

October 1, 2021

VIA ELECTRONIC MAIL

Gregory Eisenstark

Direct Phone 973-200-7411
Direct Fax 973-200-7465
geisenstark@cozen.com

Ms. Aida Camacho-Welch
Secretary
NJ Board of Public Utilities
44 South Clinton Street, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625

**Re: In the Matter of the New Jersey Board of Public Utilities' Response to
The COVID-19 Pandemic
BPU Docket No. AO20060471**

Dear Secretary Camacho-Welch:

Pursuant to the Board of Public Utilities' Order dated September 14, 2021 Order in the above-referenced matter, enclosed for filing is a plan of Jersey Central Power & Light Company.

This letter is being filed in electronic format only, consistent with the Board's Order dated March 19, 2020 (Docket No. EO20030254) directing that all submissions to the Board, of any kind, be submitted electronically. No paper copies will follow and we would appreciate if the Board Secretary's office would please acknowledge receipt of this filing. Your anticipated courtesies and cooperation are very much appreciated.

Respectfully submitted,

COZEN O'CONNOR



By: Gregory Eisenstark

Enclosures

c: Service List (*via electronic mail*)

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**In the Matter of the New Jersey Board of Public Utilities' Response to
The COVID-19 Pandemic
BPU Dkt. No. AO20060471 (and BPU Docket No. EO20100629U)**

NJ BOARD OF PUBLIC UTILITIES

Aida Camacho-Welch, Secretary
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
board.secretary@bpu.nj.gov

Robert Brabston, Executive Director
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
Robert.Brabston@bpu.nj.gov

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

Abraham Silverman
General Counsel
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
abe.silverman@bpu.nj.gov

Carol Artale
Deputy General Counsel
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
carol.artale@bpu.nj.gov

Michael Kammer, Director
Division of Water
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
Mike.kammer@bpu.nj.gov

Julie Ford-Williams, Director
Division of Customer Assistance
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
Julie.ford@bpu.nj.gov

Megan Lupo, Esq.
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
Megan.Lupo@bpu.nj.gov

Lanhi Saldana, Esq.
Legal Specialist
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
Lanhi.Saldana@bpu.nj.gov

Benjamin Witherell
Chief Economist
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
Benjamin.witherell@bpu.nj.gov

Hannah Thonet
Senior Policy Advisor
N.J. Board of Public Utilities
44 South Clinton Avenue, 10th Floor
P.O. Box 350
Trenton, NJ 08625-0350
Hannah.thonet@bpu.nj.gov

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DIVISION OF RATE COUNSEL

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

Susan McClure, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003
smcclure@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

Robert Glover, Esq.
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003
rglover@rpa.nj.gov

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

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

Karen Forbes
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-0003
kforbes@rpa.nj.gov

**DEPT. OF LAW & PUBLIC SAFETY –
DIVISION OF LAW**

Pamela Owen, Deputy Attorney General
Dept. of Law & Public Safety
Division of Law
Hughes Justice Complex-7th Floor
P.O. Box 112
Trenton, New Jersey 08625
pamela.owen@law.njoag.gov

Terel Klein, Deputy Attorney General
Dept. of Law & Public Safety
Division of Law
Hughes Justice Complex-7th Floor
P.O. Box 112
Trenton, New Jersey 08625
terel.klein@law.njoag.gov

Tanya Lloyd-Samuel
Dept. of Law & Public Safety
Division of Law
Hughes Justice Complex-7th Floor
P.O. Box 112
Trenton, New Jersey 08625
Tanya.lloyd_samuel@law.njoag.gov

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**JERSEY CENTRAL POWER & LIGHT
COMPANY**

Mark A. Mader
Director NJ Rates
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, New Jersey 07960
mamader@firstenergycorp.com

Lauren Lepkoski, Esq.
FirstEnergy Service Company
2800 Pottsville Pike
Reading, Pennsylvania 19601
llepkoski@firstenergycorp.com

Joshua Eckert, Esq.
Jersey Central Power & Light Company
300 Madison Avenue
P.O. Box 1911
Morristown, New Jersey 07960
jeckert@firstenergycorp.com

Andrew Hendry
Senior Advisor, NJ Regulatory Affairs
Jersey Central Power & Light Company
150 West State Street
Trenton, New Jersey 08608
ahendry@firstenergycorp.com

Michael J. Connolly, Esq.
Cozen O'Connor
One Gateway Center, Suite 910
Newark, NJ 07102
mconnolly@cozen.com

Gregory Eisenstark, Esq.
Cozen O'Connor
One Gateway Center, Suite 910
Newark, NJ 07102
geisensentark@cozen.com

**PUBLIC SERVICE ELECTRIC & GAS
COMPANY**

Matthew Weissman, Esq.
Managing Counsel, State Regulatory
Public Service Electric & Gas Co.
80 Park Plaza, T-5
Newark, NJ 07102-4194
Matthew.weissman@pseg.com

Danielle Lopez, Esq.
Associate Counsel
Public Service Electric & Gas Co.
80 Park Plaza, T-5
Newark, NJ 07102-4194
danielle.lopez@pseg.com

Katherine Smith, Esq.
Associate Counsel
Public Service Electric & Gas Co.
80 Park Plaza, T-5
Newark, NJ 07102-4194
Katherine.smith@pseg.com

Michele Falco
Regulatory Case Supervisor
Public Service Electric & Gas Co.
80 Park Plaza, T-5
Newark, NJ 07102-4194
Michele.falco@pseg.com

Bernard Smalls
Paralegal
Public Service Electric & Gas Co.
80 Park Plaza, T-5
Newark, NJ 07102-4194
Bernard.smalls@pseg.com

Caitlyn White
Regulatory Case Coordinator
Public Service Electric & Gas Co.
80 Park Plaza, T-5
Newark, NJ 07102-4194
Caitlyn.white@pseg.com

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ATLANTIC CITY ELECTRIC CO.

Philip J. Passanante, Esq.
Pepco Holdings, LLC-92DC56
500 N. Wakefield Drive
P.O. Box 6066
Newark, DE 19714-6066
philip.passanante@pepcoholdings.com

ROCKLAND ELECTRIC CO.

John L. Carley, Esq.
Associate General Counsel
Consolidated Edison Co. of NY
4 Irving Place
New York, NY 10003
carleyj@coned.com

Margaret Comes, Esq.
Regulatory Associate Counsel
Consolidated Edison Co. of NY
4 Irving Place
New York, NY 10003
comesm@coned.com

David Braunftel
Customer Assistance Director- O&R
Consolidated Edison Co. of NY
4 Irving Place
New York, NY 10003
Braunfteld@oru.com

BOROUGH OF BUTLER

Robert H. Oostdyk, Jr. Esq.
Murphy McKeon P.C.
51 Route 23 South
P.O. Box 70
Riverdale, NJ 07457
roostdyk@murphymckeonlaw.com

James Lampmann
Borough Administrator
1 Ace Road
Butler, NJ 07405
jlampmann@butlerborough.com

NJ NATURAL GAS COMPANY

Andrew K. Dembia, Esq.
NJ Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719
adembia@njng.com

Mark G. Kahrer
NJ Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719
mkahrer@njng.com

Tina Trebino
NJ Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719
ttrebino@njng.com

Susan Fastuca
NJ Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719
sfastuca@njng.com

Maria Deleplain
NJ Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719
mdelaplain@njng.com

Suzanne Bostwick
NJ Natural Gas Company
1415 Wyckoff Road
P.O. Box 1464
Wall, NJ 07719
sbostwick@njng.com

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**SOUTH JERSEY GAS CO.AND
ELIZABETHTOWN GAS CO.**

Deborah Franco, Esq.
SJ Industries
Regulatory Affairs Counsel
520 Green Lane
Union , NJ 07083
dfranco@sjindustries.com

Diana Donnelly
SJ Industries
Director Customer Experience ETG
520 Green Lane
Union , NJ 07083
ddonnelly@sjindustries.com

Marissa Travaline
South Jersey Gas Co. and Etown Gas Co.
520 Green Lane
Union , NJ 07083
mtravaline@sjindustries.com

Brian Jacobs
South Jersey Gas Co. and Etown Gas Co.
520 Green Lane
Union , NJ 07083
bjacobs@sjindustries.com

Dominick DiRocco
South Jersey Gas Co. and Etown Gas Co.
520 Green Lane
Union , NJ 07083
ddirocco@sjindustries.com

Andrew McNally
South Jersey Gas Co. and Etown Gas Co.
520 Green Lane
Union , NJ 07083
amcnally@sjindustries.com

GORDON'S CORNER WATER CO.

David Em, President
Gordon's Corner Water Co.
27 Vanderburg Road
P.O. Box 145
Marlboro, NJ 07746
dgern@gordonscornerwater.com

Eric Olson
Gordon's Corner Water Co.
27 Vanderburg Road
P.O. Box 145
Marlboro, NJ 07746
eolsen@gordonscornerwater.com

AQUA NJ, INC.

Lawrence Carson, President
Aqua NJ, Inc.
10 Black Forest Road
Hamilton, NJ 08691
lrcarson@aquaamerica.com

Adam Burger
Aqua NJ, Inc.
10 Black Forest Road
Hamilton, NJ 08691
aburger@aquaamerica.com

Kimberly Joyce
Aqua NJ, Inc.
10 Black Forest Road
Hamilton, NJ 08691
kajoyce@aquaamerica.com

Bill Packer
Aqua NJ, Inc.
10 Black Forest Road
Hamilton, NJ 08691
wcpackerjr@aquaamerica.com

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NJ AMERICAN WATER CO.

Cheryl Norton, President
NJ American Water Co.
One Water Street
Camden, NJ 08102
Cheryl.norton@amwater.com

Debbie Albrecht, Esq.
NJ American Water Co.
One Water Street
Camden, NJ 08102
Debbie.albrecht@amwater.com

Christoper Arfaa
NJ American Water Co.
One Water Street
Camden, NJ 08102
Christopher.arfaa@amwater.com

FAYSON LAKES WATER CO.

John Cannie, President
Fayson Lakes Water Co.
160 Boonton Avenue
Kinnelon, NJ 07405
flwc@optonline.net

MONTAGUE WATER CO.

Steve Lubertozi, President
Montague Water Co.
2335 Sanders Road
Northbrook, IL 60062
Steve.lubertozi@uiwater.com

LAKE LENAPE WATER CO.

Jeffrey Fuller, President
Lake Lenape Water Co.
3 Eagle Chase
Woodbury, NY 11797
JMF1294@yahoo.com

MIDDLESEX WATER CO.

Dennis W. Doll
Middlesex Water Company
481 C Route 1 South, Suite 400
Iselin, NJ 08830
ddoll@middlesexwater.com

Jay Kooper
Middlesex Water Company
481 C Route 1 South, Suite 400
Iselin, NJ 08830
jkooper@middlesexwater.com

SUEZ WATER NJ, INC.

Charles Dickerson
Suez Water Company
461 From Road, Suite 400
Paramus, NJ 07652
Charles.dickerson@suez.com

Rodolphe Bouichou
Suez Water Company
461 From Road, Suite 400
Paramus, NJ 07652
Rodolphe.bouichou@suez.com

Jim Cagle
Suez Water Company
461 From Road, Suite 400
Paramus, NJ 07652
Jim.cagle@suez.com

**In the Matter of the New Jersey Board of Public Utilities' Response to
The COVID-19 Pandemic
BPU Dkt. No. AO20060471 (and BPU Docket No. EO20100629U)**

MIDTOWN WATER CO.

John J. Brunetti, President
Midtown Water Co.
1655 US Highway 9
Old Bridge, NJ 08857
Jbrunetti@brunetti.com

Jennifer Zappola, Tax Manager
Midtown Water Co.
1655 US Highway 9
Old Bridge, NJ 08857
jzappola@brunetti.com

SHORE WATER CO.

Samuel Faiello, President
Shore Water Co.
105-23rd Avenue
South Seaside Park, NJ 08752
Samsjf@verizon.net

Gloria Stuart
Shore Water Co.
105-23rd Avenue
South Seaside Park, NJ 08752
Glorstuart@comcast.com

SIMMONS WATER CO.

David B. Simmons, Jr., President
Simmons Water Company
P.O. Box 900
Branchville, NJ 07826
dbsjr@simmonstransport.com

ATLANTIC CITY SEWER CO.

Wendy Stewart, President
Atlantic City Sewerage Co.
1200 Atlantic Avenue, Suite 300
Atlantic City, NJ 08401
wstewart@acsewerage.com

Carl Cordek
Atlantic City Sewerage Co.
1200 Atlantic Avenue, Suite 300
Atlantic City, NJ 08401
cordekc@aol.com

MT. OLIVE VILLAGES WATER CO.

Henryk Schwarz, President
Mt. Olive Villages Water Co.
200 Central Avenue
Mountainside, NJ 07902
ZLN1@aol.com

AARP

AARP New Jersey State Office
303 George Street, Suite 505
New Brunswick, NJ 08901
Evelyn Liebman, Director of Advocacy
Eliebman@aarp.org

Janine G. Bauer, Esq.
Szaferman, Lakind, Blumstein &
Blader, P.C.
101 Grovers Mill Road, Suite 200
Lawrenceville, NJ 08648
JBauer@szaferman.com

April Costello
Szaferman, Lakind, Blumstein &
Blader, P.C.
101 Grovers Mill Road, Suite 200
Lawrenceville, NJ 08648
Acostello@szaferman.com

**IN THE MATTER OF THE NEW JERSEY BOARD OF PUBLIC UTILITIES’
RESPONSE TO THE COVID-19 PANDEMIC
BPU DOCKET NO. AO20060471**

Jersey Central Power & Light Company
Plan in Compliance with the BPU’s September 14, 2021 Order

In its September 14, 2021 Order, the Board of Public Utilities (“Board” or “BPU”) ordered that the regulatory asset period for deferral of COVID-19 related incremental costs be extended through December 31, 2022. In that same Order, the Board wrote:

The Board has further considered Rate Counsel’s recommendation for a formal filing of a plan by the respective Companies and Water Companies setting out how the extension will be used and to require additional data and periodic filings. The Board FINDS that Rate Counsel’s recommendations are reasonable to ensure transparency, and a formal plan will serve as a guide for the parties to timely complete the steps necessary to meet the extended Regulatory Asset Period deadline. Now, THEREFORE, the Board HEREBY ORDERS the utility companies regulated by the Board to file a formal plan within 10 days from the effective date of this Order outlining how the additional time afforded by this Order will be used in meeting the Regulatory Asset Period deadline.

September 14 Order, at p. 6.

The specific Division of Rate Counsel (“Rate Counsel”) recommendation that the Board referred to stated:

Rate Counsel recommends that the Board impose reasonable conditions on any extension, particularly requiring each utility in this proceeding to file a plan setting forth how it will use the additional time to obtain appropriate federal funds and work with customers to reduce arrearages and avoid disconnections, as well as, requiring the utilities to keep transparent record of actions taken and costs incurred.

Rate Counsel Comments dated Aug. 4, 2021, at unnumbered pp. 7-8.

Accordingly, Jersey Central Power & Light Company (“JCP&L” or “Company”) is filing this plan in compliance with the above-cited provision of the September 14 Order.

A. JCP&L’s Use of the Additional Regulatory Asset Deferral Time

JCP&L appreciates the Board’s extension of the regulatory asset deferral period through the end of 2022. During this time period, the Company plans to take several steps to address its incremental COVID-19 related costs and work with its customers to address arrearages and disconnection of service.

- As JCP&L has previously informed the Board, due to the recent increase in infection rates, the return-to-work timeframe for FirstEnergy/JCP&L employees has been delayed. Until recently, it was expected that the majority of JCP&L/FirstEnergy employees would return to work in the office as of September 20, 2021. However, that date has been delayed to February 28, 2022. As a result of this delay, many of the incremental COVID-related expenses that JCP&L has deferred pursuant to the COVID Regulatory Asset Order will continue to accrue at least through early 2022 and perhaps longer, until the Company can return to normal operations.
- Many of these expenses are associated with measures designed to promote social distancing, so as to minimize the potential for spread of the virus amongst employees, particularly those bargaining unit employees working in field operations. The Company has worked closely with bargaining unit leadership to put these protocols in place for the benefit and protection of its employees. While these measures come with some incremental costs, the Company will not cut corners when the health and safety of its employees is at stake.

B. How JCP&L Will Work With Customers To Reduce Arrearages and Avoid Disconnections

- In regard to COVID-related arrearages, JCP&L has taken a number of steps during the extended disconnection moratorium and “grace period.” These include:
 - Offering enhanced and extended deferred payment arrangements, with no required money down;
 - Providing additional information through various channels to advise customers of other available sources of assistance for utility bills, including federal programs, State programs, and non-governmental organizations. These channels include:
 - FirstEnergy Contact Centers
 - Field Collections Personnel
 - Mass media, bill messaging, reminder calls, and social media.

Once the COVID-related disconnection moratorium ends, JCP&L will transition back to its normal collections processes. The transition back to a normal state of collections activity should work to reduce the level of arrearages over time – likely over the next two to three years.

C. How JCP&L Will Use the Additional Time to Obtain Appropriate Federal Funds

The Company will continue to work closely with the Board and the Department of Community Affairs (“DCA”) to facilitate DCA outreach to customers in arrears, to make those customers aware of additional available federal funding through programs such as LIHEAP and the American Rescue Plan. With respect to the latter, the DCA will soon be sending out letters to customers encouraging them to sign up for available funding, which letters were developed in conjunction

with the utilities and other Parties, and with customer contact information provided by the utilities. JCP&L will also continue to work to make customers aware of the increased eligibility thresholds approved by the Board for the Universal Service Fund (“USF”) and FreshStart program, in conjunction with the forthcoming energy assistance days. JCP&L will remain active in the “arrears workgroups” convened by the Board and through other such means to stay abreast of funding availability and collective action necessary to encourage customers to apply for such funds and continued program development.

Record-keeping

- In regard to record-keeping, JCP&L has continued to maintain the level of detail as required by the Board’s Orders in regard to incremental COVID-19 related costs, and has filed such information with its quarterly reports. In accord with the September 14 Order, the Company will expand its quarterly reports on a going-forward basis to include the following additional data:
 - the number of Deferred Payment Arrangements created each month;
 - the number of Fresh Start recipients;
 - funds received through existing State and federal programs;
 - the number of new hires related to addressing COVID-19 arrearages;
 - the number of field collection visits; and,
 - the number of disconnections and reconnections by zip code or city.

Efforts to Promote Customer Engagement

Proactively, JCP&L has implemented new, and modified existing, outreach programs in order to provide information to customers. These outreach programs include:

- Outbound dialing messages to customers with delinquent bills that normally receive reminder or termination notice calls were modified so that such customers receive reminder calls that include energy assistance program information specifically focused on COVID-19 relief.
- Creation of internal small business team, specialized in educating commercial customers regarding relevant provisions within the CARES Act and their options for payment arrangements.

- A customer outreach campaign through field collections activities starting in August 2020 to present new printed materials to customers with delinquent accounts, encouraging them to contact the Company for payment options and to provide energy assistance program information.
- A bill assistance campaign providing bill inserts and bill messaging related to assistance options for residential customers and the CARES Act for commercial customers.
- Email and social media campaigns that focused on assistance options, promoted human service programs and provided energy assistance information to residential customers, including a new email campaign to highlight LIHEAP and USF programs.
- A new website dedicated to information and resources related to the Company's response to COVID-19 and multiple news releases which focused on the suspension of service termination and customer payment and assistance options.¹
- Advertising campaigns that included radio, television and billboard ads were run to encourage customers to enroll in no money down DPAs and seek assistance.
- Live-Agent outbound calls to residential customers with past due balances more than 60 days past due who did not have a recent payment, were not on a payment arrangement, and were not participating in a customer assistance program. Customers were contacted to discuss payment, payment arrangements, and customer assistance information.
- Email communications to certain residential customers who did not have a recent payment, did not recently enter into a payment arrangement, and were not participating in a customer assistance program. The emails encouraged customers to address their arrears by making a payment or entering into an installment plan. The emails also encouraged customers to learn more about their potential eligibility for a customer assistance program.
- Talking points for customer-facing employees on the Company's COVID-19 response and assistance options for residential and commercial customers.

¹ The website can be accessed at: <https://www.firstenergycorp.com/help/safety/coronavirus.html>

- Residential customer Bill of Rights, as revised by the Board, emailed or sent via regular mail to customers (underway as of this filing).
- Bill messaging encouraging customers to call or visit a link to our website, which link includes information about assistance programs and also the revised residential customer Bill of Rights.