

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

In the Matter of the Verified Petition of : BPU DOCKET NO. ER20020146
Jersey Central Power & Light Company :
for Review and Approval of Increases in and : OAL Docket No. PUC _____
Other Adjustments to Its Rates and Charges :
For Electric Service, and For Approval of : **Notice of Motion to Intervene of**
Other Proposed Tariff Revisions in : **Walmart Inc.**
Connection Therewith (“**2020 Base Rate** :
Filing”) :
:

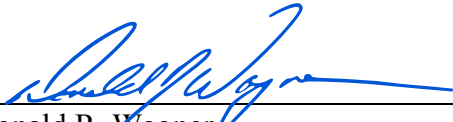
TO: Board of Public Utilities
Two Gateway Center
Newark, NJ 07102

PLEASE TAKE NOTICE that the undersigned, counsel for Walmart Inc. (“Walmart”), hereby files this Motion to the Board of Public Utilities pursuant to the Uniform Administrative Procedure Rules (“UAPR”) of the Office of Administrative Law (“OAL”), and the Rules of Practice of the Board of Public Utilities (“Board”), N.J.A.C. 1:1-16.1, *et seq.*, to intervene in the above-captioned proceeding.

PLEASE TAKE FURTHER NOTICE that in support of its Motion, Walmart shall rely upon the annexed Certification of Steve W. Chriss.

Respectfully submitted,

STEVENS & LEE¹



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Attorneys for Walmart Inc.

Dated: March 18, 2020

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BOARD OF PUBLIC UTILITIES**

In the Matter of the Verified Petition of	:	BPU DOCKET NO. ER20020146
Jersey Central Power & Light Company	:	
for Review and Approval of Increases in and	:	OAL Docket No. PUC _____
Other Adjustments to Its Rates and Charges	:	
For Electric Service, and For Approval of	:	Certification of Steve W. Chriss In
Other Proposed Tariff Revisions in	:	Support of Motion to Intervene of
Connection Therewith (“ 2020 Base Rate	:	Walmart Inc.
Filing ”)	:	
	:	
	:	

Steve W. Chriss, of full age, certifies as follows:

1. I am Director, Energy Regulatory Analysis for Walmart Inc. and I make this Certification in support of the motion of Walmart Inc. (“Walmart”) to intervene in the above-captioned proceeding.

2. Walmart Inc. is a Delaware Corporation authorized to do business in New Jersey. The business address of Walmart is 2608 SE J St., Bentonville, AR, 72716.

3. Walmart currently operates facilities in the service territory of Jersey Central Power & Light Company (“JCP&L”), and Walmart is a large retail customer of JCP&L. Specifically, Walmart operates 20 Walmart Stores, and one Sam’s Club in the JCP&L service territory.

4. By Verified Petition (“Petition”) filed with the Board of Public Utilities (“Board”) on or about February 18, 2020, JCP&L seeks Board approval for an increase in its current base rates for electric service which would result in additional revenues of approximately \$186.9 million annually, or approximately 7.8%. Additionally, JCP&L proposes: to revise certain terms and conditions of its existing tariff for electric service; certain revisions to its LED Street Lighting tariff; and certain modifications to its depreciation accrual rates. JCP&L is also requesting that all of the capital investments under the JCP&L Reliability Plus program that will be placed into service by December 31, 2020 be rolled into base rates.

5. The rate changes proposed by JCP&L will substantially, specifically and directly impact each of the 21 Walmart locations in JCP&L's service territory, and Walmart has preliminarily determined that such proposed changes will substantially increase the distribution charges that it pays to JCP&L if such changes are approved.

6. As a large customer of JCP&L, Walmart may be adversely impacted by the relief being requested by JCP&L, and therefore has a direct interest in participating in this case. Walmart desires to participate in the case to assure that issues including, but not limited to, *inter alia*, cost of service, revenue allocation, rate design, and competitive issues are adequately considered from the perspective of large retail customers.

7. Walmart respectfully submits that all factors for intervention set forth in N.J.A.C. 1:1-16.3 weigh in favor of the granting of Walmart's motion to intervene in the above-captioned proceeding.

8. Walmart's interests cannot be represented adequately by any other party, and Walmart's interests are sufficiently different from that of any party so as to add measurably and constructively to the scope of the case.

9. Walmart's motion is timely and will not cause delay or otherwise disrupt this proceeding.

10. No prejudice will result to the other parties if Walmart is allowed to intervene. Walmart's rights, however, will be affected if intervention is not granted at this time.

11. Accordingly, Walmart respectfully requests that it be permitted to intervene in the above-captioned proceeding.

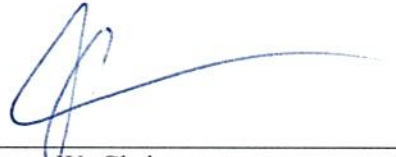
12. Further, Walmart requests that all communications regarding this proceeding be directed to Lisa V. Perry and Walmart's counsel at the following addresses:

Lisa V. Perry
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I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.



Steve W. Chriss

Dated: March 17, 2020
Bentonville, AR