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August 31, 2023

VIA ELECTRONIC MAIL ONLY

Sherri L. Golden, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350
board.secretary@bpu.nj.gov

Dear Secretary Golden:

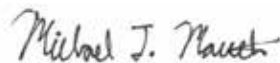
In compliance with subsection 3.5(r)(2) of the Affiliate Relations, Fair Competition and Accounting Standards and Related Reporting Requirements, N.J.A.C. 14:4-3.1 et. seq. (the “Standards”), Jersey Central Power & Light Company (“JCP&L”) hereby reports that there were no employee transfers between JCP&L and Suvon, LLC (“Suvon”)¹ from July 1, 2022, through June 30, 2023. JCP&L will continue to submit this report annually in this format, based on a June 30 year-end, unless directed otherwise.

In accordance with subsection 3.7(a) of the Standards, JCP&L is required to file a revised Compliance Plan, annually or upon changes thereto, with the Board and Rate Counsel. Please find attached electronic copies of the Revised Compliance Plan of Jersey Central Power & Light Company Regarding Affiliate Relations, Fair Competition and Accounting Standards and Related Reporting Requirements dated August 31, 2023, and all Appendices thereto.

Please kindly confirm your receipt of this filing by electronic mail at your earliest convenience.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,



Michael J. Martelo
Counsel for Jersey Central Power & Light Company

Attachments

cc: B. Lipman

¹ Suvon was a related competitive business segment of JCP&L’s parent public utility holding company, FirstEnergy Corp., which provided or offered competitive services to retail customers in New Jersey and which was engaged in offering merchant functions and/or electric related services or gas related services. As of May 2023, Suvon is no longer a part of the FirstEnergy System.

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

**REVISED COMPLIANCE PLAN OF JERSEY CENTRAL POWER & LIGHT
COMPANY REGARDING AFFILIATE RELATIONS, FAIR COMPETITION AND
ACCOUNTING STANDARDS AND RELATED REPORTING REQUIREMENTS**

BPU DOCKET NO. EX99030182

FILED IN THE MATTER OF THE PROMULGATION OF STANDARDS BY THE BOARD
PURSUANT TO THE PROVISIONS OF THE ELECTRIC DISCOUNT AND ENERGY
COMPETITION ACT OF 1999, P.L. 1999, C.23

August 31, 2023

INTRODUCTION

Jersey Central Power & Light Company, (“JCP&L” or the “Company”), an electric public utility company subject to the regulatory jurisdiction of the New Jersey Board of Public Utilities (the “Board” or “NJBPU”), and maintaining offices at 300 Madison Avenue, Morristown, New Jersey 07962-1911 and 101 Crawfords Corner Road, Building 1, Suite 1-511, Holmdel, New Jersey 07733, hereby submits this compliance plan (the “Plan”) pursuant to the Affiliate Relations, Fair Competition and Accounting Standards and Related Reporting Requirements (the “Standards”) last readopted by the Board, N.J.A.C. 14:4-3.1, *et seq.*, effective April 11, 2012, with amendments effective May 7, 2012 and additional amendments effective April 15, 2013. In addition, this Plan incorporates various modifications over prior versions that have been submitted which address those items noted as accepted for implementation in the Company’s comments filed on July 31, 2023 to the Phase Two Report issued by Liberty Consulting Group as part of JCP&L’s most recent management audit.¹ This Plan supersedes the “REVISED COMPLIANCE PLAN OF JERSEY CENTRAL POWER & LIGHT COMPANY REGARDING AFFILIATE RELATIONS, FAIR COMPETITION AND ACCOUNTING STANDARDS AND RELATED REPORTING REQUIREMENTS” dated August 31, 2022.

JCP&L is an Electric Public Utility, as defined in the Standards, and a wholly-owned subsidiary of FirstEnergy Corp. (referred to herein as “FirstEnergy,” which is a Public Utility Holding Company, as defined in the Standards).² Capitalized terms used herein that are defined in the Standards shall have the meanings ascribed to them in the Standards.

¹ *I/M/O An Audit of the Affiliated Transactions between Jersey Central Power and Light Company, First Energy Corp. and its Affiliates Pursuant to N.J.S.A. 48:3-49, 48:3-55, 48:3-56, 48:3-58 and N.J.A.C. 14:4-3.7(e) and (f)*, BPU Docket No. EA20110733.

² FirstEnergy and its direct and indirect subsidiaries are collectively referred to herein as the “FirstEnergy System.”

OVERVIEW OF JCP&L's PLAN

The FirstEnergy System already requires that employees comply with all applicable laws and regulations. Moreover, JCP&L has certain comprehensive procedures already in place, implementing FirstEnergy Corp.'s existing Business Practice Manual and Corporate Policies, including FirstEnergy's Code of Business Conduct. Implementation of the Standards will be consistent with these existing expectations and practices. Additionally, JCP&L periodically reviews the policies and procedures in place to promote compliance with the Standards and will make updates to this Plan, as necessary and appropriate, to reflect same.

JCP&L is committed to conveying the significance of the Standards to all employees, so that they will be prepared to recognize any Standards-related issues that may arise in the course of their work. Accordingly, JCP&L has already and will continue to undertake to make employees aware of the Standards. At the same time, JCP&L recognizes that the Standards apply most directly to certain identifiable areas within the Company, and employees in these areas will require the most in-depth training about the Standards. These employees, referenced herein as "affected employees," include, for example, the Call Center employees and those personnel working in the areas of Customer Choice and Power Supply.

JCP&L uses a multi-faceted approach to educate its employees about the requirements set forth in the Standards, to ensure that employees have easy access to the Standards, and to clearly convey JCP&L's expectations regarding compliance. Specifically, JCP&L:

1. maintains a Compliance Policies page on the FirstEnergy System Intranet for the benefit of all employees. This page contains links to the Company's most current code of conduct policies, which incorporate an overview of the Standards, as well as various other employee

- guidance, governance documents, and other resources for purposes of supporting proper implementation and adherence to the Standards and all other applicable codes of conduct;
2. periodically publishes articles about the importance of the Standards in the FirstEnergy System's employee publication Employee Update, and provides electronic update memos to affected employees addressing particular Standards-related issues as they arise; and
 3. has established a training program in which an explanation of the Standards are made to new employees, all affected JCP&L employee groups, and to all Director-level³ and Manager-level employees, whether or not they are from affected employee groups; such training (on a two-year refresher basis) is required to renew affected employees' awareness of the Standards, and to update affected employees on any regulatory changes or developments that may occur.

Employees may report any Standards-related concerns directly to their supervisor, or they may call the FirstEnergy Employee Helpline. The FirstEnergy Employee Helpline is a confidential toll-free number that is answered by a third-party vendor, NAVEX Global, Inc.

Participation in training sessions is mandatory, with electronic login used to document participation. Any intentional violation of the Standards shall result in disciplinary action, which may include discharge from employment, if warranted by the circumstances of the violation. Employees are made aware of this fact as part of their training.

COMPLIANCE OVERSIGHT AND ENFORCEMENT RESPONSIBILITY

The contents of this Plan highlight the various provisions of the Standards and identify the respective applicability to JCP&L of those provisions and its plans as to their application to ensure compliance with the Standards. Oversight and implementation responsibility

³ "Director-level," as used here, refers to managerial Directors who typically report to Vice Presidents, as opposed to members of the corporate Board of Directors.

rests primarily with the President, JCP&L⁴ and Vice President, Compliance and Regulated Services,⁵ as evidenced by their signatures on the supporting verifications. Enforcement of the Company's compliance obligations under the Standards rests in part with the same, in partnership with applicable leadership, Human Resources, and FirstEnergy's Office of Ethics and Compliance, as appropriate.

Section 1. Scope

N.J.A.C. 14:4-3.3 through 3.5 apply only to transactions between JCP&L, as the Electric Public Utility, and any Related Competitive Business Segments ("RCBSs") of FirstEnergy that "provid[e] or offer[] competitive services to retail customers in New Jersey." See N.J.A.C. 14:4-3.1(a)(1).⁶ Accordingly, N.J.A.C. 14:4-3.3 through 3.5 would apply only to transactions between JCP&L (including any JCP&L Related Competitive Business Segment) and RCBSs of FirstEnergy engaged in the retail marketing of electricity or gas in New Jersey, or engaged in the provision of other Competitive Services, such as retail telecommunications services, to retail customers in New Jersey.

As of the date of JCP&L's August 31, 2022 report, Suvon, LLC ("Suvon") was the only entity within the FirstEnergy System that provided or offered Competitive Services that would bring it within the scope provisions of the Standards. Since that time, FirstEnergy determined that this business should be discontinued for business reasons, and the unwinding process has been completed and Suvon is no longer a part of the FirstEnergy System as of May 2023. Accordingly, N.J.A.C. 14:4-3.3 no longer applies to the FirstEnergy System's operations. N.J.A.C. 14:4-3.3 through 3.5 would apply to any other RCBS of FirstEnergy that, in the future,

⁴ This position is presently held by James V. Fakult.

⁵ This position is presently held by Olenger L. Pannell.

⁶ FirstEnergy does not itself provide or offer Competitive Services. It is not, therefore, referenced in this Plan, where the Plan and the corresponding Standards address providers of Competitive Services.

may provide or offer any Competitive Services within the scope of the Standards and will be addressed in future reports should any other RCBS be formed or join the FirstEnergy System.

Section 2. Definitions

This Section has been maintained in the Plan solely as a placeholder so that the remaining Sections of the Plan will correspond to the sequence of the sections in the Standards.

Section 3. Nondiscrimination

This Section prohibits actions by JCP&L that unreasonably discriminate against any competitor in favor of any affiliated RCBS. As outlined in response to Section 1, above, no such RCBS exists at this time.

Section 3, §§ (a), (b), & (c). JCP&L is prohibited from unreasonably discriminating against any competitor in favor of JCP&L's RCBS.

While no applicable RCBS exists at this time, JCP&L will not unreasonably discriminate against any competitor in favor of any RCBS that may be formed within or join the FirstEnergy System in the future, and specific training and protocols to ensure education and compliance around these Standards will be developed if such development were to occur. Specifically, JCP&L will not represent that any RCBS or its customers will receive any different treatment than JCP&L provides to any other, nonaffiliated entities or the customers thereof, nor would JCP&L give the RCBS or its customers any preference over any nonaffiliated entities or their customers in the provision of goods or services offered by the Company.

Section 3, § (d). With certain exceptions, transactions between JCP&L and its RCBS are prohibited by the Standards.

While no applicable RCBS exists at this time, JCP&L remains committed to ensuring that it does not partake in transactions that are prohibited by the Standards, except for (i)

tariffed products and services; (ii) the sale or purchase of goods, property, products or services made generally available to all market participants through an open, competitive bidding process; or (iii) permitted joint purchases, corporate support or competitive utility products and services that comply with the Standards and other applicable rules. Should any RCBS be formed within or join the FirstEnergy System in the future, any transactions between JCP&L and such RCBS will be carried out pursuant to tariffs, or under terms that are available to all entities pursuant to Board-approved contracts or rules, or as permitted joint purchases or corporate support.

Section 3, § (e). JCP&L's actions, in providing utility information, services, and unused capacity or supply, are restricted by the Standards.

While no applicable RCBS exists at this time, JCP&L remains committed to providing access to utility information, services, and unused capacity or supply on a non-discriminatory basis to all market participants except for permitted joint purchases, corporate support or competitive utility products and services that comply with the Standards and any other applicable rules. Should any RCBS be formed within or join the FirstEnergy System in the future, specific training and protocols to ensure education and compliance around these Standards will be developed and implemented.

Section 3, §§ (f) & (g). Sales of surplus energy and/or capacity to the JCP&L RCBS are governed by the Standards.

While no applicable RCBS exists at this time, JCP&L remains committed to ensuring that where JCP&L offers to sell surplus energy and/or capacity on a long-term or short-term basis, it shall make the offer on a non-discriminatory basis to non-affiliated electric marketers, via a public posting.

Section 3, §§ (h) & (i). Discounts or waivers of charges or fees to a JCP&L RCBS is governed by the Standards.

While no applicable RCBS exists at this time, JCP&L remains committed to ensuring that offers of discount or waivers of charges or fees shall be made generally available through an open, competitive bidding process or on a non-discriminatory basis to all market participants. Should any RCBS be formed within or join the FirstEnergy System in the future, the underlying cost differential of any such discount given to the RCBS shall be documented in the Affiliate Discount Report discussed below at Section 3, §§ (q), (r) and (s), and the RCBS shall not be given a preference with respect to tariff provisions that provide for discretionary waivers of fees, penalties, etc., unless such discretionary waivers are offered to all others on a non-discriminatory basis.

Section 3, §§ (j) & (k). JCP&L is required to apply tariff provisions on a non-discriminatory basis.

JCP&L shall strictly enforce those tariff provisions that do not allow discretion in their application. Where a tariff provision allows for discretion in its application, discretion shall be exercised on a non-discriminatory basis with regard to all market participants and their respective customers.

Section 3, § (l). JCP&L is required to process requests for utility services on a non-discriminatory basis.

JCP&L shall process all requests for service on a non-discriminatory basis with regard to all market participants and their respective customers.

Section 3, § (m). JCP&L is prohibited from tying its products or services to those of its RCBS.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System in the future, JCP&L shall not condition or otherwise tie the provision of its products or services, or the availability of discounts, rebates, or waivers of terms and conditions, to the taking of any products or services from its RCBS.

Section 3, § (n). JCP&L is required to make any assignment of customers on a non-discriminatory basis.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System in the future, JCP&L shall not, by default, direct assignment, option, or by any other means, assign its customers to the RCBS unless the means of assignment is equally available to all competitors on a non-discriminatory basis, except as otherwise permitted by law, regulation, or Board Order.

Section 3, §§ (o) & (p). JCP&L is prohibited from offering marketing assistance to its RCBS, except on a non-discriminatory basis.

JCP&L shall not offer customers advice or assistance relative to Competitive Services in general. JCP&L employees are to respond to customer inquiries that “due to NJBPU regulations the only advice [they] may impart to a customer is the internet address of the BPU website (www.bpu.state.nj.us).” While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System in the future, and except as otherwise permitted by the Standards, JCP&L shall not offer assistance, aid or services relative to customer enrollment, marketing or business development to such RCBS.

Section 3, §§ (q), (r) and (s). Any discounts or rebates offered to its RCBS by JCP&L, or waivers of any charges, penalties or fees payable by its RCBS, are governed by the Standards. All records maintained pursuant to these Standards shall also conform to applicable FERC rules.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System in the future, and if JCP&L were to offer an RCBS a discount, rebate, or waiver of any charge, penalty or fee, JCP&L would be required to make a timely public posting of the transaction and to retain certain records thereof. Within 24 hours of any such transaction, JCP&L shall make an Affiliate Discount Report, consisting of a public posting of the name of the RCBS involved, the rate charged, the maximum rate, the time-period for which the rate applies, the quantities and delivery points involved, any applicable discounts or requirements, documentation of the cost differential underlying the discount, and procedures by which a non-affiliated entity may request a comparable offer. Moreover, for the required periods of time, and consistent with all applicable rules issued by the Federal Energy Regulatory Commission, JCP&L shall maintain the required records identifying the RCBS involved in the transaction, its role in the transaction, the duration of the discount or waiver, the maximum rate, the rate actually charged, the quantity involved, and facts demonstrating that the discount, rebate, or waiver was offered to non-affiliated entities on a non-discriminatory basis.

Section 4. Information Disclosure

In accordance with the Standards, this Section places restrictions and conditions on the information that JCP&L may disseminate to any RCBS that may be formed within or join the FirstEnergy System, or to third parties, including customers. The Section also contains public posting and recordkeeping requirements. Affected employees will be educated on the Section's

provisions, so that they will understand the source and significance of the practices being implemented to assure compliance with the Section. As outlined in response to Section 1, above, no such RCBS exists at this time.

The website maintained by JCP&L/FirstEnergy for energy suppliers is password-protected, to prevent suppliers (regardless of affiliation) from accessing other suppliers' information.

Section 4, § (a). The dissemination of individual proprietary customer information is restricted.

JCP&L will not provide individual proprietary customer information to an RCBS or other third party except with the customer's prior affirmative written consent, or as otherwise authorized by the Board, and only if that same information is also provided to unaffiliated entities on a non-discriminatory basis with the customer's prior affirmative written consent, or as otherwise authorized by the Board. However, to the extent the customer specifically authorizes release of information only to a specific RCBS, supplier or market participant in particular, such information will not be made available to other market participants without further prior affirmative written consent from the customer.

Section 4, § (b). JCP&L is restricted in the dissemination of certain non-public or proprietary information that is not customer-specific.

In the course of operating its distribution system, JCP&L may acquire information that is not customer-specific, but is nonetheless non-public or proprietary. The information may relate to various topics, including JCP&L's electricity purchases, sales, operations, or electricity-related goods or services. While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System in the future, JCP&L may exchange such

information with its RCBS on an exclusive basis if it is necessary to do so in conjunction with the provision of corporate support services, as permitted under the Standards. Otherwise, JCP&L will not make such information available to such RCBS unless JCP&L also makes it available to all other service providers on a non-discriminatory basis, via public posting, and keeps the information open to public inspection.

Section 4, § (c). JCP&L's supplier lists must comply with certain requirements.

Under the Standards, any supplier list made available by JCP&L may contain only Board-licensed suppliers, must be maintained in alphabetical order, and may not highlight or promote any particular supplier. It is JCP&L's existing practice, when providing a supplier list, to provide a copy of the current list provided by the Board itself. JCP&L intends to maintain this practice (even if the Board at some point reorders its list to follow some system of organization other than alphabetical order) because JCP&L believes that the use of the Board's own list is the best method of assuring that all of the Board's expectations are met.

Section 4, §§ (d) & (e). JCP&L is restricted in the dissemination of certain non-public supplier information and data and shall not solicit the release of such information on an exclusive basis in an effort to prevent other market participants from access to that information and data.

JCP&L may receive non-public information and data from unaffiliated suppliers. JCP&L will only provide such information and data to such RCBS, should any RCBS be formed within or join the FirstEnergy System in the future, or to non-affiliated entities, if the unaffiliated suppliers in question have given JCP&L written or electronic affirmative authorization to do so.

JCP&L will not solicit the release of such information exclusively to an RCBS in an effort to keep such information from other unaffiliated entities.

Section 4, §§ (f) & (g). JCP&L is restricted in the scope of permissible statements it may make about affiliated product and/or service providers.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System in the future, JCP&L will not provide customers with any list of product and/or service providers that highlights or otherwise identifies its RCBS, regardless of whether the list also includes the names of unaffiliated entities, except upon request by a customer, or as authorized in the Standards or otherwise by the Board. Where a customer requests information about such RCBS, JCP&L employees will respond that “due to NJBPU regulations the only advice [they] are permitted to provide is the internet address of the NJBPU website (www.bpu.state.nj.us).”

Section 4, §§ (h), (i) & (j). JCP&L is subject to certain record-keeping requirements.

JCP&L will maintain complete and accurate records of all tariffed and non-tariffed transactions that would occur with FirstEnergy and, should any RCBS be formed within or join the FirstEnergy System in the future, JCP&L and said RCBS, including all waivers of tariff or contract provisions. Such records will be available for review by the Board and/or the Division of Rate Counsel on 72 hours notice. JCP&L will maintain them in accordance with the requirements of N.J.A.C. 14:5-5.2,⁷ or longer, if another government agency so requires.

⁷ As of March 17, 2008, the reference to N.J.A.C. 14:5-5.2 in the Standards should be to N.J.A.C. 14:5-6.2.

Section 4, § (k). JCP&L is required to maintain certain records of affiliate contracts and related bids.

JCP&L will maintain records of contracts and related bids for the provision of work, products and/or services between JCP&L and FirstEnergy and, should any RCBS be formed within or join the FirstEnergy System in the future, between JCP&L and said RCBS. Such records will be retained in accordance with the requirements of N.J.A.C. 14:5-5.2,⁸ or longer, if another government agency so requires.

Section 5. Separation

This Section requires that JCP&L and any affiliated RCBS be separate entities, and that the separation be maintained in certain practical ways, by limiting, qualifying, restricting or prohibiting various forms of cooperation that might otherwise be implemented. As outlined in response to Section 1, above, no such RCBS exists at this time.

Section 5, § (a). JCP&L is required to maintain itself as a separate corporate entity.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System in the future, it will be maintained as a separate entity from JCP&L.

Section 5, §§ (b), (c) & (d). JCP&L is required to fulfill particular requirements as to the maintenance of its books and records.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System in the future, JCP&L and such RCBS will maintain separate books and records. In addition, JCP&L maintains its books and records in accordance with generally accepted accounting principles and the Uniform System of Accounts. JCP&L also maintains

⁸ See footnote 7 above.

internal accounting controls to ensure that costs are fully allocated and all transfers are properly tracked. JCP&L's books and records are open for examination by the Board to the extent necessary to ascertain compliance with the Standards. Similarly, FirstEnergy's books and records are also open for examination by the Board to the extent necessary to ascertain compliance with the Standards to the extent engaged in transactions, interactions, and relations with JCP&L.

Section 5, § (e). JCP&L is required to comply with applicable restrictions on shared plant, facilities, equipment or costs.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System in the future, JCP&L will comply with applicable restrictions on shared plant, facilities, equipment or costs. Specifically, JCP&L will not share office space, office equipment, services and systems with said RCBS, except to the extent appropriate to perform shared corporate support functions permitted by the Standards.

Section 5, §§ (f), (g) & (h). JCP&L is required to comply with requirements and limitations applicable to Joint Products and Services, as well as Joint Purchases.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System and any Joint Products or Services be offered or Joint Purchases be made in the future, JCP&L will comply with applicable requirements and limitations. As to Joint Purchases, JCP&L will specifically ensure that they are priced, reported and conducted as required by the Standards to ensure proper apportioning of direct and indirect costs between JCP&L and its RCBS. As the FirstEnergy System is regulated by agencies of the federal government, JCP&L must also comply with any rules and orders of such agencies relating to transfer pricing between affiliates.

Section 5, §§ (i) & (j). JCP&L may share joint corporate oversight, governance, support systems and personnel with its RCBS or FirstEnergy Service Company,⁹ subject to certain requirements and restrictions.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System and any Joint Purchases be made in the future, JCP&L and such RCBS may share directly, or through FirstEnergy Service Company, joint corporate oversight, governance, support systems and personnel. To the extent such event would occur, JCP&L will comply with the pricing and reporting requirements of the Standards, consistent with any federal rules discussed in Section 5, §§ (f), (g) & (h) above. Moreover, JCP&L will not utilize joint corporate support services as a conduit in circumvention of the Standards.

Section 5, §§ (k), (l), (m), (n) & (o). Corporate identification, advertising, and joint marketing are governed by the Standards.

The Standards prohibit the JCP&L RCBS from employing JCP&L's logo in connection with the use of any "circulated material" in New Jersey without including a three-part disclaimer, as required by N.J.A.C. 14:4-3.5(k). While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System, JCP&L and such RCBS will comply with all aspects of the Standards, including the proper use of the disclaimer in connection with the use of "circulated material" in New Jersey. Further, the promotional materials of a RCBS will not be stuffed into JCP&L's billing envelopes or included in any of JCP&L's written communications with customers, except pursuant to Board-approved procedures that are available to all other unaffiliated service providers on the same terms and conditions. Additionally, JCP&L

⁹ FirstEnergy Service Company is a wholly-owned subsidiary of FirstEnergy, authorized to provide various corporate support services to the entities comprising the FirstEnergy System. It is a "business segment . . . created solely to perform corporate support services," as described in the Standards. N.J.A.C. 14:4-3.5(i). Agreements between JCP&L and FirstEnergy Service Company have been previously filed with the Board.

will not participate in joint advertising or marketing activities with its RCBS, except as permitted by the Standards. Nor will JCP&L subsidize costs, fees or payments with any RCBS associated with research and development or investment in advanced technology research. Finally, JCP&L will not represent—either directly or indirectly—that a customer or an affiliate is in any way provided different treatment as a result of the affiliate relationship.

Section 5, § (p). JCP&L and its RCBS are restricted in the sharing of personnel.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System, JCP&L and such RCBS will not share personnel, except as permitted by the Standards, and the competitive services of the RCBS shall be provided utilizing assets separate from those utilized by JCP&L to provide non-competitive utility and safety services.

Section 5, § (q). JCP&L and its RCBS are restricted in the sharing of corporate officers or directors.¹⁰

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System, JCP&L and its RCBS shall not share corporate officers or directors, consistent with the Board’s interpretation or application of the Standards.

Section 5, § (r). Employee transfers between JCP&L and its RCBS are governed by the Standards.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System, JCP&L will comply with the Standards governing employee transfers related to posting, reporting, and employment restrictions.

¹⁰ The term “director” here refers to a member of a corporate Board of Directors, as distinguished from a managerial Director (as referenced in the Overview of JCP&L’s Plan and at footnote 3).

Section 5, § (s). Transferred employees are restricted in their use of information.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System, any employee transferred from JCP&L to such RCBS will not convey to the RCBS information gained at JCP&L that the RCBS would otherwise be precluded from having under the Standards, and will not use any such information to the benefit of the RCBS or to the detriment of unaffiliated competitors. These restrictions will be emphasized during the course of exit interviews with employees transferring from JCP&L to the JCP&L RCBS. JCP&L will not make temporary or intermittent assignments or rotations of employees to a JCP&L RCBS.

Section 5, § (t). Transfers of services between JCP&L and its RCBS are governed by the Standards.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System, JCP&L will comply with the Standards governing transfers of services, as well as with any other applicable pricing rules, as referenced in Section 5, §§ (f), (g) & (h) above.

Section 5, § (u). The Standards apply to any transfers, leases, rentals, licenses, easements, or other encumbrances of assets that may be made between JCP&L and its RCBS.

While no applicable RCBS exists at this time, should any RCBS be formed within or join the FirstEnergy System, JCP&L will comply with the pricing provisions of the Standards for any transfers, leases, rentals, licenses, easements, or other encumbrances of assets that may be made between JCP&L and its RCBS.

Section 6. The Act and the Standards restrict JCP&L's ability to offer competitive products and/or services without a Board-approved tariff.

JCP&L does not offer any competitive products and/or services other than a Conditioned Power Service Program, which is carried out pursuant to a Board Order dated October 19, 1993, as amended by Supplemental Order dated September 13, 1994, in Docket No. ET92040380. These products and/or services are offered pursuant to such Board Order and in compliance with relevant filed tariffs. The Consumer Electronics Protection Service Program, one component of JCP&L's Conditioned Power Service Program, was closed to new customers as of March 3, 1999.

Section 7. Regulatory Oversight

This Compliance Plan is submitted in fulfillment of the requirements of the Standards. N.J.A.C. 14:4-3.7. The list of affiliates referenced in N.J.A.C. 14:4-3.7(b)(1) is attached hereto as Appendix C.

Section 8. Dispute Resolution

JCP&L will fulfill its obligations, as outlined in the Standards, with regard to the resolution of disputes. In compliance with the Standards, JCP&L has formulated the following dispute resolution procedure:

The FirstEnergy Employee Helpline serves as a telephone complaint hotline, which can be found on FirstEnergy's website, to address complaints alleging violations of the Standards. The FirstEnergy Employee Helpline is a confidential toll-free number that is answered by a third-party vendor, NAVEX Global, Inc. The telephone number is 1-800-683-3625.

Complaints will be investigated under the auspices of the Chief Ethics Officer of FirstEnergy Service Company and the results of such investigation shall be made available to the

complainant, in writing, within thirty days of JCP&L's receipt of the complaint. This written communication shall include a description of any action taken in response to the complaint. A log shall be maintained of all complaints, both pending and resolved. The log shall be subject to review by the Board and the Division of Rate Counsel. It shall contain, at minimum, a summary of each complaint, an explanation of why any pending complaint remains pending, and a statement of the manner in which each resolved complaint was resolved. Within five business days of becoming aware of any violation of the Standards, JCP&L shall report the violation to the Board and shall provide the Division of Rate Counsel with a copy of the report.

Section 9. Violations and Penalties

If the Board were to determine that a fine for a proven violation were appropriate, and ordered JCP&L to pay such a fine, JCP&L would do so as required by law.

###

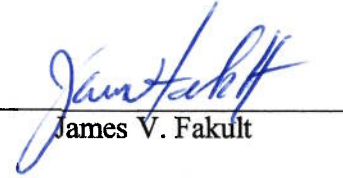
APPENDIX A

IN THE MATTER OF THE : VERIFICATION OF SENIOR
PROMULGATION OF STANDARDS BY : CORPORATE OFFICER OF JERSEY
THE BOARD PURSUANT TO THE : CENTRAL POWER & LIGHT COMPANY
PROVISIONS OF THE ELECTRIC : PURSUANT TO AFFILIATE RELATIONS,
DISCOUNT AND ENERGY COMPETITION : FAIR COMPETITION AND
ACT OF 1999, P.L. 1999, C.23 : ACCOUNTING STANDARDS OF THE
: BOARD OF PUBLIC UTILITIES
:
: DOCKET NO. EX99030182

James V. Fakult, being duly sworn upon his oath, deposes and says:

1. I am James V. Fakult, President of Jersey Central Power & Light Company ("JCP&L"), and I am duly authorized by JCP&L to make this Affidavit of Verification on its behalf.
2. I have read the contents of the foregoing Compliance Plan, and I am generally familiar with the mechanisms and procedures that are described in the Compliance Plan to reasonably ensure that JCP&L follows the mandates of the above-captioned Standards.
3. To the best of my knowledge, I hereby verify the adequacy of the specific mechanisms and procedures that are described in the Compliance Plan to reasonably ensure that JCP&L follows the mandates of the above-captioned Standards.
4. Pursuant to N.J.A.C. 14:4-3.5(i), to the best of my knowledge, I verify that the mechanisms and procedures described in the Compliance Plan are adequate to reasonably ensure that joint corporate support services will not be used as a conduit to circumvent the above-captioned Standards.
5. Pursuant to N.J.A.C. 14:4-3.5(j), to the best of my knowledge, I verify that the mechanisms and procedures described in the Compliance Plan are adequate to reasonably ensure that shared officers and directors are not utilized in violation of the *Electric Discount and*


Energy Competition Act, N.J.S.A. 48:3-49, *et seq.*, or in violation of the above-captioned Standards.


James V. Fakult



Commonwealth of New Jersey:
County of Monmouth:

Sworn to and subscribed before
me this 31st day of August 2023


Janet C. Hrbek
Notary Public

Janet C. Hrbek
Notary Public of New Jersey
My Commission Expires Sept. 22, 2026



FINAL 2023 Affiliate Standards Compliance Plan - Appendix B Draft.docx

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E-Signature Summary

E-Signature 1: Olenger L Pannell (Olp)

August 31, 2023 14:00:23 -5:00 [47B120946320] [174.207.40.211]
pannelo@firstenergycorp.com (Principal) (Personally Known)

E-Signature Notary: Kori Rebecca Auman-Krebs (KRK)

August 31, 2023 14:00:23 -5:00 [06CEF7308250] [98.237.82.177]
kauman@firstenergycorp.com

I, Kori Rebecca Auman-Krebs, did witness the participants named above electronically sign this document.



APPENDIX B

IN THE MATTER OF THE : VERIFICATION OF SENIOR
PROMULGATION OF STANDARDS BY : CORPORATE OFFICER OF JERSEY
THE BOARD PURSUANT TO THE : CENTRAL POWER & LIGHT COMPANY
PROVISIONS OF THE ELECTRIC : PURSUANT TO AFFILIATE RELATIONS,
DISCOUNT AND ENERGY COMPETITION : FAIR COMPETITION AND
ACT OF 1999, P.L. 1999, C.23 : ACCOUNTING STANDARDS OF THE
: BOARD OF PUBLIC UTILITIES
:
: DOCKET NO. EX99030182

Olenger L. Pannell, being duly sworn upon his oath, deposes and says:

1. I am Olenger L. Pannell, Vice President, Compliance and Regulated Services, FirstEnergy Service Company, and I am duly authorized by FirstEnergy Corp. to make this Affidavit of Verification on its behalf.
2. I have read the contents of the foregoing Compliance Plan, and I am generally familiar with the mechanisms and procedures that are described in the Compliance Plan to reasonably ensure that FirstEnergy Corp. follows the mandates of the above-captioned Standards.
3. To the best of my knowledge, I hereby verify the adequacy of the specific mechanisms and procedures that are described in the Compliance Plan to reasonably ensure that FirstEnergy Corp. follows the mandates of the above-captioned Standards.
4. Pursuant to N.J.A.C. 14:4-3.5(i), to the best of my knowledge, I verify that the mechanisms and procedures described in the Compliance Plan are adequate to reasonably ensure that joint corporate support services will not be used as a conduit to circumvent the above-captioned Standards.

15858BEE-0C77-452F-BED5-32BFF7CCC42F --- 2023/08/31 12:31:41 -5:00 --- Remote Notary



5. Pursuant to N.J.A.C. 14:4-3.5(j), to the best of my knowledge, I verify that the mechanisms and procedures described in the Compliance Plan are adequate to reasonably ensure that shared officers and directors are not utilized in violation of the *Electric Discount and Energy Competition Act*, N.J.S.A. 48:3-49, *et seq.*, or in violation of the above-captioned Standards.

Olenger L Pannell
Signed on 2023/08/31 14:00:23 -5:00

Olenger L. Pannell

Commonwealth of Pennsylvania :
County of York :

Sworn to and subscribed before
me this 31st day of August 2023

Kori Rebecca Auman-Krebs
Notary Public

Commonwealth of Pennsylvania - Notary Seal
Kori Rebecca Auman-Krebs, Notary Public
Berks County
My Commission Expires Feb 14, 2027
Commission Number 1345524

Notary Stamp 2023/08/31 11:00:23 PST 06CEF7308250

Notarial act performed by audio-visual communication

15858BEE-0C77-452F-BED5-32BFF7CCC42F --- 2023/08/31 12:31:41 -5:00 --- Remote Notary



APPENDIX C

List of Jersey Central Power & Light Company Affiliates

In accordance with N.J.A.C. 14:4-3.7(b)(1), JCP&L, a first-tier subsidiary of FirstEnergy Corp., hereby provides a list of all affiliates. Specifically, in addition to information about FirstEnergy Corp. (JCP&L's parent corporation), FirstEnergy Corp.'s other first-tier subsidiaries are identified and for each the following information is provided: (i) a brief description of the direct subsidiary's business; (ii) an address; (iii) an officer's name; (iv) business telephone number; and (v) a list of its direct subsidiaries (if any).

FirstEnergy Corp.

Description of Business: A diversified public utility holding company headquartered in Akron, Ohio. Its subsidiaries and affiliates are involved in the generation, transmission and distribution of electricity, as well as energy management and other energy-related services.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Direct Subsidiaries:¹

Allegheny Energy Service Corporation

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is a service company providing certain administrative support and other services on behalf of FirstEnergy subsidiary companies through FirstEnergy Service Company.

Primary Address: 800 Cabin Hill Drive, Greensburg, PA 15601

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Allegheny Energy Supply Company, LLC

Description of Business: A limited liability company wholly owned by FirstEnergy Corp. and organized for any lawful act or activity for which such companies may be formed, including but not limited to, generating electric power.

Primary Address: 800 Cabin Hill Drive, Greensburg, PA 15601

Officer's Name: Mary M. Swann

Business Telephone Number: [REDACTED]

Subsidiaries:

AE Supply Renaissance Southwest, LLC

Allegheny Energy Supply Renaissance Southwest, LLC

Buchanan Energy Company of Virginia, LLC

Mon Synfuel, LLC – 2.45% ownership

NYC Energy, LLC (50% owned by Allegheny Energy Supply Company, LLC)

¹ In addition to the direct subsidiaries listed herein, FirstEnergy Corp. also has a 3.5% ownership interest in the Ohio Valley Electric Corporation.

Allegheny Ventures, Inc.

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which pursues appropriate investment opportunities.

Primary Address: 800 Cabin Hill Drive, Greensburg, PA 15601

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

APS Constellation, L.L.C. – 50% ownership

Utility Associates, Inc. – 6.19% ownership

FELHC, Inc.

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which serves as licensee on all FCC radio licenses for FirstEnergy companies.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

FirstEnergy Fiber Holdings Corp.

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is organized for the purpose of offering fiber capacity to telecommunications end-use services providers.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

FirstEnergy Foundation²

Description of Business: A charitable foundation that provides community support to non-profit, tax-exempt organizations within the service areas of the FirstEnergy electric operating companies. Funded solely by FirstEnergy Corp., FirstEnergy Foundation awards grants in the area of education, the arts, community improvements, and health and welfare.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Secretary

Business Telephone Number: [REDACTED]

FirstEnergy Pennsylvania Holding Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which serves as the holding company for FirstEnergy Pennsylvania Electric Company.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

FirstEnergy Pennsylvania Electric Company

² FirstEnergy Foundation would be more accurately considered an affiliate as opposed to a subsidiary of FirstEnergy Corp. FirstEnergy Foundation is a non-profit organization sponsored by FirstEnergy Corp. that performs charitable functions on behalf of FirstEnergy Corp.

FirstEnergy Properties, Inc.

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which owns non-utility land and coal rights held for sale, investment or potential development, office buildings rented to affiliated companies and third parties, and also holds the former Centerior Corporation's partnership share in economic development investments.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

FirstEnergy Service Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp., which provides administrative support and services to FirstEnergy affiliated entities.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

FirstEnergy Transmission, LLC

Description of Business: A limited liability company 80.1% owned by FirstEnergy Corp. and organized for any lawful act or activity for which such companies may be formed, under the Delaware Limited Liability Company Act and laws of the State of Delaware.

Primary Address: 5001 NASA Boulevard, Fairmont, West Virginia 26554

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

AET PATH Company, LLC

American Transmission Systems, Incorporated

AYE Series, Potomac-Appalachian Transmission Highline, LLC (a wholly-owned subsidiary of AET PATH Company, LLC)

Grid Assurance, LLC

Keystone Appalachian Transmission Company

Mid-Atlantic Interstate Transmission, LLC³

PATH Allegheny Maryland Transmission Company, LLC (97% owned by PATH Allegheny Transmission Company, LLC)

PATH Allegheny Transmission Company, LLC (a wholly-owned subsidiary of AYE Series, Potomac-Appalachian Transmission Highline, LLC)

PATH Allegheny Virginia Transmission Corporation (a wholly-owned subsidiary of PATH Allegheny Transmission Company, LLC)

PATH West Virginia Transmission Company, LLC (a wholly-owned subsidiary of West Virginia Series, Potomac-Appalachian Transmission Highline, LLC)

PATH-Allegheny Land Acquisition Company (a wholly-owned subsidiary of PATH Allegheny Transmission Company, LLC)

Potomac-Appalachian Transmission Highline, LLC (50% owned by AET PATH Company, LLC)

Trans-Allegheny Interstate Line Company

³ Pennsylvania Electric Company and Metropolitan Edison Company have economic only membership interest in Mid-Atlantic Interstate Transmission, LLC

West Virginia Series, Potomac-Appalachian Transmission Highline, LLC (50% owned by AET PATH Company, LLC)

FirstEnergy Ventures Corp.

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. whose principal business involves the ownership of stock investments in certain unregulated enterprises and business ventures.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

Bay Shore Power Company

Global Mining Holding Company, LLC – 33.3% ownership

Warrenton River Terminal, Ltd.

GPU Nuclear, Inc.

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is the licensed owner of the non-operational Three Mile Island Unit 2 nuclear generating station.

Primary Address: 300 Madison Avenue, Morristown, NJ 07962

Officer's Name: Mary M. Swann

Business Telephone Number: [REDACTED]

Green Valley Hydro, LLC.

Description of Business: A limited liability company wholly owned by FirstEnergy Corp. and organized as the owner of four hydro generating stations (Luray, Shenandoah, Newport, and Warren) located in the Commonwealth of Virginia.

Primary Address: 800 Cabin Hill Drive, Greensburg, Pennsylvania 15601

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Jersey Central Power & Light Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is an electric utility company, which engages in the distribution and sale of electric energy to one million customers within 3,200 square miles of northern and central New Jersey.

Primary Address: 300 Madison Avenue, Morristown, NJ 07962-1911

Officer's Name: Daniel M. Dunlap, Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

JCP&L Transition Funding II LLC

Keystone Appalachian Transmission Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. The Company's purpose is to engage in any lawful act or activity for which a public service company may be formed in the Commonwealth of Virginia, including, but not limited to, design, engineer, site, acquire rights-of-way for procure, permit, construct, commission, finance, own, operate and maintain certain transmission and interconnection facilities in the PJM Region.

Metropolitan Edison Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is an electric utility company, which engages in the distribution and sale of electric energy in parts of central and eastern Pennsylvania.

Primary Address: 2800 Pottsville Pike, Reading, PA 19605-2459

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Monongahela Power Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is an electric utility serving substantially all of the northern half of West Virginia.

Primary Address: 5001 NASA Boulevard, Fairmont, West Virginia 26554

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

Allegheny Generating Company

Allegheny Pittsburgh Coal Company – 25% ownership

MP Renaissance Funding, LLC

MP Environmental Funding, LLC (wholly-owned subsidiary of MP Renaissance Funding, LLC)

Ohio Edison Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is an electric utility that engages in the distribution and sale of electric energy within a 7,500 square-mile area of central and northeastern Ohio.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

OE Funding, LLC

OES Ventures, Incorporated

Ohio Valley Electric Corporation (0.85% ownership)

Pennsylvania Power Company

Pennsylvania Electric Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is an electric utility that engages in the distribution and sale of electric energy to 580,000 customers within 17,600 square miles of northern and central Pennsylvania.

Primary Address: 5404 Evans Road, Erie, PA 16509

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

The Waverly Electric Light and Power Company

Suvon, LLC

Description of Business: A limited liability company wholly owned by FirstEnergy Corp. and organized to carry on any lawful act or activity for which limited liability companies may be formed under the law.

Primary Address: 76 South Main Street, Akron, Ohio 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

The Cleveland Electric Illuminating Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is an electric utility that engages in the distribution and sale of electric energy within a 1,700 square-mile area of northeastern Ohio, including the City of Cleveland.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

CEI Funding, LLC

The Potomac Edison Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is an electric utility serving portions of Maryland, Virginia, and West Virginia.

Primary Address: 10802 Bower Avenue, Williamsport, MD 21795

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

Allegheny Pittsburgh Coal Company– 25% ownership

PATH Allegheny Maryland Transmission Company, LLC – 3% ownership

PE Renaissance Funding, LLC

PE Environmental Funding, LLC (a wholly owned subsidiary of PE Renaissance Funding, LLC)

The Toledo Edison Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is an electric utility that engages in the distribution and sale of electric energy within a 2,500 square-mile area of northwestern Ohio, including the City of Toledo.

Primary Address: 76 South Main Street, Akron, OH 44308

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

TE Funding, LLC

Ohio Valley Electric Corporation – 4% ownership

West Penn Power Company

Description of Business: A wholly-owned subsidiary of FirstEnergy Corp. which is an electric utility serving parts of southwestern and north and south central Pennsylvania.

Primary Address: 800 Cabin Hill Drive, Greensburg, Pennsylvania 15601

Officer's Name: Mary M. Swann – Corporate Secretary

Business Telephone Number: [REDACTED]

Subsidiaries:

Allegheny Pittsburgh Coal Company– 50% ownership

The West Virginia Power & Transmission Company

West Penn Southwest, LLC