Aaron I. Karp **Associate Counsel - Regulatory** Law Department **PSEG Services Corporation** 80 Park Plaza – T10

Newark, NJ 07102-4194 T: 973-430-8970

Email: <u>aaron.karp@pseg.com</u>



VIA BPU E-FILING SYSTEM & ELECTRONIC MAIL

June 24, 2024

In the Matter of the Provision of Basic Generation Service for the Period Beginning June 1, 2024

BPU Docket No. ER23030124

Compliance Tariff Filing Reflecting Changes to Schedule 12 Charges in PJM Open Access **Transmission Tariff** BPU Docket No.

Sherri L. Golden Secretary of the Board New Jersey Board of Public Utilities 44 South Clinton Avenue, 1st Floor Trenton, New Jersey 08625-0350

Dear Secretary Golden:

Enclosed for filing on behalf of Atlantic City Electric Company ("ACE"), Jersey Central Power & Light Company, Public Service Electric and Gas Company, and Rockland Electric Company (collectively, the "EDCs") please find tariff sheets and supporting exhibits proposed by each of the EDCs.1

¹ This Compliance Tariff Filing has also been uploaded to the New Jersey Board of Public Utilities' (the "Board" or "BPU") E-Filing system. Consistent with the Order issued in connection with In the Matter of the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations, BPU Docket No. EO20030254, Order dated March 19, 2020, these documents are only being electronically filed with the Secretary of the Board and the proposed Service List. No paper copies will follow.

Request for Board Approval of Revised Tariff Rates Related to Open Access Transmission Tariffs

The tariff sheets have been revised to reflect changes to the PJM Interconnection ("PJM") Open Access Transmission Tariff ("OATT") made in response to the annual formula rate update filings made by:

- (i) Trans-Allegheny Interstate Line Company in Federal Energy Regulatory Commission ("FERC") Docket No. ER07-562, by Baltimore Gas and Electric Company in FERC Docket No. ER09-1100, by PECO Energy Company in FERC Docket No. ER17-1519, by Commonwealth Edison Company in FERC Docket No. ER07-583, by Duquesne Light Company; in FERC Docket No. ER06-1549, by MISO- AES Indiana (Indianapolis Power & Light) in FERC Docket No. ER13-2379; and
- (ii) the public utility affiliates of Pepco Holdings Inc. (now known as Pepco Holdings LLC) in FERC Docket No. ER08-1423 and the respective utility affiliate compliance filings for formula rate updates made by ACE in FERC Docket No ER09-1156, by Delmarva Power & Light Company in FERC Docket No. ER09-1158, and by Potomac Electric Power Company in FERC Docket No. ER09-1159.
- (iii) Transource Pennsylvania LLC in FERC Docket No. ER17-419 charges are included in this filing.

The filings referred to in (i), (ii), and (iii) above are collectively referred to as the "OATT Filings."

A. Background of the OATT Filings

In its Order dated November 17, 2023 (BPU Docket No. ER23030124), the Board authorized the EDCs to recover FERC-approved changes in firm transmission service-related charges from Basic Generation Service ("BGS") customers and pay PJM directly.

The annual update for formula rate transmission service of the Transmission Enhancement Charges ("TECs") detailed in Schedule 12 of the PJM OATT and the Network Integration Transmission Service Rate ("NITS") were implemented to compensate transmission owners for the annual transmission revenue requirements and for "Required Transmission Enhancements" (again, as defined in the PJM OATT) that are requested by PJM for reliability or economic purposes. TECs are recovered by PJM through an additional transmission charge in the transmission zones assigned cost responsibility for Required Transmission Enhancement Projects. Because EDCs will begin to pay these increased transmission charges in June 2024², the EDCs request a waiver of the 30-day filing requirement. In turn, the EDCs will file with the Board for approval to recover TECs and NITS charges from BGS customers and to pay PJM for costs

² Transource Pennsylvania LLC charges are being paid as of January 2024 and will become part of the January NITS/TEC EDC joint filings going forward.

assigned to them by PJM for the load served in the respective EDC service territories.

B. Request for Board Approval of the Revised Tariff Rates and for Authorization to Pay PJM

The EDCs respectfully request Board approval to implement the attached revised BGS-RSCP and BGS-CIEP tariff rates effective September 1, 2024. In support of this request, the EDCs have included pro-forma tariff sheets shown in **Attachment 2**. The proposed BGS tariff rates have been modified in accordance with the Board-approved methodology contained in each EDC's Company-Specific Addendum in the above-referenced BGS proceedings and in conformance with each EDC's Board-approved BGS tariff sheets. The attached pro-forma tariff sheets propose an effective date of September 1, 2024 and will remain in effect until changed. The BGS-RSCP and BGS-CIEP rates included in the amended tariff sheets for each EDC are revised to reflect costs effective on June 1, 2024 for TECs and NITS costs resulting from all of the FERC-approved OATT Filings. These rates are based on the FERC-approved (and PJM implemented) rates for transmission services.

Attachment 1 shows the derivation of the ACE Network Integration Transmission Service Charge ("Derived NITS Rate") and Attachment 3 sets forth the details of the rate design calculation incorporating the Derived NITS Rate. The translation of the transmission zone rate impact to the BGS rates of each of the EDCs assuming implementation on September 1, 2024 from the balance of the TECs from the annual rate update filings made by the transmission companies above is included as Attachment 4. Attachment 5 shows the cost impact for the 2024/2025 period for each of the EDCs. These costs were allocated to the various transmission zones using the cost information from the formula rates for the projects covered by the OATT Filings, as posted on the PJM website. Copies of the OATT Filings and all formula rate updates are included as Attachment 6, and can also be found on the PJM website at:

http://www.pjm.com/markets-and-operations/billing-settlements-and-credit/formula-rates.aspx.

Any differences between payments to PJM and charges to customers will flow through BGS Reconciliation Charges. This treatment is consistent with the previously approved mechanisms.

We thank the Board for all courtesies extended.

Respectfully submitted,

Karp

Attachments

cc:

Stacy Peterson, BPU (Electronic)
Brian O. Lipman, Esq., Division of Rate Counsel (Electronic)
Service List (Electronic)

PUBLIC SERVICE ELECTRIC AND GAS COMPANY BGS TRANSMISSION ENHANCEMENT CHARGE

BOARD OF PUBLIC UTILITIES 44 South Clinton Avenue, 9 th Floor P.O. Box 350 Trenton, NJ 08625-0350				
Stacy Peterson Deputy Executive Director stacy.peterson@bpu.nj.gov	Sherri Golden, Secretary board.secretary@bpu.nj.gov	Benjamin Witherell Chief Economist benjamin.witherell@bpu.nj.gov		
Heather Weisband, Esq. heather.weisband@bpu.nj.gov	William Barkasy william.barkasy@bpu.nj.gov			
DIVISION OF RATE COUNSEL 140 East Front Street, 4 th Floor Trenton, NJ 08608-2014				
Brian Lipman, Esq. blipman@rpa.nj.gov	David Wand dwand@rpa.nj.gov	Celeste Clark cclark@rpa.nj.gov		
Debora Layugen dlayugan@rpa.nj.gov				
DEPARTMENT OF LAW & PUBLIC SAFETY Division of Law 124 Halsey Street, 5 th Floor Newark, NJ 07101-45029				
Pamela Owen, ASC, DAG	Daren Eppley, DAG	Michael Beck, DAG		
pamela.owen@law.njoag.gov	daren.eppley@law.njoag.gov	michael.beck@law.njoag.gov		
	EDCs			
Sherryl Chen ACE sherryl.chen@pepcoholdings.com	Philip Passanante, Esq. ACE – 89KS philip.passanante@pepcoholdings.com	Yongmei Peng JCP&L ypeng@firstenergycorp.com		
Peter Samuel JCP&L psamuel@firstenergycorp.com	Diane Novak PEPCO Holdings dnnovak@pepco.com	Rachel Northcutt NERA rachel.northcutt@nera.com		
James Austin Meehan, Esq. FirstEnergy Service Company jameehan@firstenergycorp.com	John L. Carley, Esq. Consolidated Edison of NY carleyj@coned.com	Margaret Comes, Esq. Senior Staff Attorney Consolidated Edison of NY comesm@coned.com		
Aaron I. Karp, Esq. Associate Counsel – Regulatory PSEG Services Corporation aaron.karp@pseg.com	Katherine Smith, Esq. Managing Counsel - State Regulatory PSEG Services Corporation katherine.smith@pseg.com	Terrence Moran PSE&G terrence.moran@pseg.com		
Myron Filewicz PSE&G myron.filewicz@pseg.com				
OTHER				
Rick Sahni Contract Services – Power BP Energy Company rick.sahni@bp.com	Matthew Clements Contract Services – Power BP Energy Company matthew.clements@bp.com	Commodity Operations Group Citigroup Energy Inc. ceiconfirms@citi.com		

PUBLIC SERVICE ELECTRIC AND GAS COMPANY BGS TRANSMISSION ENHANCEMENT CHARGE

Legal Department Citigroup Energy Inc. ceiconfirms@citi.com	Jackie Roy ConocoPhillips jackie.roy@conocophillips.com	John Foreman ConocoPhillips john.r.foreman@conocophillips.com
Marcia Hissong DTE Energy Trading hissongm@dteenergy.com	Justin Brenner NextEra Energy Power Marketing DL-PJM-RFP@fpl.com	Cynthia Klots DTE Energy Trading klotsc@dteenergy.com
Danielle Fazio Engelhart CTP (US) danielle.fazio@ectp.com	Cara Lorenzoni Noble Americas Gas & Power clorenzoni@mercuria.com	Steven Gabel Gabel Associates steven@gabelassociates.com
Paul Rahm Exelon Generation Company paul.m.rahm@constellation.com	Jessica Miller Exelon Generation Company jessica.miller@constellation.com	Connie Cheng Macquarie Energy LLC connie.cheng@macquarie.com
Sherri Brudner Macquarie Energy LLC sherri.brudner@macquarie.com	Patricia Haule Macquarie Energy LLC patricia.haule@macquarie.com	Matthew Davies TransCanada Power Marketing matthew_davies@transcanada.com
Laura DiBenedetto PSEG ER&T laura.dibenedetto@pseg.com	Brian McPherson TransCanada Power Marketing Ltd. brian mcpherson@transcanada.com	