

**MURRAY E. BEVAN**  
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March 24, 2020

**VIA ELECTRONIC MAIL**

Aida Camacho-Welch  
Secretary of the Board  
State of New Jersey  
Board of Public Utilities  
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[board.secretary@bpu.nj.gov](mailto:board.secretary@bpu.nj.gov)

***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 ("2020 Base Rate Filing")***  
***BPU Dkt. No.: ER20020146***

Dear Secretary Camach-Welch:

On behalf of Commercial Metals Company, enclosed please find the Company's Motion to Intervene in the above docket. Consistent with the Board's Order of March 19, 2020 (BPU Docket No. EO20030254), we have filed and served this motion via electronic mail only.

Feel free to contact the undersigned with any questions.

Respectfully submitted,



Murray E. Bevan

Enclosures

cc: Service List



CMC acquired the Sayreville Steel Mill on November 5, 2018, as part of its acquisition of Gerdau Ameristeel Sayreville, Inc. (“Gerdau”).

2. The Sayreville Steel Mill is within the service territory of Jersey Central Power & Light Company (“JCP&L”), and it receives electric distribution service from JCP&L at transmission level voltage. The Sayreville Steel Mill’s recent annual bills from JCP&L are in excess of \$1,000,000, making it one of JCP&L’s largest industrial customers.
3. JCP&L is requesting a substantial increase in its rates in this proceeding. CMC will therefore be directly and specifically affected by JCP&L’s requested rate relief. Moreover, as a large volume purchaser of services from JCP&L at transmission level voltage, CMC’s interests are clearly distinct from other customers of JCP&L and no other party to this proceeding can adequately represent CMC’s interest.
4. CMC will work with the parties to establish a procedural schedule in this case.
5. Granting CMC intervention at this stage of the proceeding will not cause undue delay or confusion, nor impose an undue burden on any party to this proceeding.
6. CMC (or its predecessor Gerdau) was granted full intervenor status in prior rate cases of JCP&L.
7. The Verification of Mark Zimmerman is attached hereto stating that the facts stated in this motion are true and accurate to the best of his knowledge and belief.
8. Correspondence concerning this Motion and this proceeding should be sent to:

Murray E. Bevan, Esq.  
Katherine M. Dailey  
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[KDailey@bmg.law](mailto:KDailey@bmg.law)

9. A Certificate of Service and proposed form of Order granting intervention are attached hereto.

**WHEREFORE**, CMC respectfully requests the Board to (1) grant it full rights as an intervenor in this matter pursuant to N.J.A.C. 1:1-16.1, and (2) order such further relief in connection therewith as the Board deems reasonable and just.

By:



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Counsel for Commercial Metals Company

Dated: 3/24/2020


**VERIFICATION**

STATE OF :  
:  
CITY OF :

I, Mark Zimmerman, hereby state that I am the Energy Manager for Commercial Metals Company, the Petitioner in the foregoing Petition; that I am authorized to make this Verification on behalf of Commercial Metals Company, that the foregoing Petition was prepared under my direction and supervision; and that the statements in the foregoing Petition are true and correct to the best of my knowledge, information, and belief.

  
Mark Zimmerman  
Energy Manager  
Commercial Metals Company

SWORN TO AND SUBSCRIBED before me on the 17 day of March, 2020.

  
Notary Public

My commission expires: 10/14/2021

**KIM M. SCHMIDT**  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
ID # 2413532  
MY COMMISSION EXPIRES OCT. 14, 2021



**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") )  
\_\_\_\_\_

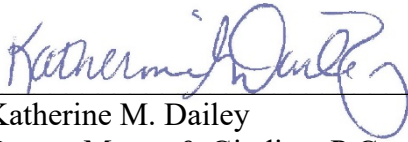
BPU Docket No. ER20020146

**MOTION TO INTERVENE**

**CERTIFICATE OF SERVICE**

I, Katherine M. Dailey, upon my oath, duly state that I have sent or caused to be sent by electronic mail, the attached Motion to Intervene and supporting Verification by the Commercial Metals Company to the persons set forth on the attached service list, and that it is my understanding that such electronic service is consistent with the Board of Public Utilities' Order dated March 19, 2020, in Docket No. EO20030254 temporarily waiving certain requirements for non-essential obligations.

Date: 3/24/2020

  
\_\_\_\_\_  
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**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**

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