
Timothy K. McHugh, Esq.
(610) 301-9072
tmchugh@firstenergycorp.com

February 22, 2024

VIA ELECTRONIC MAIL ONLY

Sherri L. Golden, RMC
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, New Jersey 08625-0350
sherri.golden@bpu.nj.gov
board.secretary@bpu.nj.gov

**RE: In the Matter of the Petition of Public Service Electric and Gas Company for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service, B.P.U.N.J. No. 17 Electric and B.P.U.N.J. No. 17 Gas, and for Changes in Depreciation Rates, Pursuant to N.J.S.A. 48:2-18, N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, and for Other Appropriate Relief
BPU Docket Nos. ER23120924 and GR23120925**

Dear Secretary Golden:

On behalf of Jersey Central Power & Light Company (“JCP&L” or the “Company”), please find attached for filing with the Board of Public Utilities JCP&L’s Motion to Participate in the above-captioned proceeding.

I hereby confirm that copies of this motion are being delivered as of this date via electronic mail to all persons whose names appear on the attached distribution list.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



Timothy K. McHugh

Enclosures

cc: Attached Service List (via email)

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

IN THE MATTER OF THE PETITION	:	MOTION
OF PUBLIC SERVICE ELECTRIC AND	:	TO
GAS COMPANY FOR APPROVAL OF	:	PARTICIPATE
AN INCREASE IN ELECTRIC AND GAS	:	
RATES AND FOR CHANGES IN THE	:	
TARIFFS FOR ELECTRIC AND GAS	:	
SERVICE, B.P.U.N.J. NO. 17 ELECTRIC	:	
AND B.P.U.N.J. NO. 17 GAS, AND FOR	:	BPU DOCKET NOS. ER23120924
CHANGES IN DEPRECIATION RATES,	:	GR23120925
PURSUANT TO <i>N.J.S.A.</i> 48:2-18, <i>N.J.S.A.</i>	:	
48:2-21 AND <i>N.J.S.A.</i> 48:2-21.1, AND FOR	:	
OTHER APPROPRIATE RELIEF	:	

Jersey Central Power & Light Company (“JCP&L” or the “Company”) hereby moves for an Order granting its status as a Participant in the above-referenced proceeding pursuant to *N.J.A.C.* 1:1-16.6. In support of this Motion, JCP&L respectfully submits:

1. JCP&L is a New Jersey electric public utility, as defined by *N.J.S.A.* 48:2-13, and is primarily engaged in the purchase, transmission, distribution, and sale of electric energy and related utility services to approximately 1.1 million residential, commercial, and industrial customers located within 13 counties and 236 municipalities in the State of New Jersey.

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

Tori Giesler, Esq.
FirstEnergy Service Company
Legal Department
2800 Pottsville Pike
Reading, PA 19612-6001
Tel: 610-921-6658
tgiesler@firstenergycorp.com

Timothy K. McHugh, Esq.
First Energy Service Company
Legal Department
2800 Pottsville Pike
Reading, PA 19612-6001
Tel: 610-301-9072
tmchugh@firstenergycorp.com

Additional electronic only copies should be addressed to:

Mark A. Mader
Jersey Central Power & Light Co.
300 Madison Avenue
P.O. Box 1911
Morristown, NJ 07962-1911
mamader@firstenergycorp.com

Carol Pittavino
Jersey Central Power & Light Co.
800 Cabin Hill Drive
Greensburg, PA 15601
cpittavino@firstenergycorp.com

3. *N.J.A.C.* 1:1-16.6(a) provides that “[a]ny person or entity with a significant interest in the outcome of a case may move for permission to participate.”

4. The standard to allow such participation is “whether the participant’s interest is likely to add constructively to the case without causing undue delay or confusion.” *N.J.A.C.* 1:1-16-6(b).

5. JCP&L has a significant interest in this proceeding, and, as such, is entitled to participate in this proceeding.

6. The Board of Public Utilities’ (“Board”) decision in this proceeding is likely to have precedential effect and impact not only on the Petitioner herein, but also on New Jersey’s other electric and gas utilities, including JCP&L and its customers. A variety of issues that will be addressed in this proceeding may have an impact on JCP&L. The Company will therefore likely be directly and specifically affected by the relief provided herein.

7. JCP&L’s service territory borders the Public Service Electric & Gas Company’s (“PSE&G”) service territory.

8. The service territories, customers, and the operations of JCP&L are distinct from other parties or participants in this proceeding. Thus, no other party will represent the interests of JCP&L in this proceeding.

9. JCP&L has a history of coordinating its activities in dockets at the Board with other similar entities where appropriate. JCP&L will coordinate its representation with other similarly situated entities in this docket to the extent such actions are appropriate.

10. Due to JCP&L's experience in the electric industry, its participation as a Participant in this proceeding is likely to add constructively to the proceeding and will help develop a complete record for Board consideration.

11. The Company will abide by any schedule set for this proceeding.

12. The granting of this Motion will not cause any undue delay or confusion.

WHEREFORE, JCP&L respectfully requests an Order (1) granting its right as a Participant in this proceeding pursuant to *N.J.A.C.* 1:1-16.6, and (2) providing such further relief in connection therewith as deemed reasonable, just, and consistent with the foregoing.

Respectfully submitted,



Timothy K. McHugh
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 301-9072
tmchugh@firstenergycorp.com

Counsel for Jersey Central Power & Light Company

DATED: February 22, 2024

In the Matter of the Petition of Public Service Electric and Gas Company for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service, B.P.U.N.J. No. 17 Electric and B.P.U.N.J. No. 17 Gas, and for Changes in Depreciation Rates, Pursuant to *N.J.S.A.* 48:2-18, *N.J.S.A.* 48:2-21 and *N.J.S.A.* 48:2-21.1, and for Other Appropriate Relief
BPU Docket Nos. ER23120924 and GR23120925

Service List

BPU

Sherri L. Golden
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, NJ 08625-0350
sherri.golden@bpu.nj.gov
board.secretary@bpu.nj.gov

Stacy Peterson
Deputy Executive Director
stacy.peterson@bpu.nj.gov

Michael Beck, Esq.
Chief Counsel
michael.beck@bpu.nj.gov

Carol Artale, Esq.
Deputy Chief Counsel
carol.artale@bpu.nj.gov

Heather Weisband, Esq.
Senior Counsel
heather.weisband@bpu.nj.gov

Benjamin Witherell, Ph.D.
Chief Economist
benjamin.witherell@bpu.nj.gov

Jackie O'Grady
Office of the Chief Economist
jackie.ogrady@bpu.nj.gov

Dean Taklif
dean.taklif@bpu.nj.gov

Christopher Oprysk
christopher.oprysk@bpu.nj.gov

David Brown
david.brown@bpu.nj.gov

Nisa Rizvi
nisa.risvi@bpu.nj.gov

Bart Kilar
bart.kilar@bpu.nj.gov

Jackie Galka
jacqueline.galka@bpu.nj.gov

William Barkasy
william.barkasy@bpu.nj.gov

AJ DeAnni
anthony.deanni@bpu.nj.gov

Dari Urban
dari.urban@bpu.nj.gov

Andrew Tuzzo
andrew.tuzzo@bpu.nj.gov

Justin Cederberg
justin.cederberg@bpu.nj.gov

Kofi Ocansey
kofi.ocansey@bpu.nj.gov

Kyle Felton
kyle.felton@bpu.nj.gov

Cindy Bianco
cindy.bianco@bpu.nj.gov

DAG
Pamela Owen, Esq.
Assistant Attorney General
Hughes Justice Complex
25 Market Street
P.O. Box 112
Trenton, NJ 08625
pamela.owen@law.njoag.gov

Daren Eppley, Esq.
Deputy Attorney General
daren.eppley@law.njoag.gov

Matko Ilic, Esq.
Deputy Attorney General
matko.ilic@law.njoag.gov

Steven A. Chaplar, Esq.
Deputy Attorney General
steven.chaplar@law.njoag.gov

RATE COUNSEL
Brian O. Lipman, Esq.
Director
Division of Rate Counsel
140 East Front Street, 4th Floor
P.O. Box 003
Trenton, NJ 08625-003
blipman@rpa.nj.gov

T. David Wand, Esq.
[dward@rpa.nj.gov](mailto:dwand@rpa.nj.gov)

Maura Caroselli, Esq.
Deputy Rate Counsel
mcaroselli@rpa.nj.gov

PSE&G
Joseph F. Accardo, Jr., Esq.
PSEG Services Corporation
80 Park Plaza, T10
P.O. Box 570
Newark, NJ 07102
joseph.accardojr@pseg.com

Katherine E. Smith, Esq.
katherine.smith@pseg.com

Aaron I. Karp, Esq.
aaron.karp@pseg.com

Danielle Lopez, Esq.
danielle.lopez@pseg.com

Matthew M. Weissman, Esq.
matthew.weissman@pseg.com

Stacey Mickles, Esq.
stacey.mickles@pseg.com

Caitlyn White
caitlyn.white@pseg.com

Bernard Smalls
bernard.smalls@pseg.com