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October 16, 2020

James C. Meyer, Esq. Riker Danzig Scherer Hyland & Perretti Headquarters Plaza One Speedwell Avenue Morristown, NJ 07962-1981

Re: IN THE MATTER OF THE IMPLEMENTATION OF <u>P.L.</u> 2018, <u>C.</u> 17 REGARDING THE ESTABLISHMENT OF ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION PROGRAMS

IN THE MATTER OF THE VERIFIED PETITION OF JERSEY CENTRAL POWER & LIGHT COMPANY FOR APPROVAL OF JCP&L'S ENERGY EFFICIENCY AND CONSERVATION PLAN INCLUDING ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION PROGRAMS (JCP&L EE&C)

BPU DOCKET NOS. QO19010040 AND EO20090620

Dear Mr. Meyer:

We are writing in response to the above-referenced petition, which Jersey Central Power & Light Company ("JCP&L" or "the Company") filed with the Secretary of the New Jersey Board of Public Utilities ("Board") on September 25, 2020 and supplemented on October 5, 2020 and October 8, 2020.

Board Staff has reviewed the petition for completeness, in accordance with the Board's June 10, 2020 Order in Docket Nos. QO19010040, QO19060648, and QO17091004 ("June 2020 Order"). Staff has determined that the petition is not administratively complete. We have enclosed, for your information, a list of the deficiencies in the petition and the information/documentation required to remedy the deficiencies.

N.J.S.A. 48:3-98.1(b) provides the Board with 180 days to approve, modify, or deny JCP&L's requested recovery of costs for the above-referenced program. As stated in the Board's May 2008 Order in Docket No. EO08030164, the 180-day review period will commence on the last filing date of the remediation of all deficiencies.

Should you have any questions, please contact the undersigned.

Sincerely,

Stacy Peterson

Director, Division of Energy

Kelly Mooii

Director, Division of Clean Energy

General Filing Requirements:

a. States the following:

The utility shall provide with all filings information and data pertaining to the specific program proposed as set forth in applicable sections of N.J.A.C. 14:1-5.11 and N.J.A.C. 14:1-5.12.

The filing is missing information related to N.J.A.C. 14:1-5.12.

b. States the following:

All filings shall contain information and financial statements for the proposed program(s) in accordance with the applicable Uniform System of Accounts that is set forth in N.J.A.C. 14:1-5.12. The utility shall provide the Accounts and Account numbers that will be utilized in booking the revenues, costs, expenses, and assets pertaining to each proposed program so that they can be properly separated and allocated from other regulated and/or other programs.

This Minimum Filing Requirement ("MFR") requires the petitioner to submit the accounts and account numbers that will be utilized in booking the revenues, costs, expenses and assets. The Company did not provide a comparative balance sheet or income statements for the most recent three-year period, nor a balance sheet with the most recent data available. The filing does not appear to delineate all accounts that will be used or provide proposed journal entries.

Cost Recovery Mechanism

b. States the following:

The utility shall provide detailed spreadsheets of the accounting treatment of the proposed cost recovery, including describing how costs will be amortized, which accounts will be debited or credited each month, and how the costs will flow through the proposed method of recovery of program costs.

This MFR requires the petitioner to describe how costs will be amortized and which accounts will be debited and credited each month, as well as how the costs will flow. A break out of accounts or accounting treatment said accounts was not included in the filing. The filing does not include proposed journal entries that would show how the costs will flow and which accounts would be debited and credited.