



State of New Jersey

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April 17, 2020

Via Electronic Mail

Gregory Eisenstark, Esq.
Cozen O'Connor, P.C.
One Gateway Center
Suite 910
Newark, NJ 07102

Re: **In the Matter of the Verified Petition of Jersey
Central Power & Light Company for Review and
Approval of Increases in, and Other Adjustments to,
Its Rates and Charges for Electric Service, and for
Approval of Other Proposed Tariff Revisions in
Connection Therewith**

BPU Docket No. ER20020146

Dear Mr. Eisenstark:

This Office represents the Staff of the New Jersey Board of Public Utilities ("Board Staff") in the above-referenced matter. Pursuant to N.J.A.C. 1:1-10.4 et seq., enclosed please find Board Staff's Discovery Requests **S-JCP&L-DEP-13** through **S-JCP&L-DEP-18** and **S-JCP&L-REV-65** through **S-JCP&L-REV-68** directed to Petitioner. Please respond to the requests and submit copies of the documents requested herein within fifteen (15) days, or submit a schedule of reasonable compliance within fifteen (15) days from receipt of this letter.

Please submit the responses electronically and on three-hole punched paper, with each question repeated at the top of the sheet along with the name of the person responsible for each response. All electronic responses should be provided in portable document format (.PDF) containing a text searchable optical character recognition (OCR) layer. However, any responses in spreadsheet form should be provided in Excel format.



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Please note that these discovery requests impose a continuing responsibility to correct or update the responses as soon as such information becomes known or available during the course of this proceeding. Thank you for your attention to this matter.

Sincerely yours,

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/Terel Klein

Enclosure

Cc: Service List (w/encl. by electronic mail)

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

In the Matter of the Verified Petition of Jersey Central Power & Light Company for Review and Approval of Increases in, and Other Adjustments to, Its Rates and Charges for Electric Service, and for Approval of Other Proposed Tariff Revisions in Connection Therewith (“2020 Base Rate Filing”)

BPU Docket No. ER20020146

Board Staff Discovery Requests, S-JCP&L-DEP-13 through S-JCP&L-DEP-18, Directed to Petitioner

- S-JCP&L-DEP-13** Reference John Spanos Direct Testimony, Page 3, lines 6-9
- a. Please provide the specific dates of retirement for the overhead conductors and devices (Account 365).
 - b. Please provide the cost of removal (COR) and installation cost of overhead conductors and devices.
 - c. What were the service lives of all retired overhead conductors and devices?
 - d. What is the service life for all installed overhead conductors and devices?
 - e. Does the \$10.4 million include deferred costs for account 365?
- S-JCP&L-DEP-14** What was the total retirement cost for Account 365 in Company’s last depreciation study?
- S-JCP&L-DEP-15** What is the current balance for the Excess Cost of Removal Liability (“ECRL”) the Board established through an annual amortization in the Company’s 2002 base rate case?
- S-JCP&L-DEP-16** Reference John Spanos Testimony, Page 11, lines 13-16
- a. Please provide the excel calculation and all documentation related to the cost of removal and gross salvage value for the increased volume of work associated the Company’s reliability improvement.
 - b. Did the Company debit the ERCL by more than the \$1,888,563 approved for the total Reliability Plus related COR.
- S-JCP&L-DEP-17** Please provide information on whether the Company included Reliability Plus related COR in net salvage calculation for the depreciation study. If yes, what is the total Reliability Plus COR included within the calculation.

S-JCP&L-DEP-18 Reference John Spanos Testimony, Page 14, lines 2-4

What is the percentage rate increase for General Plant accounts due to the proposed modification from the typical five (5) year amortization period to a four (4) year amortization period?

**Board Staff Discovery Requests, S-JCP&L-REV-65 through S-JCP&L-REV-68, Directed to
Petitioner**

- S-JCP&L-REV-65** With reference to JCP&L Reliability Plus Program, does the Company anticipate any adjustment in expenditure to the capital investment budget. If yes, do the adjustments or variations exceed 10% of the total annual program budget.
- S-JCP&L-REV-66** Please confirm that, based on projections, the Company will maintain its baseline capital expenditure of \$158,200,272 as of December 31, 2020.
- S-JCP&L-REV-67** Reference Jennifer Spricigo Direct Testimony, Exhibit JC-5, Schedule JS-5
- a. Please provide the excel calculations with all formulae intact of the \$996,885 advertising expenses. Please provide the details for each advertisement category, e.g. Informational and instructional, and the total amount spent.
 - b. How does the Company determine cost allocation between the different advertising categories.
 - c. Please provide documentations and workpapers of all advertising expenditures over the last five (5) years.
- S-JCP&L-REV-68** Reference Carol Pittavino Direct Testimony, page 14, lines 1-7
- a. What was the initial amortization period for the production related regulatory assets (Oyster Creek and TMI-1 design basic documentation studies).
 - b. When did the Company divest its interest in the production facilities.
 - c. Please explain the Company's rationale for proposing a three (3) year amortization period.