



October 3, 2017

VIA Electronic and Overnight Mail

Irene Kim Asbury, Secretary
New Jersey Board of Public Utilities
44 South Clinton Ave, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

BOARD OF PUBLIC UTILITIES

OCT 03 2017

MAIL RECEIVED

RE: Infrastructure Investment and Recovery – BPU Docket No. AX1750469

AX 17050469

Dear Secretary Asbury:

Jersey Central Power & Light Company (“JCP&L”) submits these comments in support of the proposed new subchapter to the New Jersey Administrative Code, N.J.A.C. 14:3-2A, titled Infrastructure Investment and Recovery (“IIR”).

The proposed IIR regulation represents important improvements to regulatory paradigm in New Jersey to encourage utility infrastructure investments. The framework under the proposed IIR regulation is similar to those available to other FirstEnergy utilities located in Pennsylvania and Ohio. Further, more timely cost recovery afforded by the included surcharge mechanism is not only important to attracting capital, the cash flow improvements are also credit supportive for New Jersey utilities.

JCP&L appreciates that the proposed IIR regulation is not an entirely new concept in New Jersey. While there have been similar one-off infrastructure programs submitted and approved by the Board of Public Utilities (“BPU”) in the past, JCP&L strongly believes that formalizing this practice through regulations provides for greater certainty for planning and more predictable outcomes, which are of interest to our customers and investors.

In its support of the proposed IIR regulation, JCP&L stands with the New Jersey Utilities Association (“NJUA”) and echoes the comments submitted on behalf of its members, including JCP&L. JCP&L urges the BPU to adopt the proposed IIR regulation as final, considering and including the comments of NJUA.

Respectfully,

Lauren M. Lepkoski

LML:rnr

CMS
Legal
A. Moreau
J. Walker