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CASE MANAGEMENT

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

BOARD OF PUBLIC UTILITIES

In the Matter of the Verified Petition of Jersey
Central Power & Light Company For
Approval of An Infrastructure Investment
Program (**JCP&L Reliability Plus**)

: BPU Docket No. EO18070728
:
: SUBSTANTIATION OF
: CONFIDENTIALITY AFFIDAVIT
:

STATE OF NEW JERSEY)
)
COUNTY OF *Morris*)

Dennis Pavagadhi, being of full age and duly sworn, deposes and says:

1. I am the Director, Operations Support for Jersey Central Power & Light Company (“JCP&L”). I have personal knowledge and aver to the truth and accuracy of the information set forth herein to the best of my knowledge, information and belief.

2. Enclosed as Attachment G to the Stipulation of Settlement in the above captioned matter are detailed Schedules for project components. The confidential portion of the Schedules consists of the information in the “Component” column for the following JCP&L Reliability Plus (at the following pages of the Schedules):

- Enhanced Vegetation Management (pages 46-62);
- Substation Enhanced Flood Mitigation (page 63);
- Substation Equipment Replacement (page 64);
- Modernize Protective Equipment (pages 66-74);
- Circuit Protection and Sectionalization (pages 75-90);
- Distribution Automation (Loop Schemes) (pages 118-120);
- RTU Upgrades in Substations (pages 121-122);

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CMS
S. Peterson (4)

This Confidential Information is indicated with gray shading. The Confidential Information identifies specific substations, circuits and relays where work will be performed in the JCP&L Reliability Plus Projects. This information is highly sensitive and confidential because disclosure of this information could provide individuals information that could jeopardize the security and reliability of the electric distribution system.

3. N.J.S.A. 47:1A-1.1 exempts from the definition of a government record, and deems to be confidential information: “trade secrets and proprietary commercial or financial information obtained from any source,” “energy or security information or procedures for any buildings or facility which, if disclosed, would jeopardize security of the building or facility or persons therein,” and “security measures and surveillance techniques which, if disclosed, would create a risk to the safety of persons, property, electronic data or software.”

4. The Confidential Information is highly proprietary commercial information and highly sensitive security information. Disclosure of the Confidential information would harm JCP&L and the public by providing individuals key information regarding equipment locations that affect the security of the electric distributions system.

5. JCP&L takes measures to ensure the Confidential Information remains safeguarded from public disclosure. JCP&L limits distribution of the Confidential Information to those employees, attorneys and consultants that have a need to work with it in connection with the pending matter. Further, JCP&L pursues confidentiality protection, such as entering the Agreement of Non-disclosure with the parties to this proceeding, and filing the Schedules in redacted form to protect the material from public disclosure. Here, the Company redacted the Confidential Information in the Schedules it originally filed with the Board and only provided the Confidential Information to those parties that executed the Agreement of Non-disclosure.

6. The Confidential Information is not contained in materials routinely available to the public. Nor is it routinely available to other governmental entities, unless confidentiality protection is first sought.

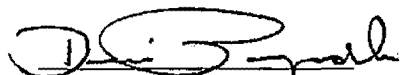
7. The Confidential Information should be treated as proprietary and confidential for an indeterminate amount of time.

8. JCP&L notes that the public is not unduly impacted by Confidential treatment of the Confidential Information, since much of the information in the Schedules is public and set forth in the redacted version of the Schedules attached to the Stipulation, and JCP&L has disclosed the limited Confidential Information to Staff and Rate Counsel subject to a Non-disclosure Agreement.

9. The following is the addressee for all oral and written communications from the custodian and all correspondence, inquiries, and notices:

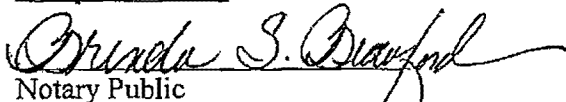
For claimant Jersey Central Power & Light Company

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Dennis Pavagadhi

Sworn before me this 22 day of

April, 2019


Notary Public

