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JAN 03 2019

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Lauren M. Lepkoski, Esq.
(610) 921-6203
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December 21, 2018

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JAN 03 2019

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

VIA UPS OVERNIGHT DELIVERY

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Street
3rd Floor Suite 314
Trenton, New Jersey 08625

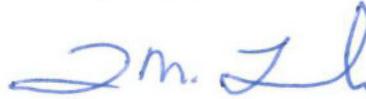
Re: In the Matter of the Verified Petition of Jersey Central Power & Light Company Seeking Review and Approval of the Veterans' Organization Service Application and Tariff
BPU Docket No. ER 19010013

Dear Secretary Camacho-Welch:

On behalf of Jersey Central Power & Light Company ("JCP&L" or the "Company"), please find enclosed for filing the original and eleven (11) copies of JCP&L's Verified Petition Seeking Review and Approval of the Veterans' Organization Service Application and Tariff.

Please return a time-stamped copy to me for our records using the enclosed stamped, self-addressed envelope. If you have any questions, please feel free to contact me.

Very truly yours,



Lauren M. Lepkoski

kbw
Enclosures
cc: Certificate of Service

CMS
Legal
DAG
RPA
S. Peterson
A. Reid
B. Kilar
Energy

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

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

In the Matter of the Verified Petition of **Jersey
Central Power & Light Company** Seeking
Review and Approval of the Veterans'
Organization Service Application and Tariff

: Board Docket No.

VERIFIED PETITION

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 principal offices at 300 Madison Avenue, Morristown, New Jersey 07962-1911 and 101 Crawford Corner 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:

**Lauren Lepkoski, Esq.
First Energy Service Company
Legal Department
2800 Pottsville Pike
Reading, PA 19612-6001**

-and-

**Mark A. Mader
James O'Toole
Jersey Central Power & Light Company
300 Madison Avenue
Morristown, New Jersey 07962-1911**

-and-

**Carol Pittavino
FirstEnergy Service Company
800 Cabin Hill Drive
Greensburg, PA 15601**

Purpose of Filing

3. The purpose of this filing is to provide for a review by the Board, the Board's Staff ("Staff"), and the Division of Rate Counsel ("Rate Counsel"), and approval by the Board, of the Company's proposed tariff reflecting changes to the requirements for Veterans' Organizations in accordance with N.J.S.A 48:2-21.41 (also referred to as P.L.2018, c.77).

Procedural History

4. On August 10, 2018, Governor Murphy signed P.L.2018, c.77 into law. This law, effective immediately, requires a public utility to charge a veterans' organization a residential rate for service delivered to the property at which the veterans' organization primarily operates, if the residential rate is lower than the commercial rate for service at that property.

5. P.L.2018, c.77 also required the public utilities, in consultation with the Board to establish a reasonable procedure by which an organization may certify itself as a veterans' organization with the public utility.

Components

6. The Company is seeking to modify its tariff to reflect changes to the requirements for Veterans' Organizations in accordance with P.L.2018, c.77. JCP&L hereby files proposed tariff sheets (attached hereto as Attachment A) referencing N.J.S.A 48:2-21.41 for Veterans' Organizations. JCP&L is also submitting for approval a proposed application form for Veterans' Organizations to complete in order to have the request processed (attached hereto as Attachment B).

7. JCP&L is proposing to hire one additional employee at the cost of \$40,000 to review the applications received from Veterans' Organizations as described in Attachment B. If the application(s) meet the requirements of N.J.S.A. 48:2-21.41, the application(s) will be approved; however, these customers ("eligible customers") will continue to be billed under their current tariff Service Classification. JCP&L will review the eligible customers' bills annually. Specifically, the same Company employee reviewing the applications, will manually review eligible customers' delivery service charges annually¹ and if the comparable delivery service charges under Service Classification RS (Residential Service) are lower than the delivery service charges under the eligible customers' current tariff Service Classification, a credit in the amount of the difference will be applied to the eligible customers' next bill. *See Attachment C – Illustrative Calculation* for details. The Company may need to hire additional employees at the estimated cost of \$40,000, depending on the volume of applications received.

8. JCP&L respectfully requests authority from the Board to defer on its books actually incurred costs associated with the implementation of the requirements for Veterans'

¹ Eligible customers' will be assigned an anniversary date, which will be the next billing cycle following approval of the application.

Organizations and not otherwise recovered through its currently approved base rates. The appropriate amortization period for such deferred expenses will be addressed in the Company's next base rate case or in another appropriate rate recovery proceeding.

9. JCP&L also requests recovery of carrying charges on the deferred balance as described in paragraph 8, calculated based upon JCP&L's weighted average cost of capital that was approved by the Board on December 12, 2016 in the 2016 JCP&L base rate case, BPU Docket No.ER16040383.

10. JCP&L also seeks recovery from any loss of distribution revenues as a result of applying the lower residential rate to the Veterans' Organization accounts, which include customer charges and distribution charges (KWH, KW Demand, and KVAR), associated with these accounts. JCP&L proposes to recover these lost revenues in its next electric distribution base rate case or in another appropriate rate recovery proceeding.

11. JCP&L respectfully requests that the Board approve this request in an expedited manner and issue a Decision and Order authorizing such deferred accounting treatment and recovery of lost revenues.

Attachments

12. Attached hereto and made a part of this Verified Petition are the following Attachments:

Attachment A	Proposed Tariff Sheets
Attachment B	Proposed Application For Service Under the Veterans' Organization Service Special Provision

Public Notice and Service

13. Because JCP&L is not proposing a rate increase in this filing, the Company does not believe that any public notices need be published or served pursuant to N.J.A.C. 14:1-5.12(b)1&3, (c) and (d), nor is there any requirement for any public hearings in the Company's service area.

Service of Petition

14. Copies of this Verified Petition and of all supporting Attachments thereto have been or will be duly served by overnight express delivery at the time of the filing hereof upon the Director, Division of Rate Counsel, 140 East Front Street, 4th Floor, P.O. Box 003, Trenton, New Jersey 08625-0003, and upon the Department of Law & Public Safety, Division of Law, 124 Halsey Street, 5th Floor, P.O. Box 45029, Newark, New Jersey 07101.

CONCLUSION

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

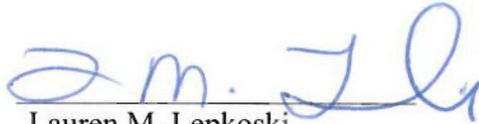
(1) Approving JCP&L's request for authority to defer on its books actually incurred costs associated with the implementation of the Veteran's Organizations tariff as set forth herein and not otherwise recovered through its currently approved base rates, including carrying charges, calculated based upon JCP&L's weighted average cost of capital that was determined by the Board in JCP&L's most recent electric distribution rate case, associated with the deferred costs.

(2) Approving JCP&L's request to recover any and all lost revenue associated with the implementation of the Veteran's Organizations tariff as set forth herein.

(3) Approving as just and reasonable, the proposed tariff and the proposed application form attached hereto and incorporated herein.

(4) granting such other and further relief as the Board shall deem just, lawful and proper.

Respectfully submitted,



Lauren M. Lepkoski
FirstEnergy Service Company
2800 Pottsville Pike
Reading, Pennsylvania 19612-6001
(610) 921-6203
llepkoski@firstenergycorp.com

Counsel for Jersey Central Power & Light Company

Dated: December 21, 2018

AFFIDAVIT
OF
VERIFICATION

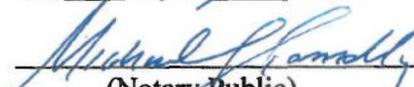
Mark A. Mader, being duly sworn upon his oath, deposes and says:

1. I am Director of Rates and 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 insofar as it relates to the review and approval of the Company’s tariff reflecting changes to the requirements for Veterans’ Organizations in accordance with N.J.S.A 48:2-21.41, and I hereby verify that the statements of fact and other information contained therein are true and correct to the best of my knowledge, information and belief.


Mark A. Mader 12/21/18

Sworn to and subscribed before me
this 21 day of December, 2018.



(Notary Public)

Michael J. Connolly
Attorney at Law
Licensed in the State of New Jersey
#035092001