



James C. Meyer
Partner

Direct:
t: 973.451.8464
f: 973.451.8688
jmeyer@riker.com
Reply to: Morristown

ATTORNEYS AT LAW

September 14, 2021

Via Email

Hon. Robert Gordon, Commissioner
Hon. Aida Camacho-Welch, Secretary
Board of Public Utilities
44 South Clinton Avenue
Suite 314, 3rd Floor
Trenton, NJ 08625-0350

Re: I/M/O the Verified Petition of Jersey Central Power & Light Company For Approval of An Advanced Metering Infrastructure (AMI) Program (JCP&L AMI) BPU Docket No. EO20080545

Dear Commissioner Gordon and Secretary Camacho-Welch:

The undersigned is Counsel to Jersey Central Power & Light Company (“JCP&L” or the “Company”) in connection with the above referenced matter.

The Company hereby files the following materials collectively constituting the “Supplement” to the Verified Petition in this matter:

- this letter;
- Supplemental Direct Testimony of Carol Pittavino (Ex. JC-4) (explaining the reason for the Supplement); and
- Attachment A to Ms. Pittavino’s Supplemental Direct Testimony (identifying the revised provisions of the original filing).

Commissioner Gordon previously granted the Company’s request with the consent of the parties for a suspension of the Procedural Schedule in the January 13, 2021 Prehearing Order to facilitate on-going settlement discussions. Please note that this filing is not intended to reactivate the procedural schedule, but rather to provide a necessary update in order to further facilitate the settlement of this matter. With settlement discussions continuing, JCP&L is optimistic that this proceeding can be resolved without the need for further litigation. If the litigation schedule is reactivated, which we do not expect, the Company would provide the full Petition, testimonies and AMI Plan as revised by this Supplement for use of the parties.

The Supplemental Testimony explains an accounting policy change that has increased the capital cost of the AMI Plan, but that will be balanced out with reductions in base costs. Accordingly, this Supplement reflects a change in the AMI Plan’s capital cost from approximately \$360 million to \$390.0 million over first six years of the AMI Plan that includes the one-year pre-deployment phase, three-year smart meter deployment phase, and two-year final engineering phase to address challenged locations. The AMI Plan capital cost has increased from \$342 million to \$370.7 million over the first four years of the Plan. There is no change in

September 14, 2020
Page 2

incremental O&M expense. Over the twenty-year study period, the benefit cost ratios remain positive at 1.74:1. Further, the Company's calculation of benefit to cost ratios on a net present value basis also remain positive from a societal perspective (1.55:1), customer perspective (1.44:1) and Company perspective (1.08:1).

There are a limited number of other items reflected in the Supplement that reflect corrections to the original filing identified in discovery and the Cost of Capital from the Company's most recent base rate case, as described in Ms. Pittavino's Supplemental Direct Testimony.

Because the Supplement reflects an increase in the overall cost of the AMI Plan, the Company is working with the parties to schedule two additional public hearings (on the same day).

Pursuant to the Board's March 19, 2020 Order regarding the COVID-19 pandemic (Docket No. EO20030254), this Supplement is being electronically filed by email with the Secretary and served by email upon the attached service list; no paper copies will follow.

Kindly have the Office of the Secretary or the Office of Case Management confirm receipt by email to the undersigned.

Thank you for your courtesy and cooperation.

Respectfully submitted,

/s/ James C. Meyer

James C. Meyer

cc: Service List (by email)

In the Matter of the Verified Petition of Jersey Central Power & Light Company For
Approval of An Advanced Metering Infrastructure (AMI) Program (JCP&L AMI)
BPU Docket No. EO20080545 --Service List [September 14, 2021]

BPU

#Aida Camacho-Welch, Board Secretary
Board of Public Utilities
44 South Clinton Avenue, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
board.secretary@bpu.nj.gov
aida.camacho@bpu.nj.gov
karriemah.graham@bpu.nj.gov

Robert Brabston, Esq., Executive Director
Board of Public Utilities
44 South Clinton Avenue, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
Robert.Brabston@bpu.nj.gov

Abe Silverman, Esq., Chief Counsel
Board of Public Utilities
44 South Clinton Avenue, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
abe.silverman@bpu.nj.gov

Stacy Peterson
Director, Division of Energy
Board of Public Utilities
44 South Clinton Avenue, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
stacy.peterson@bpu.nj.gov

Cindy Bianco
Board of Public Utilities
44 South Clinton Avenue, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
Cindy.Bianco@bpu.nj.gov

Dr. Ben Witherell, Chief Economist
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
ben.witherell@bpu.nj.gov

Ryan Moran
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
Ryan.Moran@bpu.nj.gov

David Brown
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
David.Brown@bpu.nj.gov

Dean Taklif
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
Dean.Taklif@bpu.nj.gov

Heather Weisband
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350
Heather.Weisband@bpu.nj.gov

DIVISION OF LAW

Pamela Owen, Esq.
Deputy Attorney General
NJ Department of Law and Public Safety
Richard J. Hughes Justice Complex
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton, NJ 08625
Pamela.owen@law.njoag.gov

Terel Klein, Esq.
Deputy Attorney General
NJ Department of Law and Public Safety
Richard J. Hughes Justice Complex
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton, NJ 08625
Terel.klein@law.njoag.gov

*Matko Ilic, Esq.
Deputy Attorney General
NJ Department of Law and Public Safety
Richard J. Hughes Justice Complex
Public Utilities Section
25 Market Street, P.O. Box 112
Trenton, NJ 08625
matko.ilic@law.njoag.gov

RATE COUNSEL

*Brian O. Lipman, Esq.
Acting Director
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003
blipman@rpa.nj.gov

Maria Novas-Ruiz, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003
mnovas-ruiz@rpa.nj.gov

Debora Layugan, Paralegal
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003
dlayugan@rpa.nj.gov

T. David Wand
dwand@rpa.nj.gov

Christine Juarez
cjuarez@rpa.nj.gov

Robert Glover
rglover@rpa.nj.gov

Dave Peterson
davep@chesapeake.net

Matthew Kahal
mkahal@exeterassociates.com

Paul Alvarez
palvarez@wiredgroup.net

JCP&L

Lauren Lepkowski, Esq.
FirstEnergy Corp.
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
llepkoski@firstenergycorp.com

*James C. Meyer, Esq.
Edward K. DeHope, Esq.
Riker Danzig Scherer Hyland & Perretti
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962-1981
jmeyer@riker.com
edehope@riker.com

Mark A. Mader
Jersey Central Power & Light Company
300 Madison Avenue
Morristown, NJ 07962-1911
mamader@firstenergycorp.com

Carol Pittavino
FirstEnergy Service Company
800 Cabin Hill Drive,
Greensburg, PA 15601
cpittavino@firstenergycorp.com

John C. Ahr
FirstEnergy Service Company
800 Cabin Hill Drive,
Greensburg, PA 15601
jahr@firstenergycorp.com

James O'Toole
Jersey Central Power & Light Company
300 Madison Avenue
Morristown, NJ 07962-1911
jotoole@firstenergycorp.com

*Receives two hard copies of pleadings; #Only receives filed pleadings-no discovery

INTERVENORS

Market Participants (NRG, etc.)

Christopher E. Torkelson, Esq.
Eckert, Seamans, Cherin & Mellott, LLC
P.O. Box 5404
Princeton, NJ 08543
ctorkelson@eckertseamans.com

Karen O. Moury, Esq.
Sarah C. Stoner, Esq.
Eckert, Seamans, Cherin & Mellott, LLC
213 Market St., 8th Fl.
Harrisburg, PA 17101
kmoury@eckertseamans.com
SStoner@eckertseamans.com

Utilidata, Inc.

Alice M. Bergen, Esq.
William Harla, Esq.
DeCotiis, Fitzpatrick, Cole & Giblin, LLP
61 South Paramus Rd, Suite 250
Paramus, NJ 07652
ABergen@decotiislaw.com
wharla@decotiislaw.com

PARTICIPANTS

EEA-NJ

John M. Kolesnik, Esq.
Energy Efficiency Alliance of New Jersey
701 E. Gate Drive
Mount Laurel, NJ 08054
jkolesnik@eeaofnj.org

PSEG

Matthew M. Weissman, Esq.
PSEG Services Corporation
80 Park Plaza, T5
P.O. Box 570
Newark, NJ 07102
Matthew.Weissman@pseg.com

Katherine E. Smith, Esq.
Katherine.smith@pseg.com

E-Mail Only

Bernard Smalls, Paralegal
Bernard.Smalls@pseg.com

Michele Falcao, Regulatory Case Supervisor
Michele.Falcao@pseg.com

Caitlyn White, Regulatory Case Coordination
Caitlyn.White@pseg.com