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September 30, 2022

**VIA ELECTRONIC MAIL ONLY**

Carmen Diaz, Acting Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

**Re: In the Matter of the Verified Petition of Jersey Central Power & Light Company For the Review and Approval of Costs Incurred For Environmental Remediation of Manufactured Gas Plant Sites Pursuant to the Remediation Adjustment Clause of Its Filed Tariff (“2021 RAC Filing”)  
BPU Docket No. \_\_\_\_\_**

Dear Acting Secretary Carmen Diaz:

On behalf of the Petitioner, Jersey Central Power & Light Company (“JCP&L” or the “Company”), attached for filing with the Board of Public Utilities (“Board”) is an electronic copy of JCP&L’s Verified Petition and supporting Attachments in its above-captioned “2021 RAC Filing”, relating to the Company’s Remediation Adjustment Clause (“RAC”), which is a component of the Societal Benefits Charge (“SBC”) of JCP&L’s filed Tariff.<sup>1</sup> Also attached is an electronic version of the voluminous Minimum Filing Requirements (“MFRs”) required by the 2004 RAC Filing Stipulation dated as of November 15, 2005, as modified by the 2006-2008 RAC Filing Stipulation dated February 8, 2011. Please note that MFR-07 and MFR-10, which contain confidential information, have been omitted from this filing pending execution of an appropriate confidentiality agreement.

As noted in the Verified Petition (at ¶3), the purpose of this filing is to provide the Board, its Staff and the Division of Rate Counsel with the opportunity to conduct a review of all actual costs and expenditures incurred by JCP&L relating to the period from January 1, 2021 through December 31, 2021.

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<sup>1</sup> In accordance with the March 19, 2020 Order of the Board in Docket No. EO20030254, which directed that all submissions to the Board or to the Division of Rate Counsel (“Rate Counsel”), this Petition and the attachments hereto are being sent by electronic mail only.

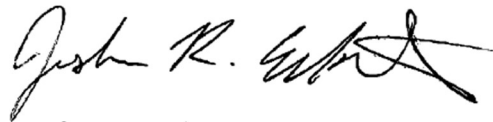
As noted in ¶42 of the Verified Petition, the Company proposes to defer costs related to Natural Resource Damage (“NRD”) issues and incentive compensation costs for 2021, but not to include such NRD-related and incentive compensation costs for recovery until there is a final resolution regarding the appropriateness of recovering same.

As noted in ¶¶ 41, 42 and 43 of the Verified Petition, the incremental expenses incurred in connection with JC&L’s Manufactured Gas Plant (“MGP”) remediation program in the 2021 period are \$7.65 million. During 2021, the deferral accrued carrying costs of \$0.6 million, leaving a net balance of unrecovered 2021 MGP costs, as of December 31, 2021, of \$8.207 million. After subtracting the deferred incentive compensation costs of \$12,933, the resulting net incremental MGP costs incurred during calendar year 2021, which represents the total recoverable MGP remediation expense for the 2021 period, is \$8.194 million. When combined with the 2021 over-recovered deferred RAC balance of \$0.3 million and the remaining amortization of prior RAC expenditures previously approved for recovery, the resultant *decrease* to JCP&L’s Rider RAC charge is \$0.000026 per kilowatt-hour (“kWh”) (before sales and use tax (“SUT”)), which would decrease revenues by \$0.5 million annually. However, the Company is proposing that no change be made to the Rider RAC Tariff Rate beyond the increase approved in the 2020 Rider RAC Filing.

I hereby confirm that this letter and the attached Verified Petition and supporting Attachments are this day being served by electronic delivery upon the Director, Division of Rate Counsel, and upon the Department of Law & Public Safety, Division of Law, as set forth in ¶46 of the Verified Petition.

If you have any questions, please feel free to contact me.

Very truly yours,



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Joshua R. Eckert

Attachments

cc: Certificate of Service

**SERVICE LIST**  
**JERSEY CENTRAL POWER & LIGHT COMPANY**  
**2021 RAC Filing**  
**BPU Docket No. \_\_\_\_\_**

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**JCP&L**

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**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

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In the Matter of the Verified Petition of <b>Jersey</b>	:	BPU Docket No.
<b>Central Power &amp; Light Company</b> for the	:	
Review and Approval of Costs Incurred for	:	
Environmental Remediation of Manufactured	:	
Gas Plant Sites Pursuant to the Remediation	:	<b>VERIFIED PETITION</b>
Adjustment Clause of Its Filed Tariff	:	
<b>(“2021 RAC Filing”)</b>	:	

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**TO THE HONORABLE BOARD OF PUBLIC UTILITIES:**

Petitioner, Jersey Central Power & Light Company (the “Petitioner”, the “Company” or “JCP&L”), an electric public utility company of the State of New Jersey subject to the regulatory jurisdiction of the Board of Public Utilities (the “Board”), and maintaining offices at 300 Madison Avenue, Morristown, New Jersey 07962-1911, and 101 Crawford Corners Road, Building 1, Suite 1-511, Holmdel, New Jersey 07733, in support of its above-captioned Verified Petition, respectfully shows:

1. JCP&L is a New Jersey electric public utility primarily engaged in the purchase, transmission, distribution and sale of electric energy and related utility services to more than 1,000,000 residential, commercial, and industrial customers located within 13 counties and 236 municipalities of the State of New Jersey.

2. Copies of all correspondence and other communications relating to this proceeding should be addressed to:

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**Jersey Central Power & Light Company**  
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**Morristown, New Jersey 07962-1911**

**Purpose of Filing**

3. The purpose of this filing is to provide the Board, the Board's Staff ("Staff") and the Division of Rate Counsel ("Rate Counsel"), with the opportunity to conduct a review of all actual costs and expenditures incurred by JCP&L relating to the environmental remediation of its former manufactured gas plant ("MGP") sites for the period from January 1, 2021 through December 31, 2021, pursuant to the Remediation Adjustment Clause ("RAC") of JCP&L's filed Tariff ("2021 RAC Filing"). As explained in this Petition, JCP&L is requesting that no change be made to its currently effective Rider RAC charge, given the minor decrease in anticipated revenues that would result from implementing the calculated rate.

## **Procedural History**

4. By Order dated July 30, 1997 in Docket No. ER95120634 (the “1997 RAC Order”), the Board adopted in its entirety a Stipulation of Settlement dated June 24, 1997 among JCP&L, Staff and Rate Counsel. The 1997 RAC Order established Rider RAC in JCP&L’s filed tariff, which was intended to allow JCP&L to recover all prudently incurred costs and expenses, including associated transaction and carrying costs, and net of insurance and other third-party recoveries, related to the environmental remediation of various former MGP sites. That Order also approved the scope and reasonableness of all such MGP remediation costs and expenses previously incurred by JCP&L through December 31, 1995.

5. The Board’s Final Decision and Order dated March 7, 2001, in Docket Nos. EO97070458, EO97070459, EO97070460 (the “Restructuring Order”), which concluded JCP&L’s rate unbundling, stranded costs and restructuring filings, established a new Tariff Rider designated as the Societal Benefits Charge (“SBC”). The SBC, as approved by the Board, is designed to include Rider RAC for the recovery of costs related to MGP site remediation.

6. On March 13, 2002, JCP&L filed with the Board a Verified Petition, under Docket No. ER02030173 (the “2002 RAC Filing”), in order to provide the Board, its Staff and Rate Counsel with the opportunity to conduct a review of all actual and projected MGP-related costs and expenditures, including related insurance recoveries, incurred by JCP&L for the period from January 1, 1996 through July 31, 2003. Following extensive discovery and both public and evidentiary hearings thereon, the 2002 RAC Filing was resolved by a Stipulation of Settlement of Remediation Adjustment Clause dated June 10, 2003 (the “2002 RAC Filing Stipulation”) by and among JCP&L, Staff and Rate Counsel (collectively, the “Parties”). The 2002 RAC Filing

Stipulation was approved by the Board at its July 25, 2003 Agenda Meeting, as reflected in both the Board's Summary Order dated August 1, 2003 (at 3) and its Final Order dated May 17, 2004 (at 14-15), which were issued in several consolidated dockets including Docket No. ER02030173.

7. Among other things, the 2002 RAC Filing Stipulation, as approved by the Board, resolved all issues relating to JCP&L's MGP costs and related insurance recoveries for the period from January 1, 1996 through December 31, 2002. The 2002 RAC Filing Stipulation determined that JCP&L had a net unrecovered deferred RAC balance of \$678,396 as of December 31, 2002, which was to be carried forward by JCP&L for future recovery without any immediate adjustment to its RAC factor, but subject to the agreed-upon subsequent write-off by JCP&L of \$2.5 million in principal amount from the deferred RAC account balance. The 2002 RAC Filing Stipulation also prospectively modified the interest rate and changed the method and timing of the interest calculation for deferred RAC balances, including the annual compounding of interest thereon.

8. On December 22, 2003, JCP&L filed its 2003 Annual RAC Filing under Docket No. ER03121020, seeking the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1 through December 31, 2003. Following extensive discovery and conferences, the 2003 RAC proceeding was resolved by a Stipulation of Settlement of Remediation Adjustment Clause dated September 10, 2004 (the "2003 RAC Filing Stipulation"), by and among JCP&L, Staff and Rate Counsel. In the 2003 RAC Filing Stipulation, the Parties agreed and recommended to the Board that, subject to the application of the previously agreed-upon \$2.5 million write-off, JCP&L's deferred RAC balance of \$5,765,342, at December 31, 2003, be approved by the Board for future recovery through Rider RAC of the Company's Tariff. The Parties also agreed upon certain prospective modifications, namely, to move the

effective date for interest compounding and interest rate resetting to January 1 (instead of August 1) of each year, commencing January 1, 2005. The 2003 RAC Filing Stipulation was approved by the Board's Decision and Order Approving Stipulation, dated October 5, 2004.

9. At its Agenda meeting held on September 13, 2004, under Docket No. EM02060377, the Board approved the proposed transfer of certain MGP-related properties pursuant to a Separation Agreement dated September 22, 2000, by and between JCP&L and New Jersey Natural Gas Company ("NJNG"), in order to achieve certain efficiencies with respect to the remediation of MGP sites for which responsibility had previously been shared by those two companies. Consistent with the Separation Agreement, JCP&L no longer shares in the remediation costs for the Long Branch and Toms River MGP sites, but now has full financial responsibility for the continued remediation of the remaining eight sites previously shared with NJNG.

10. On December 28, 2004, JCP&L filed its 2004 Annual RAC Filing under Docket No. ER04121758, seeking the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1 through December 31, 2004. Following extensive discovery and conferences, the 2004 Annual RAC proceeding was resolved by a Stipulation of Settlement of 2004 Remediation Adjustment Clause Filing dated as of November 15, 2005 (the "2004 RAC Filing Stipulation"), by and among JCP&L, Staff and Rate Counsel. In paragraph 3(b) of the 2004 RAC Filing Stipulation, the Parties agreed and recommended to the Board that JCP&L's deferred RAC net balance of \$6,257,042, at December 31, 2004, be approved by the Board as eligible for future recovery through Rider RAC and/or through current application of other provisions of Rider SBC of the Company's Tariff. The Parties also agreed in the 2004 RAC Filing Stipulation upon various additional record-keeping requirements and information to be provided in future annual RAC filings and to provide specific responses in such annual filings



to the agreed-upon minimum filing requirements (“MFRs”) as set forth in Exhibit A thereto. The Parties further agreed to have the Staff’s Audit Division perform a RAC audit to review the Company’s RAC-related transactions and to verify that the Company has followed all applicable Board-approved RAC procedures and related Board Orders. The 2004 RAC Filing Stipulation was approved by the Board at its March 16, 2006 Agenda Meeting.

11. On March 31, 2006, JCP&L filed its 2005 Annual RAC Filing under Docket No. ER06030258, seeking the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1 through December 31, 2005. This filing had been delayed from its anticipated filing in December 2005 pending Board approval of the 2004 RAC Filing Stipulation, which, as noted above, occurred on March 16, 2006. Following extensive discovery and conferences, the 2005 Annual RAC proceeding was resolved by a Stipulation of Settlement of 2005 Remediation Adjustment Clause Filing dated as of April 2, 2009 (the “2005 RAC Filing Stipulation”), by and among JCP&L, Staff and Rate Counsel. In paragraph 3(b) of the 2005 RAC Filing Stipulation, the Parties agreed and recommended to the Board that JCP&L’s deferred RAC net balance of \$2,576,903, at December 31, 2005, be approved by the Board as eligible for future recovery through Rider RAC and/or through current application of other provisions of Rider SBC of the Company’s Tariff. The 2005 RAC Filing Stipulation also acknowledged that JCP&L had deferred an additional \$62,856 of costs related to Natural Resource Damage (“NRD”) issues from 2005. The Parties agreed in the 2005 RAC Filing Stipulation that, while it was appropriate for JCP&L to defer these NRD-related costs, they should not be recovered until there was a final Board determination as to whether NRD-related costs are within the scope of the Board’s RAC recovery authorization. The Parties reserved all of their respective rights with respect to the issue of whether it is appropriate for JCP&L to recover these 2005 NRD-related

costs, as well as a total of approximately \$76,000 of NRD-related costs from 2003 and 2004. The 2005 RAC Filing Stipulation was approved by Board Order dated April 27, 2009.

12. On March 9, 2009, JCP&L filed its 2006-2008 RAC Filing under Docket No. ER09030194, seeking the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1, 2006 through December 31, 2008, *i.e.*, covering calendar years 2006, 2007 and 2008. Following extensive discovery and conferences, the 2006-2008 RAC Filing was resolved by a Stipulation of Settlement of 2006-2008 Remediation Adjustment Clause Filing dated as of February 8, 2011 (the “2006-2008 RAC Filing Stipulation”), by and among JCP&L, Staff and Rate Counsel. The 2006-2008 RAC Filing Stipulation was approved by a Board Order dated March 9, 2011.

13. On February 19, 2010, JCP&L filed its 2009 SBC/SCC and RAC Filing under Docket No. ER10020130, the RAC portion of which sought the review and approval of its actual MGP remediation costs and expenditures incurred for the period of January 1, 2009 through December 31, 2009 (“2009 RAC Filing”). In the RAC portion of that filing, the Company requested an increase in its Rider RAC charge to recover an additional \$1.8 million annually. Although there was extensive discovery and numerous conferences among JCP&L, Staff and Rate Counsel in connection with the 2009 RAC Filing, the matter remained pending in early March 2011.

14. On March 15, 2011, the Company filed its 2010 RAC Petition (“2010 RAC Filing”) even though the 2009 RAC Filing remained pending. The 2010 RAC Filing, which was assigned Docket No. ER11030141, sought an increase in JCP&L’s Rider RAC charge to recover an additional \$1.1 million annually. On June 15, 2011, the Board issued an order approving a Stipulation of Settlement for the 2009 RAC Filing, and the Company implemented the revised

rates effective July 1, 2011.

15. On March 12, 2012, the Board issued an order approving a Stipulation of Settlement resolving the Company's 2010 RAC Filing. In that Stipulation of Settlement, the parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2010 was an under-recovered balance of \$20,379,454, after application of over-recoveries of \$7,847,211 from other components of Rider SBC, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition to the deferred RAC net balance of \$20,379,454, at December 31, 2010, referred to above, the parties agreed that JCP&L has deferred (i) \$435,073 of costs related to NRD issues from 2005 through 2010, and (ii) \$103,751 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2010. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in the 2010 RAC Filing as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. On April 1, 2012, JCP&L implemented the revised Rider RAC rates.

16. On August 15, 2012, the Company filed its 2011 RAC Petition ("2011 RAC Filing"). The 2011 RAC Filing, which was assigned Docket No. ER12080751, the Verified Petition demonstrated a calculated increase to JCP&L's Rider RAC charge of 0.000062 /kWh, which would have recovered an additional \$1.32 million annually. However, rather than implementing a small Rider RAC charge increase, JCP&L proposed to leave the current rate

(0.000130 /kWh, excluding sales and use tax (“SUT”)) in place.

17. On November 21, 2014, the Board issued an order approving a Stipulation of Settlement resolving the Company’s 2011 RAC Filing. In that Stipulation, the parties agreed that the Company’s ending recoverable deferred RAC balance at December 31, 2011 was an under-recovered balance of \$28,510,182, subject to the Parties’ reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. The parties also agreed that JCP&L’s Rider RAC would remain \$0.000130 per kWh (excluding SUT). In addition to the deferred RAC net balance of \$28,510, 182, at December 31, 2011, referred to above, the parties agreed that JCP&L had deferred (i) \$468,477 of costs related to NRD issues from 2005 through 2011, and (ii) \$114,625 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2011. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company’s RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate.

18. On April 30, 2015, JCP&L filed its 2012-2014 RAC Petition with the Board (“2012-2014 RAC Filing”). The 2012-2014 RAC Filing requested a calculated increase to JCP&L’s Rider RAC charge of \$0.000306/kWh (excluding SUT), which would recover an additional \$6.457 million annually. The Company proposed that the new rate become effective on October 1, 2015. The matter was transmitted to the Office of Administrative Law and assigned to Administrative Law Judge (“ALJ”) Richard McGill.

19. On July 29, 2016, the Board issued an Order approving an Initial Decision-Settlement, which in turn had recommended approval of a Stipulation of Settlement among the parties to the 2012-2014 RAC Filing. In that Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2014 was an under-recovered balance of \$64,428,766, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition, the Parties also agreed that JCP&L has deferred (i) \$651,070 of costs related to NRD issues from 2005 through 2014, and (ii) \$143,077 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2014. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in that proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. Pursuant to the Board's July 29, 2016 Order, the Company's Rider RAC was increased by \$0.000306 per kWh (excluding SUT) to \$0.000436 per kWh (excluding SUT), effective for service rendered on and after August 8, 2016. As a result of this rate change, the Company's revenues under its RAC were expected to increase by approximately \$6.457 million annually.

20. On September 30, 2016, JCP&L filed its 2015 RAC Petition with the Board ("2015 RAC Filing"). The 2015 RAC Filing requested a calculated increase to JCP&L's Rider RAC charge of \$0.000080/kWh (excluding SUT), which would recover an additional \$1.617 million annually. The Company proposed that the new rate become effective on January 1, 2017.

21. On October 6, 2017, JCP&L filed a fully executed Stipulation of Settlement with the Board to resolve the 2015 RAC Filing. In that Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2015 was an under-recovered balance of \$73,052,760, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition, the Parties also agreed that JCP&L had deferred (i) \$749,686 of costs related to NRD issues from 2005 through 2015, and (ii) \$156,325 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2015. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. On November 21, 2017, the Board issued an Order approving the October 6, 2017 Stipulation. Pursuant to the Board's November 21, 2017 Order, the Company's Rider RAC was increased by \$0.000080/kWh (excluding SUT) to \$0.000516 per kWh (excluding SUT), effective for service rendered on and after December 1, 2017. As a result of this rate change, the Company's revenues under its RAC were increased by approximately \$1.617 million annually.

22. On November 28, 2017, JCP&L filed its 2016 RAC Petition with the Board ("2016 RAC Filing"). The 2016 RAC Filing requested a calculated increase to JCP&L's Rider RAC charge of \$0.000100 per kWh (excluding SUT), which would recover an additional \$2.031 million annually. The Company proposed that the new rate become effective on March 1, 2018.

23. On June 4, 2018, JCP&L filed a fully executed Stipulation of Settlement

with the Board to resolve the 2016 RAC Filing. In that Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2016 was an under-recovered balance of \$87,624,589, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition, the Parties also agreed that JCP&L had deferred (i) \$801,633 of costs related to NRD issues from 2005 through 2016, and (ii) \$169,876 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2016. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. On June 22, 2018, the Board issued an Order approving the June 4, 2018 Stipulation. Pursuant to the Board's June 22, 2018 Order, the Company's Rider RAC was increased by \$0.000100 per kWh (excluding SUT) to \$0.000616 per kWh (excluding SUT), effective for service rendered on and after July 1, 2018. As a result of this rate change, the Company's revenues under its RAC were increased by approximately \$2.031 million annually.

24. On August 29, 2018, JCP&L filed its 2017 RAC Petition, assigned Docket No. ER18080965 ("2017 RAC Filing"), with the Board. The 2017 RAC Filing requested a calculated increase to JCP&L's Rider RAC charge of \$0.000195/kWh (excluding SUT), which would recover an additional \$3.95 million annually. The Company proposed that the new rate become effective on December 1, 2018.

25. On October 4, 2019, Board Staff and JCP&L executed a Stipulation of

Settlement to resolve the 2017 RAC Filing. In that Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2017 was an under-recovered balance of \$115,039,883, subject to the Parties' reservation of their rights to challenge the recovery of expenditures that might be found to have been recorded in error or improperly accounted for in the pending Board Staff audit of RAC expenditures for 2005. In addition, the Parties also agreed that JCP&L had deferred (i) \$804,850 of costs related to NRD issues from 2005 through 2017, and (ii) \$182,598 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2017. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all of their respective rights with respect to the issue of whether such recovery is appropriate. Furthermore, the Parties agreed that the Company would file its next annual RAC Filing for the period January 1, 2018 through December 31, 2018 no later than October 4, 2019.

26. On October 4, 2019, JCP&L filed its 2018 RAC Petition, assigned Docket No. ER19101332 ("2018 RAC Filing"). The 2018 RAC Filing supported an increase to JCP&L's Rider RAC charge of \$0.000214/kWh (excluding SUT) to \$0.000830 per kWh (excluding SUT), which was calculated to increase Rider RAC revenues by approximately \$4.285 million annually. However, the Company proposed no change be made to the Rider RAC Tariff Rate beyond the \$3.951 million increase stipulated to in the fully executed Stipulation of Settlement in the 2017 RAC Filing filed October 4, 2019, pending Board approval of same.

27. On October 25, 2019, the Board issued an Order in the 2017 Rider RAC



Filing adopting the October 4, 2019 Stipulation as its own and ordering that the Company's RAC rate be set at \$0.000811 per kwh, excluding SUT, for services rendered on or after November 1, 2019. The Board's order increased the Rider RAC Tariff Rate by \$0.000195 per kWh (excluding SUT), a change expected to increase the Company's RAC revenues by approximately \$3.951 million annually.

28. On April 2, 2020, JCP&L filed a fully executed Stipulation of Settlement with the Board to resolve the 2018 RAC Filing. In the 2018 Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2018 was an under-recovered balance of \$116,380,196. In addition, the Parties also agreed that JCP&L had deferred (i) \$803,654 of costs related to NRD issues from 2005 through 2018, and (ii) \$192,520 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2018. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all their respective rights with respect to the issue of whether such recovery is appropriate. In addition, JCP&L agreed to file its next annual RAC Filing, for the period January 1, 2019 through December 31, 2019, no later than October 1, 2020.

29. On May 5, 2020, the Board issued an Order adopting the 2018 Stipulation, filed April 2, 2020, as its own and ordered that the Company's RAC rate be maintained at \$0.000811 per kwh, excluding SUT, and remain in effect until further Order of the Board. The Board directed the Company to file revised tariff sheets by June 1, 2020.

30. On October 1, 2020, JCP&L filed its 2019 RAC Petition, assigned Docket

No. ER20100628 (“2019 RAC Filing”). The 2019 RAC Filing supported a decrease to JCP&L’s Rider RAC charge of (\$0.000107)/kWh (excluding SUT) to \$0.000704 per kWh (excluding SUT), which was calculated to decrease Rider RAC revenues by approximately \$2.130 million annually.

31. On January 29, 2021, JCP&L filed a fully executed Stipulation of Settlement with the Board to resolve the 2019 RAC Filing. In the 2019 Stipulation, the Parties agreed that the Company’s ending recoverable deferred RAC balance at December 31, 2019 was an under-recovered balance of \$98,108,720. In addition, the Parties also agreed that JCP&L had deferred (i) \$803,654 of costs related to NRD issues from 2005 through 2019, and (ii) \$206,582 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2019. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company’s RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all their respective rights with respect to the issue of whether such recovery is appropriate. In addition, JCP&L agreed to file its next annual RAC Filing, for the period January 1, 2020 through December 31, 2020, no later than October 1, 2021.

32. On February 17, 2021, the Board issued an Order adopting the 2019 Stipulation, filed January 29, 2021, as its own and ordered that the Company’s RAC rate be set at \$0.000704 per kWh, excluding SUT, for services rendered on or after March 1, 2021. The Board’s order decreased the Rider RAC Tariff Rate by \$0.000107 per kWh (excluding SUT), a change expected to decrease the Company’s RAC revenues by approximately \$2.13 million annually.

33. On October 1, 2021, JCP&L filed its 2020 RAC Petition, assigned Docket No. ER21101155 (“2020 RAC Filing”). The 2020 RAC Filing supported an increase to JCP&L’s

Rider RAC charge of \$.000102/kWh (excluding SUT) to \$0.000806 per kWh (excluding SUT), which was calculated to increase Rider RAC revenues by approximately \$1.957 million annually.

34. On August 2, 2022, JCP&L filed a fully executed Stipulation of Settlement with the Board to resolve the 2020 RAC Filing. In the 2020 Stipulation, the Parties agreed that the Company's ending recoverable deferred RAC balance at December 31, 2020 was an under-recovered balance of \$108,180,578. In addition, the Parties also agreed that JCP&L had deferred (i) \$803,654 of costs related to NRD issues from 2005 through 2020, and (ii) \$221,397 of incentive compensation paid to personnel who worked on RAC matters from 2006 through 2020. The Parties agreed that it is appropriate for such NRD-related and incentive compensation costs to be deferred. The Parties also agreed that the Board should make no determination in this proceeding as to the reasonableness, or the recoverability under the Company's RAC filings, of NRD damages or related costs or of incentive compensation amounts, if any. The Parties reserved all their respective rights with respect to the issue of whether such recovery is appropriate. In addition, JCP&L agreed to file its next annual RAC Filing, for the period January 1, 2021 through December 31, 2021, no later than October 1, 2022.

35. On August 17, 2022, the Board issued an Order adopting the 2020 Stipulation, filed August 2, 2022, as its own and ordered that the Company's RAC rate be set at \$0.000806 per kwh, excluding SUT, for services rendered on or after September 1, 2022. The Board's order increased the Rider RAC Tariff Rate by \$0.000102 per kwh (excluding SUT), a change expected to increase the Company's RAC revenues by approximately \$1.96 million annually.

### **2021 RAC Review**

36. During calendar year 2021, JCP&L has continued to perform its MGP

remediation activities in compliance with the regulatory requirements established pursuant to the Site Remediation Reform Act (“SRRA”) and, Administrative Consent Orders (“ACOs”) or Memorandums of Agreement (“MOAs”) executed with the New Jersey Department of Environmental Protection (“NJDEP”) for these sites. All such activities were conducted in accordance with those controlling NJDEP documents and other governing regulatory and environmental rules, regulations and guidance.

37. A summary of some of the remediation activities performed during the 2021 period is presented below:

- a. Remedial investigation activities were performed at the following sites:
  - Asbury Park, Phillipsburg, and Wildwood.
- b. Remedial action selection-related activities were performed at the following sites:
  - Asbury Park, Newton II, and Red Bank
- c. Remedial action work plan and design-related activities were performed at the following sites:
  - Asbury Park, Dover, Newton I, Newton II, and Ocean City.
- d. Remedial implementation activities were performed at the following sites:
  - Belmar, Cape May, Dover, Flemington, Lambertville, Ocean City, and Wildwood.

38. In addition to engineering and environmental services provided by remedial consultants and contractors, other activities directly supporting the MGP remediation program included specialized communication and legal services. Henry & Germann Public Affairs, L.L.C. (“Henry & Germann”) provided services such as: direct communications with affected property owners; conducting site visits; attending meetings with key stakeholders (e.g., municipal officials); preparing written work products such as project updates; coordinating community outreach open

house events; and strategic planning assistance. The law firm Schenck, Price, Smith & King (“SPSK”) provided legal services such as: negotiation of access and deed notice agreements; acquisition of impacted properties; and preparation of property transfers pursuant to the September 22, 2000 Separation Agreement between JCP&L and NJNG. A by-site listing of charges for the services of Henry & Germann and SPSK are included in Attachment D.

39. The Company has continued to apply various budget development and expenditure tracking mechanisms to all its MGP activities. MGP budgets are developed by the Company project managers and Supervisor - Remediation, based on information provided by environmental engineering consultants. All remediation expenses are processed through the Company’s formal accounting system of record. Unique orders are established for each MGP site and for general program management. Charges are captured by cost element to distinguish the nature of the charges (e.g., outside contractor, professional). Expenditures are reviewed and tracked on an ongoing basis and, if needed, correcting journal entries are made. Attachment B summarizes the actual expenses from January 1, 2021 through December 31, 2021. Attachment C provides a detailed breakdown of expenses by quarter. A listing of expenditures by vendor, and a description of the services provided, is included in Attachment D. The 2021 budget and the actual expenses through December 31, 2021, together with variances from budget, are presented in Attachment E. A summary of all actual expenses to date for the MGP program and the estimated future expenses are presented in Attachment F.

40. The Company requires monthly submittals from the primary consultants, including progress reports, invoices and a budget and expenditure analysis broken down on a per-task basis. These submittals are reviewed by the Company project managers on a regular basis. The Company requires that invoice submittals include detailed supporting documentation,

including (but not limited to) time records, expense records, subcontractor invoices and other relevant and supporting data. The Company has established surcharge rates with the consultants for subcontracted services, and these surcharges are clearly identified in the invoice package. The nature of these projects requires that the Company must be flexible to ensure that contracted services can quickly respond to unforeseeable changes, such as new field conditions. Competitive unit rates are established for repetitive tasks during the bidding process and undergo periodic comparisons with other firms. The invoices identify these unit costs to facilitate comparison to the contract rate structure. Where changes in the work scope are required, the primary consultants are required to promptly bring such matters to the attention of the assigned Company project manager. The consultant then documents the work scope changes and related costs in the monthly progress reports and other written correspondence. Change orders to the contract contain documentation prepared by the Company project manager. The primary consultants and remediation contractors have been pre-qualified via competitive bidding, taking into consideration the relevant technical, cost and commercial factors. Individual projects are also subject to bidding based on consideration of various factors including regulatory deadlines and other emergency considerations, economies of scale that take into account the institutional knowledge of the incumbent contractor and project-specific demands, and the unique requirements of the work scope required. The Company pursues joint procurement of remediation services with other utilities, as with the sites shared between the Company and South Jersey Industries, d/b/a Elizabethtown Gas Company. The Company maintains documentation for all expenses, which is available for review by Staff and Rate Counsel.

### **Results of 2021 RAC Review**

41. As discussed in paragraph 35 above, the BPU Order adopted the Stipulation

in the 2020 RAC Filing that established JCP&L's ending recoverable deferred RAC balance at December 31, 2020 to be an under-recovered balance of \$108,180,578 exclusive of NRD-related and incentive compensation costs. This 2021 RAC Filing includes actual MGP data for the period from January 1, 2021 through December 31, 2021.

42. As set forth in greater detail in certain of the Attachments hereto, the incremental expenses incurred in connection with JCP&L's MGP remediation program during calendar year 2021 are \$7.65 million (*see* Attachment A-1, line 59). As shown in Attachment A-1, line 60 and Attachment G, carrying costs accrued in 2021 are \$0.6 million, leaving a net balance of unrecovered MGP costs including carrying costs at December 31, 2021 of \$8.207 million.. The above-identified incremental expense amounts for 2021 does not include any costs related to NRD issues but does include charges of \$12,933 related to incentive compensation. *See* Attachment A-1, lines 62 and 63, respectively). JCP&L proposes to continue to defer NRD-related and incentive compensation costs, but not to recover such NRD-related and incentive compensation costs until there is a final resolution of the issue concerning the appropriateness of recovery thereof.

43. After subtracting the incentive compensation costs, the total MGP remediation expense proposed for recovery for 2021 is \$8.194 million. *See* Attachment A-1, Line 64. When combined with the 2021 *over*-recovered deferred RAC balance of \$0.3 million (Attachment A-1, line 68) and the remaining amortization of prior RAC expenditures previously approved for recovery, the result is a decrease of \$0.000026 kWh (excluding SUT) in JCP&L's Rider RAC charge to a calculated rate of \$0.000780 kWh (excluding SUT) from the current rate of \$0.000806 kWh (excluding SUT), which would decrease revenues by approximately \$0.5 million annually. *See* Attachment A-1, lines 75, 73, 74 and 76, respectively. However, the Company is proposing that no change be made to the existing Rider RAC Tariff Rate given the

decrease in anticipated revenues that would result from implementing the calculated change.<sup>1</sup> Additionally, the decreased calculated rate for this annual period was caused, in part, by budget under-runs due to project delays related to COVID-19 work restrictions and supply chain issues. As a result, JCP&L anticipates that the delayed work will be conducted in the near future as COVID-19-related work restrictions and supply chain issues ease.

### **Attachments**

44. Attached hereto and made a part of this Verified Petition are the following

Attachments:

- Attachment A-1 Derivation of MGP Remediation Adjustment Charge
- Attachment A-2 Manufactured Gas Plant Remediation Adjustment Deferred Accounting
- Attachment B Summary of MGP Incremental Remediation Expenses for 2021
- Attachment C JCP&L MGP Sites – Quarterly Reports for 2021 – Summary by Site
- Attachment D JCP&L MGP Sites – Summary of Vendor Charges by Site – 1/1/21 through 12/31/21
- Attachment E 2021 Remediation Expenditures – Summary vs. Budget
- Attachment F Summary of Actual and Estimated Remediation Expenses - Total Project Cost
- Attachment G Calculation of Interest on Deferred MGP Remediation Expenses Under/(Over) Recovery

### **Public Notice**

45. Because JCP&L is not proposing a rate increase in this filing, the Company does not believe that any public notices need be published or served pursuant to N.J.A.C. 14:1-5.12(b)1&3, (c) and (d), nor is there any requirement for any public hearings in the Company's service area.

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<sup>1</sup> When compared to rates that will be in effect as of October 1, 2022, implementing the calculated rate would result in an average decrease of \$0.02 (including SUT) a month, or 0.02%, for a typical residential customer using the class average 783 kWh per month.



**Service of Petition**

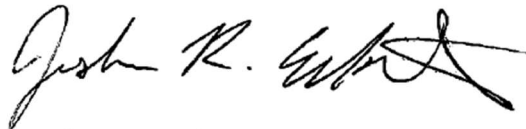
46. Copies of this Verified Petition, and all supporting Attachments thereto, have been or will be served by electronic mail to the Acting Director, Division of Rate Counsel, and the Department of Public Law and Safety, Division of Law.

**Conclusion**

**WHEREFORE**, the Petitioner, Jersey Central Power & Light Company, respectfully requests that the Board issue a final decision and order:

- (1) approving the reasonableness and prudence of all costs and expenditures incurred by the Petitioner from January 1, 2021 through December 31, 2021, relating to the environmental remediation of its former MGP sites;
- (2) approving the maintenance of the Company’s currently effective Rider RAC Charge at the same rate;
- (3) authorizing the continued deferral by the Petitioner of the net deferred RAC balance at December 31, 2021, with the continuing accrual of interest on the unamortized balance (net of deferred taxes), and the continued deferral of the Petitioner’s expenditures related to environmental remediation of its former MGP sites that are subsequently incurred, all in accordance with and subject to the terms of Petitioner’s Rider RAC and related Rider SBC; and
- (4) granting such other and further relief as the Board shall deem just, lawful and proper.

Respectfully submitted,



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Joshua R. Eckert  
FirstEnergy Service Company  
300 Madison Ave.  
Morristown, New Jersey 07962  
330-690-8329

jeckert@firstenergycorp.com

Dated: September 30, 2022

Counsel for Jersey Central Power & Light Company

**AFFIDAVIT**  
**OF**  
**VERIFICATION**

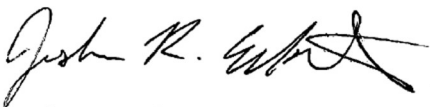
Jennifer Spricigo, being duly sworn upon her oath, deposes and says:

1. I am employed by First Energy Service Company as Rates Analyst in Rates & Regulatory Affairs-New Jersey for Jersey Central Power & Light Company ("JCP&L"), the Petitioner named in the foregoing Verified Petition, and I am duly authorized to make this Affidavit of Verification on its behalf.

2. I have read the contents of the foregoing Verified Petition by JCP&L for review and approval of costs and expenses incurred in 2021 for the environmental remediation of manufactured gas plant sites, and I hereby verify that the data and calculations set forth in Attachments A, G and H thereto are true and correct to the best of my knowledge, information and belief.

  
Jennifer Spricigo

Sworn to and subscribed before me  
This 30<sup>th</sup> day of September 2022



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Joshua R. Eckert  
An Attorney-at-Law licensed to practice in the State of New Jersey  
Attorney ID: 250992018

**AFFIDAVIT**  
**OF**  
**VERIFICATION**

Frank D. Lawson, being duly sworn upon his oath, deposes and says:

1. I am employed by FirstEnergy Service Company as Supervisor - Remediation and Environmental Services in the Environment Department and support Jersey Central Power & Light Company ("JCP&L"), the Petitioner named in the foregoing Verified Petition, and I am duly authorized to make this Affidavit of Verification on its behalf.

2. I have read the contents of the foregoing Verified Petition by JCP&L for review and approval of costs and expenses incurred in 2021 for the environmental remediation of manufactured gas plant ("MGP") sites, and I hereby verify that the statements of fact and other information contained therein, other than the data and calculations set forth in Attachments A, G and H thereto, are true and correct to the best of my knowledge, information and belief.

3. I hereby further attest and verify that all costs and expenses summarized in the foregoing Verified Petition, and more particularly as set forth in Attachments B, C, D, E and F thereto, are all related to the remediation of MGP sites.



Frank D. Lawson

Sworn to and subscribed before me  
this 30<sup>th</sup> day of September 2022



Joshua R. Eckert  
An Attorney-at-Law licensed to practice in the State of New Jersey  
Attorney ID: 250992018

**JERSEY CENTRAL POWER & LIGHT COMPANY** **Attachment A-1**  
**Derivation of Manufactured Gas Plant (MGP) Remediation Adjustment Charge (RAC)** **Page 1 of 3**  
**For Tariff Rider Effective January 1, 2023**

Line No.	Through 12/31/2020 (1)	Year 2021 (2)	Total as of 12/31/2021 (3)	Data Sources
<b>MGP Remediation Costs</b>				
1	\$ 50,166,335			
2	(150,892)			
3	(29,097,165)			Footnote (b)
4	\$ 20,918,278			Line Nos. 1 through 3
5	435,073			Footnote (c)
6	103,751			Footnote (d)
7	\$ 20,379,454			ER10020130 (6/15/11) & ER11030141 (3/12/12)
8	\$ 7,700,028			ER12080751 (11/21/2014)
9	474,978			ER12080751 (11/21/2014)
10	\$ 8,175,006			Line Nos. 8 + 9
11	33,404			Footnote (c)
12	10,874			Footnote (d)
13	\$ 8,130,728			ER12080751 (11/21/2014)
14	\$ 34,539,907			ER15040499
15	1,589,722			ER15040499
16	36,129,629			Line Nos. 14 + 15
17	182,593			Footnote (c)
18	28,452			Footnote (d)
19	\$ 35,918,584			ER15040499 (07/29/2016)
20	\$ 7,883,897			ER16090922
21	851,961			ER16090922
22	\$ 8,735,858			Line Nos. 20 + 21
23	98,616			Footnote (c)
24	13,248			Footnote (d)
25	\$ 8,623,994			ER16090922 (11/21/17)
26	\$ 13,621,248			ER17111191
27	1,016,079			ER17111191
28	\$ 14,637,327			Line Nos. 26 + 27
29	51,947			Footnote (c)
30	13,551			Footnote (d)
31	\$ 14,571,829			ER17111191 (06/22/18)
32	\$ 26,063,647			ER18080965 (Attmt B Revised)
33	1,367,586			ER18080965 (Attmt G Revised)
34	\$ 27,431,233			Line Nos. 32 + 33
35	3,217			Footnote (c)
36	12,722			Footnote (d)
37	\$ 27,415,294			ER18080965 (10/25/19)
38	\$ 16,629,984			ER19101332
39	1,975,403			ER19101332
40	(17,256,349)			Footnote (b)
41	\$ 1,349,038			Line Nos. 38 + 39 + 40
42	(1,196)			Footnote (c)
43	9,922			Footnote (d)
44	\$ 1,340,313			ER19101332 (05/15/20)
45	\$ 8,983,474			ER20100628
46	1,716,401			ER20100628
47	(3,947,992)			Footnote (e)
48	(4,629,843)			Footnote (b)
49	\$ 2,122,040			Line Nos. 45 + 46 + 47 + 48
50	-			Footnote (c)
51	14,062			Footnote (d)
52	\$ 2,107,978			ER20100628 (02/27/21)
53	\$ 8,918,306			ER21101155
54	1,168,367			ER21101155
55	10,086,673			Line Nos. 53 + 54
56	-			Footnote (c)
57	14,815			Footnote (d)
58	\$ 10,071,858			ER21101155 (08/24/22)

**JERSEY CENTRAL POWER & LIGHT COMPANY** **Attachment A-1**  
**Derivation of Manufactured Gas Plant (MGP) Remediation Adjustment Charge (RAC)** **Page 2 of 3**  
**For Tariff Rider Effective January 1, 2023**

59	Total MGP remediation costs incurred	\$	7,654,476		Attachment B
60	Carrying cost on deferred MGP costs accrued		552,672		Attachment G
61	Total unrecovered MGP costs at 12/31/21		<u>8,207,148</u>		Line Nos. 59 + 60
62	Less: Natural Resources Damages (NRD) expenses				Footnote (c)
63	Less: Incentive Compensation Program (ICP) Costs		12,933		Footnote (d)
64	Total MGP costs submitted for recovery		<u>\$ 8,194,215</u>		Line Nos. 61 less 62 & 63
65	Total recoverable MGP remediation expenses	<u>\$ 128,560,032</u>	<u>\$ 8,194,215</u>	<u>\$ 136,754,246</u>	Columns (1) through (3)
<b><u>Derivation of Tariff Rider RAC:</u></b>					
66	Total recoverable MGP remediation expenses	\$ 128,560,032	\$ 8,194,215	\$ 136,754,246	Line 65
67	Less: Fully Amortized Layers (Lines 7 & 13)	(28,510,182)		(28,510,182)	
68	Ending over-recovered deferred RAC balances		(293,969)	(293,969)	Attachment A-2 p.3 (26)
69	Total recoverable MGP remediation costs incl.under-recovery	<u>\$ 100,049,850</u>	<u>\$ 7,900,245</u>	<u>\$ 107,950,095</u>	Line Nos. 66 + 67 + 68
70	RAC recovery period (years)	<u>7</u>	<u>7</u>	<u>7</u>	ER91121820J 12/16/94 Order
71	Net annual recoverable MGP expenses	<u>\$ 14,292,836</u>	<u>\$ 1,128,606</u>	<u>\$ 15,421,442</u>	Line 69 divided by Line 70
72	Retail Sales forecasted (MWh)			19,770,258	12 mos. Ended 12/31/23 Line
73	Calculated RAC factor (\$ per kWh) before SUT			\$ 0.000780	71 divided by Line 72 Rider
74	RAC factor currently in effect (\$ per kWh)			\$ 0.000806	RAC effective 9/1/22 Line 73 -
75	Calculated increase/(decrease) in RAC Factor (\$ per kWh) before SUT			<u>\$ (0.000026)</u>	Line 74
76	Rider RAC revenue (decrease) *			<u>\$ (514,027)</u>	Line 72 x Line 75

\* The Company is proposing no change in the current Rider RAC rate.

**JERSEY CENTRAL POWER & LIGHT COMPANY** **Attachment A-1**  
**Derivation of Manufactured Gas Plant (MGP) Remediation Adjustment Charge (RAC)** **Page 3 of 3**  
**For Tariff Rider Effective January 1, 2023**

**FOOTNOTES:**

(a) Total cost incurred is net of:

- (1) Write-off in accordance with RAC Stipulation and BPU Order ER03121020 (\$2,500,000);
- (2) Insurance proceeds received (\$36,100,000);
- (3) MGP revenue previously collected through base rates (\$16,877,403).

(b) Application of over-recovered SBC components at year-end in accordance with Tariff Rider SBC:

	Annual	Cumulative
2004	\$ (6,424,026)	
2005	(2,639,759)	
2006	(2,401,577)	
2007	(5,621,172)	
2008	(2,640,262)	
2009	(1,523,158)	
2010	(7,847,211)	\$ (29,097,165)
2011	-	(29,097,165)
2012	-	(29,097,165)
2013	-	(29,097,165)
2014	-	(29,097,165)
2015	-	(29,097,165)
2016	-	(29,097,165)
2017	-	(29,097,165)
2018	(17,256,349)	(46,353,513)
2019	(4,629,843)	(50,983,356)
2020	-	(50,983,356)
2021	-	(50,983,356)

(c) NRD Expenses incurred by year:

	Annual	Cumulative
2005	\$ 62,856	
2006	157,594	
2007	53,434	
2008	18,046	
2009	89,580	
2010	53,563	\$ 435,073
2011	33,404	468,477
2012	83,412	551,889
2013	5,116	557,005
2014	94,065	651,070
2015	98,616	749,686
2016	51,947	801,633
2017	3,217	804,850
2018	(1,196)	803,654
2019	-	803,654
2020	-	803,654
2021	-	803,654

(d) ICP Costs by year:

	Annual	Cumulative
2006	\$ 27,479	
2007	32,141	
2008	30,346	
2009	-	
2010	13,785	\$ 103,751
2011	10,874	114,625
2012	11,328	125,953
2013	10,259	136,212
2014	6,865	143,077
2015	13,248	156,325
2016	13,551	169,876
2017	12,722	182,598
2018	9,922	192,520
2019	14,062	206,582
2020	14,815	221,397
2021	12,933	234,330

(e) Per the BPU's Order in Docket No.ER20010089, dated May 20, 2020, that adopted the Stipulation of Settlement ("SOS") in JCP&L's final annual filing with respect to its Storm Recovery Charge Rider ("Final 2019 SRC Filing") in its entirety, and incorporated the terms and conditions of the SOS as though fully set forth in its Order. In the BPU-approved SOS, it was agreed that JCP&L's Final 2019 SRC Filing was the final true-up of the Rider SRC balance and that the ending deferred balance in Rider SRC at December 31, 2019, was an over-recovery of \$3,947,992, including carrying costs of \$302,742. The Parties further agreed that, in accordance with the July 2019 Order, the ending deferred balance in Rider SRC was applied to Rider RAC, which was the largest under-recovered component of the Company's SBC deferred balance at the time of the filing of the Company's January 2020 Petition.

(f) The 2020 Total MGP remediation costs incurred (Lines 53 and 54 above) have been reduced for 2019 New Jersey Sales & Use Tax adjustments of approximately \$21.5k including interest.









**Jersey Central Power & Light Company  
Summary of Manufactured Gas Plant Incremental Remediation Expenses**

**Incremental Expenses for the Period 2021**

<b>Site Name</b>	<b>Actual 01/2021-12/2021</b>
Asbury Park	315,799
Belmar	491,376
Boonton	1,133,659
Cape May	846,947
Dover	1,237,257
Flemington	280,854
Lakewood	210,757
Lambertville/LaRoche	96,370
Long Branch	-
Newton I	130,393
Newton II	888,536
Ocean City	529,474
Phillipsburg	142,588
Red Bank	157,630
Sea Isle City	481,055
Toms River	-
Tuckerton	4,732
Washington	249,410
Wildwood	317,846
General	139,793
Total Incremental Expense (Excluding NRD):	7,654,476
2021 NRD:	0
<hr/>	
Total Incremental Expense (Including NRD):	7,654,476

**JCP&L Manufactured Gas Plant Sites  
Quarterly Report  
Summary by Site**

**January 1 through December 31**

<b>Asbury Park</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	-	648	100	848	1,596
Professional Services	-	-	-	-	0
Remediation	37,638	65,563	93,145	109,952	306,298
Legal	1,982	538	177	1,294	3,992
NJDEP Fees	2,385	-	-	30	2,415
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	365	365	768	1,498
<b>Total</b>	<b>42,005</b>	<b>67,114</b>	<b>93,787</b>	<b>112,892</b>	<b>315,799</b>

<b>Belmar</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	1,397	1,247	399	249	3,292
Professional Services	-	-	-	-	0
Remediation	161,133	68,504	122,855	118,797	471,289
Legal	-	1,569	9,650	1,713	12,933
NJDEP Fees	-	835	-	30	865
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	743	743	1,512	2,998
<b>Total</b>	<b>162,530</b>	<b>72,897</b>	<b>133,647</b>	<b>122,302</b>	<b>491,376</b>

<b>Boonton</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	848	2,544	449	200	4,040
Professional Services	-	-	-	-	0
Remediation	73,690	236,620	349,927	454,042	1,114,279
Legal	6,651	4,582	36	-	11,268
NJDEP Fees	-	4,010	-	-	4,010
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	14	48	-	-	62
<b>Total</b>	<b>81,203</b>	<b>247,803</b>	<b>350,411</b>	<b>454,241</b>	<b>1,133,659</b>

<b>Cape May</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	7,581	4,289	2,594	2,494	16,958
Professional Services	-	-	-	-	0
Remediation	155,018	190,950	189,788	170,773	706,529
Legal	27,072	27,560	41,101	23,591	119,324
NJDEP Fees	3,260	-	-	550	3,810
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	135	190	1	2	327
<b>Total</b>	<b>193,067</b>	<b>222,989</b>	<b>233,483</b>	<b>197,409</b>	<b>846,947</b>

**JCP&L Manufactured Gas Plant Sites  
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Summary by Site**

**January 1 through December 31**

<b>Dover</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	898	3,142	599	599	5,237
Professional Services	-	-	-	-	0
Remediation	161,418	278,233	485,512	232,240	1,157,403
Legal	(1,496)	1,615	2,438	13,137	15,693
NJDEP Fees	-	3,310	-	-	3,310
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	370	13,791	13,569	27,883	55,613
<b>Total</b>	<b>161,190</b>	<b>300,091</b>	<b>502,117</b>	<b>273,859</b>	<b>1,237,257</b>

<b>Flemington</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	2,095	449	249	798	3,591
Professional Services	-	-	-	-	0
Remediation	71,999	81,393	60,487	125,559	339,438
Legal	-	-	-	1,814	1,814
NJDEP Fees	-	4,770	-	-	4,770
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	(11,962)	-	-	(56,797)	(68,759)
<b>Total</b>	<b>62,132</b>	<b>86,611</b>	<b>60,737</b>	<b>71,374</b>	<b>280,854</b>

<b>Lakewood</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	-	798	100	249	1,147
Professional Services	-	-	1,218	85	1,303
Remediation	28,956	52,713	27,452	78,900	188,021
Legal	2,146	(155)	727	552	3,269
NJDEP Fees	-	-	-	-	0
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	4,243	4,243	8,531	17,017
<b>Total</b>	<b>31,102</b>	<b>57,599</b>	<b>33,739</b>	<b>88,317</b>	<b>210,757</b>

<b>Lambertville/LaRoche</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	150	898	648	100	1,796
Professional Services	-	-	-	-	0
Remediation	18,534	5,744	25,800	44,445	94,523
Legal	-	-	27	-	27
NJDEP Fees	-	-	-	-	0
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	24	-	-	24
<b>Total</b>	<b>18,683</b>	<b>6,667</b>	<b>26,475</b>	<b>44,544</b>	<b>96,370</b>

**JCP&L Manufactured Gas Plant Sites**  
**Quarterly Report**  
**Summary by Site**

**January 1 through December 31**

<b>Newton I</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	1,446	1,197	2,244	1,596	6,484
Professional Services	41,327	42,147	(1,470)	58,021	140,025
Remediation	-	-	472	2,530	3,002
Legal	1,061	1,937	3,162	1,480	7,639
NJDEP Fees	-	4,770	-	-	4,770
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	(8,924)	(3,545)	(13,538)	(5,520)	(31,527)
<b>Total</b>	<b>34,910</b>	<b>46,506</b>	<b>(9,130)</b>	<b>58,107</b>	<b>130,393</b>

<b>Newton II</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	1,047	2,993	2,195	1,197	7,431
Professional Services	-	-	-	-	0
Remediation	60,462	86,152	16,986	661,681	825,281
Legal	6,658	10,342	2,931	22,410	42,340
NJDEP Fees	-	3,260	-	-	3,260
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	2,537	2,510	5,177	10,224
<b>Total</b>	<b>68,167</b>	<b>105,283</b>	<b>24,622</b>	<b>690,464</b>	<b>888,536</b>

<b>Ocean City</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	249	698	1,047	1,297	3,292
Professional Services	-	-	-	-	0
Remediation	165,948	114,309	69,010	148,144	497,411
Legal	(1,970)	5,684	6,046	4,586	14,345
NJDEP Fees	11,135	2,300	910	-	14,345
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	81	-	-	81
<b>Total</b>	<b>175,363</b>	<b>123,071</b>	<b>77,013</b>	<b>154,027</b>	<b>529,474</b>

<b>Phillipsburg</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	3,791	4,339	2,444	1,895	12,469
Professional Services	3,667	35,586	6,107	80,118	125,477
Remediation	-	-	(5,169)	3,000	(2,169)
Legal	-	300	(10)	-	290
NJDEP Fees	3,260	3,260	-	-	6,520
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	-	-	-	0
<b>Total</b>	<b>10,717</b>	<b>43,485</b>	<b>3,373</b>	<b>85,013</b>	<b>142,588</b>

**JCP&L Manufactured Gas Plant Sites**  
**Quarterly Report**  
**Summary by Site**

**January 1 through December 31**

<b>Red Bank</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	399	1,945	200	50	2,594
Professional Services	-	-	-	-	0
Remediation	51,626	(6,878)	57,919	49,985	152,652
Legal	-	-	-	-	0
NJDEP Fees	-	2,385	-	-	2,385
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	-	-	-	0
<b>Total</b>	<b>52,025</b>	<b>(2,548)</b>	<b>58,119</b>	<b>50,035</b>	<b>157,630</b>

<b>Sea Isle City</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	1,726	3,957	1,895	2,843	10,422
Professional Services	-	-	6,880	-	6,880
Remediation	48,145	86,726	57,825	80,013	272,709
Legal	26,100	14,838	41,529	33,332	115,799
NJDEP Fees	-	-	-	-	0
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	20	15,247	15,166	44,812	75,245
<b>Total</b>	<b>75,991</b>	<b>120,768</b>	<b>123,296</b>	<b>161,000</b>	<b>481,055</b>

<b>Tuckerton</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	-	249	-	-	249
Professional Services	-	-	-	-	0
Remediation	200	1,340	920	820	3,280
Legal	-	-	227	-	227
NJDEP Fees	-	-	-	-	0
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	246	246	483	976
<b>Total</b>	<b>200</b>	<b>1,836</b>	<b>1,393</b>	<b>1,303</b>	<b>4,732</b>

<b>Washington</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	349	798	100	249	1,496
Professional Services	134,623	56,901	25,351	20,606	237,481
Remediation	(8,783)	-	-	559	(8,224)
Legal	807	377	124	-	1,307
NJDEP Fees	3,260	-	-	-	3,260
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	3,605	3,605	6,881	14,090
<b>Total</b>	<b>130,256</b>	<b>61,680</b>	<b>29,179</b>	<b>28,295</b>	<b>249,410</b>

**JCP&L Manufactured Gas Plant Sites  
Quarterly Report  
Summary by Site**

**January 1 through December 31**

<b>Wildwood</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	449	798	599	-	1,845
Professional Services	-	-	-	-	0
Remediation	57,745	90,428	61,351	81,776	291,300
Legal	2,784	5,508	(186)	875	8,981
NJDEP Fees	2,385	-	-	30	2,415
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	-	3,309	3,228	6,768	13,305
<b>Total</b>	<b>63,363</b>	<b>100,043</b>	<b>64,991</b>	<b>89,449</b>	<b>317,846</b>

<b>General</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
Payroll/Salaries	15,611	20,100	16,758	17,107	69,576
Professional Services	-	1,265	500	-	1,765
Remediation	5,718	-	4,129	(19)	9,828
Legal	2,125	3,186	242	-	5,553
NJDEP Fees	-	-	-	-	0
RI/RA Financial Trust Fund	-	-	-	-	0
Miscellaneous Other	14,307	13,009	12,878	12,878	53,072
<b>Total</b>	<b>37,760</b>	<b>37,560</b>	<b>34,507</b>	<b>29,966</b>	<b>139,793</b>

Notes:

Figures in parentheses are negative amounts resulting from credits or corrections.

Professional Services includes outside engineering, environmental and other supporting consultants.

Remediation includes remedial construction and waste removal, transportation and disposal, engineering and property controls, and remediation O&M.

Legal includes outside counsel fees and expenses.

NJDEP Fees include oversight costs, permit fees, LSRP annual fees, and any other fees billed by the NJDEP.

RI/RA Financial Trust Fund includes charges associated with financial assurance trust funds for RI extensions and RA permits.

Miscellaneous Other includes minor expenses not included in one of the above categories.

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Asbury Park</i>			
	CITY OF ASBURY PARK	1,498	Property tax payments
	GEI CONSULTANTS, INC.	30,465	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	6,484	Community relations and communications services
	LANGAN ENGINEERING & ENVIRONMENTAL	227,091	Environmental and engineering consulting services
	SCHENCK, PRICE, SMITH & KING	3,892	Legal services
	TREASURER - STATE OF NEW JERSEY	2,415	LSRP Annual Fee and other permitting costs
<i>Belmar</i>			
	ARCADIS US INCORPORATED	237,022	Environmental and engineering consulting services
	BOROUGH OF BELMAR	3,384	Property tax payments and utilities - water
	BROWN AND CALDWELL	137,645	O&M services for the groundwater remediation system
	EVOQUA WATER TECHNOLOGIES, LLC	7,510	O&M services for the groundwater remediation system
	HALEY & ALDRICH INCORPORATED	22,885	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	5,130	Community relations and communications services
	K&M CONTRACTING INCORPORATED	2,937	Construction and property maintenance services



**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Belmar (cont'd)</i>			
	SCHENCK, PRICE, SMITH & KING	12,933	Legal services
	TREASURER - STATE OF NEW JERSEY	5,550	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	62,012	Waste handling, transport, disposal and treatment services
<i>Boonton</i>			
	ARCADIS US INCORPORATED	522,937	Environmental and engineering consulting services
	GROUND/WATER TREATMENT & TECHNOLOGY	164,667	Remediation services
	H2M ASSOCIATES INCORPORATED	112,114	Project management services
	HANDEX OF NEW JERSEY, INC.	20,185	O&M services for the ground water remediation system
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	1,062	Community relations and communications services
	ONORATI	12,800	Property lease for groundwater treatment system
	SCHENCK, PRICE, SMITH & KING	13,768	Legal services
	STARK AND STARK	3,500	Third party legal services
	TREASURER - STATE OF NEW JERSEY	6,395	LSRP Annual Fee
	VEOLIA ENVIRONMENTAL SERVICES	21,671	Waste handling, transport, disposal and treatment services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Cape May</i>			
	ARCADIS US INCORPORATED	511,053	Environmental and engineering consulting services
	ATLANTIC CITY ELECTRIC	3,000	Utilities - Electric (groundwater treatment system)
	CAPE MAY HOUSING AUTHORITY	19,615	Reimbursement for legal and environmental services
	CITY OF CAPE MAY	159	Utilities - Water/sewer & property tax payments
	GEI CONSULTANTS, INC.	86,589	Project management and engineering consulting services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	65,689	Community relations and communications services
	SCHENCK, PRICE, SMITH & KING	121,399	Legal services
	TREASURER - STATE OF NEW JERSEY	3,810	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	28,087	Waste handling, transport, disposal and treatment services
	WESTERLAND LANDSCAPING, INC.	1,003	Landscaping and property maintenance services
<i>Dover</i>			
			Annual occupancy usage fee related to subsurface containment
	AECOM TECHNICAL SERVICES, INC.	733,891	Environmental and engineering consulting services
	AMERICAN WATER	(85)	Reversal - Incorrect charge associated with JCP&L Dover Richboynton line shop
	CHESAPEAKE & DELAWARE LLC	971	Annual occupancy usage fee related to subsurface containment

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Dover (cont'd)</i>			
	DOVER WATER COMMISSION	998	Utilities - Water & fire line
	EVOQUA WATER TECHNOLOGIES LLC	1,234	O&M - Carbon Regeneration Service
	HALEY & ALDRICH INCORPORATED	67,518	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	4,078	Community relations and communications services
	K&M CONTRACTING INCORPORATED	26,393	Construction and property maintenance services
	NEW JERSEY NATURAL GAS	(739)	Utility disconnect - building demolition
	NICHOLAS DE SALVO	150	Locksmith service
	PANTHER TECHNOLOGIES INCORPORATED	187,221	Building demolition (353 East Blackwell Street)
	ROCKAWAY TOWNSHIP	25,296	Utilities - Sewer & property tax payments
	SCHENCK, PRICE, SMITH & KING	13,293	Legal services
	TOWN OF DOVER	30,006	Utilities - Water & property tax payments
	TREASURER - STATE OF NEW JERSEY	3,310	LSRP Annual Fee and other permitting costs
	URS CORPORATION	(1,643)	Environmental and engineering consulting services
	VEOLIA ENVIRONMENTAL SERVICES	10,865	Waste handling, transport, disposal and treatment services
	VERIZON NEW JERSEY INCORPORATED	463	Building fire suppression system upgrade at Neptune Products

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Flemington</i>			
	BROWN AND CALDWELL	(45)	Environmental and engineering consulting services
	ELIZABETHTOWN GAS COMPANY (AKA SOUTHERN COMPANY/S. JERSEY INDUSTRIES)	(68,759)	Cost sharing agreement reimbursement for remedial costs
	GEI CONSULTANTS, INC.	415,079	Environmental and engineering consulting services
	HALEY & ALDRICH INCORPORATED	24,739	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	2,354	Community relations and communications services
	MEYNER AND LANDIS, LLP	(5,394)	Legal services for third party
	SCHENCK, PRICE, SMITH & KING	1,814	Legal services
	TREASURER - STATE OF NEW JERSEY	4,770	LSRP Annual Fee and other permitting costs
<i>General</i>			
	CHEMISTRY COUNCIL OF NEW JERSEY	3,299	Membership dues & expenses
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	481	Community relations and communications services
	K&M CONTRACTING INCORPORATED	1,265	Construction services and property maintenance (NJNG)
	NEW JERSEY NATURAL GAS	52,689	Property tax payments - Toms River
	SCHENCK, PRICE, SMITH & KING	5,553	Legal services
	TRC ENVIRONMENTAL CORPORATION	6,548	Store & maintain air monitoring equipment

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
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*Lakewood*

ARCADIS US INCORPORATED		134,924	Environmental and engineering consulting services
H2M ASSOCIATES INCORPORATED		16,290	Project management services
HENRY & GERMANN PUBLIC AFFAIRS, LLC		1,592	Community relations and communications services
K&M CONTRACTING INCORPORATED		3,994	Construction services and property maintenance
SCHENCK, PRICE, SMITH & KING		3,269	Legal services
TOWNSHIP OF LAKEWOOD		17,017	Property tax payments
TREASURER - STATE OF NEW JERSEY		3,895	LSRP Annual Fee and other permitting costs
VEOLIA ENVIRONMENTAL SERVICES		2,097	Waste handling, transport, disposal and treatment services

*Lambertville/LaRoche*

H2M ASSOCIATES INCORPORATED		11,271	Project management services
HENRY & GERMANN PUBLIC AFFAIRS, LLC		3,156	Community relations and communications services
THE ELM GROUP, INC.		65,396	Environmental and engineering consulting services
SCHENCK, PRICE, SMITH & KING		27	Legal services
TREASURER - STATE OF NEW JERSEY		3,895	LSRP Annual Fee and other permitting costs
VEOLIA ENVIRONMENTAL SERVICES		1,743	Waste handling, transport, disposal and treatment services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Newton I</i>			
	ELIZABETHTOWN GAS COMPANY (AKA SOUTHERN COMPANY/S. JERSEY INDUSTRIES)	(31,594)	Cost sharing agreement reimbursement for remedial costs
	H2M ASSOCIATES INCORPORATED	44,125	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	4,597	Community relations and communications services
	LANGAN ENGINEERING & ENVIRONMENTAL	93,751	Environmental and engineering consulting services
	SCHENCK, PRICE, SMITH & KING	7,139	Legal services
	TREASURER - STATE OF NEW JERSEY	4,770	LSRP Annual Fee and other permitting costs
<i>Newton II</i>			
	ADR ENVIRONMENTAL	3,055	Environmental oversight services for third party
	BROWN AND CALDWELL	180,663	Environmental and engineering consulting services
	EIKON PLANNING AND DESIGN LLC	2,203	Consultant services for third party
	HALEY & ALDRICH INCORPORATED	51,864	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	8,877	Community relations and communications services
	K&M CONTRACTING INCORPORATED	470	Construction services and property maintenance
	MEYNER AND LANDIS, LLP	14,021	Legal services for third party

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Newton II (cont'd)</i>			
	SCHENCK, PRICE, SMITH & KING	595,040	Legal services and escrow for property purchase (21 E. Clinton Street)
	SWIFT REAL ESTATE SOLUTIONS LLC	11,500	Property appraisal services (21 E. Clinton Street)
	TOWN OF NEWTON	10,197	Property tax payments
	TREASURER - STATE OF NEW JERSEY	3,260	LSRP Annual Fee and other permitting costs
<i>Ocean City</i>			
	ATLANTIC CITY ELECTRIC	12,752	Utilities - Electric (groundwater treatment system) & Settlement Payments
	CASCADE ENVIRONMENTAL HOLDINGS	19,511	MGP material management services (NJAWC waterline installation)
	CLEANLAND OCEAN CITY, INC.	17,500	Settlement agreement
	GEI CONSULTANTS, INC.	52,839	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	1,785	Community relations and communications services
	PANTHER TECHNOLOGIES INCORPORATED	(5,004)	Remediation services
	SCHENCK, PRICE, SMITH & KING	16,595	Legal services
	TETRA TECH INCORPORATED	404,945	Environmental and engineering consulting services
	TREASURER - STATE OF NEW JERSEY	14,345	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	11,672	Waste handling, transport, disposal and treatment services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
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*Phillipsburg*

	BLESSED HOPE CHURCH OF THE NAZARENE	500	License agreement payment
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	2,622	Community relations and communications services
	THE ELM GROUP, INC.	81,008	Environmental and engineering consulting services
	SCHENCK, PRICE, SMITH & KING	290	Legal services
	TREASURER - STATE OF NEW JERSEY	6,520	LSRP Annual Fee and other permitting costs

*Red Bank*

	HALEY & ALDRICH INCORPORATED	25,693	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	9,476	Community relations and communications services
	LANGAN ENGINEERING & ENVIRONMENTAL	121,820	Environmental and engineering consulting services
	TREASURER - STATE OF NEW JERSEY	2,385	LSRP Annual Fee
	VEOLIA ENVIRONMENTAL SERVICES	1,193	Waste handling, transport, disposal and treatment services

*Sea Isle City*

	ARCADIS US INCORPORATED	(12,067)	Environmental and engineering consulting services
	ATLANTIC CITY ELECTRIC	2,663	Utilities - Electric



**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Sea Isle City (cont'd)</i>			
	CAPE ISLAND APPRAISALS, INC.	7,000	Appraisals of JCP&L-owned properties to support future sale
	CITY OF SEA ISLE CITY	71,231	Utilities - Water/sewer & property tax payments
	CME ASSOCIATES	900	Condo plans for association amendment
	GEI CONSULTANTS, INC.	204,506	Project management services & environmental and engineering consulting services
	GERRY'S LAWN CARE	2,456	Landscaping and property maintenance services
	GLENN R. WATTS	9,866	Settlement agreement
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	11,539	Community relations and communications services
	HYLAND DESIGN GROUP, INC.	2,934	Residential reconstruction support
	MAKING CHANGES LLC	7,550	Property maintenance/repair services
	SCHENCK, PRICE, SMITH & KING	119,824	Legal services
	SOUTH JERSEY GAS COMPANY	3,323	Utilities - Gas
	T.O.P.S. CONSTRUCTION INCORPORATED	12,118	Residential construction services
	TREASURER - STATE OF NEW JERSEY	3,415	LSRP Annual Fee
	VEOLIA ENVIRONMENTAL SERVICES	11,221	Waste handling, transport, disposal and treatment services

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Tuckerton</i>			
	BOROUGH OF TUCKERTON	976	Property tax payments
	GEI CONSULTANTS INCORPORATED	1,280	Project management services & environmental and engineering consulting services
	HOME TURF YARD & HOME MAINT., LLC	2,000	Landscaping and property maintenance services
	SCHENCK, PRICE, SMITH & KING	227	Legal services
<i>Washington</i>			
	AMERICAN WATER	(20)	Utilities - Water (reimbursement)
	BOROUGH OF WASHINGTON	14,684	Utilities - Sewer & Property tax payments
	GEI CONSULTANTS, INC.	118,834	Environmental and engineering consulting services
	H2M ASSOCIATES INCORPORATED	43,938	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	10,830	Community relations and communications services
	JONY'S LANDSCAPING	6,621	Landscaping and property maintenance services
	SCHENCK, PRICE, SMITH & KING	1,307	Legal services
	THE AMBIENT GROUP LLC	63,384	Building demolition services
	TREASURER - STATE OF NEW JERSEY	3,260	LSRP Annual Fee & Remediation Cost Review Fee

**JCP&L Manufactured Gas Plant Sites  
Summary of Vendor Charges by Site**

**January 1 through December 31**

<b>Project</b>	<b>Vendor Name</b>	<b>Total</b>	<b>Services Provided</b>
<i>Wildwood</i>			
	ATLANTIC CITY ELECTRIC	7,056	Utilities - Electric
	CITY OF WILDWOOD	13,224	Property tax payments
	GEI CONSULTANTS, INC.	37,403	Project management services
	HENRY & GERMANN PUBLIC AFFAIRS, LLC	2,894	Community relations and communications services
	LANGAN ENGINEERING & ENVIRONMENTAL	233,159	Environmental and engineering consulting services
	ONE CALL CONCEPTS INCORPORATED	94	Underground utility mark-out request
	SCHENCK, PRICE, SMITH & KING	12,851	Legal services
	TREASURER - STATE OF NEW JERSEY	2,415	LSRP Annual Fee and other permitting costs
	VEOLIA ENVIRONMENTAL SERVICES	4,821	Waste handling, transport, disposal and treatment services
	WESTERLAND LANDSCAPING, INC.	2,520	Landscaping and property maintenance services

**JCP&L Manufactured Gas Plant Financial Report**

**2021 Remediation Expenditures - Summary**

SITE NAME	2021 INCREMENTAL	2021 BUDGET ESTIMATE	VARIANCE
Asbury Park	\$315,799	\$245,000	\$70,799
Belmar	491,376	568,000	(76,624)
Boonton	1,133,659	1,885,000	(751,341)
Cape May	846,947	487,000	359,947
Dover	1,237,257	1,794,000	(556,743)
Flemington	280,854	419,000	(138,146)
Lakewood	210,757	290,000	(79,243)
Lambertville/LaRoche	96,370	280,000	(183,630)
Long Branch	-	-	-
Newton I	130,393	3,306,000	(3,175,607)
Newton II	888,536	1,586,000	(697,464)
Ocean City	529,474	320,000	209,474
Phillipsburg	142,588	255,000	(112,412)
Red Bank	157,630	1,345,000	(1,187,370)
Sea Isle City	481,055	160,000	321,055
Toms River	-	-	-
Tuckerton	4,732	5,000	(268)
Washington	249,410	165,000	84,410
Wildwood	317,846	175,000	142,846
General Program	139,793	-	139,793
<b>Total</b>	<b>\$7,654,476</b>	<b>\$13,285,000</b>	<b>(\$5,630,524)</b>

**Summary of Actual and Estimated Remediation Expenses**

SITE NAME	PROJECT EXPENSE TO DATE	ADDITIONAL TO COMPLETE PROJECT	TOTAL PROJECT COST
Asbury Park	\$ 7,713,981	\$ 4,213,000	\$ 11,926,981
Belmar	16,622,112	8,734,000	25,356,112
Boonton	7,776,775	5,325,000	13,101,775
Cape May	32,885,218	5,860,000	38,745,218
Dover	28,898,019	10,656,000	39,554,019
Flemington	8,680,439	950,000	9,630,439
Lakewood	18,357,081	930,000	19,287,081
Lambertville/LaRochere	4,356,717	1,471,000	5,827,717
Long Branch	4,162,580	-	4,162,580
Newton I	3,032,754	6,648,000	9,680,754
Newton II	13,381,777	7,342,000	20,723,777
Ocean City	6,388,896	9,152,000	15,540,896
Phillipsburg	3,218,443	511,000	3,729,443
Red Bank	2,044,393	2,040,000	4,084,393
Sea Isle City	40,534,792	820,000	41,354,792
Toms River	2,245,527	-	2,245,527
Tuckerton	5,918,315	75,000	5,993,315
Washington	9,969,915	1,335,000	11,304,915
Wildwood	10,175,663	2,595,000	12,770,663
General Program	7,605,122	-	7,605,122
<b>Total</b>	<b>\$ 233,968,519</b>	<b>\$ 68,657,000</b>	<b>\$ 302,625,519</b>

**Notes to Attachment F:**

Project expenses include only incremental costs.

- Future cost estimates are revised at the mid-year and end-of-year periods.

In general, the future costs are projected using the following assumptions:

- Unimpeded access to sites.
- No litigation.
- Third party property purchased where feasible or institutional controls are granted at reasonable cost.
- Generally, the remedial technology to be deployed is limited excavation, capping, and pumping and treating the ground water.
- Operational period of treatment system, where deployed, is 15 years.
- In general, only limited soil "hot-spot" removal is necessary except where determined on a case-by-case basis that more significant soil removal may preclude the need for ground water treatment system, significantly reduce operational period of treatment and/or reduce long-term liability.
- Projections are generally not "engineering estimates" derived through a rigorous, dedicated application of established engineering precepts and cost factors, but rather are current "reasonable estimates" for the activity scenario. However, depending upon the status of the project, individual activities may have progressed to the point where such "engineering estimates" have been prepared by the Company's consultants. In such instances these "engineering estimates" would be used as part of the overall project cost projection.
- No future expenses have been established for General Program expenses. These expenses will be variable and dependent upon factors such as regulatory initiatives and other issues which could have a programmatic impact.
- In general, the projected costs are in current dollars and are not adjusted for inflation or present value.
- Remedial Investigation and Remedial Action implementation activities for the Red Bank site are "To Be Determined".

Calculation of Interest on Deferred Manufactured Gas Plant (MGP) Remediation Expenses Under/(Over) Recovery

Account #	Beginning January 2021	Ending January 2021	February 2021	March 2021	April 2021	May 2021	June 2021	July 2021	August 2021	September 2021	October 2021	November 2021	December 2021	YTD 2021
182199	\$ (2,291,806.14)	\$ (2,532,593.04)	\$ (2,716,375.54)	\$ (2,745,112.23)	\$ (2,578,853.79)	\$ (2,391,483.63)	\$ (2,297,021.91)	\$ (2,483,196.76)	(2,788,804.48)	(3,032,900.87)	(2,955,119.11)	(2,702,151.96)	(2,585,775.27)	
182318	\$12,210,372.28	12,549,091.20	13,028,614.21	13,611,036.07	14,140,132.83	14,636,453.59	15,310,492.23	15,803,529.50	16,506,317.73	17,173,669.81	17,478,086.67	18,196,485.73	19,874,822.77	
182319	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	1,168,367.00	
182336	55,059,499.62	53,916,633.62	52,773,767.62	51,579,250.62	50,384,733.62	49,269,884.62	48,101,923.62	46,933,962.62	45,766,001.62	44,598,040.62	43,430,079.62	42,262,086.62	41,190,919.62	
Total Dfd. Balances	\$ 66,146,432.76	\$ 65,101,498.78	\$ 64,254,373.29	\$ 63,613,541.46	\$ 63,114,379.66	\$ 62,683,221.58	\$ 62,283,760.94	\$ 61,422,662.36	\$ 60,651,881.87	\$ 59,907,176.56	\$ 59,121,414.18	\$ 58,924,787.39	\$ 59,648,334.12	
Tax Rate	28.11%	28.11%	28.11%	28.11%	28.11%	28.11%	28.11%	28.11%	28.11%	28.11%	28.11%	28.11%	28.11%	
Dfd Taxes	\$ 18,593,762.25	\$ 18,300,031.31	\$ 18,061,904.33	\$ 17,881,766.50	\$ 17,741,452.12	\$ 17,620,253.59	\$ 17,507,965.20	\$ 17,265,910.39	\$ 17,049,243.99	\$ 16,839,907.33	\$ 16,619,029.53	\$ 16,563,757.74	\$ 16,767,146.72	
Dfd Bal Excl Tax	\$ 47,552,670.51	\$ 46,801,467.47	\$ 46,192,468.96	\$ 45,731,774.96	\$ 45,372,927.54	\$ 45,062,967.99	\$ 44,775,795.74	\$ 44,156,751.97	\$ 43,602,637.88	\$ 43,067,269.23	\$ 42,502,384.65	\$ 42,361,029.65	\$ 42,881,187.40	
Avg.Dfd.Bal Excl Tax		\$ 47,177,068.99	\$ 46,496,968.22	\$ 45,962,121.96	\$ 45,552,351.25	\$ 45,217,947.77	\$ 44,919,381.87	\$ 44,466,273.86	\$ 43,879,694.93	\$ 43,334,953.56	\$ 42,784,826.94	\$ 42,431,707.15	\$ 42,621,108.53	
Interest Rate		1.24%	1.24%	1.24%	1.24%	1.24%	1.24%	1.24%	1.24%	1.24%	1.24%	1.24%	1.24%	
Interest Income		\$ 48,750.00	\$ 48,047.00	\$ 47,494.00	\$ 47,071.00	\$ 46,725.00	\$ 46,417.00	\$ 45,948.00	\$ 45,342.00	\$ 44,779.00	\$ 44,211.00	\$ 43,846.00	\$ 44,042.00	\$ 552,672.00