Board was not previously aware of the modifications. Now that the Board has become aware of the modifications, it has promptly filed this motion to intervene.

Moreover, the District's participation will not delay the proceedings. FERC has yet to render a decision on the Application. Therefore, the District's motion is sufficiently early in the proceedings as to not avoid further confusion.

IV. Conclusion:

For the reasons stated above, the District requests that FERC grant this "Motion to Intervene Out-Of-Time" as a party with full rights to participate in all future proceedings.

Respectfully submitted,



Kerry Sevilis
*Business Administrator/
Board Secretary*

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