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April 21, 2023

VIA ELECTRONIC MAIL ONLY

Sherri L. Golden, Secretary
New Jersey Board of Public Utilities
44 South Clinton Ave.
Trenton, NJ 08625
Board.secretary@bpu.nj.gov

Re: Letter Petition of Jersey Central Power & Light Company Seeking New Jersey Board of Public Utilities Approval Pursuant to N.J.A.C. 14:3-4.4(e) for Use of an Out of State Meter Testing Facility (“JCP&L TESCO Facility Filing”)

BPU Docket No. _____

Dear Secretary Golden:

Pursuant to N.J.A.C. 14:3-4.4(e), Jersey Central Power & Light Company (“JCP&L” or the “Company”) hereby submits this Letter Petition to the New Jersey Board of Public Utilities (“Board” or “BPU”) seeking approval to use an out-of-state meter testing facility. On August 15, 2022, the Board amended N.J.A.C. 14:3-4.4 to include a requirement that: “All out-of-State meter testing shops that begin testing meters of New Jersey customers after December 31, 2021, require prior Board approval.” Accordingly, JCP&L hereby submits its Petition seeking Board approval to begin using an out-of-state meter testing shop operated by The Eastern Specialty Company (“TESCO”) located at 925 Canal Street, Bristol, Pennsylvania 19007 (the “TESCO Facility”) for purposes of retirement testing of legacy meters being replaced under JCP&L’s Board-approved Advanced Metering Infrastructure (“AMI”) Program.

In support of the Company’s Letter Petition, JCP&L states as follows:

1. JCP&L presently tests the meters of New Jersey customers at two different meter testing shops - one located at 10 Legion Place, Morristown, New Jersey 07960 (the “Morristown Meter Shop”) and the other located at 5601 Four Points Road, Bethel, Pennsylvania 19507 (the “Bethel Meter Shop”). Generally, the Morristown Meter Shop is used to conduct meter tests initiated by a customer complaint to the Company or the Board. The Bethel Meter Shop is used to conduct regular periodic and retirement meter testing. The Bethel Meter Shop has been regularly used by the Company since 2001 for the testing of New Jersey customer meters.

2. On February 19, 2020, the Board required that all New Jersey electric distribution companies file proposed programs for the accelerated replacement of legacy meters with AMI meters through their service territories. *See* BPU Docket No. ER16060534, Order dated February 19, 2020 (“AMI Filing Order”).
3. On August 27, 2020, JCP&L filed its AMI Program, which proposed to replace 99% of JCP&L’s legacy meters with AMI meters by December 31, 2025. *See* BPU Docket No. EO20080545 (“JCP&L AMI Filing”).
4. On February 23, 2022, the Board approved a Stipulation of Settlement resolving the JCP&L AMI Filing with the Order being effective March 1, 2022. Pursuant to the Stipulation of Settlement, JCP&L is to complete replacement of 99% of the legacy meters in its service territory by December 31, 2025. *See In The Matter Of The Verified Petition Of Jersey Central Power & Light Company For Approval Of An Advanced Metering Infrastructure Program*, BPU Docket No. EO20080545, Order dated February 23, 2022 (“JCP&L AMI”).
5. Given the volume of meter retirement testing required because of the accelerated deployment of AMI meters under the AMI Program, JCP&L found it necessary to engage a third-party vendor to assist the Company with retirement testing. Accordingly, and based on its procurement process, JCP&L issued a series of competitive solicitations for meter retirement testing and associated services commencing with an RFP in December 2021. JCP&L received 4 responses from the 8 vendors solicited throughout this process. TESCO was the lowest bidder, with the cost of the next lowest bidder was an in-state vendor and was approximately 77% higher than TESCO. Following completion of the bid evaluations, TESCO was selected as the winning bidder. JCP&L entered into an agreement with TESCO on May 2, 2022 to have it perform meter retirement testing and associated services at the TESCO Facility of legacy meters replaced under the AMI Program (the “Retirement Testing Agreement”). TESCO received approval January 20, 2023 from the NJ Office of Weights and Measures for compliance under 14:3-4.4(b)2.ii.
6. After execution of the Retirement Testing Agreement, JCP&L and TESCO began work to start preparing the Company, TESCO, and the TESCO Facility to initiate the retirement testing of meters replaced under the AMI Program. That preparation work commenced June 2022 and included Meter Handling and Reporting Workshops with TESCO representative participating in JCP&L-run workshops to define processes and integration requirements as well as finalize deployment and testing schedule.
7. On August 15, 2022, the Board enacted amendments to N.J.A.C. 14:3-4.4 that included, among other things, a new requirement to seek Board approval of any out-of-state meter testing facility that was to begin testing the meters of New Jersey customers after December 31, 2021.

8. On January 31, 2023, JCP&L filed an “Annual Meter Testing Facility Compliance Report of Jersey Central Power & Light Company” (the “Compliance Report”) pursuant to another recently enacted requirement under N.J.A.C. 14:3-4.4. In its Compliance Report, JCP&L set forth the meter testing facilities testing the meters of New Jersey customers, including the Morristown Meter Shop, the Bethel Meter Shop, and the TESCO Facility. With respect to the Bethel Meter Shop and the TESCO Facility, JCP&L noted that:

The Bethel Meter Shop and TESCO Facility, each an Out of State meter testing shop, commenced work prior to the effective date of the current version of N.J.A.C. 14:3-4.4(e). Notwithstanding the foregoing, as this constitutes JCP&L’s first reporting of its anticipated use of the TESCO Facility, the Company respectfully requests that the Board issue an approval of the TESCO Facility based on the attached approval from the New Jersey Office of Weights and Measures.

A copy of the Compliance Report is attached hereto as **Exhibit A** and is hereby incorporated into the Company’s Letter Petition.

9. The TESCO Facility is located approximately 11 miles from the Board’s office in Trenton, New Jersey. JCP&L and TESCO commit to making the TESCO Facility available to Board staff for inspection, upon reasonable notice, as required by N.J.A.C. 14:3-4.4(e).
10. Assuming TESCO would be performing retirement testing of meters exchanged as part of the AMI Program, JCP&L and TESCO have established processes that enable the testing of legacy meters, upon customer request, which had previously been sent to the TESCO Facility for retirement testing. TESCO must have storage capacity available to provide a minimum of 90 days of meter storage after receipt such that JCP&L can request any legacy meter be accessed and returned to JCP&L for at least 90 days from receipt by TESCO. TESCO will then pack such meter suitably for transport and ship the meter back to JCP&L. This will enable JCP&L to perform its Legacy Meter Customer Complaint Testing process upon customer request.

And finally, JCP&L’s Deployment Vendor has a similar contractual obligation for JCP&L to request and Vendor to provide individual legacy meters following the exchange to AMI, but prior to shipment to TESCO.

11. In response to the August 15, 2022 new BPU requirement to seek Board approval of any out-of-state meter testing facility, JCP&L informed TESCO that its meter retirement testing cannot commence until such approval is attained. JCP&L and TESCO agreed to have TESCO pursue receipt of meters from JCP&L’s

Deployment Vendor but only store such trailers at the TESCO facility until approval is attained. TESCO informed JCP&L it has storage capacity, with an incremental cost to the original contract to accommodate meter exchanges through August 2023. During the week of April 17, 2023, JCP&L's Deployment Vendor reached a position to have TESCO retrieve its first trailer of meters to be tested.

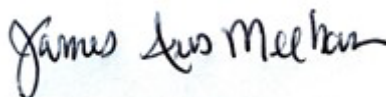
JCP&L also inquired with its Deployment Vendor for additional storage capacity at its cross docks. JCP&L's Deployment Vendor identified potential opportunity with its current cross dock landlord to store additional trailers through December 2023.

12. To avoid incurring additional costs associated with ongoing storage of the legacy meters being replaced under the AMI Program prior to retirement testing, to avoid the risk of securing a higher cost vendor to perform retirement testing (from a competitive bid process, the next least-cost vendor per unit pricing was significantly higher than TESCO), and to avoid the risk of delays to the approved deployment schedule, JCP&L must be able to begin retirement testing at the TESCO Facility by July 3, 2023. JCP&L estimates it will incur approximately \$200,000 of incremental storage costs with TESCO thru June and estimates approximately an additional \$250,000 of incremental storage cost if needed thru year-end 2023.

WHEREFORE, in accordance with the above, JCP&L respectfully requests that the Board issue an Order, or authorize the issuance of a Secretary Letter, by June 30, 2023 providing that:

- (i) the Company is authorized, in accordance with N.J.A.C. 14:3-4.4(e), to begin using the TESCO Facility for the retirement testing of legacy meters being replaced under the Company's AMI Program; and
- (ii) granting such other and further relief as the Board shall deem just, lawful, and proper.

Respectfully submitted,



James Austin Meehan
Counsel for Jersey Central Power & Light Company

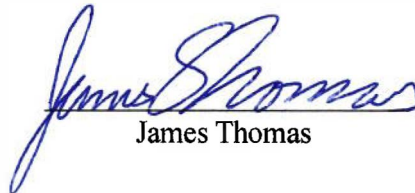
cc: Service List

AFFIDAVIT
OF
VERIFICATION

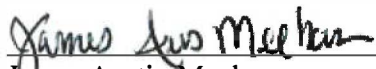
James Thomas, being duly sworn upon his oath, deposes and says:

1. I am Manager, Meter & Rubber Goods Test Shops for FirstEnergy Service Company, and I am duly authorized to make this Affidavit of Verification on behalf of Jersey Central Power & Light Company ("JCP&L"), the Petitioner named in the foregoing Letter Petition.

2. I have read the contents of the foregoing Letter Petition by JCP&L constituting its request seeking New Jersey Board of Public Utilities Approval Pursuant to N.J.A.C. 14:3-4.4(e) for Use of an Out of State Meter Testing Facility ("JCP&L TESCO Facility Filing"), and I hereby verify that the statements of fact and other information contained therein are true and correct to the best of my knowledge, information and belief.


James Thomas

Sworn to and subscribed before me
this 21st day of April, 2023


James Austin Meehan

An Attorney-at-Law licensed to practice in the State of New Jersey
Attorney ID: 014752011

EXHIBIT A

Joshua R. Eckert, Esq.
(330) 690-8329
(330) 315-9165 (Fax)

January 31, 2023

VIA ELECTRONIC MAIL ONLY

Francis Gaffney
Board of Public Utilities
44 South Clinton Ave.
Trenton, NJ 08625
Francis.gaffney@bpu.nj.gov

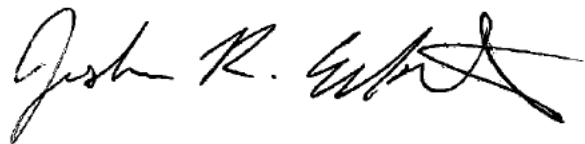
Re: Annual Meter Testing Facility Compliance Report of Jersey Central Power & Light Company

Dear Director Gaffney:

Jersey Central Power & Light Company ("JCP&L" or the "Company") hereby submits its annual compliance report listing the current locations of all meter testing shops that test the meters of the utility's New Jersey customers. This report is being filed with the Director of the Division of Reliability and Security for the New Jersey Board of Public Utilities ("Board" or "BPU") pursuant to N.J.A.C. 14:3-4.4(e).

In accordance with the Board's March 19, 2020 Order in BPU Docket No. EO20030254, this compliance filing is being provided by electronic mail only. Please kindly confirm your receipt and acceptance of the attached for filing by electronic mail at your earliest convenience. Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,



Joshua R. Eckert
Counsel for Jersey Central Power & Light Company

cc: Carmen Diaz, Acting Secretary, BPU
Brian Lipman, Esq., Director, Division of Rate Counsel

Jersey Central Power & Light Company

Compliance Report to the Division of Reliability and Security

January 31, 2023

N.J.A.C. 14:3-4.4(e)

N.J.A.C. 14:3-4.4(e) Requirement:

A utility shall, by January 31st of each year, provide to the Director of the Board's Division of Reliability and Security, the current location of all meter testing shops that test the meters of the utility's New Jersey customers . . .

In compliance with the above-referenced requirement, below is a list of Jersey Central Power & Light Company ("JCP&L" or the "Company") meter testing shops that regularly test, or are anticipated to regularly test in 2023, meters of New Jersey customers:

- **Morristown Meter Shop**
 - 10 Legion Place, Morristown, New Jersey 07960
- **Bethel Meter Shop***
 - 5601 Four Points Road, Bethel, Pennsylvania 19507
- **TESCO – The Eastern Specialty Company ("TESCO Facility")***
 - 925 Canal Street, Bristol, Pennsylvania 19007

* The Bethel Meter Shop and TESCO Facility, each an Out of State meter testing shop, commenced work prior to the effective date of the current version of N.J.A.C. 14:3-4.4(e). Notwithstanding the forgoing, as this constitutes JCP&L's first reporting of its anticipated use of the TESCO Facility, the Company respectfully requests that the Board issue an approval of the TESCO Facility based on the attached approval from the New Jersey Office of Weights and Measures.



PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

New Jersey Office of the Attorney General

Division of Consumer Affairs
Office of Weights and Measures



MATTHEW J. PLATKIN
Attorney General

CARI FAIS
Acting Director

DAVID FREED
Acting State Superintendent

January 20, 2023

Mr. Perry A Lawton, Northeast Regional Manager
Tesco – The Eastern Specialty Company
925 Canal St.
Bristol, PA 19007

Mailing Address:
1261 Route 1&9
South Avenel, NJ 07001
(732) 815-4840
(732) 382-5298 FAX

Dear Mr. Lawton,

Please be advised that the New Jersey Office of Weights and Measures has received meter testing material from you for our review, pursuant to N.J.A.C 14:3-4.4, testing of utility meter testing equipment.

Upon review, and based on the information provided, it has been found that the meter testing information provided complies with N.J.A.C 14:3-4.4 (b)2.ii., and approval is granted for the purpose of compliance of this sub-chapter.

If further information is required, please contact Raymond Szpond, Supervisor of Licensing, Metrology and Registration of this office.

Sincerely,

David Freed

Acting State Superintendent

cc: Raymond Szpond, Supervisor
Licensing, Metrology and Registration Section

Letter Petition of Jersey Central Power & Light Company Seeking New Jersey Board of
Public Utilities Approval Pursuant to N.J.A.C. 14:3-4.4(e) for Use of an Out of State
Meter Testing Facility (“JCP&L TESCO Facility Filing”)

BPU Docket No. _____

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