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MAIL ROOM

AUG 17 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Steven S. Goldenberg
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August 14, 2018

Aida Camacho-Welch, Secretary
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
Trenton, NJ 08625-0350

RECEIVED
CASE MANAGEMENT

AUG 17 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Re: I/M/O the Verified Petition of Jersey Central Power & Light Company for
Approval of an Infrastructure Investment Program (JCP&L Reliability Plus)
BPU Docket No. EO18070728

Dear Secretary Camacho-Welch:

Please accept this letter as the response of the New Jersey Large Energy Users Coalition ("NJLEUC") to the August 8 letter of Jersey Central Power and Light Company ("JCP&L") regarding NJLEUC's pending intervention motion in this matter. In its letter, JCP&L states that it takes no position regarding NJLEUC's intervention motion because NJLEUC has not identified any NJLEUC members that are JCP&L customers. JCP&L further states that if NJLEUC demonstrates that its members include current JCP&L customers, JCP&L would not oppose the motion.

As JCP&L is well aware, the Board has consistently granted NJLEUC intervenor status in literally all cases in which the group has sought such status since NJLEUC formed in 2002. NJLEUC has represented the interests of large energy users in literally every proceeding of any consequence involving JCP&L, including the First Energy merger proceeding, a succession of rate cases and several regulatory filings including the recent MAIT proceedings.

With regard to this proceeding, in keeping with its past practice, as consistently accepted by the Board, NJLEUC states that its members include Gerdau Longsteel, N.A., Novartis Pharmaceuticals and Merck, Inc. which are companies located in the JCP&L service territory that currently are served by JCP&L. NJLEUC requests the Board to continue its longstanding practice to grant intervenor status to NJLEUC based upon the associational standing conferred by these representative member companies, who would otherwise have standing to intervene in their own name.

A Pennsylvania Limited Liability Partnership

California Minnesota Colorado Nevada Connecticut New Jersey Delaware New York District of Columbia Pennsylvania Florida Texas Illinois Washington

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A. Had
A. Meara, Esq.

Handwritten: O. Hamilton



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NJLEUC respectfully requests the Board to grant NJLEUC's motions to intervene in this proceeding and for the *pro hac vice* admission of Paul F. Forshay, Esq.

Respectfully,

Steven S. Goldenberg

SSG:ssg

cc: Distribution List

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