

# GIORDANO, HALLERAN & CIESLA, P.C.

A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
WWW.GHCLAW.COM

STEVEN P. GOUIN, ESQ.  
SHAREHOLDER  
ALSO ADMITTED TO PRACTICE IN NY  
SGOUIN@GHCLAW.COM  
DIRECT DIAL:(732) 219-5498

*Please Reply To:*  
125 HALF MILE ROAD  
SUITE 300  
RED BANK, NJ 07701  
(732) 741-3900  
FAX: (732) 224-6599

June 30, 2023

Client/Matter No. 19306/29

## VIA E-MAIL AND REGULAR MAIL

St. David's Place Residents  
Leisuretowne Residential Community  
c/o Phyllis Peak  
74 Saint David's Place  
Southampton Township, NJ 08088  
Email: [phylster@gmail.com](mailto:phylster@gmail.com)

**Re: BEMS Southampton Solar Farm / Switchgear**

Dear Residents:

I am writing to provide you with an update to my last letter dated June 23, 2023. As the 4<sup>th</sup> of July holiday is coming up next week, it is very likely that I will not have much new information to report until the week of July 10<sup>th</sup>. However, as developments occur, I will do my best to keep you, the Township, and the HOA informed.

We have preliminarily reached out to Pinelands to discuss the potential relocation of the switchgear to points along Big Hill Road. We had identified three possible locations – directly across from the PSEG manhole on Big Hill Road on Block 3301, Lot 1; further to the south along Big Hill Road, also on Block 3301, Lot 1, but approximately 318 ft. from the manhole; and on Leisuretowne HOA property (Block 2703, Lot 3), behind Block 2702.25, Lots 45 and 46. Going only by aerials, Pinelands identified two other locations, one being located about 750 ft. to the north of the PSEG manhole on Big Hill Road at an existing turn-off by the cranberry bogs and the other on either Lot 45 or 46 in Block 2702.25 itself.

None of these locations has been “selected” as a new location of the switchgear and we are still evaluating all potential locations for relocation. Each of the above locations that have been identified has pros and cons associated with it and we need to meet with Pinelands and discuss the best possible solution. Colliers Engineering has developed a true conceptual relocation plan that will be shared with Pinelands, the Township, and the HOA as soon as today. Once that plan is submitted, it is anticipated that we will convene a meeting of the stakeholders sometime during the week of July 10<sup>th</sup> to discuss option moving forward.

At the same time, my client is working with various contractors and subcontractors to gather estimates of costs associated with the relocation. Those costs will likely be significant. Any relocation will require additional construction work, both at St. David's Court and along Big Hill Road. We are trying to get a handle on estimated costs, timing, and feasibility. This is an

---

RED BANK • TRENTON • NEWARK • NEW YORK CITY

GIORDANO, HALLERAN & CIESLA  
A Professional Corporation  
ATTORNEYS-AT-LAW

Saint David's Place  
June 30, 2023  
Page 2

ongoing process and will continue as we work with the Township and Pinelands on potential locations.

I know that some people noticed that PSEG continues to do work both on Big Hill Road and on St. David's Place. PSEG is contracted by the owner of the solar facility (Luminace, a subsidiary of Brookfield Renewable – my client's tenant) to complete the physical interconnection work for the solar facility. PSEG has its own deadlines to meet to satisfy its contractual obligations with Luminace. Additionally, there are safety requirements that dictate that PSEG must complete certain work and not leave work unfinished or partly complete. Very likely, PSEG will be finished with any construction work within the next week and then there will be a phase for testing and ensuring that everything has been safely constructed. In any event, the fact that PSEG is continuing to perform its work is completely independent of what my client is doing in pursuing potential options for relocation. My client will continue to work through that process and will coordinate with PSEG as, ultimately, PSEG will also have to approve any new potential location.

You also may notice over the next week or so that CS Energy will be installing a fence around the switchgear. Please understand that my client has directed CS to install the fence only to provide some measure of screening of the facility while we work through these other issues. Of course, it will be an added cost to remove the fence if that becomes necessary, but our thought is that at least some interim level of screening is better than nothing. The fence has been on order for some time, and rather than store it on-site, my client felt it best to simply install it, with the understanding that it may need to be removed at some point in the near future. For the same reason, however, my client is holding off on installing any permanent landscaping at the St. David's island until we have resolved the relocation issue. The landscaping at the Sterling Place island will begin to be installed soon, however, as we now have an approved landscape plan from the Township.

Some people have asked about EMF readings and I believe I pointed out in my last communication that Colliers Engineering had already completed the baseline survey of the properties surrounding the switchgear. To the extent those measurements are relevant at some point in the future, they have been completed.

Very truly yours,



STEVEN P. GOUIN

SPG/aep

cc: CEP Renewables, LLC (via email)  
CS Energy, LLC (via email)  
Jonas Singer, Esq.  
George Morris, Esq.  
Gregg Shivers, Esq.