



STATE OF NEW JERSEY
Board of Public Utilities
44 South Clinton Avenue, 1st Floor
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Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

ENERGY

IN THE MATTER OF THE VERIFIED PETITION)	DECISION AND ORDER
OF JERSEY CENTRAL POWER & LIGHT)	APPROVING STIPULATION FOR
COMPANY CONSTITUTING ITS ANNUAL FILING)	FINAL RATES
WITH RESPECT TO THE NON-UTILITY)	
GENERATION CHARGE CLAUSE OF ITS FILED)	
TARIFF ("2020 NGC FILING"))	DOCKET NO. ER21010083

Parties of Record:

Michael J. Martelo, Esq., on behalf of Jersey Central Power & Light Company
Brian O. Lipman, Esq., Director, New Jersey Division of Rate Counsel

BY THE BOARD:

On January 29, 2021, Jersey Central Power & Light Company ("JCP&L" or "Company") filed a petition with the New Jersey Board of Public Utilities ("Board") seeking review and approval of the amounts included in the Company's Non-Utility Generation Charge ("NGC") deferred balance for the period January 1, 2020, through December 31, 2020 ("2020 NGC Period") ("2020 NGC Petition"). By this Decision and Order, the Board considers a Stipulation for Final Rates ("Stipulation") executed by JCP&L, Board Staff ("Staff"), and the New Jersey Division of Rate Counsel ("Rate Counsel") (collectively, "Parties") which resolves all issues related to the 2020 NGC Petition.

BACKGROUND AND PROCEDURAL HISTORY

As a result of the Board's March 7, 2001, Final Decision and Order, the Company implemented unbundled rates that included a new tariff rider entitled the "Market Transition Charge" which was renamed the NGC effective September 1, 2004.¹ The NGC is designed to recover, among other things, the portion of the costs of power purchases from non-utility generators ("NUGs") that were deferred on JCP&L's books, to the extent JCP&L was unable to fully recover them under its regulated rates and market sales.

¹ In re Jersey Central Power and Light Company d/b/a GPU Energy – Rate Unbundling, Stranded Cost and Restructuring Filings, BPU Docket Nos. EO97070458, EO97070459, and EO97070460, Final Decision and Order dated March 7, 2001 ("Restructuring Order").

Other costs included in the NGC are costs associated with the Yards Creek pumped storage generating facility ("Yards Creek"), wholesale energy/capacity revenues and expenses for PURPA Qualifying Facilities ("QFs") taking service under Rider QFS, wholesale revenues and expenses associated with an allocation of the St. Lawrence public power project ("St. Lawrence"), and revenues from the lease of certain legacy fiber communication equipment to third parties.²

The composite NGC rate also includes the recovery of the Deferred Basic Generation Service ("BGS") Transition Bond Charge ("DB-TBC") and Deferred BGS MTC-Tax Charge ("DB-MTC-Tax") related to the securitization of BGS transition costs.

2020 NGC Petition

On January 29, 2021, JCP&L filed the 2020 NGC Petition with the Board seeking review and approval of the amounts included in the Company's NGC deferred balance to the extent accumulated during the 2020 NGC Period. The 2020 NGC Petition provided that the net NGC deferral balance on December 31, 2020, amounted to an over-recovery of \$6,987,587 after the application of carrying costs of \$286,443. In addition, the Company projected that, at then-current rates, the net NGC deferred balance on December 31, 2021, would be an over-recovery of \$1,246,595 after the application of carrying costs of \$22,564. In JCP&L's 2019 NGC Petition under Docket No. ER20060473, the Company indicated that the DB-TBC would be fully satisfied as of May 2021. Accordingly, the Company proposed to reset the NGC factor, effective June 1, 2021, to reset the NGC to incorporate the removal of Yards Creek, St. Lawrence DB-TBC and DB-MTC-Tax. The proposed total NGC would be a credit rate of \$0.000114 per kWh [excluding Sales and Use Tax ("SUT")] which would credit customers \$2,189,109 annually to refund the net of ongoing revenues and expenses from the lease of certain legacy fiber communications equipment to third parties and Rider QFS.

JCP&L explained that after the Company received the Yards Creek Order, the Company became aware that an amendment to Yards Creek Interconnection Service Agreement ("ISA") needed to be filed at the Federal Energy Regulatory Commission ("FERC"). On January 13, 2021, PJM Interconnection, L.L.C. and JCP&L filed an amended Yards Creek ISA at FERC, requesting an expedited comment period and issuance of an order accepting the amended Yards Creek ISA by February 15, 2021. Accordingly, the Company was not able to close on the transaction until FERC approved the amended ISA. JCP&L anticipated that the transaction would close in the first quarter of 2021, and indicated that it would supplement the 2020 NGC Petition with testimony regarding the closing at that time.

Subsequently, JCP&L submitted supplemental testimony regarding the Yards Creek transaction and updated the schedules in the 2020 NGC Petition to include actual information through June 2021 ("Updates"). Based upon the Updates, JCP&L projected that, at then-current rates, the net NGC deferred balance at December 31, 2021, would be an over-recovery of \$323,421 (after the

² On October 28, 2020, the BPU approved the sale of JCP&L's ownership interest in Yards Creek. See In re the Verified Petition of Jersey Central Power & Light Company Seeking (a) Approval of the Sale of its Ownership Interest in the Yards Creek Generating Station Pursuant to N.J.S.A. 48:3-7, (b) Waiver of the Advertising Requirement of N.J.A.C. 14:1-5.6(b), (c) A Specific Determination Allowing the Yards Creek Generating Station to be an Eligible Facility Pursuant to Section 32 of the Public Utility Holding Company Act of 1935 Under the Public Utility Holding Company Act of 2005, (d) To the Extent Necessary, a Determination of Compliance with, or the Non-Applicability or Waiver of, the Auction Standards Under the Board's 1998 Order Adopting Auction Standards Under N.J.S.A. 48:3-59(b), and (e) Other Related Relief, BPU Docket No. EM20050343, Order dated October 28, 2020 ("Yards Creek Order").

application of carrying charges). Based upon the Updates, JCP&L revised its proposed NGC credit rate to \$0.000215 per kWh, excluding SUT.

The Company's 2020 NGC Petition requested a decrease to rates, and therefore, public hearings were not held in this matter. In addition, no written comments were received.

By Order dated October 28, 2021, the Board approved a stipulation for provisional rates executed by the Parties. The October 2021 Order authorized a reduction in JCP&L's composite Market Transition Charge ("MTC") / NGC factor to a credit of \$0.000215 per kWh (excluding SUT), on a provisional basis, subject to refund with interest.³

STIPULATION

Following a complete review of the 2020 NGC Petition, Updates, and discussions, the Parties executed the Stipulation, which provides for the following:⁴

1. The Parties agree that the credit rate of \$0.000215 per kWh (excluding SUT) shall remain in effect.
2. The Parties agree that JCP&L's proposed refund of certain vendor payments through the NGC is thus moot for purposes of this proceeding.
3. The Parties agree that the net proceeds of the Yards Creek transaction were \$109,395,532, with the cost to sell being \$920,871. For context, a detailed itemization of JCP&L's originally stated cost to sell of \$1,377,948 was provided in this proceeding, which included outside legal costs of \$1,147,605.38 (inclusive of legal accruals of \$44,706). The legal bills were examined by the Parties and the Parties agreed to reduce the amount of outside legal costs by \$457,077—resulting in a corresponding reduction in the originally stated cost to sell of \$1,377,948 to \$920,871—with this amount being applied to the under recovered deferred storm-related regulatory asset balance as originally authorized in the Yards Creek Proceeding, BPU Docket No. EM20050343.
4. The Parties further agree that the interest rate applied to the NGC deferred balance will be set to an interest rate equal to the rate on seven (7)-year constant maturity Treasuries, as shown in the Federal Reserve Statistical Release on or closest to January 1 of each year, plus sixty (60) basis points, ("Carrying Cost Rate"), until changed by a future Board Order. The Parties agree that the Carrying Cost Rate is currently 4.55%. The annual compounding date remains January 1st of each year.

³ In re the Verified Petition of Jersey Central Power & Light Company Constituting Its Annual Filing with Respect to the Non-Utility Generation Charge Clause of Its Filed Tariff ("2020 NGC Filing"), BPU Docket No. ER21010083, Order dated October 28, 2021 ("October 2021 Order").

⁴ Although described in this Order, should there be any conflict between this summary and the Stipulation, the terms of the Stipulation control, subject to the findings and conclusions contained in this Order. Each paragraph is numbered to coincide with the paragraphs of the Stipulation.

DISCUSSION AND FINDING

The Board, having carefully reviewed the record in this proceeding, including the 2020 NGC Petition, the Updates and attached Stipulation, **HEREBY FINDS** that the Stipulation is reasonable, in the public interest and in accordance with the law. Accordingly, the Board **HEREBY ADOPTS** the Stipulation as its own, as if fully set forth herein.

The Board **HEREBY APPROVES** on a final basis, a composite MTC/NGC credit factor of \$0.000215 per kWh (excluding SUT). As a result of the Stipulation, customers will experience no changes to their monthly bills.

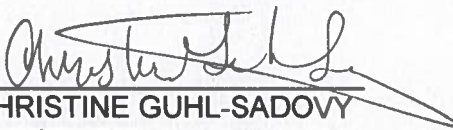
The Board **HEREBY DIRECTS** the Company to file the appropriate revised tariff sheets conforming to the terms of this Order by September 15, 2024.

The Company's costs, including those related to the NGC deferred balance, remain subject to audit by the Board. This Decision and Order shall not preclude nor prohibit the Board from taking any actions determined to be appropriate as a result of any such audit.

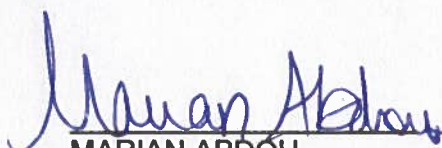
The effective date of this Order is September 11, 2024.

DATED: September 4, 2024

BOARD OF PUBLIC UTILITIES
BY:

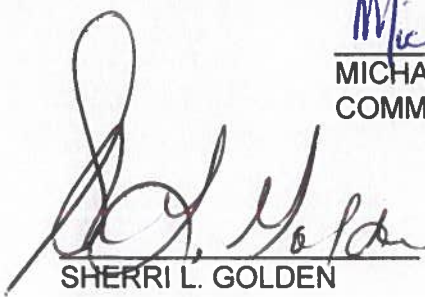

CHRISTINE GUHL-SADOVY
PRESIDENT


DR. ZENON CHRISTODOULOU
COMMISSIONER


MARIAN ABDOU
COMMISSIONER


MICHAEL BANGE
COMMISSIONER

ATTEST:


SHERRI L. GOLDEN
SECRETARY

I HEREBY CERTIFY that the within
document is a true copy of the original
in the files of the Board of Public Utilities.

IN THE MATTER OF THE VERIFIED PETITION OF JERSEY CENTRAL POWER & LIGHT COMPANY
CONSTITUTING ITS ANNUAL FILING WITH RESPECT TO THE NON-UTILITY GENERATION
CHARGE CLAUSE OF ITS FILED TARIFF ("2020 NGC FILING")

BPU DOCKET NO. ER21010083

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

IN THE MATTER OF THE VERIFIED PETITION))	STIPULATION FOR FINAL
OF JERSEY CENTRAL POWER & LIGHT)	RATES
COMPANY CONSTITUTING ITS ANNUAL)	
FILINGS WITH RESPECT TO THE)	
NON-UTILITY GENERATION CHARGE)	
CLAUSE OF ITS FILED TARIFF)	BPU DOCKET NO. ER21010083
("2020 NGC FILING"))	

TO THE HONORABLE BOARD OF PUBLIC UTILITIES:

APPEARANCES:

Michael J. Martelo, Esq., FirstEnergy Service Company, for Petitioner, Jersey Central Power & Light Company

Steven A. Chaplar, Esq., Deputy Attorney General, for the Staff of the New Jersey Board of Public Utilities (**Matthew J. Platkin, Esq.**, Attorney General of the State of New Jersey)

T. David Wand, Esq., Deputy Rate Counsel, for the New Jersey Division of Rate Counsel (**Brian O. Lipman, Esq.**, Director)

This Stipulation of Settlement ("Stipulation") is hereby made and executed as of the dates provided below by and among the Petitioner, Jersey Central Power & Light Company ("JCP&L" or "Company"), the Staff of the New Jersey Board of Public Utilities ("Staff"), and the New Jersey Division of Rate Counsel ("Rate Counsel") (collectively, "Parties").

The Parties do hereby join in recommending that the New Jersey Board of Public Utilities ("Board" or "BPU") issue an Order approving this Stipulation based upon the following provisions.

Background

JCP&L's Non-Utility Generation Charge ("NGC") was initially approved by the Board to recover, among other things, the portion of the costs of power procured from non-utility generators ("NUGs") that were deferred on the Company's books to the extent that the Company

was unable to recover them in full under its regulated rates and market sales.¹ The Restructuring Order authorized the Company to defer, for future recovery, its costs incurred under power purchase agreements (“PPAs”) with NUGs to the extent that those costs were not recovered on a current basis through the Company’s capped and declining rates over the restructuring Transition Period (August 1, 1999, through July 31, 2003), with such treatment to continue after the end of the Transition Period.²

Pursuant to the Board’s Order dated May 17, 2004, all issues relating to the NGC deferred balance through July 31, 2003 (the end of the restructuring Transition Period) were determined and resolved.³

JCP&L’s 2005 NGC Filing sought 1) review of its NGC deferred balance for the period from August 1, 2003 through December 31, 2005, and 2) approval of an adjustment to the level of its NGC. On November 8, 2006, a stipulation was entered into by and among the parties, and on December 6, 2006, the Board approved the stipulation.⁴ The 2006 NGC Order directed the Company to make an annual informational NGC filing with the Board in the last quarter of each

¹ In re Jersey Central Power & Light Company, d/b/a GPU Energy – Rate Unbundling, Stranded Cost and Restructuring Filings, BPU Docket Nos. EO97070458, EO97070459, and EO97070460, Order dated March 7, 2001 (“Restructuring Order”).

² Restructuring Order at p. 112 ¶ 30.

³ In re the Verified Petition of Jersey Central Power & Light Company for Review and Approval of Its Deferred Balances Relating to the Market Transition Charge and Societal Benefits Charge, BPU Docket No. ER02080507, Order dated May 17, 2004 (“Deferred Balances Order”). The NUG clause was originally designated as the Market Transition Charge and renamed the NGC effective September 1, 2004, to comply with the Board’s Final Order issued in connection with JCP&L’s 2002 Deferred Balances Petition.

⁴ In re the Verified Petition of Jersey Central Power & Light Company (“JCP&L”) for the Review and Approval of an Adjustment of the Non-Utility Generation Charge Clause of Its Filed Tariff (“2005 NGC Filing”), BPU Docket No. ER05121018, Order dated December 6, 2006 (“2006 NGC Order”).

year commencing in 2007, with notice to Rate Counsel, and an opportunity for full discovery and evidentiary hearings.⁵

As directed in the 2006 NGC Order, JCP&L submitted its annual NGC filings between December 21, 2007, and June 26, 2020, with JCP&L's 2019 NGC Filing on the latter date. On December 2, 2020, the Board issued an Order approving a stipulation resolving the 2019 NGC Filing and requiring JCP&L to make its 2020 NGC Filing in January 2021.⁶ Pursuant to the stipulation approved by the December 2020 Order, JCP&L agreed to "file testimony in the 2020 NGC proceeding upon the closing of the Yards Creek Generating Station ("Yards Creek") sale to address the final accounting of the Yards Creek sale and the associated calculation of net proceeds."

Previously, on October 28, 2020, the Board issued an Order approving JCP&L's sale of its interest in Yards Creek to Yards Creek Energy, LLC and applying the net proceeds of the sale against the balance of the Company's deferred storm-related regulatory asset.⁷ By the October 2020 Order, the Board required JCP&L to file, within thirty (30) days of closing, proof of the closing, net transaction costs, and final journal entries along with a detailed calculation, including selling expenses, of the sale.

⁵ 2006 NGC Order at p. 4 ¶ 6.

⁶ In re the Verified Petition of Jersey Central Power & Light Company Constituting Its Annual Filing With Respect to the Non-Utility Generation Charge Clause of Its Filed Tariff ("2019 NGC Filing"), BPU Docket No. ER20060473, Order dated December 2, 2020 ("December 2020 Order").

⁷ In re the Verified Petition of Jersey Central Power & Light Company Seeking (a) Approval of the Sale of Its Ownership Interest in the Yards Creek Generating Station Pursuant to N.J.S.A. 48:3-7, (b) Waiver of the Advertising Requirement of N.J.A.C. 14:1-5.6(b), (c) a Specific Determination Allowing the Yards Creek Generation Station to Be an Eligible Facility Pursuant to Section 32 of the Public Utility Holding Company Act of 1935 Under the Public Utility Holding Company Act of 2005, (d) to the Extent Necessary, a Determination of Compliance With, or the Non-Applicability or Waiver of, the Auction Standards Under the Board's 1998 Order Adopting Auction Standards Under N.J.S.A. 48:3- 59(b), and (e) Other Related Relief, BPU Docket No. EM20050343, Order dated October 28, 2020.

In accordance with the December 2020 Order, on January 29, 2021, JCP&L filed a Verified Petition with the Board, including supporting schedules, thereby commencing this proceeding (“2020 NGC Petition”). By the 2020 NGC Petition, the Company sought review and approval of the deferred amounts included in the Company’s NGC deferred balance, which, among other things, relate to amounts paid by the Company under Board-approved contracts with NUGs, to the extent accumulated from January 1, 2020 through December 31, 2020. By the 2020 NGC Petition, JCP&L proposed to set a new NGC factor at a credit rate of \$0.000114 per kWh [excluding Sales and Use Tax (“SUT”)].⁸

On March 5, 2021, JCP&L’s sale of its interest in Yards Creek to Yards Creek Energy, LLC closed.⁹

On April 27, 2021, JCP&L filed a Supplemental Letter in this proceeding, thereby supplementing the Company’s 2020 NGC Petition with the Direct Testimony of Tracy M. Ashton and associated Schedule TMA-1, which addressed the final accounting of the Yards Creek sale and the associated calculation of the net proceeds resulting from same (“Supplemental Letter”). Schedule TMA-2 stated that the cost to sell Yards Creek was \$1,377,947.99. The Supplemental Letter also updated schedules reflecting certain credits that the Company was proposing to be applied against the Rider NGC deferred balance. Specifically, JCP&L proposed that a monthly credit be applied against the Rider NGC deferred balance to return ratepayer funds used for certain vendor payments that FirstEnergy Corp. disclosed had been improperly classified,

⁸ At the time JCP&L submitted the 2020 NGC Petition, it had not closed on the Yards Creek sale. Consequently, the Company did not then submit direct testimony addressing the final accounting of the Yards Creek sale and the associated calculation of net proceeds.

⁹ On April 5, 2021, JCP&L filed the accounting entries associated with the closing of the Yards Creek transaction in the Yards Creek Proceeding, BPU Docket No. EM20050343, in accordance with the requirements of that proceeding.

misallocated, or otherwise lacked proper supporting documentation, and which had been charged to its affiliated operating companies, including JCP&L ratepayers.

On October 19, 2021, the Parties entered into a stipulation for provisional rates in this proceeding, which the Board subsequently approved and adopted by Order dated October 28, 2021 (“Provisional Rate Stipulation”).¹⁰ In the Provisional Rate Stipulation, the Parties agreed that, during the pendency of this proceeding, an interim credit rate of \$0.000215 per kWh (excluding SUT) would be implemented.

Further, in the Provisional Rate Stipulation, the Parties agreed that “this proceeding [would] remain open and that discovery [would] continue on issues related to [1] the Company’s proposed refund of certain vendor payments through the NGC and [2] the Company’s calculation of the net proceeds of the Yards Creek transaction, including but not limited to the legal fees related to that transaction.”

The first issue, JCP&L’s proposed refund of certain vendor payments through the NGC, was addressed in the JCP&L 2023 Base Rate Filing.¹¹ By Order dated February 14, 2024, the Board approved a stipulation in JCP&L’s 2023 Base Rate Filing wherein JCP&L agreed “to refund to customers \$17,928,462, which represents amounts included in distribution charges that were misclassified, misallocated or lacked proper supporting documentation and certain other non-recoverable and/or non-operating costs, as estimated through February 29, 2024” that the Company would “be permitted to amortize and apply the \$17,928,462 regulatory liability to

¹⁰ In re the Verified Petition of Jersey Central Power & Light Company Constituting its Annual Filing With Respect to the Non-Utility Generation Charge Clause of its Filed Tariff, BPU Docket No. ER21010083, Order dated October 28, 2021. (“2020 NGC Filing”).

¹¹ In re 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), BPU Docket No. ER23030144, Order dated February 14, 2024. (“JCP&L 2023 Base Rate Filing”).

income,” with “[t]he balance of the regulatory liability [being] amortized beginning February 15, 2024 through June 1, 2024 to offset the base rate increase that otherwise would have occurred in that period”; and that “[a]ny amounts over- or under-refunded [would] be placed in a regulatory asset for future refund or recovery, whichever the case may be.”¹² While the signatory parties to that stipulation agreed that it was appropriate to refund the \$17,928,462, the signatory parties reserved their rights to challenge the amount and/or seek additional amounts for refund in a future base rate case or other appropriate proceedings.

With respect to the second issue identified in the Provisional Rate Stipulation, per the accounting entries submitted as Exhibit 5 to JCP&L’s closing documents filed on April 5, 2021 in the Yards Creek Proceeding, the net proceeds of the Yards Creek transaction were \$108,938,455, with the cost to sell being \$1,377,948. In this proceeding, JCP&L provided Staff and Rate Counsel with a detailed itemization of the \$1,377,948 cost to sell, which included outside legal costs of \$1,147,605.38 (inclusive of legal accruals of \$44,706).

¹² Ibid.

Upon review of the 2020 NGC Petition, all supplements thereto, and all discovery exchanged in this proceeding, the Parties stipulate and agree as follows.

Stipulation

1. The Parties agree that the credit rate of \$0.000215 per kWh (excluding SUT) shall remain in effect.

2. The Parties agree that JCP&L's proposed refund of certain vendor payments through the NGC is moot for purposes of this proceeding.

3. The Parties agree that the net proceeds of the Yards Creek transaction were \$109,395,532, with the cost to sell being \$920,871. For context, a detailed itemization of JCP&L's originally stated cost to sell of \$1,377,948 was provided in this proceeding, which included outside legal costs of \$1,147,605.38 (inclusive of legal accruals of \$44,706). The legal bills were examined by the Parties and the Parties agreed to reduce the amount of outside legal costs by \$457,077—resulting in a corresponding reduction in the originally stated cost to sell of \$1,377,948 to \$920,871—with this amount being applied to the under recovered deferred storm-related regulatory asset balance as originally authorized in the Yards Creek Proceeding, BPU Docket No. EM20050343.

4. The Parties further agree that the interest rate applied to the NGC deferred balance will be set to an interest rate equal to the rate on seven (7)-year constant maturity Treasuries, as shown in the Federal Reserve Statistical Release on or closest to January 1 of each year, plus sixty (60) basis points, ("Carrying Cost Rate"), until changed by a future Board Order. The Parties agree that the Carrying Cost Rate is currently 4.55%. The annual compounding date remains January 1st of each year.

Conclusion

5. The Parties agree that this Stipulation contains mutual balancing and interdependent clauses and is intended to be accepted and approved in its entirety. In the event any particular provision of this Stipulation is not accepted and approved in its entirety by the Board, or is modified by a court of competent jurisdiction, then any Party aggrieved thereby shall not be bound to proceed with this Stipulation and shall have the right, upon written notice to be provided to all other Parties within ten (10) days after receipt of any such adverse decision, to litigate all issues addressed herein to a conclusion. More particularly, in the event this Stipulation is not adopted in its entirety by the Board in an appropriate Order, or is modified by a court of competent jurisdiction, then any Party hereto is free, upon the timely provision of such written notice, to pursue its then available legal remedies with respect to all issues addressed in this Stipulation, as though this Stipulation had not been signed. The Parties agree that this Stipulation shall be binding on them for all purposes herein.

6. It is specifically understood and agreed that this Stipulation represents a negotiated agreement and, except as otherwise expressly provided for herein:

a. By executing this Stipulation, no Party waives any rights it possesses under any prior Stipulation, except where the terms of this Stipulation supersede such prior Stipulation.

b. The contents of this Stipulation shall not in any way be considered, cited or used by any of the undersigned Parties as an indication of any Party's position on any related or other issue litigated in any other proceeding or forum, except to enforce the terms of this Stipulation.

7. This Stipulation may be executed in any number of counterparts, each of which shall be considered one and the same agreement and shall become effective when one or more counterparts have been signed by each of the Parties.

WHEREFORE, the Parties hereto have duly executed and do respectfully submit this Stipulation to the Board and recommend that the Board issue a Final Decision and Order adopting and approving this Stipulation in its entirety in accordance with the terms hereof.

**JERSEY CENTRAL POWER & LIGHT COMPANY
PETITIONER**

By: Michael J. Martelo
MICHAEL J. MARTELO, ESQ.
COUNSEL

Dated: August 19, 2024

**BRIAN O. LIPMAN, DIRECTOR
NEW JERSEY DIVISION OF RATE COUNSEL**

By: T. David Wand
T. DAVID WAND, ESQ.
DEPUTY RATE COUNSEL

Dated: August 19, 2024

**MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
Attorney for the Staff of the Board of Public Utilities**

By: Steven Chaplar
STEVEN CHAPLAR, ESQ.
DEPUTY ATTORNEY GENERAL

Dated: August 19, 2024