

**STATE OF NEW JERSEY
OFFICE OF ADMINISTRATIVE LAW**

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) BPU Docket No.ER23030144
Charges For Electric Service, and For Approval of Other) OAL Docket No. PUC3346-23
Proposed Tariff Revisions in Connection Therewith)
("JCP&L 2023 Base Rate Filing"))

**MOTION TO INTERVENE OF
NEW JERSEY LARGE ENERGY USERS COALITION**

The New Jersey Large Energy Users Coalition ("NJLEUC"), an association whose members include large volume electric customers serviced by Jersey Central Power & Light Company ("JCP&L"), hereby moves to intervene in the above-captioned proceeding. In support of its motion, NJLEUC states as follows:

1. All communications and correspondence concerning this proceeding should be directed to:

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2. By Petition dated March 16, 2023, JCP&L seeks approval of the Board of Public Utilities ("Board") of certain increases in JCP&L's rates and charges for electric service and for related relief. JCP&L states that since the 2020 Base Rate Case and through June, 2023, JCP&L will have expended \$794.2 million in a number of distribution system-related capital investments for which it seeks recovery. JCP&L also seeks to recover \$310 million in deferred storm restoration costs, as well as certain deferred expenses related to the implementation of the Board's Advanced

Metering Infrastructure and Electric Vehicle Programs that will have accrued by the end of the test year period. JCP&L proposes a rate increase in the sum of \$184.95 million on an annual basis, representing an overall average increase in JCP&L rates of 6.8%, and certain tariff revisions.

WHEREFORE, in support of its application for intervention in this proceeding, and as further summarized below, NJLEUC respectfully submits that all factors for intervention set forth in N.J.A.C. 1:1-16 weigh in favor of the granting of NJLEUC's motion to intervene in the above-captioned proceeding:

1. NJLEUC formed, in part, to monitor regulatory proceedings involving the State's electric and natural gas utilities, including JCP&L, and participate or intervene in regulatory and rate proceedings to the extent necessary to represent its members' common interests. Members of NJLEUC purchase electric distribution service from JCP&L and, therefore, will be substantially and specifically affected by the outcome of the proceeding;

2. Given its capacity as an association of large end-use customers on the JCP&L system that will be directly and immediately affected by the rate relief sought by JCP&L in this proceeding, NJLEUC's interests are unique from and not adequately represented by any other party.

3. NJLEUC has a unique perspective and insight regarding the potential impact, on JCP&L's large consumers, of the rate relief and charges that have been sought, and will be sought, by JCP&L in this proceeding.

4. NJLEUC's motion is timely and will not delay or otherwise disrupt the prosecution of this proceeding;

5. Fundamental fairness and due process considerations require that NJLEUC be afforded an opportunity to fully participate as an Intervenor in this proceeding, the outcome of which will have a significant impact on the cost of electric service received from JCP&L by the members of NJLEUC;

6. NJLEUC has consistently been granted Intervenor status in, among others, prior JCP&L base rate cases, including the most recent 2020 base rate case, the GPU/FirstEnergy merger proceeding and other infrastructure and regulatory proceedings brought by or involving JCP&L.

7. The issues to be decided in this proceeding “substantially, specifically and directly affect” NJLEUC within the meaning of these terms as used in the Uniform Rules, thereby making it appropriate for NJLEUC to intervene as a party;

8. Furthermore, the interests of NJLEUC’s members as large end-use customers of JCP&L, and as active intervenors in matters involving JCP&L, are substantially different from those of any other party seeking intervention. Therefore, NJLEUC’s interests in this proceeding are unique on both a quantitative and qualitative basis;

9. NJLEUC’s entry as a party would “measurably and constructively” advance this proceeding (N.J.A.C. 1:1-16.3(a)) because of the unique status of its members as large end-use customers on the JCP&L system. NJLEUC’s entry as a party would promote an informed and balanced presentation of the issues;

10. Notwithstanding its unique interests, where it is possible and practical for it to do so, NJLEUC will endeavor to work cooperatively with other parties in this proceeding in the interests of administrative efficiency and economy.

11. For the foregoing reasons, and because the cost of electric service to NJLEUC’s members will be directly and substantially affected by the issues to be determined in this proceeding, NJLEUC has a direct and immediate interest in the outcome of this proceeding that cannot adequately be represented by any other party.

WHEREFORE, pursuant to N.J.A.C. 1:1-16.1, *et seq.*, NJLEUC respectfully requests that it be permitted to intervene, with full procedural and substantive rights, in the above-captioned proceeding.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'S. Goldenberg', written over a horizontal line.

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Dated: May 30, 2023

CERTIFICATION OF SERVICE

I hereby certify that I have this day served via electronic mail copies of the foregoing Motion to Intervene to the parties identified on the service list, and to Sherri Golden, Secretary, Board of Public Utilities.

Dated at Red Bank, New Jersey this 30th day of May, 2023.



Steven S. Goldenberg

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 Dkt. No.:

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