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May 12, 2017

VIA ELECTRONIC MAIL

Irene Asbury, Secretary
Board of Public Utilities
44 South Clinton Ave (9th Floor)
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Trenton, NJ 08625-0350
board.secretary@bpu.state.nj.us

Re: Comments of Jersey Central Power & Light Company on a Straw Proposal Regarding Potential Regulations and Filing Requirements for Implementation of Provisional Base Rates During the Pendency of a Rate Case Matter, Issued by the Staff of the New Jersey Board of Public Utilities

Dear Secretary Asbury:

On April 26, 2017, the Board of Public Utilities (“BPU”) Staff issued a straw proposal regarding potential regulations and filing requirements for implementation of provisional base rates during the pendency of a rate case matter (“Straw Proposal”). On May 4, 2017, BPU Staff held a stakeholder meeting regarding the Straw Proposal to take public comments. BPU Staff also invited interested stakeholders to submit written comments by May 12, 2017.

Please accept these comments submitted by Jersey Central Power & Light, a FirstEnergy Company (“JCP&L” or “Company”), regarding the above-referenced matter.

I. COMMENTS

While the statutory provisions of *N.J.S.A.* 48:2-21 have been available to the utilities for some time, the Company is pleased that the BPU and BPU Staff are endeavoring to bring additional structure and clarity to the implementation of these provisions to benefit the rate-making process in New Jersey. JCP&L believes that the proposed rule will encourage greater efficiency in the processing of utility base rate cases.

JCP&L notes that the New Jersey statutory provisions for provisional rates are not unlike those in other jurisdictions in which it has distribution operations. The 8-month suspension period in New Jersey is reasonable when compared to the neighboring states of Pennsylvania and Maryland, which are 7 months and 180 days respectively.

JCP&L stands with New Jersey Utilities Association (“NJUA”) and echoes the comments submitted on behalf of its members, including JCP&L.

II. Conclusion

JCP&L appreciates the opportunity to participate in this process to provide additional clarity and certainty regarding the authority provided to utilities under this statute.

Respectfully submitted,

Dated: May 12, 2017



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