

March 16, 2023

VIA E-MAIL (BOARD.SECRETARY@BPU.NJ.GOV)

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Acting Secretary Carmen Diaz
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 Verified Petition of Jersey Central Power & Light Company for Review and Approval of Increases in and Other Adjustments to Its Rates and Charges For Electric Service, and For Approval of Other Proposed Tariff Revisions in Connection Therewith (“2023 Base Rate Filing”)
BPU Docket No. _____**

Dear Acting Secretary Diaz:

On behalf of the Petitioner, Jersey Central Power & Light Company (“JCP&L”), attached for filing with the Board of Public Utilities (“Board”) are copies of JCP&L’s Verified Petition and appendices, direct testimony, schedules and exhibits thereto, in its above-captioned “2023 Base Rate Filing.”

Please note that Exhibit JC-8 (Direct Testimony of Timothy S. Lyons on Class Cost of Service Study) contains certain confidential information. Accordingly, JCP&L is requesting confidential treatment of such information and has included herewith an Affidavit of Confidentiality in support of this request. JCP&L is filing both Confidential and Redacted (Public) versions of Exhibit JC-8 with the Board. A copy of the Confidential version of JC-8 will be provided to the Division of Rate Counsel upon the execution of the standard form of non-disclosure agreement for this matter.

These documents are being filed with the Acting Board Secretary electronically 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. I hereby confirm that copies each of this letter and the enclosed Verified Petition and supporting documents are on this day being duly served via electronic mail upon the Director, Division of Rate Counsel, and upon the Department of Law & Public Safety, Division of Law. We would appreciate if the Board Secretary’s office would please acknowledge receipt of this filing.

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Acting Secretary Carmen Diaz
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Your anticipated courtesies and cooperation are deeply appreciated.

Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "Gregory Eisenstark".

By: Gregory Eisenstark

Enclosures

cc: Service List via electronic mail (*via E-mail*)

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("2023 Base Rate Filing")
BPU Dkt. No.:**

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BPU Dkt. No.:

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Company for Review and Approval of Increases in, and Other
Adjustments to, Its Rates and Charges for Electric Service, and for
Approval of Other Proposed Tariff Revisions in Connection Therewith
("2023 Base Rate Case")**

**AFFIDAVIT
OF
CONFIDENTIALITY**

Mark A. Mader, of full age, being duly sworn upon her oath, deposes and says:

1. I am employed by FirstEnergy Service Company as Director, Rates and Regulatory Affairs – New Jersey. In this role, I am responsible for the management and oversight of Jersey Central Power & Light Company's ("JCP&L" or the "Company") regulatory filings, including base rate cases. I am duly authorized to make this Affidavit of Confidentiality on behalf of JCP&L in connection with the above-referenced proceeding. On March 16, 2023, JCP&L filed the above-referenced Verified Petition, including pre-filed direct testimony and schedules.

2. In connection with the above-captioned matter, Timothy S. Lyons filed direct testimony and schedules on cost of service issues, including cost of service studies. Mr. Lyons' direct testimony is marked as Exhibit JC-8 and includes two supporting schedules (TSL-1 and TSL-2). I have reviewed the testimony and schedules and am familiar with the information within them. The testimony and schedules all contain confidential information. Accordingly, the confidential versions of the testimony and schedules have been marked "Confidential" (and are referred to in this affidavit as the "Confidential Schedules"). In addition, redacted (or "Preliminary Public") copies of the testimony and schedules are also included with the rate case filing. The information that has been redacted from the Confidential Schedules, in the course of preparing the

Preliminary Public version, is referenced herein as the “Confidential Information.”

3. The Direct Testimony of Timothy S. Lyons, Exhibit JC-8, and Confidential Schedules TSL-1 and TSL-2 contain individual customer proprietary information. More specifically, JCP&L has a single customer under rate schedule GT, Special Provision D (“GT_D”). Therefore, certain data identified in Exhibit JC-8 and in corresponding Schedules TSL-1 and TSL-2 with respect to that rate classification constitute individual customer proprietary information. I have been advised that, under New Jersey law, a public utility cannot disclose individual customer proprietary information without that customer’s prior consent.

4. By way of substantiating the claim of confidentiality, I hereby verify that:
- a. JCP&L has taken measures to prevent the disclosure of the Confidential Information to others, by restricting its dissemination even within the Company, and among JCP&L’s counsel, on a “need to know” basis.
 - b. The Confidential Information is not contained in materials which are routinely made available to the general public, such as Initial and Final Orders in contested case adjudications, press releases, speeches, pamphlets and educational materials.
 - c. The Confidential Information has not been disclosed to others except pursuant to confidentiality agreements or as set forth in paragraph (a) above on a strict need-to-know basis, in which case the recipients of such need-to-know disclosures are professionally obliged to refrain from making further disclosure.
 - d. No relevant confidentiality determinations have previously been made by the Board, the Board’s custodian of records, or any other state or federal agency or court of competent jurisdiction regarding the Confidential Information.
 - e. Public disclosure or release of the Confidential Information would have a harmful effect on JCP&L and JCP&L’s customer because of the reasons set forth hereinabove.

5. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Mark A. Mader

Sworn to and subscribed electronically
this 16th day of March, 2023



Gregory Eisenstark
Attorney At Law of the State
of New Jersey

The undersigned attorney, Gregory Eisenstark, certifies that the affiant electronically acknowledged the genuineness of the signature.



Gregory Eisenstark, Esquire