



## **LOCAL UNION 1289**

P.O. BOX 1690, WALL, NJ 07719



September 29, 2022

### **VIA E-MAIL**

Aida Camacho-Welch  
Secretary of the Board  
44 South Clinton Ave. 1<sup>st</sup> Floor  
Post Office Box 350  
Trenton, NJ 08625-0350

**Re: Straw Proposal on Advanced Metering  
Infrastructure (AMI) Data Transparency, Privacy & Billing  
Docket No. EO20110716**

Dear Secretary Camacho-Welch:

My name is Jeffrey Ecklof and I am currently the President/Business Manager of the International Brotherhood of Electrical Workers (IBEW), Local 1289. As you may or may not know, this Local represents all of the unionized employees employed by Jersey Central Power and Light Company (JCP&L), here in the State of New Jersey. I am submitting these comments on behalf of the leadership of this Local and its Members.

As reflected in the notice, JCP&L filed its AMI petition on August 27, 2020 seeking installation of smart meters and associated data systems to their service territory. Once the petition was filed, this Local started conversations with the Company (JCP&L) in March of 2021, in which the Company committed to work closely with IBEW, Local 1289 to minimize the impact on employees such as Meter Readers, Business Office Employees, Customer Service Representatives (CSR's) including Representatives that work in the Back Office, and in Business Offices.

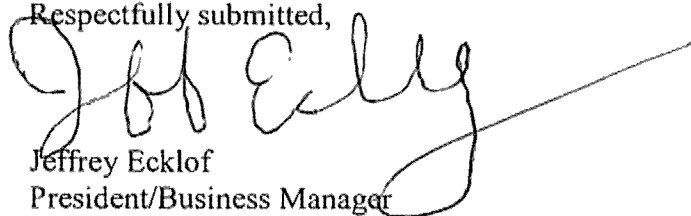
On June 4, 2021, the Company and the Union successfully came to an agreement for a Transitional Workforce to assist Meter Readers and Business Office CSR's so permanent employees could adjust career paths to maintain employment within JCP&L. To date, we currently have seventy-six (76) Meter Readers and five (5) Business Office, CSR's to find alternate permanent positions for.

As noted, in JCP&L's filing on August 27, 2020, a reduction in Back Office activities will occur due to smart meter technology along with data and analytics which is related to billing including the resolution of high bill complaints, misreads, estimated reads, and move-in/move-out reads. This Local, for over a year, has requested both verbally and in writing to enter into impact bargaining for our Members in the billing department that will be affected by AMI and these negotiations, as of this writing, have not occurred. As recently as September 14, 2022, the Local was informed that Technical Billing work will NOT be performed in New Jersey but rather the work will be transferred to states such as Ohio, Pennsylvania and West Virginia. This is not acceptable to this Local, and we would hope that this transferring of work to out of state non-union positions would not be acceptable to the State of New Jersey as well. This Local is aware that the loss of this work, which has been normally and customarily performed, by Members of this Local, and its movement to out of state non-union personnel has never been conveyed to the BPU by JCP&L/FirstEnergy in any of their filings.

IBEW, Local 1289 currently supports the State's energy efficiency and clean energy goals and believes that there may be benefits associated with the implementation of AMI. However, now that JCP&L will be sending New Jersey customer billing out of state, post AMI implementation, we believe that this is vital information that all JCP&L customers and especially the BPU should be aware of. It should also be noted, JCP&L moved their customer call center out of the State of New Jersey in 1999. These calls currently are being handled now in Pennsylvania, Ohio and West Virginia. Since that move, JCP&L customers will not only have their customer calls performed out of State, but now they are proposing to move the billing work out of New Jersey as well. Local 1289's leadership firmly believes this will have no benefit to the customers and should remain in NJ where the current employees are familiar with both the work and the NJ tariff.

I respectfully request, the NJ BPU reconsider the consequences with JCP&L's billing department being moved out of the State of New Jersey due to AMI implementation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeff Ecklof", with a long horizontal line extending from the end of the signature.

Jeffrey Ecklof  
President/Business Manager  
IBEW, Local 1289  
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