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October 1, 2021

**VIA ELECTRONIC MAIL ONLY**

Aida Camacho-Welch, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

**Re: In the Matter of the Verified Petition of Jersey Central Power & Light Company For the Review and Approval of Costs Incurred For Environmental Remediation of Manufactured Gas Plant Sites Pursuant to the Remediation Adjustment Clause of Its Filed Tariff (“2020 RAC Filing”)  
BPU Docket No. \_\_\_\_\_**

Dear Secretary Camacho-Welch:

On behalf of the Petitioner, Jersey Central Power & Light Company (“JCP&L” or the “Company”), attached for filing with the Board of Public Utilities (“Board”) is an electronic copy of JCP&L’s Verified Petition and supporting Attachments in its above-captioned “2020 RAC Filing”, relating to the Company’s Remediation Adjustment Clause (“RAC”), which is a component of the Societal Benefits Charge (“SBC”) of JCP&L’s filed Tariff.<sup>1</sup> Also attached is an electronic version of the voluminous Minimum Filing Requirements (“MFRs”) required by the 2004 RAC Filing Stipulation dated as of November 15, 2005, as modified by the 2006-2008 RAC Filing Stipulation dated February 8, 2011. Please note that MFR-10, which contains confidential information, has been omitted from this filing pending execution of an appropriate confidentiality agreement.

As noted in the Verified Petition (at ¶3), the purpose of this filing is to provide the Board, its Staff and the Division of Rate Counsel with the opportunity to conduct a review of all actual costs and expenditures incurred by JCP&L relating to the period from January 1, 2020 through December 31, 2020.

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<sup>1</sup> In accordance with the March 19, 2020 Order of the Board in Docket No. EO20030254, which directed that all submissions to the Board or to the Division of Rate Counsel (“Rate Counsel”), this Petition and the attachments hereto are being sent by electronic mail only.

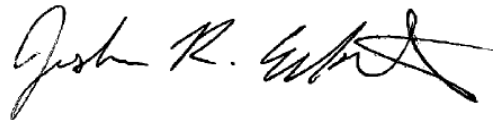
As noted in ¶ 39 of the Verified Petition, the Company proposes to defer costs related to Natural Resource Damage (“NRD”) issues and incentive compensation costs for 2020, but not to include such NRD-related and incentive compensation costs for recovery until there is a final resolution regarding the appropriateness of recovering same.

As noted in ¶¶ 38 and 39 of the Verified Petition, the incremental expenses incurred in connection with JC&L’s Manufactured Gas Plant (“MGP”) remediation program in the 2020 period are \$11.210 million. During 2020, the deferral accrued carrying costs of \$1.168 million, leaving a net balance of unrecovered 2020 MGP costs, as of December 31, 2020, of \$12.378 million. After subtracting the deferred incentive compensation costs of \$14,815, the resulting net incremental MGP costs incurred during calendar year 2020, which represents the total recoverable MGP remediation expense for the 2020 period, is \$12.364 million. When combined with the 2020 *over-recovered* deferred RAC balance of \$2.292 million and the remaining amortization of prior RAC expenditures previously approved for recovery, the resultant *increase* to JCP&L’s Rider RAC charge is \$0.000102 per kilowatt-hour (“kWh”) (before sales and use tax (“SUT”)), which would increase revenues by \$1.96 million annually. The Company is proposing that the new rate of \$0.000806 per kWh (before SUT) become effective on January 1, 2022.

I hereby confirm that this letter and the attached Verified Petition and supporting Attachments are this day being served by electronic delivery upon the Acting Director, Division of Rate Counsel, and upon the Department of Law & Public Safety, Division of Law, as set forth in ¶42 of the Verified Petition.

If you have any questions, please feel free to contact me.

Very truly yours,



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Joshua R. Eckert

Attachments

cc: Certificate of Service

**SERVICE LIST**  
**JERSEY CENTRAL POWER & LIGHT COMPANY**  
**2020 RAC Filing**  
**BPU Docket No. \_\_\_\_\_**

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**JCP&L**

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**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

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In the Matter of the Verified Petition of <b>Jersey</b>	:	BPU Docket No.
<b>Central Power &amp; Light Company</b> for the	:	
Review and Approval of Costs Incurred for	:	
Environmental Remediation of Manufactured	:	
Gas Plant Sites Pursuant to the Remediation	:	<b>VERIFIED PETITION</b>
Adjustment Clause of Its Filed Tariff	:	
<b>("2020 RAC Filing")</b>	:	

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**TO THE HONORABLE BOARD OF PUBLIC UTILITIES:**

Petitioner, Jersey Central Power & Light Company (the "Petitioner", the "Company" or "JCP&L"), an electric public utility company of the State of New Jersey subject to the regulatory jurisdiction of the Board of Public Utilities (the "Board"), and maintaining offices at 300 Madison Avenue, Morristown, New Jersey 07962-1911, and 101 Crawford Corners Road, Building 1, Suite 1-511, Holmdel, New Jersey 07733, in support of its above-captioned Verified Petition, respectfully shows:

1. JCP&L is a New Jersey electric public utility primarily engaged in the purchase, transmission, distribution and sale of electric energy and related utility services to more than 1,000,000 residential, commercial, and industrial customers located within 13 counties and 236 municipalities of the State of New Jersey.

2. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

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**- and -**

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**Jersey Central Power & Light Company  
300 Madison Avenue  
Morristown, New Jersey 07962-1911**

**Purpose of Filing**

3. The purpose of this filing is to provide the Board, the Board's Staff ("Staff") and the Division of Rate Counsel ("Rate Counsel"), with the opportunity to conduct a review of all actual costs and expenditures incurred by JCP&L relating to the environmental remediation of its former manufactured gas plant ("MGP") sites for the period from January 1, 2020 through December 31, 2020, pursuant to the Remediation Adjustment Clause ("RAC") of JCP&L's filed Tariff ("2020 RAC Filing"). As explained in detail in this Petition, JCP&L is requesting an increase in its Rider RAC charge that will increase recovery by \$1.96 million annually.

## **Procedural History**

4. By Order dated July 30, 1997 in Docket No. ER95120634 (the “1997 RAC Order”), the Board adopted in its entirety a Stipulation of Settlement dated June 24, 1997 among JCP&L, Staff and Rate Counsel. The 1997 RAC Order established Rider RAC in JCP&L’s filed tariff, which was intended to allow JCP&L to recover all prudently incurred costs and expenses, including associated transaction and carrying costs, and net of insurance and other third-party recoveries, related to the environmental remediation of various former MGP sites. That Order also approved the scope and reasonableness of all such MGP remediation costs and expenses previously incurred by JCP&L through December 31, 1995.

5. The Board’s Final Decision and Order dated March 7, 2001, in Docket Nos. EO97070458, EO97070459, EO97070460 (the “Restructuring Order”), which concluded JCP&L’s rate unbundling, stranded costs and restructuring filings, established a new Tariff Rider designated as the Societal Benefits Charge (“SBC”). The SBC, as approved by the Board, is designed to include Rider RAC for the recovery of costs related to MGP site remediation.

6. On March 13, 2002, JCP&L filed with the Board a Verified Petition, under Docket No. ER02030173 (the “2002 RAC Filing”), in order to provide the Board, its Staff and Rate Counsel with the opportunity to conduct a review of all actual and projected MGP-related costs and expenditures, including related insurance recoveries, incurred by JCP&L for the period from January 1, 1996 through July 31, 2003. Following extensive discovery and both public and evidentiary hearings thereon, the 2002 RAC Filing was resolved by a Stipulation of Settlement of Remediation Adjustment Clause dated June 10, 2003 (the “2002 RAC Filing Stipulation”) by and among JCP&L, Staff and Rate Counsel (collectively, the “Parties”). The 2002 RAC Filing Stipulation was approved by the Board at its July 25, 2003 Agenda Meeting, as reflected in both

the Board's Summary Order dated August 1, 2003 (at 3) and its Final Order dated May 17, 2004 (at 14-15), which were issued in several consolidated dockets including Docket No. ER02030173.

7. Among other things, the 2002 RAC Filing Stipulation, as approved by the Board, resolved all issues relating to JCP&L's MGP costs and related insurance recoveries for the period from January 1, 1996 through December 31, 2002. The 2002 RAC Filing Stipulation determined that JCP&L had a net unrecovered deferred RAC balance of \$678,396 as of December 31, 2002, which was to be carried forward by JCP&L for future recovery without any immediate adjustment to its RAC factor, but subject to the agreed-upon subsequent write-off by JCP&L of \$2.5 million in principal amount from the deferred RAC account balance. The 2002 RAC Filing Stipulation also prospectively modified the interest rate and changed the method and timing of the interest calculation for deferred RAC balances, including the annual compounding of interest thereon.

8. On December 22, 2003, JCP&L filed its 2003 Annual RAC Filing under Docket No. ER03121020, seeking the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1 through December 31, 2003. Following extensive discovery and conferences, the 2003 RAC proceeding was resolved by a Stipulation of Settlement of Remediation Adjustment Clause dated September 10, 2004 (the "2003 RAC Filing Stipulation"), by and among JCP&L, Staff and Rate Counsel. In the 2003 RAC Filing Stipulation, the Parties agreed and recommended to the Board that, subject to the application of the previously agreed-upon \$2.5 million write-off, JCP&L's deferred RAC balance of \$5,765,342, at December 31, 2003, be approved by the Board for future recovery through Rider RAC of the Company's Tariff. The Parties also agreed upon certain prospective modifications, namely, to move the effective date for interest compounding and interest rate resetting to January 1 (instead of August

1) of each year, commencing January 1, 2005. The 2003 RAC Filing Stipulation was approved by the Board's Decision and Order Approving Stipulation, dated October 5, 2004.

9. At its Agenda meeting held on September 13, 2004, under Docket No. EM02060377, the Board approved the proposed transfer of certain MGP-related properties pursuant to a Separation Agreement dated September 22, 2000, by and between JCP&L and New Jersey Natural Gas Company ("NJNG"), in order to achieve certain efficiencies with respect to the remediation of MGP sites for which responsibility had previously been shared by those two companies. Consistent with the Separation Agreement, JCP&L no longer shares in the remediation costs for the Long Branch and Toms River MGP sites, but now has full financial responsibility for the continued remediation of the remaining eight sites previously shared with NJNG.

10. On December 28, 2004, JCP&L filed its 2004 Annual RAC Filing under Docket No. ER04121758, seeking the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1 through December 31, 2004. Following extensive discovery and conferences, the 2004 Annual RAC proceeding was resolved by a Stipulation of Settlement of 2004 Remediation Adjustment Clause Filing dated as of November 15, 2005 (the "2004 RAC Filing Stipulation"), by and among JCP&L, Staff and Rate Counsel. In paragraph 3(b) of the 2004 RAC Filing Stipulation, the Parties agreed and recommended to the Board that JCP&L's deferred RAC net balance of \$6,257,042, at December 31, 2004, be approved by the Board as eligible for future recovery through Rider RAC and/or through current application of other provisions of Rider SBC of the Company's Tariff. The Parties also agreed in the 2004 RAC Filing Stipulation upon various additional record-keeping requirements and information to be provided in future annual RAC filings and to provide specific responses in such annual filings to the agreed-upon minimum filing requirements ("MFRs") as set forth in Exhibit A thereto. The



Parties further agreed to have the Staff's Audit Division perform a RAC audit to review the Company's RAC-related transactions and to verify that the Company has followed all applicable Board-approved RAC procedures and related Board Orders. The 2004 RAC Filing Stipulation was approved by the Board at its March 16, 2006 Agenda Meeting.

11. On March 31, 2006, JCP&L filed its 2005 Annual RAC Filing under Docket No. ER06030258, seeking the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1 through December 31, 2005. This filing had been delayed from its anticipated filing in December 2005 pending Board approval of the 2004 RAC Filing Stipulation, which, as noted above, occurred on March 16, 2006. Following extensive discovery and conferences, the 2005 Annual RAC proceeding was resolved by a Stipulation of Settlement of 2005 Remediation Adjustment Clause Filing dated as of April 2, 2009 (the "2005 RAC Filing Stipulation"), by and among JCP&L, Staff and Rate Counsel. In paragraph 3(b) of the 2005 RAC Filing Stipulation, the Parties agreed and recommended to the Board that JCP&L's deferred RAC net balance of \$2,576,903, at December 31, 2005, be approved by the Board as eligible for future recovery through Rider RAC and/or through current application of other provisions of Rider SBC of the Company's Tariff. The 2005 RAC Filing Stipulation also acknowledged that JCP&L had deferred an additional \$62,856 of costs related to Natural Resource Damage ("NRD") issues from 2005. The Parties agreed in the 2005 RAC Filing Stipulation that, while it was appropriate for JCP&L to defer these NRD-related costs, they should not be recovered until there was a final Board determination as to whether NRD-related costs are within the scope of the Board's RAC recovery authorization. The Parties reserved all of their respective rights with respect to the issue of whether it is appropriate for JCP&L to recover these 2005 NRD-related costs, as well as a total of approximately \$76,000 of NRD-related costs from 2003 and 2004. The

2005 RAC Filing Stipulation was approved by Board Order dated April 27, 2009.

12. On March 9, 2009, JCP&L filed its 2006-2008 RAC Filing under Docket No. ER09030194, seeking the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1, 2006 through December 31, 2008, *i.e.*, covering calendar years 2006, 2007 and 2008. Following extensive discovery and conferences, the 2006-2008 RAC Filing was resolved by a Stipulation of Settlement of 2006-2008 Remediation Adjustment Clause Filing dated as of February 8, 2011 (the “2006-2008 RAC Filing Stipulation”), by and among JCP&L, Staff and Rate Counsel. The 2006-2008 RAC Filing Stipulation was approved by a Board Order dated March 9, 2011.

13. On February 19, 2010, JCP&L filed its 2009 SBC/SCC and RAC Filing under Docket No. ER10020130, the RAC portion of which sought the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1, 2009 through December 31, 2009 (“2009 RAC Filing”). In the RAC portion of that filing, the Company requested an increase in its Rider RAC charge to recover an additional \$1.8 million annually. Although there was extensive discovery and numerous conferences among JCP&L, Staff and Rate Counsel in connection with the 2009 RAC Filing, the matter remained pending in early March 2011.

14. On March 15, 2011, the Company filed its 2010 RAC Petition (“2010 RAC Filing”) even though the 2009 RAC Filing remained pending. The 2010 RAC Filing, which was assigned Docket No. ER11030141, sought an increase in JCP&L’s Rider RAC charge to recover an additional \$1.1 million annually. On June 15, 2011, the Board issued an order approving a Stipulation of Settlement for the 2009 RAC Filing, and the Company implemented the revised rates effective July 1, 2011.

15. On March 12, 2012, the Board issued an order approving a Stipulation of Settlement resolving the Company's 2010 RAC Filing. In that Stipulation of Settlement, the parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2010 was an under-recovered balance of \$20,379,454, after application of over-recoveries of \$7,847,211 from other components of Rider SBC, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition to the deferred RAC net balance of \$20,379,454, at December 31, 2010, referred to above, the parties agreed that JCP&L has deferred (i) \$435,073 of costs related to NRD issues from 2005 through 2010, and (ii) \$103,751 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2010. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in the 2010 RAC Filing as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. On April 1, 2012, JCP&L implemented the revised Rider RAC rates.

16. On August 15, 2012, the Company filed its 2011 RAC Petition ("2011 RAC Filing"). The 2011 RAC Filing, which was assigned Docket No. ER12080751, the Verified Petition demonstrated a calculated increase to JCP&L's Rider RAC charge of 0.000062 /kWh, which would have recovered an additional \$1.32 million annually. However, rather than implementing a small Rider RAC charge increase, JCP&L proposed to leave the current rate (0.000130 /kWh, excluding sales and use tax ("SUT")) in place.

17. On November 21, 2014, the Board issued an order approving a Stipulation of Settlement resolving the Company's 2011 RAC Filing. In that Stipulation, the parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2011 was an under-recovered balance of \$28,510,182, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. The parties also agreed that JCP&L's Rider RAC would remain \$0.000130 per kWh (excluding SUT). In addition to the deferred RAC net balance of \$28,510, 182, at December 31, 2011, referred to above, the parties agreed that JCP&L had deferred (i) \$468,477 of costs related to NRD issues from 2005 through 2011, and (ii) \$114,625 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2011. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate.

18. On April 30, 2015, JCP&L filed its 2012-2014 RAC Petition with the Board ("2012-2014 RAC Filing"). The 2012-2014 RAC Filing requested a calculated increase to JCP&L's Rider RAC charge of \$0.000306/kWh (excluding SUT), which would recover an additional \$6.457 million annually. The Company proposed that the new rate become effective on October 1, 2015. The matter was transmitted to the Office of Administrative Law and assigned to Administrative Law Judge ("ALJ") Richard McGill.

19. On July 29, 2016, the Board issued an Order approving an Initial Decision-

Settlement, which in turn had recommended approval of a Stipulation of Settlement among the parties to the 2012-2014 RAC Filing. In that Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2014 was an under-recovered balance of \$64,428,766, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition, the Parties also agreed that JCP&L has deferred (i) \$651,070 of costs related to NRD issues from 2005 through 2014, and (ii) \$143,077 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2014. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in that proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. Pursuant to the Board's July 29, 2016 Order, the Company's Rider RAC was increased by \$0.000306 per kWh (excluding SUT) to \$0.000436 per kWh (excluding SUT), effective for service rendered on and after August 8, 2016. As a result of this rate change, the Company's revenues under its RAC were expected to increase by approximately \$6.457 million annually.

20. On September 30, 2016, JCP&L filed its 2015 RAC Petition with the Board ("2015 RAC Filing"). The 2015 RAC Filing requested a calculated increase to JCP&L's Rider RAC charge of \$0.000080/kWh (excluding SUT), which would recover an additional \$1.617 million annually. The Company proposed that the new rate become effective on January 1, 2017.

21. On October 6, 2017, JCP&L filed a fully executed Stipulation of Settlement

with the Board to resolve the 2015 RAC Filing. In that Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2015 was an under-recovered balance of \$73,052,760, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition, the Parties also agreed that JCP&L had deferred (i) \$749,686 of costs related to NRD issues from 2005 through 2015, and (ii) \$156,325 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2015. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. On November 21, 2017, the Board issued an Order approving the October 6, 2017 Stipulation. Pursuant to the Board's November 21, 2017 Order, the Company's Rider RAC was increased by \$0.000080/kWh (excluding SUT) to \$0.000516 per kWh (excluding SUT), effective for service rendered on and after December 1, 2017. As a result of this rate change, the Company's revenues under its RAC were increased by approximately \$1.617 million annually.

22. On November 28, 2017, JCP&L filed its 2016 RAC Petition with the Board ("2016 RAC Filing"). The 2016 RAC Filing requested a calculated increase to JCP&L's Rider RAC charge of \$0.000100 per kWh (excluding SUT), which would recover an additional \$2.031 million annually. The Company proposed that the new rate become effective on March 1, 2018.

23. On June 4, 2018, JCP&L filed a fully executed Stipulation of Settlement with the Board to resolve the 2016 RAC Filing. In that Stipulation, the Parties agreed that the

Company's ending recoverable deferred RAC balance at December 31, 2016 was an under-recovered balance of \$87,624,589, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition, the Parties also agreed that JCP&L had deferred (i) \$801,633 of costs related to NRD issues from 2005 through 2016, and (ii) \$169,876 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2016. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. On June 22, 2018, the Board issued an Order approving the June 4, 2018 Stipulation. Pursuant to the Board's June 22, 2018 Order, the Company's Rider RAC was increased by \$0.000100 per kWh (excluding SUT) to \$0.000616 per kWh (excluding SUT), effective for service rendered on and after July 1, 2018. As a result of this rate change, the Company's revenues under its RAC were increased by approximately \$2.031 million annually.

24. On August 29, 2018, JCP&L filed its 2017 RAC Petition, assigned Docket No. ER18080965 ("2017 RAC Filing"), with the Board. The 2017 RAC Filing requested a calculated increase to JCP&L's Rider RAC charge of \$0.000195/kWh (excluding SUT), which would recover an additional \$3.95 million annually. The Company proposed that the new rate become effective on December 1, 2018.

25. On October 4, 2019, Board Staff and JCP&L executed a Stipulation of Settlement to resolve the 2017 RAC Filing. In that Stipulation, the Parties agreed that the

Company's ending recoverable deferred RAC balance at December 31, 2017 was an under-recovered balance of \$115,039,883, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition, the Parties also agreed that JCP&L had deferred (i) \$804,850 of costs related to NRD issues from 2005 through 2017, and (ii) \$182,598 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2017. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. Furthermore, the Parties agreed that the Company would file its next annual RAC Filing for the period January 1, 2018 through December 31, 2018 no later than October 4, 2019.

26. On October 4, 2019, JCP&L filed its 2018 RAC Petition, assigned Docket No. ER19101332 ("2018 RAC Filing"). The 2018 RAC Filing supported an increase to JCP&L's Rider RAC charge of \$0.000214/kWh (excluding SUT) to \$0.000830 per kWh (excluding SUT), which was calculated to increase Rider RAC revenues by approximately \$4.285 million annually. However, the Company proposed no change be made to the Rider RAC Tariff Rate beyond the \$3.951 million increase stipulated to in the fully executed Stipulation of Settlement in the 2017 RAC Filing filed October 4, 2019, pending Board approval of same.

27. On October 25, 2019, the Board issued an Order in the 2017 Rider RAC Filing adopting the October 4, 2019 Stipulation as its own and ordering that the Company's RAC



rate be set at \$0.000811 per kwh, excluding SUT, for services rendered on or after November 1, 2019. The Board's order increased the Rider RAC Tariff Rate by \$0.000195 per kWh (excluding SUT), a change expected to increase the Company's RAC revenues by approximately \$3.951 million annually.

28. On April 2, 2020, JCP&L filed a fully executed Stipulation of Settlement with the Board to resolve the 2018 RAC Filing. In the 2018 Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2018 was an under-recovered balance of \$116,380,196. In addition, the Parties also agreed that JCP&L had deferred (i) \$803,654 of costs related to NRD issues from 2005 through 2018, and (ii) \$192,520 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2018. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all their respective rights with respect to the issue of whether such recovery is appropriate. In addition, JCP&L agreed to file its next annual RAC Filing, for the period January 1, 2019 through December 31, 2019, no later than October 1, 2020.

29. On May 5, 2020, the Board issued an Order adopting the 2018 Stipulation, filed April 2, 2020, as its own and ordered that the Company's RAC rate be maintained at \$0.000811 per kwh, excluding SUT, and remain in effect until further Order of the Board. The Board directed the Company to file revised tariff sheets by June 1, 2020.

30. On October 1, 2020, JCP&L filed its 2019 RAC Petition, assigned Docket No. ER20100628 ("2019 RAC Filing"). The 2019 RAC Filing supported a decrease to JCP&L's

Rider RAC charge of (\$0.000107)/kWh (excluding SUT) to \$0.000704 per kWh (excluding SUT), which was calculated to decrease Rider RAC revenues by approximately \$2.130 million annually.

31. On January 29, 2021, JCP&L filed a fully executed Stipulation of Settlement with the Board to resolve the 2019 RAC Filing. In the 2019 Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2019 was an under-recovered balance of \$98,108,720. In addition, the Parties also agreed that JCP&L had deferred (i) \$803,654 of costs related to NRD issues from 2005 through 2019, and (ii) \$206,582 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2019. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all their respective rights with respect to the issue of whether such recovery is appropriate. In addition, JCP&L agreed to file its next annual RAC Filing, for the period January 1, 2020 through December 31, 2020, no later than October 1, 2021.

32. On February 17, 2021, the Board issued an Order adopting the 2019 Stipulation, filed January 29, 2021, as its own and ordered that the Company's RAC rate be set at \$0.000704 per kWh, excluding SUT, for services rendered on or after March 1, 2021. The Board's order decreased the Rider RAC Tariff Rate by \$0.000107 per kWh (excluding SUT), a change expected to decrease the Company's RAC revenues by approximately \$2.13 million annually.

### **2020 RAC Review**

33. During calendar year 2020, JCP&L has continued to perform its MGP remediation activities in compliance with the regulatory requirements established pursuant to the

Site Remediation Reform Act (“SRRA”) and, Administrative Consent Orders (“ACOs”) or Memorandums of Agreement (“MOAs”) executed with the New Jersey Department of Environmental Protection (“NJDEP”) for these sites. All such activities were conducted in accordance with those controlling NJDEP documents and other governing regulatory and environmental rules, regulations and guidance.

34. A summary of some of the remediation activities performed during the 2020 period is presented below:

- a. Remedial investigation activities were performed at the following sites:
  - Asbury Park, Boonton, Newton I, Phillipsburg, and Wildwood.
- b. Remedial action selection-related activities were performed at the following sites:
  - Asbury Park, Boonton, Lambertville, Newton I, Phillipsburg, and Red Bank
- c. Remedial action work plan and design-related activities were performed at the following sites:
  - Asbury Park, Boonton, Lambertville, Newton I, Newton II, Ocean City, and Phillipsburg.
- d. Remedial implementation activities were performed at the following sites:
  - Belmar, Cape May, Dover, Flemington, Lambertville, Newton II, Ocean City, Phillipsburg, and Wildwood.

35. In addition to engineering and environmental services provided by remedial consultants and contractors, other activities directly supporting the MGP remediation program included specialized communication and legal services. Henry & Germann Public Affairs, L.L.C. (“Henry & Germann”) provided services such as: direct communications with affected property owners; conducting site visits; attending meetings with key stakeholders (e.g., municipal officials); preparing written work products such as project updates; coordinating community outreach open

house events; and strategic planning assistance. The law firm Schenck, Price, Smith & King (“SPSK”) provided legal services such as: negotiation of access and deed notice agreements; acquisition of impacted properties; and preparation of property transfers pursuant to the September 22, 2000 Separation Agreement between JCP&L and NJNG. A by-site listing of charges for the services of Henry & Germann and SPSK are included in Attachment D.

36. The Company has continued to apply various budget development and expenditure tracking mechanisms to all its MGP activities. MGP budgets are developed by the Company project managers and Supervisor - Remediation, based on information provided by environmental engineering consultants. All remediation expenses are processed through the Company’s formal accounting system of record. Unique orders are established for each MGP site and for general program management. Charges are captured by cost element to distinguish the nature of the charges (e.g., outside contractor, professional). Expenditures are reviewed and tracked on an ongoing basis and, if needed, correcting journal entries are made. Attachment B summarizes the actual expenses from January 1, 2020 through December 31, 2020. Attachment C provides a detailed breakdown of expenses by quarter. A listing of expenditures by vendor, and a description of the services provided, is included in Attachment D. The 2020 budget and the actual expenses through December 31, 2020, together with variances from budget, are presented in Attachment E. A summary of all actual expenses to date for the MGP program and the estimated future expenses are presented in Attachment F.

37. The Company requires monthly submittals from the primary consultants, including progress reports, invoices and a budget and expenditure analysis broken down on a per-task basis. These submittals are reviewed by the Company project managers on a regular basis. The Company requires that invoice submittals include detailed supporting documentation,

including (but not limited to) time records, expense records, subcontractor invoices and other relevant and supporting data. The Company has established surcharge rates with the consultants for subcontracted services, and these surcharges are clearly identified in the invoice package. The nature of these projects requires that the Company must be flexible to ensure that contracted services can quickly respond to unforeseeable changes, such as new field conditions. Competitive unit rates are established for repetitive tasks during the bidding process and undergo periodic comparisons with other firms. The invoices identify these unit costs to facilitate comparison to the contract rate structure. Where changes in the work scope are required, the primary consultants are required to promptly bring such matters to the attention of the assigned Company project manager. The consultant then documents the work scope changes and related costs in the monthly progress reports and other written correspondence. Change orders to the contract contain documentation prepared by the Company project manager. The primary consultants and remediation contractors have been pre-qualified via competitive bidding, taking into consideration the relevant technical, cost and commercial factors. Individual projects are also subject to bidding based on consideration of various factors including regulatory deadlines and other emergency considerations, economies of scale that take into account the institutional knowledge of the incumbent contractor and project-specific demands, and the unique requirements of the work scope required. The Company pursues joint procurement of remediation services with other utilities, as with the sites shared between the Company and South Jersey Industries, d/b/a Elizabethtown Gas Company. The Company maintains documentation for all expenses, which is available for review by Staff and Rate Counsel.

### **Results of 2020 RAC Review**

38. As discussed in paragraph 32 above, the BPU Order adopted the Stipulation

in the 2019 RAC Filing that established JCP&L's ending recoverable deferred RAC balance at December 31, 2019 to be an under-recovered balance of \$98,108,720 exclusive of NRD-related and incentive compensation costs. This 2020 RAC Filing includes actual MGP data for the period from January 1, 2020 through December 31, 2020.

39. As set forth in greater detail in certain of the Attachments hereto, the incremental expenses incurred in connection with JCP&L's MGP remediation program during calendar year 2020 are \$11.210 million (*see* Attachment A-1, line 53). As shown in Attachment A-1, line 54 and Attachment G, carrying costs accrued in 2020 are \$1.168 million, leaving a net balance of unrecovered MGP costs including carrying costs at December 31, 2020 of \$12.378 million, which includes a reduction resulting from a 2019 Sales and Use Tax Adjustment of \$21.5 thousand that did not impact the calculated rate increase effective January 1, 2022. The above-identified incremental expense amounts for 2020 does not include any costs related to NRD issues but does include charges of \$14,815 related to incentive compensation. *See* Attachment A-1, lines 56 and 57, respectively). JCP&L proposes to continue to defer NRD-related and incentive compensation costs, but not to recover such NRD-related and incentive compensation costs until there is a final resolution of the issue concerning the appropriateness of recovery thereof.

40. After subtracting the incentive compensation costs, the total MGP remediation expense proposed for recovery for 2020 is \$12.364 million. *See* Attachment A-1, Line 58. When combined with the 2020 *over*-recovered deferred RAC balance of \$2.292 million (Attachment A-1, line 62) and the remaining amortization of prior RAC expenditures previously approved for recovery, the result is an increase of \$0.000102 kWh (excluding SUT) in JCP&L's Rider RAC charge to a proposed rate of \$0.000806 kWh (excluding SUT) from the current rate of \$0.000704 kWh (excluding SUT) that would increase revenues by \$1.957 million annually. *See*

Attachment A-1, lines 69, 67, 68 and 70, respectively. The Company is proposing that the new rate become effective on January 1, 2022.

### **Attachments**

41. Attached hereto and made a part of this Verified Petition are the following

Attachments:

- Attachment A-1 Derivation of MGP Remediation Adjustment Charge
- Attachment A-2 Manufactured Gas Plant Remediation Adjustment Deferred Accounting
- Attachment B Summary of MGP Incremental Remediation Expenses for 2020
- Attachment C JCP&L MGP Sites – Quarterly Reports for 2020 – Summary by Site
- Attachment D JCP&L MGP Sites – Summary of Vendor Charges By Site – 1/1/20 through 12/31/20
- Attachment E 2020 Remediation Expenditures – Summary vs. Budget
- Attachment F Summary of Actual and Estimated Remediation Expenses - Total Project Cost
- Attachment G Calculation of Interest on Deferred MGP Remediation Expenses Under/(Over) Recovery
- Attachment H Current and Proposed Tariff Sheets for Rider RAC

### **Public Notice**

42. Public notice of this filing, including a statement of the overall effect thereof on customers of the Company, and which will be combined with notice of the dates, times and places of the public hearings to be scheduled thereon, substantially in the form of the notice set forth in Appendix A annexed hereto, will also be published in daily and weekly newspapers published and/or circulated in the Company's service areas, after the dates, times and places of all such public hearings thereon have been scheduled by the Board in compliance with N.J.A.C. 14:1-5.12(b)3, (c) and (d).

**Service of Petition**

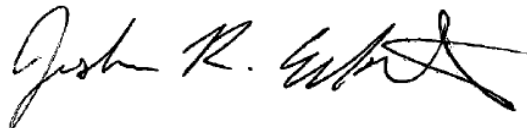
43. Copies of this Verified Petition, and all supporting Attachments thereto, have been or will be served by electronic mail to the Acting Director, Division of Rate Counsel, and the Department of Public Law and Safety, Division of Law.

**Conclusion**

**WHEREFORE**, the Petitioner, Jersey Central Power & Light Company, respectfully requests that the Board issue a final decision and order:

- (1) approving the reasonableness and prudence of all costs and expenditures incurred by the Petitioner from January 1, 2020 through December 31, 2020, relating to the environmental remediation of its former MGP sites;
- (2) approving an increase in the Rider RAC Charge to \$0.000806 per kWh (excluding SUT), which will result in an increase in annual collections of approximately \$1.957 million;
- (3) authorizing the continued deferral by the Petitioner of the net deferred RAC balance at December 31, 2020, with the continuing accrual of interest on the unamortized balance (net of deferred taxes), all in accordance with and subject to the terms of Petitioner’s Rider RAC and related Rider SBC; and
- (4) granting such other and further relief as the Board shall deem just, lawful and proper.

Respectfully submitted,



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Joshua R. Eckert  
FirstEnergy Service Company  
300 Madison Ave.  
Morristown, New Jersey 07962  
973-401-8838

Dated: October 1, 2021

Counsel for Jersey Central Power & Light Company

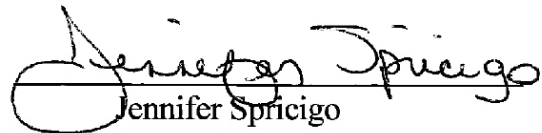


**AFFIDAVIT**  
**OF**  
**VERIFICATION**

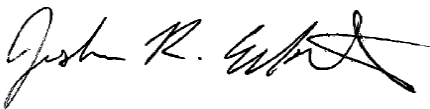
Jennifer Spricigo, being duly sworn upon her oath, deposes and says:

1. I am employed by First Energy Service Company as Rates Analyst in Rates & Regulatory Affairs-New Jersey for Jersey Central Power & Light Company ("JCP&L"), the Petitioner named in the foregoing Verified Petition, and I am duly authorized to make this Affidavit of Verification on its behalf.

2. I have read the contents of the foregoing Verified Petition by JCP&L for review and approval of costs and expenses incurred in 2020 for the environmental remediation of manufactured gas plant sites, and I hereby verify that the data and calculations set forth in Attachments A, G and H thereto are true and correct to the best of my knowledge, information and belief.

  
Jennifer Spricigo

Sworn to and subscribed before me  
this 1<sup>st</sup> day of October 2021



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Joshua R. Eckert  
An Attorney-at-Law licensed to practice in the State of New Jersey  
Attorney ID: 250992018

**AFFIDAVIT**  
**OF**  
**VERIFICATION**

Frank D. Lawson, being duly sworn upon his oath, deposes and says:

1. I am employed by FirstEnergy Service Company as Supervisor - Remediation and Environmental Services in the Environment Department and support Jersey Central Power & Light Company ("JCP&L"), the Petitioner named in the foregoing Verified Petition, and I am duly authorized to make this Affidavit of Verification on its behalf.

2. I have read the contents of the foregoing Verified Petition by JCP&L for review and approval of costs and expenses incurred in 2020 for the environmental remediation of manufactured gas plant ("MGP") sites, and I hereby verify that the statements of fact and other information contained therein, other than the data and calculations set forth in Attachments A, G and H thereto, are true and correct to the best of my knowledge, information and belief.

3. I hereby further attest and verify that all costs and expenses summarized in the foregoing Verified Petition, and more particularly as set forth in Attachments B, C, D, E and F thereto, are all related to the remediation of MGP sites.



Frank D. Lawson

Sworn to and subscribed before me  
this 1<sup>st</sup> day of October 2021



Joshua R. Eckert  
An Attorney-at-Law licensed to practice in the State of New Jersey  
Attorney ID: 250992018

**JERSEY CENTRAL POWER & LIGHT COMPANY**  
**Derivation of Manufactured Gas Plant (MGP) Remediation Adjustment Charge (RAC)**  
**For Tariff Rider Effective January 1, 2022**

Line No.	Through 12/31/2019 (1)	Year 2020 (2)	Total as of 12/31/2020 (3)	Data Sources
<b>MGP Remediation Costs</b>				
1	\$ 50,166,335			
2	(150,892)			
3	<u>(29,097,165)</u>			
4	\$ 20,918,278			Footnote (b) Line Nos. 1 through 3
5	435,073			Footnote (c)
6	<u>103,751</u>			Footnote (d) ER10020130 (6/15/11) & ER11030141 (3/12/12)
7	\$ 20,379,454			
8	\$ 7,700,028			ER12080751 (11/21/2014)
9	474,978			ER12080751 (11/21/2014)
10	\$ 8,175,006			Line Nos. 8 + 9
11	33,404			Footnote (c)
12	10,874			Footnote (d)
13	\$ 8,130,728			ER12080751 (11/21/2014)
14	\$ 34,539,907			ER15040499
15	1,589,722			ER15040499
16	<u>36,129,629</u>			Line Nos. 14 + 15
17	182,593			Footnote (c)
18	28,452			Footnote (d)
19	\$ 35,918,584			ER15040499 (07/29/2016)
20	\$ 7,883,897			ER16090922
21	851,961			ER16090922
22	\$ 8,735,858			Line Nos. 20 + 21
23	98,616			Footnote (c)
24	13,248			Footnote (d)
25	\$ 8,623,994			ER16090922 (11/21/17)
26	\$ 13,621,248			ER17111191
27	1,016,079			ER17111191
28	\$ 14,637,327			Line Nos. 26 + 27
29	51,947			Footnote (c)
30	13,551			Footnote (d)
31	\$ 14,571,829			ER17111191 (06/22/18)
32	\$ 26,063,647			ER18080965 (Attmt B Revised)
33	1,367,586			ER18080965 (Attmt G Revised)
34	\$ 27,431,233			Line Nos. 32 + 33
35	3,217			Footnote (c)
36	12,722			Footnote (d)
37	\$ 27,415,294			ER18080965 (10/25/19)
38	\$ 16,629,984			ER19101332
39	1,975,403			ER19101332
40	<u>(17,256,349)</u>			Footnote (b)
41	\$ 1,349,038			Line Nos. 38 + 39 + 40
42	(1,196)			Footnote (c)
43	9,922			Footnote (d)
44	\$ 1,340,313			ER19101332 (05/15/20)
45	\$ 8,983,474			ER20100628
46	1,716,401			ER20100628
47	(3,947,992)			Footnote (e)
48	<u>(4,629,843)</u>			Footnote (b)
49	\$ 2,122,040			Line Nos. 45 + 46 + 47 + 48
50	-			Footnote (c)
51	14,062			Footnote (d)
52	\$ 2,107,978			ER20100628 (02/27/21)
53		\$ 11,210,113		Attachment B / Footnote (f)
54		<u>1,168,367</u>		Attachment G / Footnote (f)
55		\$ 12,378,480		Line Nos. 53 + 54
56		-		Footnote (c)
57		14,815		Footnote (d)
58		<u>\$ 12,363,665</u>		Line Nos. 55 less 56 & 57
59	\$ 118,488,174	\$ 12,363,665	\$ 130,851,839	Columns (1) through (3)

**JERSEY CENTRAL POWER & LIGHT COMPANY**  
**Derivation of Manufactured Gas Plant (MGP) Remediation Adjustment Charge (RAC)**  
**For Tariff Rider Effective January 1, 2022**

<b>Derivation of Tariff Rider RAC:</b>					
60	Total recoverable MGP remediation expenses	\$ 118,488,174	\$ 12,363,665	\$ 130,851,839	Line 59
61	Less: Fully Amortized Layer (Line 7) at 12/31/2019	(20,379,454)		(20,379,454)	
62	Ending over-recovered deferred RAC balances		(2,291,806)	(2,291,806)	Attachment A-2 p.2 (22)
63	Total recoverable MGP remediation costs incl. under-recovery	\$ 98,108,720	\$ 10,071,858	\$ 108,180,578	Line Nos. 60 + 61 + 62
64	RAC recovery period (years)	7	7	7	ER91121820J 12/16/94 Order
65	Net annual recoverable MGP expenses	<u>\$ 14,015,531</u>	<u>\$ 1,438,837</u>	<u>\$ 15,454,368</u>	Line 63 divided by Line 64
66	Retail Sales forecasted (MWh)			19,185,264	12 mos. Ended 12/31/22
67	Calculated RAC factor (\$ per kWh) before SUT			\$ 0.000806	Line 65 divided by Line 66
68	RAC factor currently in effect (\$ per kWh)			\$ 0.000704	Rider RAC effective 3/1/21
69	Calculated increase in RAC Factor (\$ per kWh) before SUT			\$ 0.000102	Line 67 - Line 68
70	Proposed Rider RAC revenue increase effective 1/1/22			<u>\$ 1,956,897</u>	Line 66 x Line 69

**JERSEY CENTRAL POWER & LIGHT COMPANY**  
**Derivation of Manufactured Gas Plant (MGP) Remediation Adjustment Charge (RAC)**  
**For Tariff Rider Effective January 1, 2022**

**FOOTNOTES:**

- (a) Total cost incurred is net of:
- (1) Write-off in accordance with RAC Stipulation and BPU Order ER03121020 (\$2,500,000);
  - (2) Insurance proceeds received (\$36,100,000);
  - (3) MGP revenue previously collected through base rates (\$16,877,403).

- (b) Application of over-recovered SBC components at year-end in accordance with Tariff Rider SBC:

	Annual	Cumulative
2004	\$ (6,424,026)	
2005	(2,639,759)	
2006	(2,401,577)	
2007	(5,621,172)	
2008	(2,640,262)	
2009	(1,523,158)	
2010	(7,847,211)	\$ (29,097,165)
2011	-	(29,097,165)
2012	-	(29,097,165)
2013	-	(29,097,165)
2014	-	(29,097,165)
2015	-	(29,097,165)
2016	-	(29,097,165)
2017	-	(29,097,165)
2018	(17,256,349)	(46,353,513)
2019	(4,629,843)	(50,983,356)
2020	-	(50,983,356)

- (c) NRD Expenses incurred by year:

	Annual	Cumulative
2005	\$ 62,856	
2006	157,594	
2007	53,434	
2008	18,046	
2009	89,580	
2010	53,563	\$ 435,073
2011	33,404	468,477
2012	83,412	551,889
2013	5,116	557,005
2014	94,065	651,070
2015	98,616	749,686
2016	51,947	801,633
2017	3,217	804,850
2018	(1,196)	803,654
2019	-	803,654
2020	-	803,654

- (d) ICP Costs by year:

	Annual	Cumulative
2006	\$ 27,479	
2007	32,141	
2008	30,346	
2009	-	
2010	13,785	\$ 103,751
2011	10,874	114,625
2012	11,328	125,953
2013	10,259	136,212
2014	6,865	143,077
2015	13,248	156,325
2016	13,551	169,876
2017	12,722	182,598
2018	9,922	192,520
2019	14,062	206,582
2020	14,815	221,397

- (e) Per the BPU's Order in Docket No. ER20010089, dated May 20, 2020, that adopted the Stipulation of Settlement ("SOS") in JCP&L's final annual filing with respect to its Storm Recovery Charge Rider ("Final 2019 SRC Filing") in its entirety, and incorporated the terms and conditions of the SOS as though fully set forth in its Order. In the BPU-approved SOS, it was agreed that JCP&L's Final 2019 SRC Filing was the final true-up of the Rider SRC balance and that the ending deferred balance in Rider SRC at December 31, 2019, was an over-recovery of \$3,947,992, including carrying costs of \$302,742. The Parties further agreed that, in accordance with the July 2019 Order, the ending deferred balance in Rider SRC was applied to Rider RAC, which was the largest under-recovered component of the Company's SBC deferred balance at the time of the filing of the Company's January 2020 Petition.
- (f) The 2020 Total MGP remediation costs incurred (Lines 53 and 54 above) have been reduced for 2019 New Jersey Sales & Use Tax adjustments of approximately \$21.5 thousand including interest.









**Jersey Central Power & Light Company  
Summary of Manufactured Gas Plant Incremental Remediation Expenses**

**Incremental Expenses for the Period 2020**

<b>Site Name</b>	<b>Actual 01/2020-12/2020</b>
Asbury Park	190,747
Belmar	398,317
Boonton	699,986
Cape May	1,160,094
Dover	847,978
Flemington	266,647
Lakewood	323,594
Lambertville/LaRochemere	342,576
Long Branch	-
Newton I	129,599
Newton II	4,543,963
Ocean City	675,060
Phillipsburg	99,657
Red Bank	22,645
Sea Isle City	641,175
Toms River	-
Tuckerton	2,737
Washington	242,782
Wildwood	477,453
General	145,102
Total Incremental Expense (Excluding NRD):	11,210,113
2020 NRD:	0
Total Incremental Expense (Including NRD):	11,210,113

**JCP&L Manufactured Gas Plant Sites**  
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<b>Asbury Park</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	752	484	-	54	1,290
Professional Services	-	-	-	-	0
Remediation	16,065	34,996	14,004	114,231	179,296
Legal	(1,619)	6,024	127	1,784	6,316
NJDEP Fees	2,385	-	-	-	2,385
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	728	-	732	1,460
<b>Total</b>	<b>17,584</b>	<b>42,232</b>	<b>14,131</b>	<b>116,801</b>	<b>190,747</b>

<b>Belmar</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	1,182	1,182	1,021	322	3,708
Professional Services	-	-	-	-	0
Remediation	106,865	117,609	179,868	(16,184)	388,158
Legal	(2,543)	470	-	-	(2,073)
NJDEP Fees	2,385	-	2,300	835	5,520
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	33	1,486	-	1,486	3,004
<b>Total</b>	<b>107,922</b>	<b>120,747</b>	<b>183,189</b>	<b>(13,541)</b>	<b>398,317</b>

<b>Boonton</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	-	1,612	967	2,042	4,621
Professional Services	-	-	-	8,186	8,186
Remediation	24,812	113,775	45,402	450,077	634,065
Legal	10,000	13,505	26,205	981	50,690
NJDEP Fees	2,385	-	-	-	2,385
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	-	-	39	39
<b>Total</b>	<b>37,197</b>	<b>128,891</b>	<b>72,574</b>	<b>461,324</b>	<b>699,986</b>

<b>Cape May</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	5,965	7,577	2,848	6,932	23,321
Professional Services	-	-	-	-	0
Remediation	189,694	307,457	67,255	433,532	997,938
Legal	44,598	48,792	27,202	14,039	134,632
NJDEP Fees	3,260	-	-	550	3,810
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	66	2	179	146	393
<b>Total</b>	<b>243,583</b>	<b>363,827</b>	<b>97,485</b>	<b>455,200</b>	<b>1,160,094</b>

**JCP&L Manufactured Gas Plant Sites**  
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<b>Dover</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	215	967	107	107	1,397
Professional Services	-	-	3,979	-	3,979
Remediation	127,029	151,884	316,212	185,952	781,077
Legal	(2,700)	157	10,000	(3,802)	3,655
NJDEP Fees	2,385	-	-	-	2,385
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	173	27,333	355	27,624	55,485
<b>Total</b>	<b>127,102</b>	<b>180,341</b>	<b>330,653</b>	<b>209,881</b>	<b>847,978</b>

<b>Flemington</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	-	322	107	161	591
Professional Services	-	-	-	-	0
Remediation	-	(61,807)	38,735	255,423	232,351
Legal	-	-	-	-	0
NJDEP Fees	4,770	-	-	-	4,770
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	66,388	-	(37,453)	-	28,935
<b>Total</b>	<b>71,158</b>	<b>(61,485)</b>	<b>1,390</b>	<b>255,584</b>	<b>266,647</b>

<b>Lakewood</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	107	537	54	54	752
Professional Services	-	-	20,886	-	20,886
Remediation	50,594	114,263	39,389	69,302	273,549
Legal	-	4,912	3,500	(888)	7,524
NJDEP Fees	3,895	-	-	-	3,895
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	16	8,165	-	8,807	16,988
<b>Total</b>	<b>54,613</b>	<b>127,876</b>	<b>63,829</b>	<b>77,276</b>	<b>323,594</b>

<b>Lambertville/LaRoche</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	161	376	269	161	967
Professional Services	-	-	-	-	0
Remediation	84,949	41,150	19,886	190,629	336,614
Legal	-	-	-	-	0
NJDEP Fees	3,895	-	-	1,100	4,995
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	-	-	-	0
<b>Total</b>	<b>89,005</b>	<b>41,526</b>	<b>20,154</b>	<b>191,890</b>	<b>342,576</b>

**JCP&L Manufactured Gas Plant Sites**  
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<b>Newton I</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	914	1,505	215	2,955	5,588
Professional Services	53,596	35,421	72,211	11,615	172,843
Remediation	-	1,240	-	-	1,240
Legal	(1,700)	1,127	1,803	5,604	6,833
NJDEP Fees	4,770	-	-	-	4,770
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	(5,152)	(18,222)	(23,606)	(14,695)	(61,675)
<b>Total</b>	<b>52,427</b>	<b>21,070</b>	<b>50,622</b>	<b>5,479</b>	<b>129,599</b>

<b>Newton II</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	3,009	4,782	914	3,493	12,198
Professional Services	20,313	14,262	3,810	6,208	44,594
Remediation	2,986,465	1,794,821	(291,075)	(46,734)	4,443,478
Legal	3,241	7,906	15,189	3,927	30,262
NJDEP Fees	3,260	-	-	-	3,260
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	121	4,876	-	5,176	10,172
<b>Total</b>	<b>3,016,409</b>	<b>1,826,648</b>	<b>(271,162)</b>	<b>(27,932)</b>	<b>4,543,963</b>

<b>Ocean City</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	537	1,988	430	161	3,117
Professional Services	-	-	-	88	88
Remediation	221,880	169,324	96,067	166,493	653,764
Legal	(1,284)	1,667	(184)	4,458	4,657
NJDEP Fees	11,135	-	2,300	-	13,435
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	-	-	-	0
<b>Total</b>	<b>232,269</b>	<b>172,979</b>	<b>98,613</b>	<b>171,200</b>	<b>675,060</b>

<b>Phillipsburg</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	3,547	6,126	3,547	2,096	15,315
Professional Services	(48,997)	27,362	11,398	10,151	(85)
Remediation	51,993	31,457	4,452	(6,734)	81,167
Legal	-	-	-	-	0
NJDEP Fees	3,260	-	-	-	3,260
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	-	-	-	0
<b>Total</b>	<b>9,802</b>	<b>64,945</b>	<b>19,397</b>	<b>5,513</b>	<b>99,657</b>

**JCP&L Manufactured Gas Plant Sites**  
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<b>Red Bank</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	161	430	54	1,881	2,526
Professional Services	-	-	-	-	0
Remediation	440	12,009	5,041	244	17,735
Legal	-	-	-	-	0
NJDEP Fees	2,385	-	-	-	2,385
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	-	-	-	0
<b>Total</b>	<b>2,986</b>	<b>12,439</b>	<b>5,095</b>	<b>2,125</b>	<b>22,645</b>

<b>Sea Isle City</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	1,290	699	1,612	3,798	7,398
Professional Services	(118,303)	-	-	-	(118,303)
Remediation	63,358	117,499	195,191	230,511	606,559
Legal	(479)	13,059	29,843	39,096	81,519
NJDEP Fees	-	-	-	3,260	3,260
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	29,671	-	31,071	60,743
<b>Total</b>	<b>(54,135)</b>	<b>160,927</b>	<b>226,645</b>	<b>307,737</b>	<b>641,175</b>

<b>Tuckerton</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	-	215	-	-	215
Professional Services	-	-	-	-	0
Remediation	-	827	710	200	1,737
Legal	-	-	-	-	0
NJDEP Fees	-	-	-	-	0
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	292	-	494	786
<b>Total</b>	<b>0</b>	<b>1,334</b>	<b>710</b>	<b>694</b>	<b>2,737</b>

<b>Washington</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	-	537	107	537	1,182
Professional Services	50,741	71,283	30,955	53,214	206,192
Remediation	(3,024)	2,841	-	9,505	9,322
Legal	52	8,354	-	-	8,406
NJDEP Fees	3,260	-	-	-	3,260
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	7,251	-	7,168	14,419
<b>Total</b>	<b>51,029</b>	<b>90,266</b>	<b>31,062</b>	<b>70,424</b>	<b>242,782</b>

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<b>Wildwood</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	107	699	1,397	54	2,257
Professional Services	-	-	-	(88)	(88)
Remediation	119,479	157,059	75,934	101,323	453,795
Legal	393	209	5,052	538	6,192
NJDEP Fees	2,385	-	-	-	2,385
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	6,226	-	6,686	12,912
<b>Total</b>	<b>122,364</b>	<b>164,192</b>	<b>82,383</b>	<b>108,514</b>	<b>477,453</b>

<b>General</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	22,300	24,020	10,801	22,031	79,152
Professional Services	3,000	-	383	-	3,383
Remediation	-	-	5,988	1,360	7,348
Legal	3,200	(1,552)	-	418	2,067
NJDEP Fees	-	-	-	-	0
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	13,883	12,267	13,472	13,531	53,153
<b>Total</b>	<b>42,383</b>	<b>34,735</b>	<b>30,644</b>	<b>37,340</b>	<b>145,102</b>

Notes:

Figures in parentheses are negative amounts resulting from credits or corrections.

Professional Services includes outside engineering, environmental and other supporting consultants.

Remediation includes remedial construction and waste removal, transportation and disposal, engineering and property controls, and remediation O&M.

Legal includes outside counsel fees and expenses.

NJDEP Fees include oversight costs, permit fees, LSRP annual fees, and any other fees billed by the NJDEP.

RI/RA Financial Trust Fund includes charges associated with financial assurance trust funds for RI extensions and RA permits.

Miscellaneous Other includes minor expenses not included in one of the above categories.

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site****January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Asbury Park</i>			
	CITY OF ASBURY PARK	1,460	Property tax payments
	GEI CONSULTANTS, INC.	28,556	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	488	Community relations and communications services
	LANGAN ENGINEERING & ENVIRONMENTAL	179,362	Environmental and engineering consulting services
	SCHENCK, PRICE, SMITH & KING	12,676	Legal services
	TREASURER - STATE OF NEW JERSEY	2,385	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	726	Waste handling, transport, disposal and treatment services
<i>Belmar</i>			
	ARCADIS US INCORPORATED	128,634	Environmental and engineering consulting services
	BOROUGH OF BELMAR	4,056	Property tax payments
	BROWN AND CALDWELL	194,442	O&M services for the ground water remediation system
	EVOQUA WATER TECHNOLOGIES, LLC	13,340	O&M services for the ground water remediation system
	GEI CONSULTANTS, INC.	(44,919)	Environmental and engineering consulting services
	HALEY & ALDRICH INCORPORATED	26,474	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	504	Community relations and communications services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Belmar (cont'd)</i>			
	SCHENCK, PRICE, SMITH & KING	627	Legal services
	TREASURER - STATE OF NEW JERSEY	5,520	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	55,960	Waste handling, transport, disposal and treatment services
<i>Boonton</i>			
	ARCADIS US INCORPORATED	352,712	Environmental and engineering consulting services
	H2M ASSOCIATES INCORPORATED	66,860	Project management services
	HANDEX OF NEW JERSEY, INC.	17,733	O&M services for the ground water remediation system
	PARSIPPANY TROY HILLS	359,692	Sewer Connection Fee payment
	SCHENCK, PRICE, SMITH & KING	48,190	Legal services
	TREASURER - STATE OF NEW JERSEY	2,385	LSRP Annual Fee
	VEOLIA ENVIRONMENTAL SERVICES	449	Waste handling, transport, disposal and treatment services
<i>Cape May</i>			
	ARCADIS US INCORPORATED	662,210	Environmental and engineering consulting services
	ATLANTIC CITY ELECTRIC	5,602	Utilities - Electric (groundwater treatment system)
	CAPE MAY HOUSING AUTHORITY	20,322	Reimbursement for legal and environmental services



**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Cape May (cont'd)</i>			
	CITY OF CAPE MAY	48	Utilities - Water/sewer & property tax payments
	GEI CONSULTANTS, INC.	134,093	Project management and engineering consulting services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	58,388	Community relations and communications services
	SCHENCK, PRICE, SMITH & KING	119,810	Legal services
	SCHENCK, PRICE, SMITH & KING - ATTORNEY TRUST ACCOUNT	195,000	Escrow account for CMHA Deed Notice
	TREASURER - STATE OF NEW JERSEY	3,810	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	16,555	Waste handling, transport, disposal and treatment services
	WESTERLAND LANDSCAPING, INC.	1,363	Landscaping and property maintenance services
<i>Dover</i>			
	DOVER & ROCKAWAY RIVER RAILROAD	915	Annual occupancy usage fee related to subsurface containment wall intersecting footprint of rail line
	DOVER WATER COMMISSION	1,672	Utilities - Water
	HALEY & ALDRICH INCORPORATED	38,325	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	80	Community relations and communications services
	K&M CONTRACTING INCORPORATED	3,971	Construction and property maintenance services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site****January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Dover (cont'd)</i>			
	ROCKAWAY TOWNSHIP	25,154	Utilities - Sewer & property tax payments
	SCHENCK, PRICE, SMITH & KING	4,755	Legal services
	TOWN OF DOVER	29,360	Utilities - Water & property tax payments
	TREASURER - STATE OF NEW JERSEY	2,385	LSRP Annual Fee and other permitting costs
	URS CORPORATION	724,889	Environmental and engineering consulting services
	VEOLIA ENVIRONMENTAL SERVICES	3,625	Waste handling, transport, disposal and treatment services
	VERIZON NEW JERSEY INCORPORATED	971	Building fire suppression system upgrade at Neptune Products
<i>Flemington</i>			
	ELIZABETHTOWN GAS COMPANY (AKA SOUTHERN COMPANY/S. JERSEY INDUSTRIES)	(37,453)	Cost sharing agreement reimbursement for remedial costs
	GEI CONSULTANTS, INC.	176,771	Environmental and engineering consulting services
	HALEY & ALDRICH INCORPORATED	11,544	Project management services
	RENEW INTERNATIONAL, LLC	1,810	Contractor services/AP recovery audit
	TREASURER - STATE OF NEW JERSEY	4,770	LSRP Annual Fee and other permitting costs
<i>General</i>			
	CHEMISTRY COUNCIL OF NEW JERSEY	4,360	Membership dues & expenses

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>General (cont'd)</i>			
	NEW JERSEY NATURAL GAS	51,093	Property tax payments - Toms River
	SCHENCK, PRICE, SMITH & KING	4,250	Legal services
	TRC ENVIRONMENTAL CORPORATION	5,988	Store & maintain air monitoring equipment
<i>Lakewood</i>			
	ARCADIS US INCORPORATED	301,823	Environmental and engineering consulting services
	H2M ASSOCIATES INCORPORATED	27,412	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	160	Community relations and communications services
	SCHENCK, PRICE, SMITH & KING	7,524	Legal services
	TOWNSHIP OF LAKEWOOD	16,972	Property tax payments
	TREASURER - STATE OF NEW JERSEY	3,895	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	1,026	Waste handling, transport, disposal and treatment services
<i>Lambertville/LaRoche</i>			
	H2M ASSOCIATES INCORPORATED	31,203	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	3,921	Community relations and communications services
	HIBERNIA APARTMENTS	432	Water Usage Reimbursement

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
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*Lambertville/LaRoche (cont'd)*

THE ELM GROUP, INC.	423,609	Environmental and engineering consulting services
TREASURER - STATE OF NEW JERSEY	4,995	LSRP Annual Fee and other permitting costs

*Newton I*

VEOLIA ENVIRONMENTAL SERVICES	2,369	Waste handling, transport, disposal and treatment services
ELIZABETHTOWN GAS COMPANY (AKA SOUTHERN COMPANY/S. JERSEY INDUSTRIES)	(61,686)	Cost sharing agreement reimbursement for remedial costs
H2M ASSOCIATES INCORPORATED	41,258	Project management services
HENRY & GERMANN PUBLIC AFFAIRS, LLC	2,807	Community relations and communications services
LANGAN ENGINEERING & ENVIRONMENTAL	131,809	Environmental and engineering consulting services
SCHENCK, PRICE, SMITH & KING	9,033	Legal services
TREASURER - STATE OF NEW JERSEY	4,770	LSRP Annual Fee and other permitting costs
VEOLIA ENVIRONMENTAL SERVICES	1,240	Waste handling, transport, disposal and treatment services

*Newton II*

ADR ENVIRONMENTAL	3,855	Reimbursement of third party environmental oversight costs
BROWN AND CALDWELL	595,754	Environmental and engineering consulting services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Newton II (cont'd)</i>			
	HALEY & ALDRICH INCORPORATED	92,732	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	48,830	Community relations and communications services
	K&M CONTRACTING INCORPORATED	662	Construction services and property maintenance
	LAND REMEDIATION INCORPORATED	5,016,011	Remediation services
	SCHENCK, PRICE, SMITH & KING	30,462	Legal services
	SUSSEX EXPRESS, LLC	28,512	Shuttle service for Davita Renal Center
	TOWN OF NEWTON	10,040	Property tax payments & permit review fees
	TRC ENVIRONMENTAL CORPORATION	165,396	Perimeter air monitoring services
	TREASURER - STATE OF NEW JERSEY	3,260	LSRP Annual Fee and other permitting costs
<i>Ocean City</i>			
	ATLANTIC CITY ELECTRIC	624	Utilities - Electric (groundwater treatment system) & Settlement Payments
	CLEANLAND OCEAN CITY, INC.	42,000	Settlement agreement
	EMILCOTT ASSOCIATES INCORPORATED	30,617	Perimeter air monitoring services
	GEI CONSULTANTS, INC.	45,237	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	10,124	Community relations and communications services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Ocean City (cont'd)</i>			
	HYLAND DESIGN GROUP, INC.	(4,661)	Residential reconstruction support
	MID-ATLANTIC ENVIRONMENTAL	4,434	Groundwater treatment system services
	PANTHER TECHNOLOGIES INCORPORATED	117,787	Remediation services
	SCHENCK, PRICE, SMITH & KING	5,957	Legal services
	TETRA TECH INCORPORATED	405,449	Environmental and engineering consulting services
	TREASURER - STATE OF NEW JERSEY	13,435	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	9,156	Waste handling, transport, disposal and treatment services
<i>Phillipsburg</i>			
	BLESSED HOPE CHURCH OF THE NAZARENE	500	License agreement payment
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	36	Community relations and communications services
	THE ELM GROUP, INC.	149,724	Environmental and engineering consulting services
	TREASURER - STATE OF NEW JERSEY	3,260	LSRP Annual Fee and other permitting costs
<i>Red Bank</i>			
	BOROUGH OF RED BANK	2,500	Escrow Deposit for Engineering Oversight
	BROWN AND CALDWELL	(32,574)	Environmental and engineering consulting services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Red Bank (cont'd)</i>			
	HALEY & ALDRICH INCORPORATED	9,352	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	4,495	Community relations and communications services
	LANGAN ENGINEERING & ENVIRONMENTAL	24,680	Environmental and engineering consulting services
	TREASURER - STATE OF NEW JERSEY	2,385	LSRP Annual Fee
<i>Sea Isle City</i>			
	ANTHONY ARECHAVALA	3,500	Reimburse legal fees for 3820 Central Ave Deed Notice negotiations
	ARCADIS US INCORPORATED	2,244	Environmental and engineering consulting services
	ATLANTIC CITY ELECTRIC	4,430	Utilities - Electric
	CAPE ISLAND APPRAISALS, INC.	3,000	Appraisals of JCP&L-owned properties to support future sale
	CITY OF SEA ISLE CITY	70,150	Utilities - Water/sewer & property tax payments
	DONALD HATTON	158,750	Deed Notice Settlement - 3820 Central Ave
	FOR-SHORE WEED CONTROL, INC.	886	Landscaping and property maintenance services
	GEI CONSULTANTS, INC.	215,144	Project management services & environmental and engineering consulting services
	GERRY'S LAWN CARE	1,716	Landscaping and property maintenance services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site****January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Sea Isle City (cont'd)</i>			
	GLENN R. WATTS	(25,000)	Settlement agreement
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	13,546	Community relations and communications services
	HYLAND DESIGN GROUP, INC.	40,008	Residential reconstruction support
	SCHENCK, PRICE, SMITH & KING	82,019	Legal services
	SOUTH JERSEY GAS COMPANY	3,897	Utilities - Gas
	T.O.P.S. CONSTRUCTION INCORPORATED	199,241	Residential construction services
	THOMAS H. HEIST INSURANCE AGENCY	3,828	Property insurance (218 39th Street)
	TREASURER - STATE OF NEW JERSEY	3,260	LSRP Annual Fee
	UNITED FIRE GROUP	(118,303)	Insurance Settlement Recovery (against prior builder duplex construction at 207 40th St)
	VEOLIA ENVIRONMENTAL SERVICES	554	Waste handling, transport, disposal and treatment services
<i>Tuckerton</i>			
	BOROUGH OF TUCKERTON	786	Property tax payments
	HOME TURF YARD & HOME MAINT., LLC	1,737	Landscaping and property maintenance services
<i>Washington</i>			
	BOROUGH OF WASHINGTON	15,013	Utilities - Sewer & Property tax payments



**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
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*Washington (cont'd)*

ELIZABETHTOWN GAS COMPANY		629	Utilities - Gas
GEI CONSULTANTS, INC.		161,592	Environmental and engineering consulting services
H2M ASSOCIATES INCORPORATED		54,060	Project management services
HENRY & GERMANN PUBLIC AFFAIRS, LLC		2,625	Community relations and communications services
JONY'S LANDSCAPING		1,721	Landscaping and property maintenance services
NEW JERSEY AMERICAN WATER COMPANY		261	Utilities - Water
SCHENCK, PRICE, SMITH & KING		8,406	Legal services
TREASURER - STATE OF NEW JERSEY		3,810	LSRP Annual Fee & Remediation Cost Review Fee
VEOLIA ENVIRONMENTAL SERVICES		2,123	Waste handling, transport, disposal and treatment services

*Wildwood*

ATLANTIC CITY ELECTRIC		9,991	Utilities - Electric
CITY OF WILDWOOD		12,912	Property tax payments
EMILCOTT ASSOCIATES INCORPORATED		19,028	Perimeter air monitoring services
ENVIRO-AIR TECHNOLOGIES, INC.		310,183	Remediation services
GEI CONSULTANTS, INC.		30,353	Project management services
HENRY & GERMANN PUBLIC AFFAIRS, LLC		16,977	Community relations and communications services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Wildwood (cont'd)</i>			
	LANGAN ENGINEERING & ENVIRONMENTAL	435,298	Environmental and engineering consulting services
	ONE CALL CONCEPTS INCORPORATED	79	Underground utility mark-out request
	SCHENCK, PRICE, SMITH & KING	3,292	Legal services
	TETRA TECH INCORPORATED	(88)	Environmental and engineering consulting services
	TREASURER - STATE OF NEW JERSEY	2,385	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	7,609	Waste handling, transport, disposal and treatment services
	WESTERLAND LANDSCAPING, INC.	2,207	Landscaping and property maintenance services

**JCP&L Manufactured Gas Plant Financial Report**

**2020 Remediation Expenditures - Summary**

SITE NAME	2020 INCREMENTAL	2020 BUDGET ESTIMATE	VARIANCE
Asbury Park	\$190,747	\$459,000	(\$268,253)
Belmar	398,317	641,000	(242,683)
Boonton	699,986	587,000	112,986
Cape May	1,160,094	695,000	465,094
Dover	847,978	1,018,000	(170,022)
Flemington	266,647	229,000	37,647
Lakewood	323,594	237,000	86,594
Lambertville/LaRoche	342,576	335,000	7,576
Long Branch	-	-	-
Newton I	129,599	2,345,000	(2,215,401)
Newton II	4,543,963	1,063,000	3,480,963
Ocean City	675,060	410,000	265,060
Phillipsburg	99,657	115,000	(15,343)
Red Bank	22,645	533,000	(510,355)
Sea Isle City	641,175	335,000	306,175
Toms River	-	-	-
Tuckerton	2,737	5,000	(2,263)
Washington	242,782	250,000	(7,218)
Wildwood	477,453	262,000	215,453
General Program	145,102	-	145,102
<b>Total</b>	<b>\$11,210,113</b>	<b>\$9,519,000</b>	<b>\$1,691,113</b>

**Summary of Actual and Estimated Remediation Expenses**

SITE NAME	PROJECT EXPENSE TO DATE	ADDITIONAL TO COMPLETE PROJECT	TOTAL PROJECT COST
Asbury Park	\$ 7,398,182	\$ 4,393,000	\$ 11,791,182
Belmar	16,130,737	9,172,000	25,302,737
Boonton	6,643,116	4,810,000	11,453,116
Cape May	32,038,271	6,155,000	38,193,271
Dover	27,660,762	9,551,000	37,211,762
Flemington	8,399,586	961,000	9,360,586
Lakewood	18,146,324	960,000	19,106,324
Lambertville/LaRoche	4,260,347	1,336,000	5,596,347
Long Branch	4,162,580	-	4,162,580
Newton I	2,902,362	6,832,000	9,734,362
Newton II	12,493,241	5,548,000	18,041,241
Ocean City	5,859,422	8,855,000	14,714,422
Phillipsburg	3,075,856	825,000	3,900,856
Red Bank	1,886,763	1,870,000	3,756,763
Sea Isle City	40,053,738	790,000	40,843,738
Toms River	2,245,527	-	2,245,527
Tuckerton	5,913,583	75,000	5,988,583
Washington	9,720,504	1,160,000	10,880,504
Wildwood	9,857,816	2,445,000	12,302,816
General Program	7,465,329	-	7,465,329
<b>Total</b>	<b>\$ 226,314,043</b>	<b>\$ 65,738,000</b>	<b>\$ 292,052,043</b>

**Notes to Attachment F:**

Project expenses include only incremental costs.

- Future cost estimates are revised at the mid-year and end-of-year periods.

In general, the future costs are projected using the following assumptions:

- Unimpeded access to sites.
- No litigation.
- Third party property purchased where feasible or institutional controls are granted at reasonable cost.
- Generally, the remedial technology to be deployed is limited excavation, capping, and pumping and treating the ground water.
- Operational period of treatment system, where deployed, is 15 years.
- In general, only limited soil "hot-spot" removal is necessary except where determined on a case-by-case basis that more significant soil removal may preclude the need for ground water treatment system, significantly reduce operational period of treatment and/or reduce long-term liability.
- Projections are generally not "engineering estimates" derived through a rigorous, dedicated application of established engineering precepts and cost factors, but rather are current "reasonable estimates" for the activity scenario. However, depending upon the status of the project, individual activities may have progressed to the point where such "engineering estimates" have been prepared by the Company's consultants. In such instances these "engineering estimates" would be used as part of the overall project cost projection.
- No future expenses have been established for General Program expenses. These expenses will be variable and dependent upon factors such as regulatory initiatives and other issues which could have a programmatic impact.
- In general, the projected costs are in current dollars and are not adjusted for inflation or present value.
- Remedial Investigation and Remedial Action implementation activities for the Red Bank site are "To Be Determined".



## **Attachment H**

### **Current and Proposed Tariff Sheets**

**Rider RAC  
Remediation Adjustment Clause**

**APPLICABILITY:** Rider RAC determines a Remediation Adjustment in accordance with the formula set forth below. The factor is included in the Societal Benefits Charge applicable to all KWH usage of any Full Service Customer or Delivery Service Customer.

The calculated RAC rate shall be prepared by the Company and filed with the BPU annually by the end of December with a requested effective date of June 1 of the subsequent year. Rider RAC provides for the recovery of manufactured gas plant remediation costs (net of insurance and other recoveries) over rolling seven year periods, including carrying costs on the unamortized balance. Carrying cost is calculated on a monthly basis at an interest rate equal to the rate on seven-year constant maturity Treasuries, as shown in the Federal Reserve Statistical Release on or closest to January 1 of each year, plus sixty basis points, compounded annually as of January 1 of each year.

**CALCULATION OF THE REMEDIATION ADJUSTMENT CLAUSE FACTOR:**

- 1) By using the following formula:

$$\text{RAC} = \text{Recoverable Cost} / \text{Sales}$$

- 2) Where the terms are defined as follows:

RAC = The Remediation Adjustment Clause factor in cents per KWH to be applied to all applicable retail KWH sales.

Recoverable Cost = Manufactured Gas Plant remediation expenses (net of insurance and other recoveries) amortized over rolling seven year periods. The cost includes carrying costs on any unamortized balance of remediation costs, net of associated deferred tax balance, at an annual interest rate stated above.

Sales = The Company's forecasted retail KWH sales.

- 3) Effective **March 1, 2021**, the RAC computation is as follows (\$ Millions):

$$\text{RAC} = \mathbf{\$14.016} / \mathbf{19,906,396} \text{ MWH} = \mathbf{\$0.000704} \text{ per KWH}$$

$$\mathbf{(\$0.000751} \text{ per KWH including SUT)}$$

Issued: **February 27, 2021**

Effective: **March 1, 2021**

Filed pursuant to Order of Board of Public Utilities  
**Docket No. ER20100628 dated February 17, 2021**

Issued by James V. Fakult, President  
300 Madison Avenue, Morristown, NJ 07962-1911





JERSEY CENTRAL POWER & LIGHT COMPANY

BPU No. 13 ELECTRIC - PART III

XX Rev. Sheet No. 53

Superseding XX Rev. Sheet No. 53

**Rider RAC  
Remediation Adjustment Clause**

**APPLICABILITY:** Rider RAC determines a Remediation Adjustment in accordance with the formula set forth below. The factor is included in the Societal Benefits Charge applicable to all KWH usage of any Full Service Customer or Delivery Service Customer.

~~The calculated RAC rate shall be prepared by the Company and filed with the BPU annually by the end of December with a requested effective date of June 1 of the subsequent year.~~ Rider RAC provides for the recovery of manufactured gas plant remediation costs (net of insurance and other recoveries) over rolling seven year periods, including carrying costs on the unamortized balance. Carrying cost is calculated on a monthly basis at an interest rate equal to the rate on seven-year constant maturity Treasuries, as shown in the Federal Reserve Statistical Release on or closest to January 1 of each year, plus sixty basis points, compounded annually as of January 1 of each year.

**CALCULATION OF THE REMEDIATION ADJUSTMENT CLAUSE FACTOR:**

- 1) By using the following formula:

$$\text{RAC} = \text{Recoverable Cost} / \text{Sales}$$

- 2) Where the terms are defined as follows:

RAC = The Remediation Adjustment Clause factor in cents per KWH to be applied to all applicable retail KWH sales.

Recoverable Cost = Manufactured Gas Plant remediation expenses (net of insurance and other recoveries) amortized over rolling seven year periods. The cost includes carrying costs on any unamortized balance of remediation costs, net of associated deferred tax balance, at an annual interest rate stated above.

Sales = The Company's forecasted retail KWH sales.

- 3) Effective ~~March 1, 2024~~ January 1, 2022, the RAC computation is as follows (\$ Millions):

$$\text{RAC} = \frac{\$14.016\ \$15.454}{19,906,396\ 19,185,264} \text{ MWH} = \$0.000704\ \$0.000806 \text{ per KWH}$$

(~~\$0.000751~~ \$0.000859 per KWH including SUT)

**Issued:**

**Effective:**

**Filed pursuant to Order of Board of Public Utilities  
Docket No. dated**

Issued by James V. Fakult, President  
300 Madison Avenue, Morristown, NJ 07962-1911

**PUBLIC NOTICE**  
**JERSEY CENTRAL POWER & LIGHT COMPANY**

**In the Matter of the Verified Petition of Jersey Central Power & Light Company  
for the Review and Approval of Costs Incurred for Environmental Remediation of  
Manufactured Gas Plant Sites Pursuant to the Remediation Adjustment Clause of  
Its Filed Tariff (“2020 RAC Filing”)**

**BPU Docket No. ER\_\_\_\_\_**

**NOTICE OF PROPOSED INCREASE IN REMEDIATION ADJUSTMENT  
CLAUSE AND  
NOTICE OF PUBLIC HEARINGS THEREON**

**TO OUR CUSTOMERS:**

On October 1, 2021, Jersey Central Power & Light Company (“JCP&L” or the “Company”) filed a Verified Petition for the Review and Approval of Costs Incurred for Environmental Remediation of Manufactured Gas Plant Sites Pursuant to the Remediation Adjustment Clause of Its Filed Tariff with the New Jersey Board of Public Utilities (the “Board”), under BPU Docket No. ER\_\_\_\_\_, together with supporting attachments.

The Verified Petition provides for a reconciliation of the actual costs and collections during 2020 under the Remediation Adjustment Clause (“RAC”), which is a component of the Societal Benefits Charge of JCP&L’s filed Tariff. The Verified Petition also provides for an assessment of the need for changes in the level of collections under the RAC. JCP&L is requesting to increase collections under Rider RAC, which funds the remediation of former manufactured gas plant sites, by approximately \$1.957 million annually. The Company proposed that the change in rates would become effective on January 1, 2022 or on such date as the Board may determine.

The annual percentage change in rates, if any, applicable to specific customers will vary according to the applicable rate schedule and the level of the customer's usage. Copies of the Verified Petition, together with supporting attachments, are available for inspection at the Company's regional headquarters at 300 Madison Avenue, Morristown, New Jersey 07962, and 101 Crawfords Corner Road, Building #1, Suite 1-511, Holmdel, New Jersey 07733, or on the Company's website at [https://www.firstenergycorp.com/jersey\\_central\\_power\\_light/regulatory.html](https://www.firstenergycorp.com/jersey_central_power_light/regulatory.html). The Verified Petition, together with supporting documents, is also available for inspection at the Board located at 44 South Clinton Avenue, 2nd Floor, Suite 314, P.O. Box 350, Trenton, New Jersey 08625-0350.

The following comparisons of present and proposed rates will permit customers to determine the approximate net effect upon them of the proposed increase in charges of \$1.957 million annually. Any assistance required by customers in this regard will be furnished by the Company upon request.

**STATEMENT OF THE MONTHLY EFFECT OF PROPOSED  
INCREASE IN RIDER RAC CHARGES AS COMPARED TO THE  
RATES IN EFFECT AS OF October 1, 2021**

	<b>Summary of Customer Impact</b>		
	Residential Average Bill (Includes 6.625% Sales and Use Tax)		
	Current Monthly <u>Bill (1)</u>	Proposed Monthly <u>Bill (2)</u>	Proposed Monthly <u>Increase</u>
<u>Residential (RS)</u>			
500 kWh average monthly usage	\$67.48	\$67.53	\$0.05
1000 kWh average monthly usage	\$139.36	\$139.47	\$0.11
1500 kWh average monthly usage	\$213.04	\$213.20	\$0.16
<u>Residential Time of Day (RT)</u>			
500 kWh average monthly usage	\$70.39	\$70.44	\$0.05
1000 kWh average monthly usage	\$135.60	\$135.71	\$0.11
1500 kWh average monthly usage	\$200.80	\$200.96	\$0.16
	Overall Class Average Per Customer (Includes 6.625% Sales and Use Tax)		
	Current Monthly <u>Bill {1}</u>	Proposed Monthly <u>Bill {2}</u>	Proposed <u>% Increase</u>
<u>Rate Class</u>			
Residential (RS)	\$109.02	\$109.10	0.1%
Residential Time of Day (RT/RGT)	\$147.30	\$147.41	0.1%
General Service – Secondary (GS)	\$587.08	\$587.56	0.1%
General Service - Secondary Time of Day (GST)	\$28,004.20	\$28,030.82	0.1%
General Service – Primary (GP)	\$32,636.48	\$32,675.52	0.1%
General Service – Transmission (GT)	\$84,579.01	\$84,694.30	0.1%
Lighting (Average Per Fixture)	\$10.60	\$10.61	0.1%
{1} Rates effective 10/1/2021			
{2} Proposed rates effective TBD			

Please note that the Board, in its discretion, may apply all or any portion of a rate adjustment to other rate schedules or in a different manner than what JCP&L has proposed in its filing. Accordingly, the final rates and charges will be determined by the Board in these proceedings and may be different from what JCP&L described and provided in its Verified Petition.

Notice of this filing, together with a statement of the effect thereof on customers, is being served upon the clerk, executive, and/or administrator of each municipality and county within the Company's service areas. Such notice has also been served, together with the supporting attachments, upon the office of the New Jersey Division of Rate Counsel, who will represent the interests of ratepayers in these proceedings.

PLEASE TAKE NOTICE that the Board has scheduled telephonic public hearings on the Verified Petition under BPU Docket No. ER\_\_\_\_\_, at the following date and times:

Date:  
Time: 1:00 PM  
Conference Line: 877-332-6631  
Access Code: 2853961#

Date:  
Time: 4:00 PM  
Conference Line: 877-332-6631  
Access Code: 2853961#

Representatives from the Company, Board Staff, and the New Jersey Division of Rate Counsel will participate in the telephonic public hearings. Members of the public are invited to participate by utilizing the Dial-In number and passcode set forth above and may express their views on these filings. All comments will be made a part of the final records of these proceedings and will be considered by the Board. In order to encourage full participation in these opportunities for public comment, please submit any requests for needed accommodations, such as interpreters, listening assistance, 48 hours prior to the above hearings to the Board Secretary at [board.secretary@bpu.nj.gov](mailto:board.secretary@bpu.nj.gov). The Board will also accept written and/or electronic comments. While all comments will be

given equal consideration and will be made part of the final records of these proceedings, the preferred method of transmittal is via the Board’s External Access Portal after obtaining a MyNewJersey Portal ID. Detailed instructions for e-Filing can be found on the Board’s homepage at <https://www.nj.gov/bpu/agenda/efiling>. Emailed comments may be filed with the Secretary of the Board, in pdf or Word format, to [board.secretary@bpu.nj.gov](mailto:board.secretary@bpu.nj.gov). Written comments may also be submitted to the Board Secretary, Aida Camacho-Welch, at the Board of Public Utilities, 44 South Clinton Avenue, 9th Floor, P.O. Box 350, Trenton, NJ 08625-0350. All comments should include the name of the Petition and the docket number. All comments are considered “public documents” for purposes of the State’s Open Public Records Act. Commenters may identify information that they seek to keep confidential by submitting them in accordance with the confidentiality procedures set forth in N.J.A.C. 14:1-12.3.

**JERSEY CENTRAL POWER & LIGHT COMPANY**

Dated: \_\_\_\_\_, 2021