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VIA ELECTRONIC MAIL ONLY

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625 -0350
Board.secretary@bpu.nj.gov

**Re: Post-Technical Conference Comments of Jersey Central Power & Light
Company
Investigation of Resource Adequacy Alternatives
Docket No. EO20030203**

Dear Secretary Camacho-Welch:

On September 18, 2020, the New Jersey Board of Public Utilities (“Board” or “BPU”) held a Technical Conference on Resource Adequacy. The interests of Jersey Central Power & Light Company (“JCP&L” or the “Company”) and its customers were represented by Kevin Warvell, Senior Advisor, Rate Initiatives for FirstEnergy Service Company. JCP&L wishes to thank the Board for convening the technical conference, and respectfully files these post-technical conference comments for your consideration.

JCP&L supports the clean energy targets and environmental objectives included in New Jersey’s Energy Master Plan and is invested in New Jersey’s success in achieving those goals. As a forward-thinking utility, JCP&L welcomes opportunities to partner with the BPU to make our customers’ lives brighter and the environment better.

JCP&L believes any generation resource alternative chosen by New Jersey should continue to utilize a competitive and transparent procurement approach, which will help ensure reasonable prices for customers. The Company remains committed to this process when considering a Fixed Resource Requirement (“FRR”) approach to contract for the capacity attributes of clean energy resources.

As JCP&L stated at the Technical Conference, the inquiry into PJM’s capacity market calls for a detailed, statewide analysis and collaborative process. It is essential that all stakeholders work together to consider the potential impacts of changing New Jersey’s participation in the PJM capacity market, and the risks this change would pose for customers, utilities and the state.

Important considerations when deciding upon a course of action include:

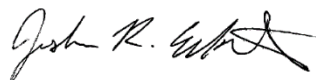
- How will contracts be structured?
- Who will monitor market power issues in an FRR structure?
- What time period is required to implement an FRR structure for the state or utility?
- As between the utility, the supplier and end-use customers, what are the risks and who is responsible for each category of risks of an FRR?
- What are the reliability and cost impacts to customers to administer an FRR structure as compared to the current PJM Reliability Pricing Market capacity market, and as compared to other relevant options?
- What specific units or technologies are not expected to clear the currently filed PJM capacity auction under the Minimum Offer Price Rule and thus are at actual risk of losing capacity revenue streams?
- How would the transition occur with the FRR process and the Basic Generation Service auction process?
- Will the BPU administer the FRR plan, or will that fall to the utilities who ultimately have the PJM tariff obligation under an FRR?

Several resource adequacy concepts were discussed at the Technical Conference, including new options not previously discussed. Whatever path New Jersey follows, JCP&L has a responsibility to make certain the Company's customers will not be disproportionately impacted as a result of any FRR plan or other capacity alternative. JCP&L's focus remains on providing safe and reliable service at a just and reasonable price to its customers, which remains a paramount consideration in this process.

JCP&L believes that legislation would likely be required for New Jersey to exercise any FRR option. As such, any decision to choose the FRR option will need to consider the legislative process and determine how best to achieve an appropriately balanced FRR implementation plan.

JCP&L appreciates the opportunity to offer these post-technical conference comments on the FRR option and looks forward to further working with the Board, The Brattle Group and stakeholders to identify the most cost-effective path toward meeting the State's clean energy goals.

Very truly yours,



Joshua R. Eckert

Counsel for Jersey Central Power & Light Company