

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

In the Matter of the Verified Petition of Jersey Central Power & Light Company for Approval of an Electric Vehicle Program and an Associated Cost Recovery Mechanism	:	BPU Docket No.
	:	VERIFIED PETITION
	:	

TO THE HONORABLE BOARD OF PUBLIC UTILITIES:

Petitioner, Jersey Central Power & Light Company (the "Petitioner", the "Company" or "JCP&L"), an electric public utility company of the State of New Jersey subject to the regulatory jurisdiction of the Board of Public Utilities (the "Board"), and maintaining offices at 101 Crawford Corner Rd. Building #1, Suite 1-511, Holmdel, New Jersey 07733 and at 300 Madison Avenue, Morristown, New Jersey 07962-1911, in support of its above-captioned Verified Petition, respectfully shows:

1. JCP&L is a New Jersey electric public utility primarily engaged in the purchase, transmission, distribution, and sale of electric energy and related utility services to more than 1,000,000 residential, commercial and industrial customers located within 13 counties and 236 municipalities of the State of New Jersey.

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

**Gregory Eisenstark, Esq.
Cozen O'Connor, P.C.
One Gateway Center
Suite 910
Newark, New Jersey 07102**

- and -

**Mark A. Mader
Jersey Central Power & Light Company
300 Madison Avenue
Morristown, New Jersey 07962-1911**

- and -

**Lauren Lepkoski, Esq.
FirstEnergy Corp.
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001**

INTRODUCTION

3. JCP&L is filing this petition in compliance with the Board's September 23, 2020 Decision and Order in BPU Docket No. QO20050357 ("EV Filing Order"). Through this petition and supporting prefiled testimony, the Company is proposing a JCP&L Electric Vehicle ("EV") Program (called the "JCP&L EV Driven Program" or "Program"). Under the Program, the Company proposes to offer incentives and rate structures that will support and encourage the development of EV charging infrastructure throughout the Company's service territory, thereby accelerating the adoption of EVs and providing benefits for JCP&L's residential, commercial and industrial customers.

4. JCP&L's EV Driven program consists of six Sub-programs, including a consumer education and outreach initiative. The six Sub-programs, which are described in detail in this petition and the Company's prefiled testimony, will incentivize EVs throughout

the JCP&L service territory. The Program will consequently support the attainment of the State's goals for EV deployment and the reduction of greenhouse gas ("GHG") emissions.

5. The Company is also proposing a cost recovery mechanism under which it will receive full and timely recovery of the EV Driven Program costs. The proposed cost recovery mechanism is an integral part of the Company's proposal.

JCP&L EV DRIVEN PROGRAM

6. JCP&L's EV Driven Program will begin on January 1, 2022 and continue over a four-year period, ending December 31, 2025. The total proposed budget is \$49.92 million, of which \$16.24 million is capital expenditures and \$33.68 million is for operations and maintenance expenses.

7. The EV Driven Program will have six Sub-programs, including a consumer education and outreach initiative: (1) Residential Customer Sub-program; (2) Mixed-Use Commercial Sub-program (with three components); (3) DC Fast Charger ("DCFC") Public Charging Sub-program ; (4) Last Resort DCFC Charging Sub-program; (5) Overburdened Communities Sub-program; and (6) Consumer Education and Outreach initiative. The following chart provides an overview of each of the Sub-programs:

Program Component	Description	Budget (\$K)
Residential Customer Sub-program		
Customer Make-Ready Incentive	Incentive of \$1,000 on up to 2,000 qualified smart L2 charger installations in customer residences	\$2,000
Utility Make-Ready Work	Utility work for approximately 10% of above residences at \$5,500 each	\$1,100
Off-Bill/Off-Peak Credit	Off-Peak, Off Bill Rewards Incentive available to up to 2,000 EV owners that have an approved L2 Smart Charger	\$1,107
Mixed-Use Commercial Customer Sub-program		
Public/Community-based Component	Incentive of up to \$6,700 on up to 500 qualified smart L2 charger ports	\$3,350
Workplace Component	Incentive of up to \$6,700 on up to 100 qualified smart L2 charger ports	\$670
Multi-Family Component	Incentive of up to \$6,700 on up to 300 qualified smart L2 charger ports	\$2,010
Utility Make-Ready Work	Utility work at approximately 225 charger locations at \$11,100 each (assumes 4 charging ports/location)	\$2,497
Rate design - Multi-family component	Off-Peak, Off Bill Rewards Incentive available to up to 2,000 EV owners that have an approved L2 Smart Charger	\$899
DCFC Public Charging Sub-program		
Customer Make-Ready Incentive	Incentive of up to \$25,000 on up to 200 qualified DCFC public charger ports	\$5,000
Utility Make-Ready Work	Utility work at approximately 100 charger locations at \$50,500 each (assumes 2 charging ports/location)	\$5,050
Demand Charge Credit	Reduced demand charges - 50% in 2022 & 2023; 25% in 2024; 0% 2025	\$1,169
Last Resort DCFC Sub-program		
JCP&L Own & Operate DCFC	20 DCFC charging ports at locations deemed as last resort with no interest from 3rd parties beginning in year 2024	\$4,225
Overburdened Communities Sub-program		
Grants to Qualifying Organizations	Community organizations/nonprofits apply for grants to advance EV adoption, EV charging infrastructure, education	\$2,500
Program Implementation Costs		
Implementation Costs	Data Collection/Networking, IT Systems, Administrative, Consumer Education and Outreach	\$18,347
	O&M PROGRAM COST	\$33,682
	CAPITAL PROGRAM COST	\$16,242
	TOTAL PROGRAM COST	\$49,924

Residential Customer Sub-program

8. Under this Sub-program, JCP&L will provide incentives for Make-Ready work for the installation of Level Two networked chargers (“Level Two” or “L2 Charger”) at residential customers’ residences. The Company will also provide certain credits for customers that use the EV chargers during off-peak hours.

9. JCP&L will provide a \$1,000 incentive payment to a customer who installs a qualified L2 charger. This Sub-program will be available to 2,000 customers on a first-come, first-qualify basis. The \$1,000 incentive is for Customer Make-Ready¹ work.

10. In addition, JCP&L will provide an incentive of up to \$5,500 for 200 residential installations that require Utility Make-Ready Work.² This work includes items such as a new overhead or underground service wire, a new transformer or a new pole. Based on the Company’s experience, it is estimated that approximately 10% of the residential EV installations will require Utility Make-Ready Work. Therefore, JCP&L is proposing to provide an incentive to 10% of the 2,000 total eligible installations, or 200 qualifying EV chargers.

11. The requirements for each location will be site-specific. Therefore, for this aspect of the program, the incentive will vary based on the documented work at each installation, up to \$5,500 per qualifying installation.

¹ “Customer Make-Ready” means activities and facilities from the meter to the charger stub, and includes the pre-wiring of electrical infrastructure at a parking space, or set of parking spaces, to facilitate easy and cost-efficient future installation of Electric Vehicle Service Equipment (“EVSE”), including, but not limited to, Level Two EVSE and DC Fast Chargers. Making a site Charger-Ready includes expenses related to service panels, junction boxes, conduit, wiring, etc., necessary to make a particular location able to accommodate EVSE on a “plug and play” basis. “Make-Ready” is synonymous with the term “Charger-Ready” as these terms are used in and defined in the EV Filing Order. *See* EV Filing Order, at p. 16.

² “Utility Make-Ready Work” means activities and facilities needed to upgrade an electric service or JCP&L distribution facilities on the Company’s side of the meter to accommodate EV service equipment, such as service upgrades from the pole to meter or distribution system upgrades.

12. JCP&L witness Randall A. Frame provides additional details about this Sub-program in his prefiled testimony, Exhibit JC-2.

13. The Company will also provide a rate credit for participants in the Residential Customer Sub-program. This will be an off-bill credit based on the customer's off-peak EV charger usage. JCP&L witness Kevin M. Siedt provides additional details about this rate credit in his prefiled testimony, Exhibit JC-3.

14. The Residential Customer Sub-program will provide significant benefits to customers, the State and JCP&L. This Sub-program will incentivize EV adoption and help New Jersey meet its clean energy goals. It will provide financial incentives to customers to adopt EVs. From the Company's perspective, the data it receives as part of this Sub-program will be useful in the development of future rate structures to further incentivize EVs in New Jersey.

Mixed-Use Commercial Customer Sub-program

15. The Mixed-Use Commercial Customer Sub-program is comprised of three parts: (1) Public/Community-based component; (2) Workplace component; and (3) Multi-Family component.

16. In addition to the specific elements outlined below, all three components of this Sub-program include an incentive Utility Make-Ready Work. JCP&L has assumed that a new service will be required for every location where one or multiple L2 charging ports are installed. For Program purposes, JCP&L's assumption is that there will be an average of 4 charging ports at each location, so Utility Make-Ready Work will be required at 225 locations. The requirements for each location will be site specific; however, JCP&L has assumed for program development that the work will include new single-phase underground primary cable, a pad mounted transformer, and a new pole. The cost of the new service is estimated at \$11,100

per location. For eligible participants, the actual incentive will be based on the documented work at each installation, up to \$11,100 per qualifying installation.

i. Public/community based Component

17. JCP&L will provide incentives of up to \$6,700 each to 500 publicly-accessible L2 charging ports. There will be a minimum of 2 and a maximum of 10 charging ports per site. Similar to the Residential Sub-program, this incentive is for Customer Make-Ready Work. The incentive payment will be available for up to 300 charging ports on a first-come, first-qualify basis.

18. This Program component is fully-consistent with the goals of the EV Order and will have several benefits. It will provide an appropriate level of incentives to participants and thereby help further the State's goals for EV infrastructure and clean energy. In addition, one of the main points of emphasis in both the PIV Act and the EV Filing Order is to incentivize public charging stations. This Program component will help the State achieve that goal.

ii. Workplace Component

19. This aspect of the Commercial Mixed-Use Sub-program will work just like the public/community based charger component. The only difference is that the EV charging ports will be located at workplaces.

20. JCP&L will provide a \$6,700 incentive to qualifying participants for 100 L2 EV charging ports. There will be a minimum of 2 and a maximum of 10 charging ports per site.

21. This Program component is fully consistent with the goals of the EV Order and will provide significant benefits. It will provide an appropriate level of incentives to

participants and thereby help further the State's goals for EV infrastructure and clean energy. In addition, increasing the number of EV charging ports at the workplace will help to alleviate range anxiety associated with EVs. If employees know they can charge their vehicle while at work, that will reduce the fear that the vehicle will not have enough charge left to complete the commute home at the end of the work day.

iii. Multi-family Component

22. This component of the Commercial Mixed Use Sub-program will work just like the public/community based charger component. The only difference is that the EV charging ports will be located at multi-family dwellings.

23. JCP&L will provide a \$6,700 incentive to qualifying participants for 300 L2 EV charging ports. There will be a limit of 10 ports per site, and a minimum of 2 ports per site. In addition, 50% of this Sub-program will be reserved for multifamily dwellings in overburdened/low-income communities.

24. JCP&L is proposing a rate design specific to this component. Participants will be billed at a rate equivalent to the residential tariff rate for the EV charger portion of their electric use, instead of the commercial tariff rate that would otherwise apply. In addition, participants in the Multi-family component will also be eligible to receive the off-bill/off-peak rate credit based on the customer's EV charger usage. JCP&L witness Mr. Siedt discusses this proposal in his prefiled testimony.

25. JCP&L witness Mr. Frame provides additional details on all three components of the Mixed-Use Commercial Sub-program. See Exhibit JC-2.

Direct Current Fast Charging (“DCFC”) Public Charging Sub-program

26. Under this Sub-program, JCP&L will provide incentives of up to \$25,000 each for 200 DCFC public charging ports. The incentive is intended to cover the Customer Make-Ready costs up to the charger stub. There will be a limit of 4 ports per site under this Sub-program.

27. Based in its understanding of the industry and its distribution system, JCP&L estimates that a typical charge for Customer Make-Ready work up to the charger stub for a DCFC charging port would be approximately \$25,000. Eligible participants will be required to submit invoices or other documentation of actual costs. JCP&L will provide an incentive equal to the documented, qualifying costs, up to \$25,000 per port.

28. This Sub-program will also provide an incentive for Utility Make-Ready Work. JCP&L has assumed a new service will be required for every location where one or multiple DCFC ports are installed. The Company’s assumption is that there will be an average of 2 charging ports at each location, so Utility Make-Ready Work will be required at 100 locations. The requirements for each location will be site specific, but JCP&L has assumed for program development that a new three-phase underground primary cable, a 750 kVA pad mounted transformer (277/480V), metering CT's/PT's, and a new pole will be required. JCP&L estimates that the cost of the new service will be \$50,500 per location. Therefore, for this Sub-program, the incentive will vary based on the documented work at each installation, up to \$50,500 per qualifying installation.

29. There will also be a demand charge discount provided to participants in the DCFC Public Charging Sub-program. JCP&L witness Mr. Siedt discusses this proposal in his prefiled testimony, Exhibit JC-3.

30. The DCFC Sub-program will offer a number of benefits. It will provide an appropriate level of incentives to participants and thereby help further the State's goals for EV infrastructure and clean energy. In particular, this Sub-program is consistent with the PIV Act, P.L. 2019, c.362; N.J.S.A. 48:25-1 *et seq.*, which calls for the deployment of at least 400 DCFCs for public use by 2025.

31. JCP&L witness Mr. Frame provides additional details about the DCFC Sub-program in his prefiled testimony, Exhibit JC-2.

DCFC Last Resort Sub-program

32. The Company is also proposing a "last resort" Sub-program, which is consistent with the EV Filing Order. The EV Filing Order states: "Areas of Last Resort are locations that have not generated private investment interest for a minimum of 12 months after the EDC program has begun, for overburdened communities, or 18 months for other areas." EV Order, p. 21.

33. Under this Sub-program, if the private marketplace does not install a sufficient number of DCFC charging ports within two years after the Program begins, JCP&L will install, own and operate approximately 20 DCFC charging ports at appropriate locations within its service territory. Consistent with the EV Order, JCP&L will seek the Board's approval prior to commencing work on any DCFC Last Resort EV charging stations.

34. JCP&L witness Mr. Frame provides additional information about this Sub-program in his prefiled testimony, Exhibit JC-2.

Overburdened Communities Sub-program

35. Under this Sub-program, JCP&L will provide grants for innovative, EV-related pilot projects proposed by market participants and to be located in overburdened communities.

36. Community organizations and nonprofits can apply for grants to advance EV adoption, EV charging infrastructure and/or education. Examples may include EVs with charging infrastructure, electric cargo vans for meal delivery, EVs for ride share programs, and very targeted education and outreach programs to create awareness of EV ownership in underserved areas. However, JCP&L will leave it to the market participants to develop unique pilot projects that will help deploy EV infrastructure in overburdened communities.

37. The Company will receive grant applications, review them, and then decide on which applicants will receive the grants.

38. The proposed budget for the Overburdened Communities Sub-program is \$2.5 million. Mr. Frame provides additional details about this Sub-program in his prefiled testimony, Exhibit JC-2.

Consumer Education and Outreach Initiative

39. JCP&L will implement a consumer education and outreach initiative as part of its JCP&L EV Driven Program. The goals of this initiative are to inform and educate customers and market participants about the JCP&L EV Driven Program and EV benefits in general. More specifically, this initiative will:

- Increase public awareness of the JCP&L EV Driven Program;
- Increase awareness of EVs and EV charging infrastructure;
- Encourage interest in EVs through benefits of driving electric;

- Drive consideration of EVs through knowledge of EVs and charging infrastructure;
- Enhance intent through residential make-ready incentives;
- Inform evaluation through web portal and other means; and
- Encourage purchase of electric vehicles through co-promotion of incentives for residential and public charging.

40. JCP&L witness Mr. Frame's prefiled testimony provides additional details about the consumer education and outreach initiative.

PROGRAM IMPLEMENTATION

41. In conjunction with its consumer education and outreach efforts, the Company will develop appropriate applications for each of the Sub-programs within the overall JCP&L EV Driven Program. These applications will be publicly available on the Company's website. JCP&L will also have a dedicated email address and inbox for inquiries about the JCP&L EV Driven Program, through which customers and potential participants can ask questions and request additional information.

42. The Company will begin accepting applications on January 1, 2022. JCP&L will establish Terms and Conditions that govern the specific aspects of each part of the JCP&L EV Driven Program. The Terms and Conditions will be posted to the Company's website and each aspect of the program will be supported by a customer website landing page explaining the program, providing a way to enroll in the program via the landing page and a set of frequently asked questions ("FAQs"). The Company will implement the Program through a combination of Company employees, contractors and vendors including the use of third-party

call centers. Payment of all Incentives will require that customers and site hosts comply with all pertinent Terms and Conditions demonstrating that make-ready work has been completed.

43. JCP&L is in the process of mapping its distribution system for the purpose of identifying areas where EV infrastructure buildout would be suitable under the Program. These maps will be posted to the Company's website within 90 days of a final BPU Order. JCP&L will update these maps on a regular basis (at least annually), and make them available to the public in a timely manner to provide reasonably current maps showing options for EV charging in JCP&L's territory. The Company-prepared maps will be posted for information only and will not be used by the Company in responding to service requests. The Company further agrees that it will comply with any regulations promulgated by the Board regarding mapping EV sites and capacity.

44. JCP&L witness Mr. Frame provides additional details of the Program implementation plans in his prefiled testimony, Exhibit JC-2.

BENEFITS OF THE EV DRIVEN PROGRAM

45. The JCP&L EV Driven Program will have benefits for customers, EV market participants and the State of New Jersey. The Program is designed to help New Jersey reach its goals for EV infrastructure development and EV adoption. These goals were codified in New Jersey's Plug-In Vehicle Act ("PIV Act")³, signed by Governor Murphy in January 2020, which includes, *inter alia*:

- At least 330,000 light-duty, plug-in EVs shall be registered in New Jersey by December 31, 2025;
- At least 400 DC Fast Chargers shall be available for public use at no fewer than 200 charging locations in the State by December 31, 2025;
 - At least 75 of the 200 or more charging locations shall be at travel corridor locations, equipped with at least two DC Fast Chargers per location, each

³ P.L. 2019, c.362; N.J.S.A. 48:25-1 *et seq.*

capable of providing at least 150 kilowatts of charging power, and no more than 25 miles between the charging locations; and

- At least 100 of the 200 or more charging locations shall be community locations, equipped with at least two DC Fast Chargers per location, each capable of providing 50 kilowatts of charging power or more, and 150 kilowatts or more where feasible.
- At least 1,000 Level Two chargers shall be available for public use across the state by December 31, 2025; and
- At least 15% of all multi-family residential properties in the state shall be equipped with Electric Vehicle Service Equipment (“EVSE”) for routine charging of EVs by December 31, 2025.

46. Each of the Sub-programs described above, and in the Company’s prefiled testimony, is designed to help the State achieve these goals. More broadly, the Program will provide significant incentives to EV infrastructure developers, which will jump-start the installation of EV chargers throughout the JCP&L service territory. On the customer side, the Program will provide incentives for both in-home and “on the go” EV chargers, which should alleviate consumer concerns about charger availability and range anxiety. For multi-family properties, the Program will offer both incentives and new rate design to encourage EV adoption. In addition, JCP&L will receive data from all the EV chargers installed under the Program. This data will allow the Company to evaluate new rate structures in the future to better serve the needs of customers with EV chargers.

COST RECOVERY MECHANISM

47. JCP&L is proposing to recover Program costs via a rate clause called “Rider EV.” Rider EV will be a non-bypassable rate clause applicable to all distribution customer rate classes. Rider EV will become effective for service rendered on and after January 1, 2022, which is the proposed Program start date.

48. The initial Rider EV rates will be established based on the Company’s estimated revenue requirement for the first year of the Program. Thereafter, JCP&L will charge

actual Program costs to the rate clause. Incremental distribution revenues attributable to the Program will be credited to the rate clause. The Company will make annual filings with the Board to true-up the Rider EV based on actual costs and the reset the Rider EV rates for the next year.

49. The Rider EV will remain in place during the life of the JCP&L EV Driven Program and thereafter until the conclusion of the Program and further until all Program costs have been rolled into JCP&L's base rates. Should the Board approve an extension of the JCP&L EV Driven Program, Rider EV shall remain in place for cost recovery purposes.

50. Full and timely recovery of the Program costs are an integral part of the Company's proposal. Rate clause recovery is particularly appropriate where, as here, the costs stem from a State-mandated program under which a utility will incur significant costs from initiatives that are outside its normal operations.

51. JCP&L witness Mr. Siedt provides a detailed explanation of the proposed rate mechanism and associated issues, along with proposed tariff pages, in his prefiled testimony, Exhibit JC-3.

SUMMARY OF CUSTOMER BILL IMPACTS

52. Based upon JCP&L's current base rates, the implementation of the initial Rider EV rates proposed herein would result in an overall increase in JCP&L's revenues of approximately \$2,852,566 annually in the first Program Year, or approximately 0.1%. A typical residential customer using 783 kWh per month currently pays \$107.87 per month for electricity, on average. The implementation of the initial Rider EV rate would increase that typical residential monthly bill by \$0.14, or 0.1%, resulting in an average monthly payment of \$108.01.

PREFILED TESTIMONY, SCHEDULES AND EXHIBITS

53. Attached hereto and made a part of this Verified Petition are the following prefiled testimony, schedules and exhibits thereto:

<u>Witness</u>	<u>Exhibit No.</u>	<u>Topics</u>
Randall A. Frame	JC-2	Description of the Proposed EV Driven Program Components, Budgets and Benefits
Kevin M. Siedt	JC-3	Proposed Cost Recovery Mechanism, Rate Design, Rate Credits, Customer Bill Impacts, and Rate-Related Filing Requirements.

PUBLIC NOTICE AND SERVICE OF FILING

54. Notice of this EV Driven Program filing, including a statement of the overall effect thereof on customers of the Company, which will be combined with notice of the dates, times and places of the public hearings to be scheduled thereon, will be served by mail upon the municipal clerks, the clerks of the Boards of County Commissioners and, where appropriate, the County Executive Officers of all counties and municipalities located in the Company's service territory, in accordance with the regulations of the Board as set forth in N.J.A.C. 14:1-5.12(b)1. Such notice will be duly mailed following the scheduling of the dates, times and places of the hearings thereon, as discussed below. Listings of the aforementioned public officials are contained in Appendices A-1, A-2 and A-3 which are annexed hereto. Such notice will be substantially in the form of the notice annexed hereto as Appendix A.

55. Public notice of the JCP&L EV Driven Program filing, including a statement of the overall effect thereof on customers of the Company, and which will be combined with notice of the dates, times and places of the public hearings to be scheduled thereon, substantially in the form of the notice set forth in Appendix A annexed hereto, will also

be published in daily and weekly newspapers published and/or circulated in the Company's service areas, after the dates, times and places of all such public hearings thereon have been scheduled by the Board or by the Office of Administrative Law, in compliance with N.J.A.C. 14:1-5.12(b)3, (c) and (d).

SERVICE OF PETITION

56. Copies of this Verified Petition and supporting testimony, schedules and exhibits thereto have been or will be duly served at the time of the filing hereof upon the Department of Law and Public Safety, Richard J. Hughes Justice Complex, P.O. Box 080, Trenton, N.J. 08625-0080, and upon the Director, Division of Rate Counsel, 140 East Front Street, 4th Floor, P.O. Box 003, Trenton, N.J. 08625-0003, in compliance with N.J.A.C. 14:1-5.12(b)2.

CONCLUSION

WHEREFORE, the Petitioner, Jersey Central Power & Light Company, respectfully requests that the Board issue a final decision and order:

- (1) approving the JCP&L EV Driven Program as set forth in this filing, with a program start date of January 1, 2022;
- (2) approving JCP&L's proposed cost recovery mechanism, including Rider EV, as set forth in this filing;
- (3) approving and accepting the attached proposed tariff sheets for inclusion in JCP&L's Tariff For Service, BPU No. 14 – ELECTRIC, effective for service rendered on and after January 1, 2022; and

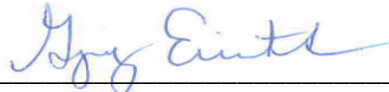
- (4) granting such other and further relief as the Board shall deem just, lawful and proper.

Respectfully submitted,

COZEN O'CONNOR, P.C.
Attorneys for Petitioner,
Jersey Central Power & Light Company

Dated: March 1, 2021

By:



Gregory Eisenstark

One Gateway Center
Suite 910
Newark, NJ 07102
(973) 200-7411

AFFIDAVIT
OF
VERIFICATION

Kevin M. Siedt, being duly sworn upon his oath, deposes and says:

1. I am a Consultant for First Energy Service Company, and I am duly authorized to make this Affidavit of Verification on behalf of Jersey Central Power & Light Company ("JCP&L"), the Petitioner named in the foregoing Verified Petition.

2. I have read the contents of the foregoing Verified Petition by JCP&L for approval of an EV Driven Program and an associated cost recovery mechanism, and I hereby verify that the statements of fact and other information contained therein are true and correct to the best of my knowledge, information and belief.

Kevin M. Siedt

[name]

Sworn to and subscribed before me
this 26th day of Feb., 2021.

[Signature]

~~(Notary Public)~~

Attorney - At - Law of
the State of New Jersey

PUBLIC NOTICE

JERSEY CENTRAL POWER & LIGHT COMPANY

**NOTICE OF ELECTRIC VEHICLE PROGRAM FILING, PROPOSED COST
RECOVERY MECHANISM, AND PROPOSED RATE INCREASES AND OTHER
ADJUSTMENTS WITH RESPECT TO JCP&L'S TARIFF RATES AND
CHARGES FOR ELECTRIC SERVICE**

AND

NOTICE OF PUBLIC HEARINGS THEREON

TO OUR CUSTOMERS:

On February 26, 2021, Jersey Central Power & Light Company ("JCP&L" or the "Company"), filed a Verified Petition with the New Jersey Board of Public Utilities (the "Board"), under BPU Docket No. _____, together with supporting appendices, testimony, exhibits and schedules and revised Tariff sheets.

The Verified Petition seeks the Board's approval of a JCP&L Electric Vehicle ("EV") Program (called the "JCP&L EV Driven Program" or "Program"). Under the Program, the Company proposes to offer incentives and rate structures that will support and encourage the development of EV charging infrastructure throughout the Company's service territory, thereby accelerating the adoption of EVs and providing benefits for JCP&L's residential, commercial and industrial customers. The

Verified Petition also seeks approval of a new tariff provision, a rate clause referred to as “Rider EV.” Rider EV will be a non-bypassable rate clause applicable to all distribution customer rate classes. Rider EV will become effective for service rendered on and after January 1, 2022, which is the proposed Program start date.

The Verified Petition also proposes other changes to the Company’s Tariff associated with the EV Driven Program. The filing, if approved, will result in overall increases in and/or other adjustments to JCP&L's various Tariff rates and charges for electric service. The Verified Petition seeks approval of all such proposed Tariff charges and revisions, which are proposed to become effective for service rendered on and after January 1, 2022, or at such other date as the Board may determine.

Based on the Verified Petition, the proposed new rates would yield an overall net operating revenue increase of approximately \$2.85 million, representing an overall revenue increase of about 0.1% as compared to the same current annualized Tariff rates and revenues. The annual percentage increase applicable to specific customers will vary according to the applicable rate schedule and the level of the customer’s usage.

Copies of the Verified Petitions and all related documents are available for inspection at the Company’s regional headquarters at 101 Crawfords Corner Rd. Building #1, Suite 1-511, Holmdel, New Jersey 07733 and at 300 Madison Avenue, Morristown, New Jersey 07962-1911, at each of the Company's local business offices, and at the Board of Public Utilities, 44 South Clinton Avenue, 9th Floor, P.O. Box 350, Trenton, New Jersey 08625. A copy of the filing will also be posted on the Company’s website at:

https://www.firstenergycorp.com/jersey_central_power_light/regulatory.html

The following comparisons of present and proposed rates will permit customers to determine the approximate net effect upon them of the proposed increases and adjustments in rates. Any assistance required by customers in this regard will be furnished by the Company upon request. Please note that the Board in its discretion may apply all or any portion of whatever rate increases the Board may ultimately allow to other rate schedules or in a different manner than what JCP&L has proposed in its filings. Accordingly, the final rates and charges to be determined by the Board in this proceeding may be different than what JCP&L has described herein.

Summary of Customer Impacts

	Residential Average Bill (Includes 6.625% Sales and Use Tax)		
	Current Monthly <u>Bill (1)</u>	Proposed Monthly <u>Bill (2)</u>	Proposed Monthly <u>Increase</u>
<u>Residential (RS)</u>			
500 kWh average monthly usage	\$66.69	\$66.78	\$0.09
1000 kWh average monthly usage	\$137.78	\$137.97	\$0.19
1500 kWh average monthly usage	\$210.68	\$210.96	\$0.28
 <u>Residential Time of Day (RT)</u>			
500 kWh average monthly usage	\$68.96	\$69.04	\$0.08
1000 kWh average monthly usage	\$132.72	\$132.89	\$0.17
1500 kWh average monthly usage	\$196.48	\$196.74	\$0.26
	Overall Class Average Per Customer (Includes 6.625% Sales and Use Tax)		
	Current Monthly <u>Bill (1)</u>	Proposed Monthly <u>Bill (2)</u>	Proposed <u>% Increase</u>
<u>Rate Class</u>			
Residential (RS)	\$107.82	\$107.96	0.1%
Residential Time of Day (RT)	\$139.27	\$139.46	0.1%
General Service – Secondary (GS)	\$579.41	\$580.11	0.1%
General Service - Secondary Time of Day (GST)	\$29,358.70	\$29,392.14	0.1%
General Service – Primary (GP)	\$35,414.62	\$35,449.00	0.1%
General Service – Transmission (GT)	\$95,481.82	\$95,540.01	0.1%
Lighting (Average Per Fixture)	\$10.45	\$10.48	0.3%

(1) Rates effective 1/1/2021

(2) Proposed rates effective 1/1/2022

The Company has also proposed other Tariff revisions and related charges, some of which would apply to all customers and others that would apply only to those customers whose requests or actions give rise to the related costs. Descriptions of all such proposed Tariff revisions are included in Exhibit JC-3 and its associated schedules.

Notice of these filings together with a statement of the effect thereof on customers are being served upon the clerk, executive or administrator of each municipality and county within the Company's service areas. Such notice has also been served, together with the Verified Petitions, Tariffs, rate schedules and all other exhibits, upon the Director of the Division of Rate Counsel, who will represent the interests of ratepayers in these proceedings.

PLEASE TAKE NOTICE that the New Jersey Board of Public Utilities has scheduled public hearings on the Verified Petition under BPU Docket No. _____ at the following times and places:

Members of the public will have an opportunity to be heard and/or to submit written comments or statements at each or any of the public hearings if they wish to do so. Such written comments or statements may also be submitted directly the Secretary, Board of Public Utilities, 44 South Clinton St., 9th Floor, PO Box 350, Trenton, NJ 08625.

Dated: _____, 2021

JERSEY CENTRAL POWER & LIGHT COMPANY

**Clerk, Township of Aberdeen
1 Aberdeen Square
Aberdeen, NJ 07747**

**Clerk, Township of Alexandria
242 Little York-Mt. Pleasant Rd.
Milford, NJ 08848**

**Clerk, Township of Allamuchy
292 Alphano Rd.
PO Box A
Allamuchy, NJ 07820**

**Clerk, Borough of Allenhurst
125 Corlies Avenue
Allenhurst, NJ 07711**

**Clerk, Borough of Alpha
1001 E. Boulevard
Alpha, NJ 08865**

**Clerk, Borough of Andover
137 Main Street
Andover, NJ 07821**

**Clerk, Andover Township
134 Newton-Sparta Road
Newton, NJ 07860-2746**

**Clerk, City of Asbury Park
One Municipal Plaza Asbury
Park, NJ 07712**

**Clerk, Borough of Atlantic Highlands
Municipal Building
100 First Avenue
Atlantic Highlands, NJ 07716**

**Clerk, Borough of Avon By The Sea
Municipal Building
301 Main Street
Avon By The Sea, NJ 07717**

**Clerk, Township of Barnegat
900 W. Bay Avenue
Barnegat, NJ 08805-1298**

**Clerk, Borough of Bay Head
81 Bridge Avenue
PO Box 248
Bay Head, NJ 08742**

**Clerk, Borough of Beachwood
1600 Pinewald Rd.
Beachwood, NJ 08722**

**Clerk, Bedminster Township
One Miller Lane
Bedminster, NJ 07921**

**Clerk, Borough of Belmar
601 Main Street
PO Box A
Belmar, NJ 07719-0070**

**Clerk, Town of Belvidere
691 Water Street
Belvidere, NJ 07823**

**Clerk, Township of Berkeley
627 Pinewald-Kenswick Rd.
PO Box B
Bayville, NJ 08721-0287**

**Clerk, Township of Berkeley Heights
29 Park Avenue
Berkeley Heights, NJ 07922-1499**

**Clerk, Bernards Township
1 Collyer Lane
Basking Ridge, NJ 07920-1441**

**Clerk, Borough of Bernardsville
Borough Hall - 166 Mine Brook Road
PO Box 158
Bernardsville, NJ 07924-0158**

**Clerk, Township of Bethlehem
405 Mine Road
Asbury, NJ 08802-1107**

**Clerk, Township of Blairstown
106 Route 94
Blairstown, NJ 07825**

**Clerk, Borough of Bloomingdale
Municipal Building
101 Hamburg Turnpike
Bloomingdale, NJ 07403**

**Clerk, Borough of Bloomsbury
91 Brunswick Avenue
Bloomsbury, NJ 08804-0098**

**Clerk, Town of Boonton
100 Washington Street
Boonton, NJ 07005**

**Clerk, Township of Boonton
155 Powerville Road
Boonton, NJ 07005-8729**

**Clerk, Borough of Bradley Beach
701 Main Street
Bradley Beach, NJ 07720**

Clerk, Township of Branchburg
1077 US Highway 202 N.
Somerville, NJ 08876-3936

Clerk, Borough of Branchville
34 Wantage Avenue
Branchville, NJ 07826-0840

Clerk, Borough of Brielle
601 Union Lane - PO Box 445
Brielle, NJ 08730-0445

Clerk, Brick Township
401 Chambersbridge Road
Brick Town, NJ 08723

Clerk, Township of Bridgewater
100 Commons Way
Bridgewater, NJ 08807

Clerk, Borough of Butler
1 Ace Road
Butler, NJ 07405

Clerk, Township of Byram
10 Mansfield Drive
Stanhope, NJ 07874

Clerk, Borough of Califon
39 Academy Street
PO Box 368
Califon, NJ 07830-0368

Clerk, Borough of Chatham
Municipal Building
54 Fairmount Avenue
Chatham, NJ 07928-2393

Clerk, Township of Chatham
58 Meyersville Road
Chatham, NJ 07928

Clerk, Borough of Chester
Municipal Building
PO Box 487
50 North Road
Chester, NJ 07930

Clerk, Township of Chester
Municipal Building
1 Parker Road
Chester, NJ 07930

Clerk, Township of Chesterfield
Municipal Building
300 Bordentown-Chesterfield Road
Chesterfield, NJ 08515

Clerk, Town of Clinton
43 Leigh Street
Clinton, NJ 08809

Clerk, Township of Clinton
1370 Rte. 31 North
Annandale, NJ 08801

Clerk, Township of Colts Neck
Town Hall
124 Cedar Drive
Colts Neck, NJ 07722-0249

Clerk, Township of Cranbury
23A North Main Street
Cranbury, NJ 08512-3287

Clerk, Borough of Deal
Municipal Building
P.O. Box 56 - Durant Square
Deal, NJ 07723-0056

Clerk, Township of Denville
Municipal Building
1 St. Mary's Place
Denville, NJ 07834

Clerk, Township of Delaware
Township Hall
PO Box 500
Sergeantsville, NJ 08557

Clerk, Town of Dover
Town Hall
37 North Sussex Street
Dover, NJ 07801

Clerk, Township of Dover
33 Washington Street
PO Box 728
Toms River, NJ 08754-0728

Clerk, Township of East Amwell
1070 Rtes. 202 and 31
Ringoes, NJ 08551-1051

Clerk, Township of East Brunswick
1 Jean Walling Civic Center
PO Box 1081
East Brunswick, NJ 08816-1081

Clerk, Township of East Hanover
411 Ridgedale Avenue
East Hanover, NJ 07936

Clerk, Township of East Windsor
Municipal Building
16 Lanning Boulevard
East Windsor, NJ 08520-1999

Clerk, Borough of Eatontown
Borough Hall
47 Broad Street
Eatontown, NJ 07724-1698

Clerk, Borough of Englishtown
15 Main Street
Englishtown, NJ 07726

Clerk, Borough of Fair Haven
Municipal Building
748 River Road
Fair Haven, NJ 07704

Clerk, Borough of Far Hills
6 Prospect Street
Far Hills, NJ 07931

Clerk, Borough of Farmingdale
Municipal Building
11 Asbury Avenue
Farmingdale, NJ 07727

Clerk, Borough of Flemington
38 Park Avenue
Flemington, NJ 08822-1398

Clerk, Borough of Florham Park
Borough Hall
111 Ridgedale Avenue
Florham Park, NJ 07932

Clerk, Township of Frankford
151 US Highway 206
Augusta, NJ 07822

Clerk, Borough of Franklin
46 Main Street
Franklin, NJ 07416

Clerk, Township of Franklin
475 DeMott Lane
Somerset, NJ 08873

Clerk, Township of Franklin
Municipal Building
2093 Rte. 57
PO Box 547
Broadway, NJ 08808

Clerk, Township of Fredon
443 Rte. 94
Newton, NJ 07860

Clerk, Borough of Freehold
51 West Main Street
Freehold, NJ 07728-2195

Clerk, Township of Freehold
One Municipal Plaza
Freehold, NJ 07728-3099

Clerk, Township of Frelinghuysen
210 Main Street
Johnsonburg, NJ 07825

Clerk, Borough of Frenchtown
Borough Hall
29 Second Street
Frenchtown, NJ 08825

Clerk, Borough of Glen Gardner
PO Box 307
Glen Gardner, NJ 08826

Clerk, Township of Green
150 Kennedy Road
PO Box 65
Tranquility, NJ 07879

Clerk, Township of Green Brook
111 Greenbrook Road
Greenbrook, NJ 08812-2501

Clerk, Township of Greenwich
321 Greenwich Street
Stewartsville, NJ 08886

Clerk, Town of Hackettstown
215 Stiger Street
Hackettstown, NJ 07840

Clerk, Borough of Hamburg
Municipal Building
16 Wallkill Avenue
Hamburg, NJ 07419

Clerk, Borough of Hampton
PO Box 418
Hampton, NJ 08827

Clerk, Township of Hampton
1 Rumsey Way
Hampton Twp., Newton, NJ 07860

Clerk, Township of Hanover
Municipal Building
1000 Rte. 10 - PO Box 250
Whippany, NJ 07981-0250

Clerk, Township of Harding
Harding Township Municipal Offices
PO Box 666
New Vernon, NJ 07976

Clerk, Township of Hardwick
40 Spring Valley Road
Blairstown, NJ 07825

Clerk, Township of Hardyston
Municipal Building, Suite A
149 Wheatsworth Rd.
Hamburg, NJ 07419

Clerk, Township of Harmony
3003 Belvidere Road
Phillipsburg, NJ 08865

Clerk, Township of Hazlet
1766 Union Avenue
Hazlet, NJ 07730

Clerk, Borough of Helmetta
Borough Hall
51 Main Street
Helmetta, NJ 08828

Clerk, Borough of High Bridge
71 Main Street
High Bridge, NJ 08829-1003

Clerk, Borough of Highlands
42 Shore Drive
Highlands, NJ 07732-1699

Clerk, Borough of Hightstown
156 Bank Street
Hightstown, NJ 08520-3291

Clerk, Township of Hillsborough
379 S. Branch Road
Hillsborough, NJ 08844

Clerk, Township of Holland
61 Church Road
Milford, NJ 08848

Clerk, Township of Holmdel
4 Crawford's Corner Road
PO Box 410
Holmdel, NJ 07733-0410

Clerk, Borough of Hopatcong
Municipal Building
111 River Styx Road
Hopatcong, NJ 07843-1599

Clerk, Township of Hope
PO Box 284
407 Hope-Great Meadows Rd
Hope, NJ 07844

Clerk, Township of Hopewell
Municipal Building
201 Washington Crossing Pennington Rd
Titusville, NJ 08560

Clerk, Township of Howell
PO Box 580
4567 Route 9 North
Howell, NJ 07731-0580

Clerk, Township of Independence
Municipal Building
286 Rte. 46 West, PO Box 164
Great Meadows, NJ 07838

Clerk, Borough of Interlaken
Borough Hall
100 Gasmere Avenue
Interlaken, NJ 07712

Clerk, Borough of Island Heights
Municipal Complex
East End & Van Sant Ave.
Island Heights, NJ 08732

Clerk, Township of Jackson
Municipal Building
95 West Veterans Highway
Jackson, NJ 08527

Clerk, Borough of Jamesburg
131 Perrineville Road
Jamesburg, NJ 08831

Clerk, Township of Jefferson
Municipal Building
1033 Weldon Road
Lake Hopatcong, NJ 07849

Clerk, Borough of Keansburg
Municipal Building
29 Church Street
Keansburg, NJ 07734

Clerk, Borough of Keyport
70 West Front Street
Keyport, NJ 07735-0070

Clerk, Township of Kingwood
599 Oak Grove Road & Route 519
Frenchtown, NJ 08825

Clerk, Borough of Kinnelon
Municipal Building
130 Kinnelon Road
Kinnelon, NJ 07405

Clerk, Township of Knowlton
Municipal Building
628 Rote. 94
Columbia, NJ 07832

Clerk, Township of Lacey
Municipal Building
818 W. Lacey Road
Forked River, NJ 08731

Clerk, Township of Lafayette
33 Morris Farm Road
Lafayette, NJ 07848

Clerk, Borough of Lakehurst
5 Union Avenue
Lakehurst, NJ 08733-3097

Clerk, Township of Lakewood
Municipal Building
231 Third Street
Lakewood, NJ 08701-3220

Clerk, City of Lambertville
18 York Street
Lambertville, NJ 08530

Clerk, Borough of Lavallette
1306 Grand Central Ave.
Lavallette, NJ 08735

Clerk, Borough of Lebanon
6 High Street
Lebanon, NJ 08833

Clerk, Township of Lebanon
530 W. Hill Road
Glen Gardner, NJ 08826-9714

Clerk, Township of Liberty
349 Mtn. Lake Road
Great Meadows, NJ 07838

Clerk, Borough of Lincoln Park
Municipal Building
34 Chapel Hill Road
Lincoln Park, NJ 07035-1998

Clerk, Borough of Little Silver
Borough Hall
480 Prospect Avenue
Little Silver, NJ 07739

Clerk, Township of Livingston
357 S. Livingston Avenue
Livingston, NJ 07039-3994

Clerk, Village of Loch Arbour
550 Main Street
Loch Arbour, NJ 07711

Clerk, City of Long Branch
City Hall
344 Broadway
Long Branch, NJ 07740

Clerk, Township of Lopatcong
Municipal Building
232 South Third St. - Morris Park
Phillipsburg, NJ 08865-1898

Clerk, Borough of Madison
Hartley Dodge Memorial Building
50 Kings Road
Madison, NJ 07940-2592

Clerk, Township of Manalapan
120 Route 522 & Taylor-Mills Road
Manalapan Township, NJ 07726

Clerk, Borough of Manasquan
201 E. Main Street
Manasquan, NJ 08736

Clerk, Township of Manchester
1 Colonial Drive
Manchester Township, NJ 08759

Clerk, Township of Mansfield
3135 Route 206 South – Suite 1
Columbus, NJ 08022-0249

Clerk, Borough of Mantoloking
Borough Hall
PO Box 4391
Brick, NJ 08738

Clerk, Township of Maplewood
Municipal Building
574 Valley Street
Maplewood, NJ 07940-0690

Clerk, Township of Marlboro
Municipal Complex
1979 Township Drive
Marlboro, NJ 07746

Clerk, Borough of Matawan
201 Broad Street
Matawan, NJ 07747

Clerk, Borough of Mendham
2 W. Main Street
Mendham, NJ 07945

Clerk, Township of Middletown
Municipal Building
1 Kings Highway
Middletown, NJ 07748-2594

Clerk, Borough of Milford
30 Water Street
PO Box 507
Milford, NJ 08848-0507

Clerk, Township of Millburn
Town Hall
375 Millburn Avenue
Millburn, NJ 07041-1379

Clerk, Township of Millstone
Municipal Building
470 Stage Coach Road
Clarksburg, NJ 08510

Clerk, Township of Mine Hill
Municipal Building
10 Baker Street
Mine Hill, NJ 07803

Clerk, Borough of Monmouth Beach
22 Beach Road
Monmouth Beach, NJ 07750

Clerk, Monroe Township
Municipal Complex
1 Municipal Plaza
Monroe Township, NJ 08831-1900

Clerk, Township of Montague
277 Clove Road
Montague, NJ 07827

Clerk, Borough of Netcong
Municipal Building
23 Maple Avenue
Netcong, NJ 07857-1121

Clerk, Township of New Hanover
2 Hockamick Rd.
Cookstown, NJ 08511

Clerk, Borough of New Providence
360 Elkwood Avenue
New Providence, NJ 07974-1844

Clerk, Town of Newton
39 Trinity Street
Newton, NJ 07860

Clerk, Township of North Hanover
Municipal Building
41 Schoolhouse Road
Jacobstown, NJ 08562

Clerk, Township of Ocean
Township Hall
399 Monmouth Road
Oakhurst, NJ 07755-1589

Clerk, Township of Ocean
50 Railroad Avenue
Waretown, NJ 08758

Clerk, Borough of Ocean Gate
801 Ocean Gate Avenue, CN-100
Ocean Gate, NJ 08740

Clerk, Borough of Oceanport
315 East Main Street
Oceanport, NJ 07757

Clerk, Borough of Ogdensburg
14 Highland Avenue
Ogdensburg, NJ 07439

Clerk, Township of Montville
Municipal Building
195 Changebridge Road
Montville, NJ 07045-9498

Clerk, Township of Morris
50 Woodland Avenue
PO Box 7603
Convent Station, NJ 07961-7603

Clerk, Borough of Morris Plains
531 Speedwell Avenue
Morris Plains, NJ 07950

Clerk, Town of Morristown
200 South Street, CN-914
Morristown, NJ 07963-0914

Clerk, Borough of Mt. Arlington
419 Howard Blvd.
Mt. Arlington, NJ 07856-1129

Clerk, Township of Mount Olive
Municipal Building
204 Flanders-Drakestown Road
PO Box 450
Budd Lake, NJ 07828

Clerk, Borough of Mountain Lakes
400 Boulevard
Mountain Lakes, NJ 07046

Clerk, Borough of Mountainside
Municipal Building
1385 Route 22
Mountainside, NJ 07092

Clerk, Township of Neptune
25 Neptune Blvd – PO Box 1125
Neptune, NJ 07753-1125

Clerk, Borough of Neptune City
106 W. Sylvania Avenue
Neptune City, NJ 07753

Clerk, Township of Old Bridge
One Old Bridge Plaza
Old Bridge, NJ 08857

Clerk, Township of Oxford
Municipal Building
11 Green Street, PO Box 119
Oxford, NJ 07863

Clerk, Township of Parsippany-Troy Hills
1001 Parsippany Boulevard
Parsippany, NJ 07054

Clerk, Township of Long Hill
915 Valley Road
Long Hill, NJ 07933

Clerk, Boroughs of Peapack & Gladstone
1 School Street, PO Box 218
Peapack, NJ 07977

Clerk, Borough of Pemberton
Municipal Building
50 Egbert Street
Pemberton, NJ 08068-0261

Clerk, Township of Pemberton
500 Pemberton-Browns Mills Road
Pemberton, NJ 08068-1539

Clerk, Township of Pequannock
530 Newark-Pompton Turnpike
Pompton Plains, NJ 07444

Clerk, Town of Phillipsburg
Municipal Building
675 Corliss Avenue
Phillipsburg, NJ 08865

Clerk, Borough of Pine Beach
599 Pennsylvania Avenue
PO Box 425
Pine Beach, NJ 08741-0425

Clerk, Township of Plumsted
121 Evergeen Road
New Egypt, NJ 08533

Clerk, Township of Pohatcong
50 Municipal Drive
Phillipsburg, NJ 08865

Clerk, Borough of Point Pleasant
2233 Bridge Avenue - PO Box 25
Point Pleasant, NJ 08742

Clerk, Borough of Pt. Pleasant Beach
416 New Jersey Avenue
Pt. Pleasant Beach, NJ 08742

Clerk, Borough of Pompton Lakes
Municipal Building – 25 Lenox Avenue
Pompton Lake, NJ 07442

Clerk, Borough of Raritan
22 First Street
Raritan, NJ 08869

Clerk, Township of Raritan
One Municipal Drive
Flemington, NJ 08822-3446

Clerk, Township of Randolph
Municipal Building
502 Millbrook Avenue
Randolph, NJ 07869

Clerk, Borough of Ringwood
Borough Hall
60 Margaret King Avenue
Ringwood, NJ 07456

Clerk, Borough of Riverdale
91 Newark Pompton Turnpike
Riverdale, NJ 07457

Clerk, Township of Readington
Municipal Building
509 Rte. 523
Whitehouse Station, NJ 08889

Clerk, Borough of Red Bank
90 Monmouth Street
Red Bank, NJ 07701

Clerk, Borough of Rockaway
Municipal Building
1 East Main Street
Rockaway, NJ 07866

Clerk, Township of Rockaway
65 Mt. Hope Road
Rockaway, NJ 07866-1698

Clerk, Borough of Roosevelt
Borough Hall - 33 N. Richdale Avenue
PO Box 128
Roosevelt, NJ 08555-0128

Clerk, Township of Roxbury
1715 Rte. 46
Ledgewood, NJ 07852

Clerk, Borough of Rumson
Memorial Borough Hall
80 E. River Rd.
Rumson, NJ 07760

Clerk, Sandyston Township
133 Route 645
Branchville, NJ 07826

Clerk, Borough of Sayreville
167 Main Street
Sayreville, NJ 08872

Clerk, Borough of Sea Bright
1167 Ocean Avenue
Sea Bright, NJ 07760

Clerk, Borough of Sea Girt
321 Baltimore Blvd. PO Box 296
Sea Girt, NJ 08750

Clerk, Seaside Heights Borough
901 Boulevard
Seaside Heights, NJ 08751

Clerk, Borough of Seaside Park
1701 N. Ocean Avenue
PO Box B
Seaside Park, NJ 08752

Clerk, Borough of Shrewsbury
419 Sycamore Avenue
PO Box 7420
Shrewsbury, NJ 07702-7420

Clerk, Township of Shrewsbury
1979 Crawford Street
Shrewsbury, NJ 07724

Clerk, City of South Amboy City
Hall, 140 N. Broadway Street
South Amboy, NJ 08879-1647

Clerk, Township of Southampton
Town Hall
5 Retreat Road
Southampton, NJ 08088

Clerk, Borough of Lake Como
1740 Main Street
Lake Como, NJ 07719

Clerk, Borough of South Toms River
Borough Hall
19 Double Trouble Road
South Toms River, NJ 08757

Clerk, Township of Mendham
Township Hall - W. Main & Cherry Lane
PO Box 520
Brookside, NJ 07926

Clerk, Township of South Brunswick
Municipal Complex - 540 Ridge Road
PO Box 190
Monmouth Junction, NJ 08852-0190

Clerk, Borough of Spring Lake
423 Warren Avenue
P.O. Box 638
Spring Lake, NJ 07762-0638

Clerk, Township of Sparta
65 Main Street
Sparta, NJ 07871

Clerk, Borough of Spotswood
77 Summerhill Road
Spotswood, NJ 08884

Clerk, Township of Springfield
Municipal Building – 1st Floor
100 Mountain Avenue
Springfield, NJ 07081-1702

Clerk, Borough of Spring Lake Heights
555 Brighton Avenue
Spring Lake Heights, NJ 07762

Clerk, Township of Springfield
Municipal Building
2159 Jacksonville Road
PO Box 119
Jobstown, NJ 08041

Clerk, Borough of Stockton
Municipal Building
2 South Main Street,
PO Box M
Stockton, NJ 08559

Clerk, Borough of Stanhope
77 Main Street
Stanhope, NJ 07874

Clerk, Township of Stillwater
964 Stillwater Road
Newton, NJ 07860

Clerk, Township of Tewksbury
169 County Road 517
Califon, NJ 07830

Clerk, City of Summit
512 Springfield Avenue
Summit, NJ 07901-2667

Clerk, Borough of Sussex
2 Main Street
Sussex, NJ 07461-2397

Clerk, Borough of Union Beach
Municipal Building
650 Poole Avenue
Union Beach, NJ 07735

Clerk, Borough of Tinton Falls
Municipal Building
556 Tinton Avenue
Tinton Falls, NJ 07724-3298

Clerk, Township of Union
140 Perryville Road
Hampton, NJ 08827

Clerk, Borough of Victory Gardens
Municipal Building
337 S. Salem Street
Dover, NJ 07801

Clerk, Township of Upper Freehold
Municipal Building
314 County Rte. 539
Cream Ridge, NJ 08514

**Clerk, Township of Vernon
Municipal Building
21 Church Street
PO Box 340
Vernon, NJ 07462**

**Clerk, Borough of Wanaque
579 Ringwood Avenue
Wanaque, NJ 07465**

**Clerk, Township of Wall
2700 Allaire Road
PO Box 1168
Wall, NJ 07719-1168**

**Clerk, Township of Walpack
16 Old Mine Road
Walpack, NJ 07881**

**Clerk, Borough of Washington
100 Belvidere Avenue
Washington, NJ 07882-1426**

**Clerk, Township of Wantage
Municipal Building
888 Rte. 23
Sussex, NJ 07461**

**Clerk, Township of Warren
Municipal Building
46 Mountain Blvd.
Warren, NJ 07059-5605**

**Clerk, Township of Washington
Robbinsville Municipal Building
1 Washington Blvd. – 2nd Floor – Suite 6
Robbinsville, NJ 08691-1103**

**Clerk, Township of Washington
211 Rt. 31 North
Washington, NJ 07882**

**Clerk, Township of Washington
43 Schooley's Mountain Road
Long Valley, NJ 07853**

**Clerk, Township of West Amwell
150 Rocktown-Lambertville Rd.
Lambertville, NJ 08530-3203**

**Clerk, Borough of Watchung
Municipal Building
15 Mountain Blvd.
Watchung, NJ 07069-6399**

**Clerk, Township of Wayne
475 Valley Road
Wayne, NJ 07470**

**Clerk, Township of West Windsor
Municipal Building
271 Clarkville Rd., PO Box 38
West Windsor, NJ 08550**

**Clerk, Borough of West Long Branch
965 Broadway
West Long Branch, NJ 07764**

**Clerk, Township of West Milford
1480 Union Valley Road
West Milford, NJ 07840-1303**

**Clerk, Township of Woodland
Municipal Building
3943 County Road 563
PO Box 388
Chatsworth, NJ 08019**

**Clerk, Borough of Wharton
Municipal Building
10 Robert Street
Wharton, NJ 07885**

**Clerk, Township of White
555 County Road 519
Belvidere, NJ 07823**

**Clerk, Borough of Wrightstown
Borough Hall
21 Saylor's Pond Road
Wrightstown, NJ 08562**

List of Boards of County Commissioners

Burlington County Bd of Cty Commissioners
County Office Bldg.
49 Rancocas Rd., Rm 123
PO Box 6000
Mt. Holly, NJ 08060

Essex County Bd of County Commissioners
Hall of Records – Room 558
465 Dr. Martin Luther King, Jr. Blvd.
Newark, NJ 07102

Hunterdon County Bd of Cty Commissioners
County Administration Bldg.
71 Main St.
P.O. Box 2900
Flemington, NJ 08822

Mercer County Bd of County Commissioners
McDade Administration Building
640 S. Broad St.
PO Box 8068
Trenton, NJ 08650-0068

Middlesex County Bd of Cty Commissioners
Administration Bldg.
75 Bayard Street, 1st Fl.
New Brunswick, NJ 08901

Monmouth County Bd of Cty Commissioners
Hall of Records
One E. Main Street
P.O. Box 1255
Freehold, NJ 07728

Morris County Bd of Cty Commissioners
Administration & Records Bldg.
PO Box 900
Morristown, NJ 07963-0900

Ocean County Bd of Commissioners
Administration Bldg.
101 Hooper Ave.
PO Box 2191
Toms River, NJ 08754-2191

Passaic County Bd of Cty Commissioners
Administration Bldg.
401 Grand St., 2nd Fl., #223
Paterson, NJ 07505

Somerset County Bd of Cty Commissioners
Administrative Building
20 Grove St.
PO Box 3000
Somerville, NJ 08876

Sussex County Bd of Cty Commissioners
Administrative Center
One Spring St.
Newton, NJ 07860

Union County Bd of Cty Commissioners
Administration Bldg.
10 Elizabethtown Plaza, 6th Fl.
Elizabeth, NJ 07207

Warren County Bd of Cty Commissioners
Wayne Dumont, Jr. Administration Building
165 County Route 519 South
Belvidere (White Twsp), NJ 07823-1949

List of County Executive Offices & Administrators

Burlington County Administrator
Municipal Bldg.
851 Old York Rd.
Burlington, NJ 08016-0340

Burlington County Administrator
City Hall
525 High Street
Burlington, NJ 08016

Essex County Executive
Hall of Records – Room 510
465 Dr. Martin Luther King, Jr. Blvd.
Newark, NJ 07102

Hunterdon County Administrator
County Administration Bldg.
71 Main St.
Flemington, NJ 08822

Mercer County Executive
McDade Administration Bldg
640 S. Broad St.
PO Box 8068
Trenton, NJ 08650-0068

Middlesex County Administrator
Administration Bldg.
JFK Square
PO Box 871
New Brunswick, NJ 08903

Monmouth County Administrator
Hall of Records
One E. Main Street
Freehold, NJ 07728

Morris County Administrator
Administration & Records Bldg.
Court St.
PO Box 900
Morristown, NJ 07963-0900

Ocean County Administrator
Administration Bldg.
101 Hooper Ave.
PO Box 2191
Toms River, NJ 08754

Passaic County Administrator
Administration Bldg.
401 Grand St.
317 Pennsylvania Avenue
Paterson, NJ 07505

Somerset County Administrator
20 Grove St.
PO Box 3000
Somerville, NJ 08876

Sussex County Administrator
Administrative Center
One Spring St.
Newton, NJ 07860

Union County Administrator
Administration Bldg.
6th Floor
Elizabeth, NJ 07207

Warren County Administrator
Dumont Administration Building
165 Rte. 519 S.
Belvidere, NJ 07823

Burlington County Administrator
County Administration Building
49 Rancocas Road
Room 123
Mount Holly, NJ 08060

Hunterdon County Administrator
County Administration Bldg.
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Middlesex County Administrator
Administration Bldg.
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75 Bayard St.
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Passaic County Administrator
Administration Bldg.
401 Grand St.
Paterson, NJ 07505

Union County Administrator
Administration Bldg
10 Elizabethtown Plaza, 6th Fl.
Elizabeth, NJ 07207

**BEFORE THE
NEW JERSEY BOARD OF PUBLIC UTILITIES**

**In the Matter of the Verified Petition of Jersey Central
Power & Light Company for Approval of an
Electric Vehicle Program and an Associated
Cost Recovery Mechanism**

BPU Docket No. _____

**Direct Testimony
Of
Randall A. Frame**

**On Behalf Of
Jersey Central Power & Light Company**

March 1, 2021

**DIRECT TESTIMONY OF RANDALL A. FRAME ON BEHALF OF
JERSEY CENTRAL POWER & LIGHT COMPANY**

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Randall A. Frame. My business address is 76 South Main Street, Akron, Ohio.

4 **Q. Please identify your employer and describe your current position.**

5 A. I am employed by FirstEnergy Service Company, which is a direct subsidiary of
6 FirstEnergy Corp. (“FirstEnergy”), the parent company of Jersey Central Power & Light
7 Company (“JCP&L” or “Company”) as Director, Emerging Technology Program
8 (“EmT”).

9 **Q. How long have you worked for FirstEnergy Service Company?**

10 A. I have worked for over thirty-eight years with subsidiaries of FirstEnergy or its predecessor
11 companies, working in a variety of positions in the engineering, customer support, sales,
12 supply chain, operations, and the EmT areas.

13 **Q. How long have you been employed in your current position?**

14 A. I have been employed in my current position since May 2018.

15 **Q. Please describe your relevant educational background and relevant work experience.**

16 A. I am a graduate of The University of Akron with a Bachelor of Science Degree in Electronic
17 Technology. I began work with FirstEnergy or its predecessor companies in 1982 as an
18 Engineering Technologist in the distribution planning area and was promoted to Division
19 Engineering Manager in 1991. In 1994, I moved into the sales area and held a number of
20 management positions until I was promoted to Director of Supply Chain in 2004.
21 Subsequently, I was promoted to the position of President at Toledo Edison and then at
22 Ohio Edison in 2011 and 2013, respectively. In 2018, I moved into my current role, which

1 was a newly created position within FirstEnergy at the time. Please refer to Appendix A
2 for my experience and qualifications.

3 **Q. Please describe your duties and responsibilities as Director, EmT.**

4 A. As Director of EmT at FirstEnergy, I am responsible for leading the systematic
5 development, standardization, optimization, implementation, and governance of assigned
6 EmT programs. These programs include distribution platform enhancement (i.e.,
7 distribution automation, volt-var optimization, distribution circuit upgrades), smart meters,
8 smart street lighting, smart cities, EV infrastructure, microgrids, storage, and solar across
9 all FirstEnergy Utilities operating companies.

10 **Q. Have you previously testified in Board of Public Utilities (“BPU” or “Board”)
11 proceedings?**

12 A. No, I have not.

13 **Q. What is the purpose of your direct testimony?**

14 A. My testimony describes JCP&L’s proposed Electric Vehicle (“EV”) Program (“JCP&L
15 EV Driven Program” or “Program”) in compliance with the Board of Public Utilities’
16 (“Board”) EV Filing Order.¹ I will provide an overview of the proposed JCP&L EV Driven
17 Program, which is designed to comply with the EV Filing Order by furthering the adoption
18 of EVs in JCP&L’s service territory and supporting the attainment of the State’s goals for
19 EV deployment and the reduction of greenhouse gas (“GHG”) emissions. JCP&L’s EV
20 Driven program consists of six subprograms, including an education and outreach
21 initiative, which, when combined, are intended to reduce the costs to customers of owning

¹ *1M/O Straw Proposal on Electric Vehicle Infrastructure Build Out*, BPU Docket No. QO20050357, Order Adopting the Minimum Filing Requirements for Light-Duty, Publicly Accessible Electric Vehicle Charging (dated September 23, 2020) (“EV Filing Order”).

1 and operating EVs, increase consumer awareness of EVs, reduce range anxiety, and
2 encourage EV charging behavior which limits electric distribution system impacts.

3 **Q. How is the remainder of your testimony organized?**

4 A. Following this introduction, my testimony is organized as follows:

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11	2.) Mixed-Use Commercial Customer Sub-program	14
12	2a. Public/Community-based Component	14
13	2b. Workplace Component	17
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17	5.) Overburdened Communities Sub-program	25
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1 **II. EXECUTIVE SUMMARY**

2 **Q. Please describe the activities that have led to the filing of the JCP&L EV Driven**
3 **Program.**

4 A. On September 30, 2020, the Board issued the EV Filing Order. The EV Filing Order
5 directed JCP&L to file an EV Program proposal by February 28, 2021.

6 Before the Board issued the EV filing Order, Governor Murphy signed the State
7 Zero-Emission Vehicle (“ZEV”) Programs Memorandum of Understanding in 2018, where
8 New Jersey committed to work collaboratively together as part of a Multi-State ZEV Task
9 force to support the deployment of electric vehicles. The signing of the ZEV Programs
10 Memorandum of Understanding reinforced New Jersey’s formal opt-in to the California
11 Zero Emission Vehicle compliance program, which positioned the State at the forefront of
12 EV adoption. Additionally, in January 2020, Governor Murphy unveiled the New Jersey
13 Energy Master Plan (“EMP”), which featured the State’s goals and initiatives to achieve
14 100% clean energy and reduce GHG emissions by 80% below 2006 levels by the year
15 2050. The EMP included a comprehensive strategy to reduce energy consumption and
16 emissions from the transportation sector. The strategy included aggressive goals indicating
17 the State’s commitment to electric transportation. These goals were solidified in New
18 Jersey’s Plug-In Vehicle Act (“PIV Act”)², signed by Governor Murphy in January 2020,
19 which includes, *inter alia*:

- 20
- 21 • At least 330,000 light-duty, plug-in EVs shall be registered in New Jersey by
22 December 31, 2025;
 - 23 • At least 400 DC Fast Chargers shall be available for public use at no fewer than
24 200 charging locations in the State by December 31, 2025;
 - 25 ▪ At least 75 of the 200 or more charging locations shall be at travel corridor
locations, equipped with at least two DC Fast Chargers per location, each

² P.L. 2019, c.362; N.J.S.A. 48:25-1 *et seq.*

1 capable of providing at least 150 kilowatts of charging power, and no more
2 than 25 miles between the charging locations; and

- 3 ■ At least 100 of the 200 or more charging locations shall be community
4 locations, equipped with at least two DC Fast Chargers per location, each
5 capable of providing 50 kilowatts of charging power or more, and 150
6 kilowatts or more where feasible.
- 7 ● At least 1,000 Level Two chargers shall be available for public use across the state
8 by December 31, 2025; and
- 9 ● At least 15% of all multi-family residential properties in the state shall be equipped
10 with Electric Vehicle Service Equipment (“EVSE”) for routine charging of EVs by
11 December 31, 2025.

12
13 Finally, the State is an active participant in the regional Transportation Climate
14 Initiative (“TCI”), which is a regional collaboration of 12 Northeast and Mid-Atlantic states
15 and the District of Columbia that seeks to improve transportation, develop the clean energy
16 economy, and reduce carbon emissions from the transportation sector. Recognizing that
17 more than one third of all GHG emissions in the region come from the transportation sector,
18 participating states, including New Jersey, are taking action through working groups
19 focused on regional priorities, such as clean vehicles and fuels.³

20 **Q. Please summarize the JCP&L EV Driven Program.**

21 A. The JCP&L EV Driven Program will have six subprograms including an education and
22 outreach initiative, as described in more detail in Exhibit RAF-1.

23 1. **Residential Customer Sub-program** – provides for Customer Make-
24 Ready Incentives⁴ for Level Two Networked or Smart (“Level Two” or “L2”) chargers

³ See <https://www.transportationandclimate.org/content/about-us>.

⁴ “Customer Make-Ready” means activities and facilities from the meter to the charger stub, and includes the pre-wiring of electrical infrastructure at a parking space, or set of parking spaces, to facilitate easy and cost-efficient future installation of Electric Vehicle Service Equipment (“EVSE”), including, but not limited to, Level Two EVSE and DC Fast Chargers. Making a site Charger-Ready includes expenses related to service panels, junction boxes, conduit, wiring, etc., necessary to make a particular location able to accommodate EVSE on a “plug and play” basis. “Make-Ready” is synonymous with the term “Charger-Ready” as these terms are used in and defined in the EV Filing Order. See EV Filing Order, at p. 16.

1 installed at single family residences. The budget also includes amounts that the utility will
2 fund and recover for Utility Make-Ready Work⁵, which is assumed to be 10% of the
3 residential customers installing a new L2 charger.

4 The Company is also offering an Off-Bill, Off-Peak usage credit to participants in
5 this Program, which is further addressed in Company witness Kevin Siedt's direct
6 testimony.

7 2. **Mixed-Use Commercial Customer Sub-program.** JCP&L will provide
8 incentives for three types of commercial EV charger installations:

9 a. **Public/Community-based Component**—provides for Customer Make-
10 Ready Incentives for Level Two chargers at publicly available charging sites. The budget
11 also includes amounts that the utility will fund and recover for Utility Make-Ready Work,
12 where commercial customers request this service for charging ports⁶.

13 b. **Workplace Component** —provides for Customer Make-Ready Incentives
14 for Level Two charges at workplaces. The budget also includes amounts that the utility
15 will fund and recover for Utility Make-Ready Work , where commercial customers request
16 this service for charging ports.

17 c. **Multi-Family Component**- provides for Customer Make-Ready Incentives
18 for Level Two chargers at multi-family buildings. The budget also includes amounts that
19 the utility will fund and recover for Utility Make-Ready Work, where commercial
20 customers request this service for charging ports. The Company will also be offering

⁵ “Utility Make-Ready Work” means activities and facilities needed to upgrade an electric service or JCP&L distribution facilities on the Company’s side of the meter to accommodate EV service equipment, such as service upgrades from the pole to meter or distribution system upgrades.

⁶ A charging “port” is the part of the charging station that connects to the EV.

1 Multi-Family charging service at a rate equivalent to a single-family residence, and
2 providing for up to 75 Multi-Family locations with Company-qualified Level Two
3 chargers to be eligible to enroll in the Off-Bill/Off-Peak credit program, which is further
4 addressed in Company witness Kevin Siedt's direct testimony. Lastly, the Company is
5 reserving 50% of this Sub-program for multi-family dwellings in overburdened and low to
6 moderate income("LMI") communities.

7 3. **DC Fast Charger ("DCFC") Public Charging Sub-program** - provides
8 for Customer Make-Ready Incentives for DCFC at publicly available charging sites. The
9 budget also includes amounts that the utility will fund and recover for Utility Make-Ready
10 Work, where commercial customers request this service for charging ports. In addition,
11 JCP&L is proposing a demand charge discount for this Program, which is further addressed
12 in Mr. Siedt's direct testimony.

13 4. **Last Resort DCFC Sub-program** - provides for JCP&L to install, own
14 and operate approximately 20 DCFC charging ports at appropriate locations within its
15 service territory should there be "no expression of interest" in the form of applications for
16 a Make-Ready from private EVSE Infrastructure Companies within the allotted periods set
17 forth in the BPU Order⁷.

18 5. **Overburdened Communities Sub-program** - Community organizations
19 and nonprofits can apply for grants to advance electric vehicle adoption, EV charging
20 infrastructure and/or education in the communities JCP&L serves. JCP&L will provide
21 grants for innovative, EV-related pilot projects proposed by market participants.

⁷ See EV Filing Order, at p. 12.

1 6. **Consumer Education and Outreach Initiative** - JCP&L will implement
2 a comprehensive program to inform and educate customers and market participants about
3 the JCP&L EV Driven Program and EV benefits in general.

4 In addition, the Company is proposing a cost recovery mechanism under which it
5 will recover its capital expenditures and operational expenses associated with the EV
6 Program. JCP&L witness Kevin M. Siedt discusses the cost recovery mechanism in his
7 pre-filed testimony, Exhibit JC-3.

8 **III. EV DRIVEN PROGRAM**

9 **A. Overview**

10 **Q. Please provide an overview of the components of JCP&L's proposed EV Driven**
11 **Program.**

12 A. As I explained above, the JCP&L EV Driven Program will have six Sub-programs: (1)
13 Residential Customer Sub-program; (2) Mixed-Use Commercial Customer Sub-program;
14 (3) DCFC Public Charging Sub-program; (4) Last Resort DCFC Sub-program; (5)
15 Overburdened Communities Sub-program; and (6) Consumer Education and Outreach
16 Initiative. The following chart provides an overview of each of the Sub-programs:

17

Program Component	Description	Budget (\$K)
Residential Customer Sub-program		
Customer Make-Ready Incentive	Incentive of \$1,000 on up to 2,000 qualified smart L2 charger installations in customer residences	\$2,000
Utility Make-Ready Work	Utility work for approximately 10% of above residences at \$5,500 each	\$1,100
Off-Bill/Off-Peak Credit	Off-Peak, Off Bill Rewards Incentive available to up to 2,000 EV owners that have an approved L2 Smart Charger	\$1,107
Mixed-Use Commercial Customer Sub-program		
Public/Community-based Component	Incentive of up to \$6,700 on up to 500 qualified smart L2 charger ports	\$3,350
Workplace Component	Incentive of up to \$6,700 on up to 100 qualified smart L2 charger ports	\$670
Multi-Family Component	Incentive of up to \$6,700 on up to 300 qualified smart L2 charger ports	\$2,010
Utility Make-Ready Work	Utility work at approximately 225 charger locations at \$11,100 each (assumes 4 charging ports/location)	\$2,497
Rate design - Multi-family component	Off-Peak, Off Bill Rewards Incentive available to up to 2,000 EV owners that have an approved L2 Smart Charger	\$899
DCFC Public Charging Sub-program		
Customer Make-Ready Incentive	Incentive of up to \$25,000 on up to 200 qualified DCFC public charger ports	\$5,000
Utility Make-Ready Work	Utility work at approximately 100 charger locations at \$50,500 each (assumes 2 charging ports/location)	\$5,050
Demand Charge Credit	Reduced demand charges - 50% in 2022 & 2023; 25% in 2024; 0% 2025	\$1,169
Last Resort DCFC Sub-program		
JCP&L Own & Operate DCFC	20 DCFC charging ports at locations deemed as last resort with no interest from 3rd parties beginning in year 2024	\$4,225
Overburdened Communities Sub-program		
Grants to Qualifying Organizations	Community organizations/nonprofits apply for grants to advance EV adoption, EV charging infrastructure, education	\$2,500
Program Implementation Costs		
Implementation Costs	Data Collection/Networking, IT Systems, Administrative, Consumer Education and Outreach	\$18,347
	O&M PROGRAM COST	\$33,682
	CAPITAL PROGRAM COST	\$16,242
	TOTAL PROGRAM COST	\$49,924

1

2

1 **Q. What is the duration of the JCP&L EV Driven Program?**

2 A. JCP&L proposes that the JCP&L EV Driven Program be in place for four years beginning
3 in 2022 and running through 2025. The Company is filing its Petition with the Board at
4 the end of February 2021 and anticipates approval in the third quarter of the year. Once
5 the Board approves the JCP&L EV Driven Program and all the specific details are known,
6 the Company will then finalize the consumer education and outreach initiative, as well as
7 the application forms. Therefore, January 1, 2022 is a reasonable date to begin the
8 Program.

9 **Q. What is the overall proposed budget for the JCP&L EV Driven Program?**

10 A. The total proposed budget is \$49.924 million, of which \$33.682 million is for operations
11 and maintenance (“O&M”) expenses and \$16.242 million is for capital expenditures.

12 **Q. What are the proposed budgets for each of the Sub-programs?**

13 A. The Sub-programs budgets are identified in Exhibit RAF-1.

14 **Q. Is the Company requesting flexibility to reallocate funds between the Sub-programs?**

15 A. Yes. As the Program is implemented, it may be necessary to reallocate funding levels
16 between the Sub-programs, based on market demand, customer interest, and EV developer
17 interest. Therefore, JCP&L proposes the following budget flexibility:

- 18 • JCP&L will be allowed to reallocate the Sub-program budgets for the Residential
19 Customer Sub-program, Mixed-Use Commercial Customer Sub-program, DCFC
20 Public Charging Sub-program, and Last Resort DCFC Sub-program by up to 5% of
21 each subprogram’s total budget, upon notification to Board Staff and Rate Counsel
22 (which should be provided 30 days in advance of the change).

1 • JCP&L will be allowed to reallocate between 6% and 25% of each of these Sub-
2 program budgets upon written consent of Board Staff.

3 • JCP&L will be allowed to reallocate over 25% of each of these Sub-program
4 budgets upon Board approval.

5 This budget flexibility will allow the Company to adapt to market and customer preferences
6 and make the overall JCP&L EV Driven Program most beneficial to the State.

7 **B. Sub-programs**

8 **1.) Residential Customer Sub-program**

9 **Q. Please explain how the Residential Customer Sub-program will work.**

10 A. Please refer to Exhibit RAF-1 for more specific details. In general, under this Sub-
11 program,

12 JCP&L will provide incentives on Level Two make-ready of \$1,000 for electrical work
13 needed for qualified Level Two chargers with equipment to enable sharing of charging data
14 with JCP&L in up to 2,000 residences. JCP&L will fund and recover Utility Make-Ready
15 Work, which estimate is based on the cost for new overhead or underground service wire,
16 new transformer, and new pole at 10% of residences receiving the above incentive (200)
17 at a cost of \$5,500 per location. Finally, as described in Mr. Siedt’s direct testimony,
18 JCP&L will provide a Residential Off-Peak, Off-Bill credit available to up to 2,000 EV
19 owners annually that have an approved Level Two charger.

20 **Q. What requirements will a customer have to satisfy to receive incentives under this**
21 **Sub-program?**

22 A. Incentives will only be paid to residential customers who have installed new qualified
23 Level Two chargers. A qualifying charger must also be networked (i.e., charging stations

1 or chargers with equipment capable of sending and receiving communications *via* wi-fi or
2 cellular network).

3 All customers – both residential and non-residential – who elect to receive
4 incentives under the JCP&L EV Driven Program shall be required to provide charging data
5 to JCP&L in a format to be determined on a semi-annual basis. Such data requirements
6 shall, at a minimum, include the number of charging events, time and date, number of
7 unique vehicles connected, total kWh dispensed, average kWh per charging event, and
8 average duration of charging events. This charging data submission requirement shall
9 apply to both DCFC and Level Two charging stations. Incentives limited to one incentive
10 per residential service address.

11 This incentive will be available to residential customers on a first-come, first-
12 qualify basis during the term of the Program beginning from effective date of the Program
13 and lasting until December 31, 2025 or until a total of 2,000 incentives have been paid.

14 **Q. How did JCP&L arrive at the \$1,000 incentive level?**

15 A. Based in its understanding of the industry, JCP&L assumed that a typical charge for make-
16 ready work behind the meter for a residential EV charger would be approximately \$1500.
17 Making a residence Charger-Ready includes expenses related to service panels, junction
18 boxes, conduit, wiring, etc., necessary to make a particular location able to accommodate
19 EVSE on a “plug and play” basis. To incentivize residential installations, JCP&L is
20 proposing to provide an incentive that will offset approximately two-thirds of these make-
21 ready costs on the customer’s side of the meter.

22 **Q. Will the participating customer have to provide invoices to JCP&L to receive the**
23 **\$1,000 incentive?**

1 A. No. To reduce administrative time and expense, the \$1,000 incentive will be a flat payment
2 to a customer who qualifies. To qualify, the customer's installation will have to meet all
3 program requirements, and a customer will have to submit an application per the to be
4 determined JCP&L process. Once a customer's application has been received and
5 approved, and the EV charger is activated, JCP&L will make the incentive payment within
6 approximately 30 days after it begins to receive data transmission from the installation.

7 **Q. Please explain how the incentive for Utility Make-Ready Work will be implemented.**

8 A. Based on the Company's experience, approximately 10% of the residential EV installations
9 will require Utility Make-Ready Work . This work would most likely be needed in older
10 homes that may still have a 60-amp service entrance that would need to be upgraded to
11 handle the load of charging an electric vehicle. Therefore, JCP&L is proposing to provide
12 an incentive to approximately 10% of the 2,000 total eligible installations, or 200
13 qualifying EV chargers.

14 The requirements for each location will be site specific but JCP&L has assumed for
15 program budget development the typical Utility Make-Ready Work will include a new
16 overhead or underground service wire, a new transformer and a new pole. The cost of the
17 new service is estimated at \$5,500 per qualifying location.

18 **Q. Will JCP&L also provide a rate credit for participants in the Residential Customer**
19 **Sub-program?**

20 A. Yes. JCP&L witness Mr. Siedt explains this aspect of the program in his pre-filed
21 testimony.

22

1 **Q. Can you provide additional details about the Residential Customer Sub-program?**

2 A. Please refer to Exhibit RAF-1, which contains additional detail about this Sub-program,
3 including the proposed expenditures.

4 **Q. What are the benefits of the Residential Customer Sub-program?**

5 A. As discussed above, the State has announced its commitment to electric vehicles. While a
6 residential program was not part of the minimum filing requirements of the EV Filing
7 Order, it nonetheless is appropriate in the context of encouraging the build-out of a
8 comprehensive EV infrastructure. In addition, the customer usage data that JCP&L will
9 receive as part of this Sub-program will be useful in understanding the impact of EV
10 charging at home to the JCP&L distribution system, and in the development of future rate
11 structures to further incentivize EVs in New Jersey.

12 **Q. Will this Sub-program assist New Jersey in meeting its clean energy goals?**

13 A. Yes. While the State's goals for EV and clean energy are laudable, there is still a good
14 deal of consumer resistance to purchasing EVs. Such resistance may be due to cost issues,
15 range anxiety associated with EVs, and the lack of both public and private EV charging
16 ports. The Residential Customer Sub-program will incentivize EV adoption and help New
17 Jersey meet its clean energy goals.

18 **2. Mixed-Use Commercial Customer Sub-program**

19 **2a.) Public/Community-based Component**
20

21 **Q. Please explain how the Public/Community component will work.**

22 A. JCP&L will provide incentives of up to \$6,700 each to 500 publicly accessible Level Two
23 charging ports. There will be a minimum of 2 and a maximum of 10 charging ports per
24 site. Similar to the Residential Customer Sub-program, this incentive is for make-ready

1 work on the customer's side of the meter. The charger owner will also have to agree to
2 provide usage data from the EV charger to JCP&L.

3 The incentive payment will be available for up to 500 charging ports on a first-
4 come, first-qualify basis.

5 **Q. How did JCP&L arrive at the \$6,700 incentive level?**

6 A. Based in its understanding of the industry, JCP&L estimates that a typical charge for make-
7 ready work behind the meter for a commercial Level Two public charging port would be
8 approximately \$6,700. To incentivize these installations, JCP&L is proposing to provide
9 an incentive that will offset 100% of the make-ready costs on the customer's side of the
10 meter in most circumstances. In addition, JCP&L considered that the PIV Act specifies at
11 least 1,000 Level Two chargers shall be available for public use across the State by
12 December 31, 2025. JCP&L customer count is about 30% of the State, so the minimum
13 number of incentives to be paid under this program is 30% of 1,000 Level Two chargers
14 for a total of 300 incentives. However, because the JCP&L territory by area is the largest
15 in the State, this Sub-program will increase the amount planned to 500 charging ports.

16 **Q. Will the participating customer have to provide invoices to JCP&L to receive the**
17 **incentive?**

18 A. Yes. Due to the varied nature of the installations, program participants will have to provide
19 JCP&L with invoices or other documentation of costs. JCP&L will provide an incentive
20 equal to the documented, qualifying costs, up to \$6,700 per port.

21 **Q. How does JCP&L define public charging? What requirements will a customer have**
22 **to satisfy to receive incentives under this Sub-program?**

1 A. Publicly accessible charging means a charger located on public land, a community location,
2 or a travel corridor. Such chargers are owned and operated by a site owner, property
3 manager or management company, EVSE Infrastructure Company or, in limited cases, an
4 EDC that is accessible to the public 24 hours a day, seven days a week. Such chargers may
5 charge the EV owner a fee for charging; such fees will be clearly displayed to the user.

6 Incentives will only be paid for new qualified Level Two chargers. A qualifying
7 charger must also be networked (i.e., charging stations or chargers with equipment capable
8 of sending and receiving communications *via* wi-fi or cellular network).

9 The station owner will also have to agree to provide usage data from the EV charger
10 to JCP&L. All customers – both residential and non-residential – who elect to receive
11 incentives under the JCP&L EV Driven Program shall be required to provide charging data
12 to JCP&L in a format to be determined on a semi-annual basis. Such data requirements
13 shall, at a minimum, include the number of charging events, time and date, number of
14 unique vehicles connected, total kWh dispensed, average kWh per charging event, and
15 average duration of charging events. This charging data submission requirement shall
16 apply to both DCFC and Level Two charging stations. Incentives are limited to a maximum
17 of 10 ports per site, with a minimum of 2 ports per site to qualify.

18 This incentive will be available to public charging stations on a first-come, first-
19 qualify basis during the term of the program beginning from the effective date of the
20 program and lasting until December 31, 2025 or until a total of 500 incentives have been
21 paid.

22

1 **Q. What are the benefits of the Public/community-based charger component?**

2 A. This Program component is fully consistent with the goals of the EV Filing Order. It will
3 provide an appropriate level of incentives to participants for making a site Charger-Ready
4 (includes expenses related to service panels, junction boxes, conduit, wiring, etc., necessary
5 to make a particular location able to accommodate EVSE on a “plug and play” basis), and
6 thereby help further the State’s goals for EV infrastructure and clean energy. In addition,
7 one of the main points of emphasis in both the PIV Act and the EV Filing Order is to
8 incentivize public charging stations. This Program component will help the State achieve
9 that goal.

10 **2b. Workplace Component**

11
12 **Q. Please describe how the Workplace component will work.**

13 A. This subprogram will work just like the public/community-based component. The only
14 difference is that the EV charging ports will be located at workplaces. Workplace means
15 a place of business where primarily employees would utilize charging services provided to
16 charge non-fleet vehicles; this definition includes but is not limited to commercial office
17 parks and office buildings, schools, industrial facilities, etc.

18 JCP&L will provide a \$6,700 incentive to qualifying participants for 100 Level
19 Two charging ports. There will be a minimum of 2 and a maximum of 10 charging ports
20 per site to qualify for the incentive.

21 The eligibility criteria and other program aspects are the same as the
22 public/community-based Sub-program detailed above.

23

1 **Q. What are the benefits of the Workplace component?**

2 A. This Sub-program is fully consistent with the goals of the EV Filing Order. It will provide
3 an appropriate level of incentives to participants for making a site Charger-Ready (includes
4 expenses related to service panels, junction boxes, conduit, wiring, etc., necessary to make
5 a particular location able to accommodate EVSE on a “plug and play” basis), and thereby
6 help further the State’s goals for EV infrastructure and clean energy.⁸ In addition,
7 increasing the number of EV charging ports at the workplace will help to alleviate range
8 anxiety associated with EVs. If employees know they can charge their vehicle while at
9 work, that will reduce the fear that the vehicle will not have enough charge left to complete
10 the commute home at the end of the workday.

11 **2c. Multi-Family Component**

12
13 **Q. Please describe how the Multi-family component will work.**

14 A. Again, this component will work just like the public/community-based component. The
15 only difference is that the EV charging ports will be located at multi-family dwellings. A
16 Multi-Family Dwelling means a structure containing more than one residence and having
17 no direct access between them except from an outside or a common hall⁹.

18 JCP&L will provide a \$6,700 incentive to qualifying participants for 300 Level
19 Two charging ports. There will be a limit of 10 ports per site, and a minimum of 2 ports
20 per site to qualify. In addition, 50% of this Sub-program will be reserved for multifamily
21 dwellings in overburdened/low-income communities. For the JCP&L EV Driven Program,
22 Overburdened/Low-Income communities are defined as any census block group, as

⁸ See EV Filing Order, at p. 16.

⁹ JCP&L Tariff for Service, Part I – General Information, Sheet No. 4

1 determined in accordance with the most recent United States Census, in which at least one
2 half of the households qualify as low income households and either: (1) at least 40% of the
3 residents of the census block group identify as Black, African American, Hispanic or
4 Latino, Asian, Pacific Islander, or as members of a State recognized tribal community; or
5 (2) at least 40% of the households in the census block group have limited English
6 proficiency. Overburdened/Low-Income communities are synonymous with the term
7 “Equity Areas.”¹⁰

8 The eligibility criteria and other program aspects are the same as the
9 public/community-based component.

10 **Q. Is JCP&L proposing a rate design specific to the Multi-family component?**

11 A. Yes. JCP&L witness Mr. Siedt discusses this issue in his pre-filed testimony.

12 **Q. What are the benefits of the Multi-family component?**

13 A. This component is fully consistent with the goals of the EV Filing Order. It will provide
14 an appropriate level of incentives to participants for making a site Charger-Ready (includes
15 expenses related to service panels, junction boxes, conduit, wiring, etc., necessary to make
16 a particular location able to accommodate EVSE on a “plug and play” basis), and thereby
17 help further the State’s goals for EV infrastructure and clean energy.¹¹ In addition, this
18 component will encourage the installation of EV charging ports in overburdened/low-
19 income communities.

20 **Q. Will the Mixed-Use Commercial Customer Sub-program have an incentive for Utility**
21 **Make-Ready Work?**

¹⁰ EV Filing Order, at p. 17.

¹¹ EV Filing Order, at p. 16.

1 A. Yes. All three components of this Sub-program include an incentive for Utility Make-
2 Ready Work. JCP&L has assumed that a new service will be required for every location
3 where one or multiple Level Two charging ports are installed and will also require a
4 separately metered service for each location. For Program purposes, JCP&L's assumption
5 is that there will be an average of 4 charging ports at each location, so Utility Make-Ready
6 Work will be required at 225 locations. The requirements for each location will be site
7 specific; however, JCP&L has assumed for program budget development that the typical
8 Utility Make-Ready Work will include new single-phase underground primary cable, a pad
9 mounted transformer, and a new pole. Therefore, for this aspect of the program, the
10 incentive will vary based on the documented work at each installation, up to \$11,100 per
11 qualifying installation.

12 **Q. Has the Company identified locations in its service territory that are suitable for the**
13 **installation of EV charging ports under the Commercial Mixed-Use Commercial Sub-**
14 **program?**

15 A. In general, JCP&L would expect that typical L2 commercial mixed-use customer charging
16 stations could be served most anywhere that JCP&L distribution infrastructure currently
17 exists. The exception would be providing service to larger concentrations of L2 chargers
18 in single locations. Utility infrastructure could be required in these cases, and owners
19 would need to contact JCP&L for further review.

20 **Q. Can you provide additional details about the Mixed-Use Commercial Customer Sub-**
21 **program?**

22 A. Please refer to Exhibit RAF-1, which contains additional detail about this Sub-program,
23 including the proposed expenditures.

1 **3. DCFC Public Charging Sub-program**

2 **Q. Please explain how the DCFC Public Charging Sub-program will work.**

3 A. Under this Sub-program, JCP&L will provide incentives of up to \$25,000 each for 200
4 DCFC public charging ports. The incentive is intended to cover the make-ready costs for
5 making a site Charger-Ready including expenses related to service panels, junction boxes,
6 conduit, wiring, etc., necessary to make a particular location able to accommodate EVSE
7 on a “plug and play” basis.¹² There will be a limit of 4 ports per site under this subprogram.
8 The charger owner will also have to agree to provide usage data from the EV charger to
9 JCP&L.

10 **Q. How did JCP&L arrive at a \$25,000 incentive level?**

11 A. Based on its understanding of the industry and its distribution system, JCP&L estimates
12 that a typical charge for make-ready work up to the charger stub for a DCFC charging port
13 would be approximately \$25,000. In addition, JCP&L considered that the PIV Act
14 specifies at least 400 DCFC shall be available for public use at no fewer than 200 charging
15 locations in the state by December 31, 2025. JCP&L’s customer count is about 30% of the
16 state, so 30% of 400 DCFC ports is 120 ports at 60 locations. However, because the JCP&L
17 territory, by area, is the largest in the state, the Company’s proposal is for ½ of the ports
18 specified in the PIV Act or 200 ports.

19 **Q. What requirements will a customer have to satisfy to receive incentives under this**
20 **subprogram?**

21 A. Incentive payments will be limited to installation of new qualified smart DCFC chargers
22 with rated nameplate capacity at a minimum of 50kW.

¹² EV Filing Order, at p. 16.

1 Colocation of one non-Combined Charging System capable charger with a dual
2 CCS / CHAdeMO capable charger makes a site eligible for 50% of the make-ready
3 incentives, colocation with two or more CCS / CHAdeMO capable chargers grants full
4 Make Ready eligibility to the site. CCS: Stands for “Combined Charging System.” A
5 charging standard developed by the Society of Automotive Engineers (“SAE”) and the
6 European Automobile Manufacturers Association that supports both AC and DC charging,
7 combined in a single plug design. CHAdeMO is an abbreviation of “CHArge de MOve”,
8 A DC fast charging standard co-developed by Tokyo Electric Power Company (TEPCO)
9 and Japanese automakers.

10 Site hosts must guarantee public accessibility and operational functionality. A
11 qualifying charger must also be networked (i.e., charging stations or chargers with
12 equipment capable of sending and receiving communications *via* wi-fi or cellular network).
13 All customers – both residential and non-residential – who elect to receive incentives under
14 the Company’s EV Charging Program shall be required to provide charging data to JCP&L
15 in a format to be determined on a semi-annual basis. Such data requirements shall, at a
16 minimum, include the number of charging events, time and date, number of unique vehicles
17 connected, total kWh dispensed, average kWh per charging event, and average duration of
18 charging events. This charging data submission requirement shall apply to both DCFC and
19 Level Two charging stations. Incentives will be paid for a maximum of 4 ports per site.
20 This incentive will be available to public charging stations on a first come first serve basis
21 during the term of the program beginning from effective date of the program and lasting
22 until December 31, 2025 or until a total of 200 incentives have been paid.

1 **Q. Will the participating customer have to provide invoices to JCP&L to receive the**
2 **incentive?**

3 A. Yes. Due to the varied nature of the installations, Program participants will have to provide
4 JCP&L invoices or other documentation of actual costs. JCP&L will provide an incentive
5 equal to the documented, qualifying costs, up to \$25,000 per port.

6 **Q. Will the DCFC Public Charging Sub-program have an incentive for Utility Make-**
7 **Ready Work?**

8 A. Yes. JCP&L has assumed a new service will be required for every location where one or
9 multiple DCFC ports are installed and will also require a separately metered service for
10 each location. For Program purposes, the Company's assumption is that there will be an
11 average of 2 charging ports at each location, so Utility Make-Ready Work will be required
12 at 100 locations. The requirements for each location will be site specific, but JCP&L has
13 assumed for program budget development that the typical Utility Make-Ready Work will
14 include new three-phase underground primary cable, a 750 kVA pad mounted transformer
15 (277/480V), metering CT's/PT's, and a new pole. Therefore, for this Sub-program, the
16 incentive will vary based on the documented work at each installation, up to \$50,500 per
17 qualifying installation.

18 **Q. Is JCP&L proposing a demand charge discount for the DCFC Public Charging Sub-**
19 **program?**

20 A. Yes. JCP&L witness Mr. Siedt discusses this issue in his pre-filed testimony.

21 **Q. What are the benefits of the DCFC Public Charging Sub-program?**

22 A. This Sub-program is fully consistent with the goals of the EV Filing Order. It will provide
23 an appropriate level of incentives to participants and thereby help further the State's goals

1 for EV infrastructure and clean energy. In particular, this Sub-program is consistent with
2 the PIV Act, which calls for the deployment of at least 400 DCFCs for public use by 2025.

3 **Q. Has the Company identified locations in its service territory that are suitable for the**
4 **installation of EV charging ports under this Sub-program?**

5 A. JCP&L agrees to post on the Company’s website public maps that will show where the
6 Company has sufficient three-phase distribution facilities in the immediate area to serve
7 new connections for DCFCs. The Company would plan to have these maps available within
8 90 days of a final BPU Order approving the EV Driven Program. These maps would be
9 prepared and updated by the Company on a regular basis, at least annually, and available
10 to the public in a timely manner in order to provide reasonably current maps showing
11 options for EV charging in JCP&L’s territory. The Company-prepared maps will be posted
12 for information only and will not be used by the Company in responding to service requests.
13 The Company further agrees that it will comply with any regulations promulgated by the
14 Board regarding mapping EV sites and capacity.

15 **Q. Can you provide additional details about the DCFC Public Charging Sub-program?**

16 A. Please refer to Exhibit RAF-1, which contains additional detail about this Sub-program,
17 including the proposed expenditures.

18 **4. DCFC Last Resort Sub-program**

19 **Q. Please describe JCP&L’s plans for a “last resort” Sub-program of the JCP&L EV**
20 **Driven Program.**

21 A. The EV Filing Order states that, under certain circumstances defined as a “last resort,” an
22 EDC may own and operate EV charging stations upon Board approval. More specifically,
23 the EV Order states: “Areas of Last Resort are locations that have not generated private

1 investment interest for a minimum of 12 months after the EDC program has begun, for
2 overburdened communities, or 18 months for other areas.”¹³ Utilities may petition the
3 Board to own and operate charging stations in these areas after those timeframes. JCP&L’s
4 DCFC Last Resort Sub-program is consistent with the EV Filing Order.

5 More specifically, if the private marketplace does not install a sufficient number of
6 DCFC charging ports within two years after the Program begins, JCP&L will install, own
7 and operate approximately 20 DCFC charging ports at appropriate locations within its
8 service territory. Consistent with the EV Filing Order, JCP&L will seek the Board’s
9 approval prior to commencing work on any DCFC Last Resort EV charging stations.

10 **Q. Can you provide additional details about the DCFC Last Resort Sub-program?**

11 A. Please refer to Exhibit RAF-1, which contains additional details about this Sub-program,
12 including the proposed expenditures.

13 **5. Overburdened Communities Sub-program**

14 **Q. Please described the proposed Overburdened Communities Sub-program.**

15 A. Given that transportation is one of the largest sources of greenhouse gas emissions in NJ,
16 this Sub-program is offered as JCP&L’s commitment to reducing these emissions by
17 accelerating access to — and adoption of — electric vehicles for everyone. Community
18 organizations and nonprofits can apply for grants to advance electric vehicle adoption, EV
19 charging infrastructure and/or education in the communities JCP&L serves.

20 **Q. What type of pilot projects would qualify for grants under the Overburdened**
21 **Communities Sub-program?**

¹³ EV Filing Order, at p. 21.

1 A. Community organizations and nonprofits can apply for grants to advance EV adoption, EV
2 charging infrastructure and/or education. Examples the qualifying organizations could get
3 awards for include EVs with charging infrastructure, electric cargo vans for meal delivery,
4 EVs for ride share programs, and very targeted education and outreach programs to create
5 awareness of EV ownership in underserved areas. However, JCP&L will leave it to the
6 market participants to develop unique pilot projects that will help deploy and EV
7 infrastructure in the State.

8 **Q. Who will decide which pilot projects receive grants?**

9 A. JCP&L will receive proposals for grants and determine which projects receive awards.

10 **Q. What is the proposed budget?**

11 A. JCP&L is proposing a budget of \$2.5 million for the Overburdened Communities Sub-
12 program.

13 **6. Consumer Education and Outreach Initiative**

14 **Q. Please describe JCP&L’s Consumer Education and Outreach Initiative.**

15 A. The purpose of the Consumer Education and Outreach initiative is to comply with the
16 Board’s directive to “provide outreach and education on EVs and EV charging in a variety
17 of consumer-friendly and comprehensible formats.”¹⁴

18 The framework of the program is designed to:

- 19 • Increase awareness of EVs and EV charging infrastructure
- 20 • Encourage interest in EVs through benefits of driving electric
- 21 • Drive consideration of EVs through knowledge of EVs and charging
22 infrastructure

¹⁴ EV Filing Order, at p. 24.

- 1 • Enhance intent through residential make-ready incentives
- 2 • Inform evaluation through web portal and other means
- 3 • Encourage purchase of electric vehicles through co-promotion of incentives for
- 4 residential and public charging.

5 **Q. Please describe the channels the Company will utilize to convey information about**
6 **the Residential Customer Sub-program.**

7 A. JCP&L will convey information about EVs and EV charging on applicable Company
8 webpages, which will include but not necessarily be limited to the secure web portal for
9 registering for the incentives. Information to be conveyed may include the purpose of the
10 incentive, tips on the benefits of Level Two charging, a list of qualifying EV chargers,
11 information about the Off-Peak, Off-Bill Credit Program, and other EV-related material.

12 In addition to the website, JCP&L will utilize digital media such as Facebook,
13 Nextdoor, and search engine optimization to reach the target audience. To increase the
14 efficacy of the Company’s consumer education, JCP&L may conduct market research to
15 identify and reach customers likely to be receptive to EV and residential make ready
16 incentives.

17 There will also be a need for print material for locations such as community
18 engagement events and car dealerships.

19 In addition, recognizing that installers will serve as de facto channel partners,
20 JCP&L will also communicate specifics of the program to contractors so that they can help
21 customers who might not otherwise know about the incentives.

22 **Q. Please describe the channels the Company will utilize to convey information about**
23 **the Mixed-Use Commercial Customer Sub-program.**

1 A. JCP&L will utilize many of the same channels as for the Residential Customer Sub-
2 program, with the exception that Mixed-Use Commercial Customer Sub-program does not
3 require the same type of outreach via social media.

4 The Mixed-Use Commercial Customer Sub-program will instead include targeted
5 messaging to homeowner associations, apartment building landlords, commercial property
6 managers, and JCP&L will investigate digital media targeting the commercial real estate
7 market.

8 **Q. Please describe the channels the Company will utilize to convey information about**
9 **the DCFC Public Charging Sub-program.**

10 A. The target market for the DCFC Public Charging Sub-program is narrower than for the
11 other Sub-programs, so JCP&L’s outreach efforts will focus on the website, a specific
12 phone number extension and/or email address, vehicle Original Equipment Manufacturers
13 (“OEMs”), key accounts, and the commercial real estate market.

14 **Q. Please describe the types of messaging JCP&L plans to convey.**

15 A. JCP&L expects that messaging will fall into one or more of three categories: Awareness to
16 increase EV adoption, EV and EV charging-specific information, and information specific
17 to commercial landlords.

18 **Q. Please describe the three categories.**

19 A. The awareness portion of the campaign will include information about JCP&L’s make
20 ready offerings and off-peak credit. The campaign will also leverage other media to
21 emphasize the financial and health benefits of driving electric. Because the general public
22 may not be familiar with EVs and Plug-In Hybrid Electric Vehicles (“PHEVs”), the

1 campaign will also include an explanation as well as a vehicle selector tool, localized
2 incentives, and a section on carbon reduction and battery issues.

3 The EV and EV charging-specific portion of the campaign will include information
4 such as the different types of charging, charging at home versus away from home, how to
5 find and understand different types of charging, and EV-specific concepts such as miles
6 per kWh and Miles Per Gallon equivalent.

7 The commercial portion of the campaign will address awareness of Utility- Make-
8 Ready Work, and will convey to landlords the benefits of bringing EV charging to the
9 property (whether retail or multifamily), best practices and features of hardware and
10 networking, and material for permitting agencies to help streamline their processes.

11 **Q. What are your plans for reaching overburdened communities?**

12 A. Maximizing communication and engagement with overburdened communities is a high
13 priority for JCP&L. The Company will leverage its government affairs, key accounts
14 representatives, community affairs team, employees who serve on boards, and others to
15 engage meaningfully, early, and often. The goal will be to listen to the needs of various
16 communities, recognizing that such needs may vary across the region. JCP&L strives to be
17 responsive and inclusive. To that end, the JCP&L EV Driven Program includes a dedicated
18 budget that will be invested according to the needs identified through a rigorous process of
19 community engagement. The Company may also work with a consultant experienced in
20 transportation electrification in overburdened and diverse communities.

21

1 **Q. What communication channels do you plan to deploy?**

2 A. Based on communication budgets in other EV charging campaigns,¹⁵ JCP&L expects that
3 approximately half of its outreach and education budget will be invested in digital media,
4 which includes social media, paid search, display ads, video, and podcasts. The Program
5 will also use interactive methods, such as online calculators and, potentially, kiosks. The
6 Company expects to communicate its messaging through earned media in the form of news
7 stories, blogs, podcasts, and local EV clubs. Because many consumers have never
8 experienced driving in an EV, JCP&L may partner with vehicle OEMs and others to
9 support EV ride and drives, and sponsor ribbon cuttings and pop-up events focused on EVs
10 and EV charging. The Company will also engage with local businesses and community
11 organizations to help get the word out about EVs and EV charging. Finally, Company
12 employees will be asked to serve as EV Ambassadors to promote EVs and EV charging to
13 their friends, family, and community.

14
15 **IV. PROGRAM IMPLEMENTATION**

16 **Q. Please explain JCP&L's plan for implementing the JCP&L EV Driven Program and**
17 **the various residential and commercial offerings.**

18 A. In conjunction with its consumer education and outreach efforts, the Company will develop
19 appropriate applications for each of the subprograms within the overall EV Driven
20 Program. These applications will be publicly available on the Company's website.
21 JCP&L will also have a dedicated email address and inbox for inquiries about the EV

¹⁵ See, e.g., Electrify America National ZEV Investment Plan: Cycle 2, Public Version, Feb. 4, 2019, at 64 (<https://www.epa.gov/sites/production/files/2019-02/documents/cycle2-nationalzevinvestmentplan.pdf>).

1 Driven Program, through which customers and potential participants can ask questions and
2 request additional information.

3 **Q. When can customers begin enrolling in the EV Driven Program?**

4 A. JCP&L is proposing that customers and program participants can submit applications as of
5 January 1, 2022.

6 **Q. Please describe the general approach the Company will use to implement the EV
7 program.**

8 A. The Company will establish Terms and Conditions that govern the specific aspects of each
9 part of the EV program. The Terms and Conditions will be posted to the Company's
10 website and each aspect of the program will be supported by a customer website landing
11 page explaining the program, providing a way to enroll in the program *via* the landing page
12 and a set of frequently asked questions ("FAQs"). The Company will implement the EV
13 program through a combination of Company employees, contractors and vendors including
14 the use of third-party call centers. Payment of all Incentives will require that customers and
15 site hosts comply with all pertinent Terms and Conditions demonstrating that make-ready
16 work has been completed.

17 **Q. Please describe how JCP&L will implement the Residential Customer Sub-program.**

18 A. Customers seeking a residential make-ready incentive may visit the JCP&L webpage or
19 contact JCP&L to learn more about the residential EV program. Once the customer has
20 applied for an incentive, JCP&L will validate the customer as a current utility customer,
21 the location as a valid residential location within the JCP&L service territory and determine
22 if the customer is deemed to be a qualified account. The Company will determine if the
23 site requires Utility Make-Ready Work. Customers will be instructed to purchase a

1 qualifying charger from the retailer of their choice and have it installed. The Company will
2 process the incentive subject to the terms and conditions of the EV program. Once a
3 customer’s application has been received and approved, and the EV charger is activated,
4 JCP&L will make the incentive payment within approximately 30 days after it begins to
5 receive data transmission from the installation. All necessary permits must be obtained for
6 any electrical work done within a residence.

7 **Q. Please describe how JCP&L will implement the Mixed-Use Commercial Sub-**
8 **program.**

9 A. Customers seeking an EV make-ready incentive for a smart commercial Level Two
10 installation may visit the JCP&L webpage or contact JCP&L to learn more about the
11 commercial Level Two program and apply for an incentive. JCP&L will validate the
12 property as being in the service territory, ensure landowner consent, and advise the
13 customer to initiate a new service request. Customers will be instructed to purchase a
14 qualifying charger from the retailer of their choice and have it installed by a licensed
15 electrician. Incentives will be issued in accordance with program terms and conditions.
16 Due to the varied nature of the installations, program participants will have to provide
17 JCP&L with invoices or other documentation of costs. JCP&L will provide an incentive
18 equal to the documented, qualifying costs, up to \$6,700 per port.

19 **Q. Please explain JCP&L’s plan for implementing the DCFC Sub-program.**

20 A. Customers seeking an EV make-ready incentive for a DCFC installation may visit the
21 JCP&L webpage or contact JCP&L to learn more about the DCFC EV program and apply
22 for an Incentive. JCP&L will validate the property as being in the service territory and
23 advise the customer to initiate a new service request. Incentives will be issued in

1 accordance with program Terms and Conditions. Due to the varied nature of the
2 installations, Program participants will have to provide JCP&L invoices or other
3 documentation of actual costs. JCP&L will provide an incentive equal to the documented,
4 qualifying costs, up to \$25,000 per port.

5 **Q. Please explain JCP&L's plan for implementing the DCFC demand charge discount.**

6 A. Customers seeking the DCFC demand charge discount may visit the JCP&L webpage or
7 contact JCP&L to learn more about the offering. JCP&L will validate the account as being
8 active and current. To receive a DCFC demand charge discount, customers must provide
9 evidence of the account being a DCFC site. Demand charge discounts will be provided to
10 customers in accordance with program Terms and Conditions.

11 **Q. What type of reporting will the Company provide the BPU?**

12 A. The Company will provide a semi-annual report on the status of each component of the EV
13 program, including program spending, number of charging ports and charging locations
14 served under each portion of the program, and total energy consumption associated with
15 EV charging under the program. Total EV load data will be provided annually to the BPU.

16
17 **V. CONCLUSION**

18 **Q. Does this conclude your pre-filed direct testimony at this time?**

19 A. Yes.

Experience and Qualifications

Resume: Education and Experience of Randall A. Frame

Education:

- 1982 Associate of Applied Science Degree, Electrical Engineering Technology, University of Akron, Ohio
- 1986 Bachelor of Science Degree, Electrical Engineering Technology, University of Akron, Ohio

Licenses:

- 1989 Professional Engineer Electrical Engineer State of PA
- 1991 Professional Engineer Electrical Engineer State of OH

Experience:

- 1982 – 1985 Engineering Technologist, Distribution Planning – Ohio Edison
- 1985 – 1987 Engineering Technologist, Distribution Standards – Ohio Edison
- 1987 – 1990 Engineering Supervisor, Youngstown Division – Ohio Edison
- 1990 – 1991 Energy Application Engineer, Warren Division – Ohio Edison
- 1991 – 1994 Division Engineering Manager, Springfield Division – Ohio Edison
- 1994 – 1997 Manager, Industrial Marketing, Akron Division – Ohio Edison
- 1997 – 2002 Director, Sales – FirstEnergy Solutions
- 2002 – 2003 Special Assignment, Performance & Process Improvement – FirstEnergy Service Company
- 2003 – 2004 Director, Performance & Process Improvement – FirstEnergy Service Company
- 2004 – 2011 Director, Supply Chain – FirstEnergy Service Company
- 2011 – 2013 Regional President – Toledo Edison
- 2013 – 2018 Regional President – Ohio Edison
- 2018 – Present Director, Emerging Technology Program – FirstEnergy Service Company

Jersey Central Power & Light EV Driven Program Detailed Program Summary

Program Description, Term, and Investment: The Program will be comprised of the components in the table below, with a total investment level of \$31,577K in electric vehicle subprograms and \$18,347K of implementation costs over 4 years beginning in 2022 following the Board’s Order authorizing the Program.

Program Component	Description	Budget (\$K)
1. Residential Customer Sub-program – Customer Make-Ready Incentive	Incentive on Level Two networked chargers installed at single family residences. JCP&L will provide incentives on Level Two make-ready of \$1,000 for electrical work needed for qualified Level Two chargers with equipment to enable sharing of charging data with JCP&L in up to 2,000 residences	\$2,000
Residential Customer Sub-program – Utility Make-Ready Work	JCP&L cost for new overhead or underground service wire, new transformer, and new pole at 10% of residences receiving above rebate (200) at a cost of \$5,500 per location.	\$1,100
Residential Customer Sub-program Off-Bill/Off-Peak Credit	JCP&L will provide a Residential Off-Peak, Off-Bill Credit available to up to 2,000 EV owners annually that have an approved Level Two charger	\$1,107
2. Mixed-Use Commercial Customer Sub-program 2a. Public/Community-based Component	Incentives to cover 100% of customer make ready costs up to \$6,700 per smart charging port for up to 500 ports.	\$3,350
2b. Workplace Component	Incentives to cover 100% of customer make ready costs up to \$6,700 per smart charging port for up to 100 ports.	\$670
2c. Multi-Family Component	Incentives to cover 100% of customer make ready costs up to \$6,700 per smart charging port for up to 300 ports.	\$2,010
Mixed-Use Commercial Customer Sub-program Off-Peak / Off-Bill Credit	Rate incentive for up to 300 qualifying new Level Two charging ports at multi-family locations to be charged the equivalent of JCP&L Residential Rates. In addition, JCP&L will offer the Off-Peak / Off-Bill Credit at up to 75 locations on a first-come, first-serve basis.	\$899
Mixed -Use Commercial Customer Sub-program – Utility Make-Ready Work	JCP&L will install new single-phase underground primary cable, a pad mounted transformer, and a new pole at approximately 225 charger locations at a cost of \$11,100 per location (assumes 4 charging ports/location).	\$2,497

Program Description, Term, and Investment: The Program will be comprised of the components in the table below, with a total investment level of \$31,577K in electric vehicle subprograms and \$18,347K of implementation costs over 4 years beginning in 2022 following the Board’s Order authorizing the Program.

Program Component	Description	Budget (\$K)
3. DCFC Public Charging Sub-program - Customer Make-Ready Incentive	Incentives to cover 100% of customer make ready costs to charger stub at up to \$25,000 per smart charging port for up to 200 ports	\$5,000
DCFC Public Charging Sub-program - Utility Make-Ready Work	JCP&L will install new three-phase underground primary cable, a 750 kVA pad mounted transformer (277/480V), metering CT's/PT's, and a new pole at approximately 100 charger locations at cost of \$50,500 per location (assumes 2 charging ports/location).	\$5,050
3a. DCFC Public Charging Sub-program - Demand Charge Discount	Reduces the impact of the demand charge for DCFC. 50% discount in 2022 and 2023; 25% discount in 2024; 0% discount in year 2025.	\$1,169
4. Last Resort DCFC Sub-program	JCP&L will own, install, and operate up to 20 DCFC charging ports at locations deemed as last resort with no interest from 3 rd parties beginning in year 2024.	\$4,225
5. Overburdened Communities Sub-program	Community organizations and nonprofits can apply for grants to advance electric vehicle adoption, EV charging infrastructure and/or education in the communities JCP&L serves. JCP&L will provide grants for innovative, EV-related pilot projects proposed by market participants.	\$2,500
TOTAL PROGRAM COSTS	Inclusive of costs for offerings outlined above	\$31,577
Total Program Implementation Costs	Data Collection / Networking, IT Systems, Administrative, Consumer Education and Outreach	\$18,347 ¹
TOTAL INVESTMENT		\$49,924

1. \$18,347K total represents an estimated \$4,992K in Data Collection and Networking costs, an estimated \$3,370K in IT Systems Upgrade costs, \$4,992K in Administrative costs, and an estimated \$4,992K in Marketing, Education and Outreach costs

1. Residential Customer Sub-program – Customer Make-Ready Incentive

Budget	\$2,000,000
Equipment Eligibility	<ul style="list-style-type: none">• Limited to new EV charging infrastructure• Target of 2,000 new EV owners on a first come, first serve basis• Incentive limited to one incentive per residential service address• Limited to installation of new qualified Level Two chargers capable of two-way communication.
Operational Eligibility	<ul style="list-style-type: none">• Site hosts must share charging data from chargers that receive make-ready incentive funds with JCP&L as a condition of receipt of make ready incentives• Incentive to be capped at \$1,000
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

1. Residential Customer Sub-program – Utility Make-Ready Work

Budget	\$1,100,000
Equipment Eligibility	<ul style="list-style-type: none">• Assumes new service may be required at approximately 10% of residences where a new Level Two networked charging port is installed• Utility make-ready work will be covered only for new residential smart Level Two equipment installs• The utility infrastructure requirements for each location will be site-specific and determined by JCP&L• If a residence requests equipment larger than deemed necessary by JCP&L, the site host will be required to pay JCP&L for the incremental cost
Operational Eligibility	<ul style="list-style-type: none">• Utility make-ready work will be provided on a per residence basis, with a target of 200 residences, based on assumption of approximately 10% of residences will require a service upgrade that will also require work on JCP&L infrastructure• Typical incentive to include a new overhead or underground service wire, a new transformer and a new pole. The cost of the new service is to be capped at \$5,500 per location
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

1. Residential Customer Sub-program – Off-Bill/Off-Peak Credit

Budget	\$1,107,179
Equipment Eligibility	<ul style="list-style-type: none">• Incentive limited to one incentive per residential service address• Limited to installation of new qualified Level Two chargers capable of two-way communication.• Receipt of off-peak incentive contingent upon the following: 1) application with prequalified Level Two charger; and 2) agreement to provide detailed charging data to JCP&L
Operational Eligibility	<ul style="list-style-type: none">• Target of 2,000 new or existing EV owners on a first come, first serve basis• Charging data must be collected for a minimum of 2 years to inform design of revenue neutral rate structure
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

2 a. Mixed-Use Commercial Customer Sub-program - Public / Community-based

Budget	\$3,350,000
Equipment Eligibility	<ul style="list-style-type: none">• Limited to new EV charging infrastructure• Limited to installation of new qualified Level Two chargers capable of two-way communication.• Limited to incremental costs associated with new charging stations• Requires installation of standard SAE J1772 connector
Operational Eligibility	<ul style="list-style-type: none">• Incentive will be distributed on a per port basis, with a target of 500 charging ports• Limited to a maximum of 10 ports and minimum of 2 ports per site• Incentive to be capped at 100% of make ready costs up to \$6,700 per smart charging port• Stations with proprietary charging connectors must collocate with at least one charging station with an SAE J1772 connector port to receive incentive• Site hosts must agree to share charging data with JCP&L as a condition of receipt of make ready incentives• Site host must guarantee public accessibility and operational functionality• Public Level Two charging stations must feature use of multiple forms of payment• Site hosts are permitted to determine charging prices to EV drivers• Make ready work to be completed by a licensed electrician
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

2b. Mixed-Use Commercial Customer Sub-program - Workplace Component

Budget	\$670,000
Equipment Eligibility	<ul style="list-style-type: none">• Limited to new EV charging infrastructure• Limited to installation of new qualified Level Two chargers capable of two-way communication at workplace facilities located in JCP&L's service territory• Limited to incremental costs associated with new charging stations• Requires installation of standard SAE J1772 connector
Operational Eligibility	<ul style="list-style-type: none">• Incentive will be distributed on a per port basis, with a target of 100 charging ports• Limited to a maximum of 10 ports and minimum of 2 ports per site• Incentive to be capped at 100% of make ready costs up to \$6,700 per smart charging port• Stations with proprietary charging connectors must collocate with at least one charging station with an SAE J1772 connector port to receive incentive• Site hosts must agree to share charging data with JCP&L as a condition of receipt of make ready incentives• Site host may or may not allow public accessibility, but must guarantee operational functionality• Workplace Level Two charging stations may be free to employees or may feature use of multiple forms of payment• Site hosts are permitted to determine charging prices to EV drivers• Make ready work to be completed by a licensed electrician
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

2c. Mixed-Use Commercial Customer Sub-program- Multi-Family Component

Budget	\$2,010,000
Equipment Eligibility	<ul style="list-style-type: none">• Limited to new EV charging infrastructure• Limited to installations of new Level Two charging stations at multi-family dwellings located in JCP&L's service territory; chargers must be capable of two-way communication• Limited to incremental costs associated with new charging stations• Requires installation of standard SAE J1772 connector• A new and separate utility meter is required for each new commercial Level Two site
Operational Eligibility	<ul style="list-style-type: none">• Incentive will be distributed on a per port basis, with a target of 300 charging ports• Limited to a maximum of 10 ports and minimum of 2 ports per site• Incentive to be capped at 100% of make ready costs up to \$6,700 per smart charging port• Charging stations must be sited in locations accessible to all EV driving residents of the family dwelling• Stations with proprietary charging connectors must collocate with at least one charging station with an SAE J1772 connector port to receive incentive• Site hosts must agree to share charging data with JCP&L as a condition of receipt of make ready incentives• Site host must guarantee operational functionality• Public Level Two charging stations must feature use of multiple forms of payment• Site hosts are permitted to determine charging prices to EV drivers• Make ready work to be completed by a licensed electrician
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

2. Mixed-Use Commercial Customer Subprogram- Off-Peak / Off-Bill Credit

Budget	\$898,691
Equipment Eligibility	<ul style="list-style-type: none"> Limited to installations of new Level Two charging stations at multi-family dwellings located in JCP&L's service territory Rates will be solely available for Level Two charging stations and associated infrastructure electric use Requires that Level Two charging stations and associated infrastructure are behind a dedicated JCP&L electric meter to qualify for this rate
Operational Eligibility	<ul style="list-style-type: none"> Target of 300 new Level Two charging sites for the residential equivalent rate at multi-family dwellings on a first come, first serve basis Target of 75 new Level Two charging sites for the off-peak / off-bill credit on a first come, first serve basis The JCP&L discount rates shall automatically terminate on earlier of December 31, 2025, or when a new rates based on a cost-of-service study prepared by JCP&L have been approved by the Board. Site hosts are permitted to determine charging prices to EV drivers Site hosts must agree to share charging data with JCP&L as a condition of receipt of calculated rate structure in order to inform cost of service study and future rate design of permanent tariff solution
Term	<ul style="list-style-type: none"> Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

2. Mixed-Use Commercial Customer Sub-program – Utility Make-Ready Work

Budget	\$2,497,500
Equipment Eligibility	<ul style="list-style-type: none">Assumes new service is required for every location where multiple Level Two charging ports are installedA new and separate utility meter is required for each new commercial Level Two siteUtility make-ready work will be covered only for new commercial Level Two equipment installsThe utility infrastructure requirements for each location will be site specific and determined by JCP&LIf a site host requests equipment larger than deemed necessary by JCP&L, the site host will be required to pay JCP&L for the incremental cost
Operational Eligibility	<ul style="list-style-type: none">Utility make-ready work will be provided on a per site basis, with a target of 225 charging station locations, based on assumption of an average of 4 new ports per the total of 900 ports covered under customer make-ready incentivesTypical incentive to include new single-phase underground primary cable, a pad mounted transformer, and a new pole. The cost of the new service is to be capped at \$11,100 per location.
Term	<ul style="list-style-type: none">Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

3. DCFC Public Charging Sub-program - Customer Make-Ready Incentive

Budget	\$5,000,000
Equipment Eligibility	<ul style="list-style-type: none">• Limited to new EV charging infrastructure located in JCP&L's service territory• Limited to installation of new qualified smart DCFC chargers with rated nameplate capacity at a minimum of 50kW.• Limited to incremental Make Ready costs associated with new charging stations• Collocation of at least one dual CCS / CHAdeMo capable charger makes a site eligible for 50% of the incentives, collocation with two or more CCS / CHAdeMo capable chargers grants full Make Ready.
Operational Eligibility	<ul style="list-style-type: none">• Incentive will be distributed on a per port basis, with a target of 200 charging ports• Limited to a maximum of 4 ports per site• Incentive to be capped at 100% of Make Ready costs up to \$25,000 per smart charging port• Site hosts must agree to share charging data from chargers that receive make-ready incentive funds with JCP&L as a condition of receipt of make ready incentives• Site host must guarantee public accessibility and operational functionality• Public DCFC charging stations must feature use of multiple forms of payment• Site hosts are permitted to determine charging prices to EV drivers• Make ready work to be completed by a licensed electrician
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

3. DCFC Public Charging Sub-program - Utility Make-Ready Work

Budget	\$5,050,000
Equipment Eligibility	<ul style="list-style-type: none">• Assumes new service is required for every location where at least 2 DCFC ports are installed• A new and separate utility meter is required for each new DCFC site• Utility make-ready work will be covered only for new DCFC equipment installs• The utility infrastructure requirements for each location will be site specific and determined by JCP&L• If a site host requests equipment larger than deemed necessary by JCP&L, the site host will be required to pay JCP&L for the incremental cost
Operational Eligibility	<ul style="list-style-type: none">• Utility make-ready will be provided on a per site basis, with a target of 100 charging station locations, based on assumption of an average of 2 new ports per the total of 200 ports covered under customer make-ready incentives• Typical incentive to include new three-phase underground primary cable, a 750 kVA pad mounted transformer (277/480V), metering CT's/PT's, and a new pole. The cost of the new service to be capped at \$50,500 per location
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

3. DCFC Public Charging Sub-program - Demand Charge Discount

Budget	\$1,168,787
Equipment Eligibility	<ul style="list-style-type: none">• New and existing DCFC charging sites are eligible for discounted rate• Rate will be solely available for DCFC charging stations and associated infrastructure electric use• Requires that DCFC charging stations and associated infrastructure are behind a dedicated JCP&L electric meter to qualify for this rate
Operational Eligibility	<ul style="list-style-type: none">• Target of 100 new or existing DCFC charging sites on a first come, first serve basis• The JCP&L discount rate shall 50% in years 2022 & 2023; 25% in year 2024; 0% in year 2025.• Site hosts are permitted to determine charging prices to EV drivers• Site hosts must agree to share charging data with JCP&L as a condition of receipt of calculated rate structure in order to inform cost of service study and future rate design of permanent tariff solution
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

4. Last Resort DCFC Sub-program

Budget	\$4,225,000
Equipment Eligibility	<ul style="list-style-type: none">• Last Resort locations will be ideal sites for DCFC chargers that have not generated private investment interest for a minimum of 12 months after the Program has begun, for overburdened communities, or 18 months for other areas. Based on this, JCP&L plan is to begin investing here 24 months after program starts.• JCP&L will submit locations to the Board for approval prior to commencing work
Operational Eligibility	<ul style="list-style-type: none">• Target will be a maximum of 10% of the DCFC ports planned in the Program, or a total of 20 ports• Company owned and operated sites will have a minimum of 2 DCFC ports and maximum of 4 DCFC ports• For purposes of defining this program, JCP&L has assumed an incremental cost of \$150,000 per dual port DCFC unit, plus normal utility overheads.• The \$25,000 of make ready on the low side of the pad mount transformer per port, and the \$50,500 of make ready on the utility side per site is not included here. It is already considered in subprogram 3.• Last Resort DCFC sites owned by JCP&L would also qualify for the demand charge reduction in subprogram 3
Term	<ul style="list-style-type: none">• Beginning no sooner than January 1, 2024 with BPU approval and lasting until December 31, 2025 or until program funds are fully exhausted.

5. Overburdened Communities Sub-program

Budget	\$2,500,000
Equipment Eligibility	<ul style="list-style-type: none">• The purpose of this subprogram is to leverage community resources and uncover grass-roots ideas for benefitting overburdened communities through transportation electrification.• This investment helps ensure that funding and benefits from the Program is equitably distributed across all customers.• JCP&L will conduct targeted outreach to the community and will engage with sufficient lead time to develop a pipeline of proposals.• Awardees will be expected to involve JCP&L in social media and in-person events related to the transportation electrification award; JCP&L may utilize its own branding on the asset, depending on the use-case.
Operational Eligibility	<ul style="list-style-type: none">• Eligible applicants include Community Organizations and non-profits, where a budget not exceeding a certain level, and generally are intended not to be overly burdensome.• Applicants may submit and receive funding for more than one proposal.• Technical assistance may be available to determine eligibility and limited financial assistance for preparing applications may also be available.• Applications will be reviewed by a group that is knowledgeable about transportation electrification but does not include the JCP&L EV implementation team; the implementation team will have the final decision on awardees.• At least a portion of the award is expected to be paid out up front, with the remainder to be paid later in the program
Term	<ul style="list-style-type: none">• Term of the program beginning from date of program launch and lasting until December 31, 2025 or until program funds are fully exhausted.

**BEFORE THE
NEW JERSEY BOARD OF PUBLIC UTILITIES**

**In The Matter Of The Verified Petition Of Jersey Central
Power & Light Company For Approval Of An Electric
Vehicle Program and an Associated
Cost Recovery Mechanism
BPU Docket No. _____**

**Direct Testimony
of
Kevin M. Siedt**

**On Behalf Of
Jersey Central Power & Light Company**

March 1, 2021

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Kevin M. Siedt and my business address is 300 Madison Avenue, Morristown, NJ
4 07862-1911.

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by First Energy Service Company and my title is Rates Consultant in the Rates
7 and Regulatory Affairs Department, concentrating on rates in New Jersey. My principal
8 responsibilities are to provide accounting, financial and analytical support for Jersey Central
9 Power & Light Company (“JCP&L”). My experience and qualifications are set forth in detail
10 in Appendix A to my direct testimony.

11 **Q. Have you previously testified before the New Jersey Board of Public Utilities (“BPU”
12 or “Board”)?**

13 A. Yes, I have previously testified in the 2003-2005 NGC evidentiary hearing regarding the
14 restructuring of JCP&L’s Non-Utility Generator (“NUG”) contracts.¹ In addition, over the
15 past 20 years, I have testified before the Pennsylvania Public Utility Commission (“Pa
16 PUC”) on several Dockets, including the Metropolitan Edison, Pennsylvania Electric
17 Company, Pennsylvania Power Company, and West Penn Power Company 2014 and 2016
18 distribution base rate cases. Appendix A to my direct testimony provides further detail on
19 the dockets in which I have provided testimony in both New Jersey and Pennsylvania.

20 **Q. Please describe the purpose of your direct testimony.**

¹ 2005 NGC Filing – NUG Mitigation Efforts, BPU Docket No. ER05121018.

1 A. In compliance with the Board Order regarding Electric Vehicle infrastructure build out²,
2 JCP&L is filing in its Petition for approval of an Electric Vehicle (“EV”) Program
3 (“JCP&L EV Driven Program” or “Program”). My direct testimony supports JCP&L’s
4 proposed cost recovery mechanism for the Program. I will address the following topics: (i)
5 Revenue requirement calculation for the various Sub-programs within JCP&L’s EV Driven
6 Program; (ii) Rate Design proposal; (iii) Proposed cost recovery mechanism; (iv) Bill
7 impacts; and (v) Proposed tariff sheets for the JCP&L EV Driven Program.

8 My testimony provides detailed schedules setting forth the proposed revenue
9 requirements, rate design calculation, initial rates, and the projected bill impacts.

10 **II. REVENUE REQUIREMENT**

11 **Q. Please describe the various Sub-programs of the JCP&L EV Driven Program for**
12 **which revenue requirements have been developed.**

13 A. The budgets for the six Sub-programs, including an education and outreach initiative,
14 within the JCP&L EV Driven Program form the basis of the revenue requirements. A more
15 detailed description of the JCP&L EV Driven Program budgets is included in the Direct
16 Testimony of Randall A. Frame. I have calculated revenue requirements for the following
17 Sub-programs:

18

² *V/M/O Straw Proposal on Electric Vehicle Infrastructure Build Out*, BPU Docket No. QO20050357, Order Adopting the Minimum Filing Requirements for Light-Duty, Publicly Accessible Electric Vehicle Charging (dated September 23, 2020) (“EV Filing Order”).

1 1. **Residential Customer Sub-program** – provides for Customer Make-
2 Ready Incentives³ for Level Two (“Level Two” or “L2”) chargers installed at single family
3 residences. Also, service will be provided under a Rider EV special provision, which will
4 include an Off-Bill, Off-Peak usage credit to participants in this Sub-program. The budget
5 also includes amounts that the utility will fund and recover for Utility Make-Ready Work⁴,
6 which is assumed to be 10% of the residential customers installing a new L2 charger.

7 2. **Mixed-Use Commercial Customer Sub-program.** JCP&L will provide
8 incentives for three types of commercial EV charger installations:

9 a. **Public/Community-based Component** – provides for Customer Make-
10 Ready Incentives for Level Two chargers at publicly available charging sites. The budget
11 also includes amounts that the utility will fund and recover for Utility Make-Ready Work,
12 where commercial customers request this service for charging ports.⁵

13 b. **Workplace Component** – provides for Customer Make-Ready Incentives
14 for Level Two charges at workplaces. The budget also includes amounts that the utility
15 will fund and recover for Utility Make-Ready Work, where commercial customers request
16 this service for charging ports.

³ “Customer Make-Ready” means activities and facilities from the meter to the charger stub, and includes the pre-wiring of electrical infrastructure at a parking space, or set of parking spaces, to facilitate easy and cost-efficient future installation of Electric Vehicle Service Equipment (“EVSE”), including, but not limited to, Level Two EVSE and DC Fast Chargers. Making a site Charger-Ready includes expenses related to service panels, junction boxes, conduit, wiring, etc., necessary to make a particular location able to accommodate EVSE on a “plug and play” basis. “Make-Ready” is synonymous with the term “Charger-Ready” as these terms are used in and defined in the EV Filing Order. *See* EV Filing Order, at p. 16.

⁴ “Utility Make-Ready Work” means activities and facilities needed to upgrade an electric service or JCP&L distribution facilities on the Company’s side of the meter to accommodate EV service equipment, such as service upgrades from the pole to meter or distribution system upgrades.

⁵ A charging “port” is the part of the charging station that connects to the EV.

1 c. **Multi-Family Component** - provides for Customer Make-Ready
2 Incentives for Level Two chargers at multi-family buildings. The budget also includes
3 amounts that the utility will fund and recover for Utility Make-Ready Work, where
4 commercial customers request this service for charging ports. Multi-Family charging
5 service will be included as a Rider EV special provision and at the same rate as a single-
6 family residence under the Rider EV special provision under RS rate schedule. The
7 Program budget also provides for up to 75 Multi-Family locations with a Company-
8 qualified smart EV Level Two Charger will be eligible to enroll in the Off-Bill/Off-Peak
9 credit program that was described in the Residential Customer Sub-program rate design
10 section of this testimony. In addition, 50% of this Sub-program is reserved for multi-family
11 dwellings in overburdened and low to moderate income(“LMI”) communities.

12 3. **DC Fast Charger (“DCFC”) Public Charging Sub-program** - provides
13 for Customer Make-Ready Incentives for DCFCs at publicly available charging sites. The
14 budget also includes amounts that the utility will fund and recover for necessary Utility
15 Make-Ready Work, where commercial customers request this service for charging ports.
16 In addition, JCP&L is proposing a demand charge discount for this Program as a Rider EV
17 special provision.

18 4. **Last Resort DCFC Sub-program** - provides for JCP&L to install, own
19 and operate approximately 20 DCFC charging ports at appropriate locations within its
20 service territory should there be “no expression of interest” in the form of applications for
21 a Make-Ready from private EVSE Infrastructure Companies within 24 months after
22 Program implementation.

1 5. **Overburdened Communities Sub-program** - Community organizations
2 and nonprofits can apply for grants to advance electric vehicle adoption, EV charging
3 infrastructure and/or education in the communities JCP&L serves. JCP&L will provide
4 grants for innovative, EV-related pilot projects proposed by market participants.

5 6. **Consumer Education and Outreach Initiative** - JCP&L will implement
6 a comprehensive program to inform and educate customers and market participants about
7 the JCP&L EV Driven Program and EV benefits in general. In addition to Consumer
8 Education and Outreach Program, the Company will incur certain O&M expense to
9 implement the JCP&L EV Driven Program. Those costs include, but are not limited to, IT
10 programming; data acquisition; and administration expenses for the JCP&L EV Driven
11 program.

12 **Q. Does the Company have a specific budget and number of participants that will be**
13 **eligible for each of the Sub-programs?**

14 A. Yes. JCP&L witness Mr. Frame provides the details of each Sub-program, including the
15 proposed budgets and the incentives available for each, in his pre-filed direct testimony.
16 Also, Schedule KMS-2 provides a summary of the budget for the JCP&L EV Driven
17 Program.

18 **Q. Does the Company plan to end the Program incentives once it reaches the**
19 **participation and/or expenditure levels set forth in the JCP&L EV Driven Program?**

20 A. The Company has included participation levels for budget purposes. Should participation
21 be different than the levels included in the budget, it may be necessary to reallocate funding
22 levels between the Sub-programs, based on market demand, customer interest, and EV
23 developer interest. This budget flexibility will allow the Company to adapt to market and

1 customer preferences and make the overall JCP&L EV Driven Program most beneficial to
2 the State. JCP&L witness Mr. Frame addresses budget flexibility issues in his prefiled
3 testimony.

4 **Q. How does JCP&L propose to calculate the Program’s revenue requirements?**

5 A. JCP&L proposes to calculate the revenue requirements associated with the Program costs
6 using the following formula:

$$\begin{aligned} & \textit{Revenue Requirements} = (\textit{Pre-Tax Cost of Capital} * \textit{Rate Base}) + \textit{Book} \\ & \textit{Depreciation} + \textit{Operations and Maintenance ("O\&M") Expense} + \textit{Program} \\ & \textit{Incentives Expense} + \textit{Carrying Charge on Program Incentives} \end{aligned}$$

- 7
- 8
- 9
- 10 ▪ Rate Base = Cumulative Investments – Accumulated Book Depreciation of
- 11 Investments – Accumulated Deferred Income Tax.
- 12 ▪ Cumulative Investments = Program-to-date investments, for utility funded
- 13 distribution system upgrades on the utility side of the meter (“Utility
- 14 Upgrades”).

15 The Company will also apply the appropriate factor to collect applicable Sales and Use
16 Tax (“SUT”).

17 **Q. Please describe the components of JCP&L’s proposed revenue requirement**
18 **calculation.**

19 A. The “Pre-Tax Cost of Capital * Rate Base” component provides recovery of the return *on*
20 the Program investment. The term “Pre-Tax Cost of Capital” means JCP&L’s pre-tax
21 overall weighted average cost of capital (“WACC”) for the Program. Accordingly, JCP&L
22 proposes to earn a return on its rate base investment in the JCP&L EV Driven Program
23 based upon an authorized ROE and capital structure including income tax effects. The

1 Company's initial WACC for the JCP&L EV Driven Program will be based on the ROE,
2 long-term debt and capital structure approved by the Board on October 28, 2020 in the
3 2020 JCP&L base rate case, BPU Docket No. ER20020146. JCP&L proposes the initial
4 pre-tax WACC to be 9.34 percent. *See* Schedule KMS-1 for the calculation of the current
5 Pre-Tax and After-Tax WACC. Any change in the WACC authorized by the Board in a
6 base rate case following this filing will be reflected in the revenue requirement calculations
7 and subsequent rate adjustment filings.

8 The term "Rate Base" refers to Cumulative Investments less the associated
9 Accumulated Depreciation less Accumulated Deferred Income Taxes ("ADIT").
10 Cumulative Investments include Utility Make-Ready Work. A summary of the projected
11 investments can be found in Schedule KMS-2.

12 ADIT is calculated as Book Depreciation less Tax Depreciation, multiplied by the
13 statutory composite federal and state income tax rate, which is currently 28.11%. Any
14 future changes to the book depreciation or tax depreciation rates during the JCP&L EV
15 Driven Program period and at the time of each rate adjustment, will be reflected in the
16 accumulated depreciation and/or ADIT calculation described above.

17 The "Depreciation" component provides for recovery *of* the Company's Program
18 investments. Book depreciation of Utility Make-Ready Work will be based on the average
19 book depreciation accrual rates for the FERC account plant investments from the latest
20 depreciation study performed for JCP&L. The average accrual rates for each Sub-
21 program's revenue requirements are defined in KMS-3. The current month's depreciation
22 expense will be included in the current month's revenue requirement and will also reduce
23 the current month's Cumulative Investment.

1 The term “O & M Expense” includes such expenses as consumer education and
2 outreach as required by the EV Filing Order⁶; IT programming expense; Data acquisition;
3 and Administration costs, including outside consultant expenses, for the JCP&L EV Driven
4 program. In Schedule KMS-3, Revenue Requirements for each Sub-program, O&M
5 Expense associated with the Program is expensed in the year incurred. The annual detail
6 supporting the O&M Expenses for the Program can be found in Schedule KMS-2.

7 Separately, all Program incentives paid to customers will be expensed in the year
8 incurred. Carrying charge shall accrue interest on any over or under recovered balances of
9 such costs at the interest rate based on a two-year constant maturity Treasuries as published
10 in the Federal Reserve Statistical Release on the first day of each month (or the closest day
11 thereafter on which rates are published), plus sixty basis points, but shall not exceed the
12 Company’s overall rate of return as approved by the BPU. Such interest rate shall be reset
13 each month. The interest calculation shall be based on the net of tax beginning and end
14 average monthly balance, compounded annually.

15 **Q. What is the rate of return that the Company applied to the JCP&L EV Driven**
16 **Program Rate Base?**

17 A. The Company proposes a rate of return of 9.34%, which is equal to the WACC agreed to
18 in the Company’s 2020 Base Rate Case at BPU Docket No. ER20020146.

19 **Q. Does the revenue requirement include any Cost of Removal?**

⁶ EV Filing Order, at p. 26.

1 A. Yes, cost of removal is included in the Company's initial estimates of the Utility Upgrades
2 necessary for Make Ready EV Charging. Therefore, the revenue requirement does include
3 Cost of Removal.

4 **Q. Have you provided a schedule showing the detailed calculation supporting the**
5 **revenue requirement?**

6 A. Yes. Schedule KMS-3 is the detailed revenue requirements calculation by EV Sub-
7 program.

8 **III. RATE FILINGS**

9 **Q. How does the Company propose to recover the revenue requirements as described**
10 **above?**

11 A. JCP&L is proposing to recover Program costs via a rate clause called "Rider EV." Rider
12 EV will be a non-bypassable rate clause applicable to all distribution customer rate classes.
13 Rider EV will become effective for service rendered on and after January 1, 2022, which
14 is the proposed Program start date. The proposed tariff sheets for Rider EV are included
15 as Schedule KMS-13 to this testimony.

16 **Q. How will the initial level of the Rider EV rates be established?**

17 A. JCP&L has projected that its first-year Program Revenue Requirement will be \$2.85
18 Million. *See* Schedule KMS-4. The first-year Revenue Requirement is used to establish
19 the initial Rider EV rates on this revenue requirement. Actual costs and expenses will then
20 be booked during the life of the Program.

21 **Q. Will incremental distribution revenues attributable to the JCP&L EV Driven**
22 **Program be credited to Rider EV?**

1 A. Yes. Incremental distribution revenues that are directly attributable to the EV Driven
2 Program will be credited to Rider EV to help offset Program costs.

3 **Q. How does the Company address unrecovered revenue requirements in a year.**

4 A. The Company proposes to file annual rate requests in a process that first resets rates to: (1)
5 to reconcile the projected Revenue Requirements for the prior period to actual Revenue
6 Requirements based on actual Program costs, and (2) reset the Rider EV charges to recover
7 projected Program costs for the prospective period.

8 **Q. Will there be carrying charges on the Rider EV deferred balance?**

9 A. Yes. JCP&L will accrue interest on the Rider EV deferred balance (i.e., “over/under”) at
10 the rate actually incurred on the Company’s short-term debt (debt maturing in one year or
11 less), or the rate on equivalent temporary cash investments if the Company has no short-
12 term debt outstanding. Interest shall be computed monthly based on the beginning and
13 ending average monthly balance net of deferred income taxes, compounded annually
14 (added to the balance on which interest is accrued annually) on January 1 of each year.

15 **Q. Will the BPU and Division of Rate Counsel have an opportunity to review the actual
16 expenditures of the Program?**

17 A. Yes, the BPU and Rate Counsel will be able to review actual Program expenditures during
18 each annual Rider EV filing.

19 **Q. Will Rider EV continue beyond the end of the Program?**

20 A. Rider EV will continue through the end of the Program (projected to be December 31,
21 2025) and until the Company’s base rates are thereafter reset. In the Company’s next base
22 rate case, JCP&L will roll the Program’s revenue requirements into base rates. The
23 Company will reserve the right to seek Board approval to continue the Program past the

1 proposed end date of December 31, 2025, to continue to support EV adoption in JCP&L's
2 territory.

3 **Q. Is approval of the proposed Rider EV for recovery of Program costs essential to the**
4 **Company's implementation of the JCP&L EV Driven Program?**

5 A. Yes. JCP&L is filing the proposed JCP&L EV Driven Program pursuant to the Board's
6 EV Filing Order⁷, which in turn was issued pursuant to new State law designed to
7 encourage public adoption of EVs. The types of capital expenditures and expenses
8 associated with the Program represent a new service for a new sub-class of its residential
9 and commercial services. These expenditures are in addition to other increases in capital
10 investments and O&M expenses associated with the State's energy efficiency and AMI
11 initiatives. A rate clause is the most effective and efficient way to ensure such full and
12 timely recovery of Program costs and to ensure cash flow to fund investments, as well as
13 to not negatively affect JCP&L's credit metrics.

14
15 **IV. RATE DESIGN**

16 **1. Residential Customer Sub-program.**

17 **Q. Is JCP&L proposing an off-peak rate incentive for managed charging to participants**
18 **in the Residential Customer Sub-program?**

19 A. Yes. JCP&L is proposing to offer an Off-Bill/Off-Peak credit to eligible residential
20 customers who have installed a Company-qualified smart EV L2 Charger. This provision
21 provides qualified customers the opportunity to receive a credit for charging an EV during

⁷ EV Filing Order, at p. 6.

1 Off-Peak hours. To qualify, customers must agree to share the charging data from their
2 smart EV L2 charger via remote access with the Company. The credit is to the distribution
3 rate and, therefore, customers are not required to purchase energy supply through Basic
4 Generation Service to be eligible for this special provision under the EV Rider. The
5 Program budget initially provides for 2,000 eligible residential and 75 eligible multi-family
6 Customers on a first-come, first-serve basis.

7 Eligible customers electing this provision within the EV Rider will receive a credit
8 of 2 cents per Kilowatt-hour (“kWh”) for Net Off-Peak kWh Usage at their smart EV Level
9 Two charger. Net Off-Peak kWh Usage is calculated as kWh usage recorded by the
10 customer’s smart EV Level Two charger during Off-Peak hours less kWh usage recorded
11 by the customer’s smart EV Level 2 charger during On-Peak hours. Net Off-Peak kWh
12 Usage must be a positive value for the customer to receive a credit. In the event Off-Peak
13 kWh less On-Peak kWh is less than zero, the Net Off-Peak kWh Usage shall be considered
14 zero for the measurement period. A third-party vendor will determine and remit the credit
15 to customers on a quarterly basis, separate from the customer bill.

16 **2. Multi-Family Component**

17 **Q. Is JCP&L proposing a rate discount for participants in the Mixed-Use Commercial**
18 **Sub-program under the Multi-Family Component?**

19 A. Yes. Multi-family dwellings are normally billed under a commercial rate classification
20 (e.g., GS). For such participants, JCP&L will bill usage on the EV charger at a rate equal
21 to the RS EV special provision. Each Multi-Family Charger will be separately metered,
22 and the usage will be billed at a rate equal to the RS EV special provision. In addition, the
23 Program budget provides for up to 75 Multi-Family locations with a Company-qualified

1 smart EV L2 Charger will be eligible to enroll in the Off-Bill/Off-Peak credit program that
2 was described in the Residential Customer Sub-program rate design section of this
3 testimony.

4 The rate design meets the Board’s objective to locate EV Chargers at multi-family
5 dwellings and to maintain rate parity with residential customers that subscribe for EV
6 charging service.⁸

7 **3. DCFC Public Charging Sub-program**

8 **Q. Is JCP&L proposing a demand charge discount for participants in the DCFC Public**
9 **Charging Sub-program?**

10 A. Yes. The Company’s proposal is in accordance with the EV Filing Order which “requires
11 that EDC filings include a proposal to address how to minimize the barriers to EV
12 adoption created by demand charges.”⁹

13 **Q. Please explain how demand charges will be determined for service to a DCFC**
14 **Station?**

15 A. All DCFC Stations will be separately metered and will be billed based on the billing
16 demand calculation that is defined within the GS service classifications. Each billing
17 month, a credit will be applied to the demand component of the Customer’s bill to reflect
18 the discount that is available for each Program Year. The discount percentages to the
19 demand charge are as follows:

20	Program Year 1	50%
21	Program Year 2	50%
22	Program Year 3	25%

⁸ EV Filing Order, at p. 26.

⁹ EV Filing Order, at p. 10

1 Program Year 4 0%
2

3 **Q. Please explain how the Company’s rate design proposal minimizes the barriers to**
4 **EV adoption created by demand charge?**

5 A. One of the barriers to the successful installation of a DCFC Station is the demand charge
6 that is part of the customer’s distribution portion of the bill. The demand component of
7 the bill is to enable the utility to recover its investment in distribution facilities to meet the
8 capacity requirements of the customer. Because a DCFC station requires larger distribution
9 facilities (i.e., higher capacity) to serve a DCFC station, the utility investment is higher,
10 and the demand charges are higher as well. Until EV adoption increases, utilization of the
11 DCFC stations will be lower. The result is a lower load factor (i.e., kWh usage divided
12 by kW demand) and a higher average cost per kWh cost, making it less economic for the
13 owner of the DCFC station. Therefore, the Company has proposed a series of discounts
14 that are tiered and tailored to providing the DCFC Station relief from demand charges
15 under the tariff in those early years. The Company’s proposal for demand discount is
16 consistent with the EV Filing Order.¹⁰

17 **V. Customer Bill Impacts**

18 **Q. What are the annual JCP&L EV Driven Program rate impacts to the typical**
19 **residential customer?**

20 A. The implementation of the JCP&L EV Driven Program will have minimal impact to the
21 typical residential customer. Based on the forecasted rates shown in Schedule KMS-5, the

¹⁰ EV Filing Order, at p. 10.

1 bill impacts for a typical residential customer as well as rate class average customers for
2 each rate period over the period January 1, 2022 through December 31, 2025 are set forth
3 in Schedule KMS-5. Based on the projected revenue requirements provided in Schedules
4 KMS-3 and KMS-4, the initial bill impact of the proposed rates for the initial rate period
5 to the typical residential customer who uses 783 kWh per month is an increase of 0.1% or
6 approximately \$0.14 per month above rates effective January 1, 2021. A summary of the
7 incremental bill impact on an average residential customer for each year of the JCP&L EV
8 Driven Program through December 31, 2025 compared to the current average monthly bill
9 is shown in Schedule KMS-5.

10 The maximum cumulative bill impact on a residential customer over the entire four-
11 year program period is an estimated increase of approximately \$0.86 or about 0.7% of the
12 current average monthly bill.

13 **VI. Tariff Rider**

14 **Q. Does the Company propose a modification to its tariff as part of this filing?**

15 A. Yes. The Company proposes to recover its costs for the JCP&L EV Driven Program
16 through rates set forth in a separate clause of its tariff. Specifically, the Company is
17 proposing a new tariff rider, Rider EV, attached hereto as Schedule KMS-13. The attached
18 Rider includes the initial tariffed rates proposed to commence on January 1, 2022.

19 **Q. Please list the schedules attached to this direct testimony.**

20 A. Schedule KMS-1 – Pre-Tax Rate of Return Calculation
21 Schedule KMS-2 - JCP&L EV Driven Program Budget
22 Schedule KMS-3 – Revenue Requirement Calculation by Sub-program
23 Schedule KMS-4 - Calculation of Surcharge for Years of Program

- 1 Schedule KMS-5 - Bill Impacts
- 2 Schedule KMS-6 - Journal Entries
- 3 Schedule KMS-7 – Proforma Income Statement and Balance Sheet
- 4 Schedule KMS-8 – Comparative three-year Balance Sheet (2017, 2018, 2019)
- 5 Schedule KMS-9 – Comparative three-year Income Statement (2017, 2018, 2019)
- 6 Schedule KMS-10 – Comparative Balance Sheet – September 30, 2020
- 7 Schedule KMS-11 – Statement of Intrastate Sales – Calendar Year 2019
- 8 Schedule KMS-12 – Transactions with Associated (Affiliated) Companies
- 9 Schedule KMS-13 – Proposed Tariff Sheets

10 **Q. Does this conclude your pre-filed direct testimony at this time?**

11 A. Yes, it does.

APPENDIX A

Experience and Qualifications

Resume: Education and Experience of Kevin M. Siedt

Education:

- | | |
|------|---|
| 1984 | Bachelor of Science Degree- Accounting/Finance, Rowan University, Glassboro, New Jersey |
| 1994 | Masters of Business Administration Degree, Moravian College, Bethlehem, PA |

Experience:

- | | |
|----------------|--|
| 1984 – 1987 | Commercial Credit Analyst – First Fidelity Bank |
| 1987 – 1993 | Financial Analyst, Corporate Finance Department – Foster Wheeler Corporation |
| 1993 – 1996 | Senior Financial Analyst, Corporate and Project Finance – Foster Wheeler Corporation |
| 1996 – 1997 | Manager of Financial Analysis, Corporate and Project Finance - Foster Wheeler Corporation |
| 1997 – 1998 | Director of Financial Analysis, Corporate and Project Finance – Foster Wheeler Corporation |
| 1998 – 2001 | Financial Consultant, Treasury Department – GPU Corporation |
| 2001 – 2002 | Consultant, Market Economics – GPU Corporation |
| 2002 – 2010 | Staff Business Analyst, Rates and Regulatory Affairs – FirstEnergy Service Company |
| 2010 – 2014 | Rate Analyst V, Rates and Regulatory Affairs – FirstEnergy Service Company |
| 2014 – Present | Consultant, Pennsylvania Rates and Regulatory Affairs – FirstEnergy Service Company |
| 2020 – Present | Consultant, Rates and Regulatory Affairs – Jersey Central Power & Light |

Prepared and presented testimony in the following rate-related cases:

<u>NJ BPU Cases</u> : Docket Nos.	EO20090620
	ER05121018
	EM02030152
	EM03060438
	EM04010045
	EM05040314
	EM12040309
<u>Pa. P.U.C. Cases</u> : Docket Nos.	P-00072259
	P-2010-2157862
	M-2011-2250561
	M-2011-2259298
	M-2011-2250682
	P-2012-2292284
	C-2012-2284617
	C-2012-2295306
	M-2012-2312766
	M-2012-2312767
	M-2012-2312769
	M-2012-2312772
	M-2012-2312633
	M-2012-2312770
	M-2012-2334387
	M-2012-2334392
	M-2012-2334395
	M-2012-2334398
	P-2013-2391368
	P-2013-2391372
	P-2013-2391375
	P-2013-2391378
	R-2014-2428745
	R-2014-2428743
	R-2014-2428744
	R-2014-2428742
	M-2015-2514768

Assisted in development and preparation of the following rate cases:

<u>Pa. P.U.C. Cases</u> : Docket Nos.	R-00061366
	R-00061367
	P-0072305
	M-2008-2069887
	P-2008-20066692
	P-2009-2093053

P-2009-2093054
R-00974008
R-00974009
M-2009-2092222
M-2009-2112952
M-2009-2552956
P-2009-2093053
P-2009-2093054
M-A-2010-2176520

A-2010-2176732
P-2011-2273650
P-2011-2273668
P-2011-2273669
P-2011-2273670
M-2012-2289411

**Jersey Central Power & Light
EV Driven Program
Weighted Average Cost of Capital (WACC)**

Schedule KMS-1

	Percent	Cost	Weighted Cost	Tax Multiplier	Pre-Tax Weighted Cost	Discount Rate
Long Term Debt	48.56%	5.083%	2.47%	1.00000	2.47%	
Common Equity	<u>51.44%</u>	9.600%	<u>4.94%</u>	1.39101	<u>6.87%</u>	<u>4.94%</u>
Total	100.0%		7.41%		9.34%	6.71%
Monthly WACC			0.617%		0.778%	
Federal and State Income Tax rate		28.11%				

**Jersey Central Power & Light
JCP&L Electric Vehicle Program
Program Expenditures**

Schedule KMS-2

Program Incentives

	2022	2023	2024	2025	Total
Residential	\$200,000	\$500,000	\$650,000	\$650,000	\$2,000,000
Multi-Family	100,500	254,600	328,300	321,600	1,005,000
Multi-Family LMI	100,500	247,900	328,300	328,300	1,005,000
C & I Level 2 Charger	402,000	1,005,000	1,306,500	1,306,500	4,020,000
C & I DC Fast Charger	500,000	1,250,000	1,625,000	1,625,000	5,000,000
DC Fast Charger Last Resort	-	-	-	-	-
Total	\$1,303,000	\$3,257,500	\$4,238,100	\$4,231,400	\$13,030,000

Residential Off-Peak Off Bill Credit Cost	288,034	273,044	273,052	273,049	\$1,107,179
Multi-Family Off-Peak Off Bill Credit Cost	222,852	208,918	209,770	209,451	850,991
Multi-Family Residential Parity Cost	5,088	11,448	16,536	14,628	47,700
Demand Discount	148,890	521,115	498,782	-	1,168,787
Non-Profit Grants to Increase EV	\$ 833,334	\$ 833,333	\$ 416,666	\$ 416,667	\$2,500,000

Utility Make-Ready Work

	2022	2023	2024	2025	Total
Residential	\$110,000	\$275,000	\$357,500	\$357,500	\$1,100,000
Multi-Family	\$44,400	\$99,900	\$144,300	\$133,200	421,800
Multi-Family LMI	\$44,400	\$99,900	\$144,300	\$122,100	410,700
C & I Level 2 Charger	\$166,500	\$432,900	\$532,800	\$532,800	1,665,000
C & I DC Fast Charger	\$505,000	\$1,262,500	\$1,616,000	\$1,666,500	5,050,000
DC Fast Charger Last Resort	\$0	\$0	\$2,112,500	\$2,112,500	4,225,000
Total	\$870,300	\$2,170,200	\$4,907,400	\$4,924,600	\$12,872,500

Program Administrative Costs

	2022	2023	2024	2025	Total
Residential	\$ 347,474	\$ 608,943	\$ 744,036	\$ 744,034	\$2,444,487
Multi-Family	150,411	268,047	340,339	328,071	1,086,868
Multi-Family LMI	150,411	268,047	340,339	328,071	1,086,868
C & I Level 2 Charger	330,314	835,460	1,068,684	1,068,684	3,303,142
C & I DC Fast Charger	1,154,632	2,246,804	2,415,011	2,154,548	7,970,995
DC Fast Charger Last Resort	-	-	1,227,421	1,227,421	2,454,842
Total	\$ 2,133,242	\$ 4,227,300	\$ 6,135,830	\$ 5,850,830	\$18,347,202

Total Cost by Class

	2022	2023	2024	2025	Total
Residential	\$ 945,508	\$ 1,656,987	\$ 2,024,588	\$ 2,024,583	\$ 6,651,666
Multi-Family	409,281	732,730	926,092	894,911	2,963,013
Multi-Family LMI	409,281	726,030	926,092	890,511	2,951,913
C & I Level 2 Charger	898,814	2,273,360	2,907,984	2,907,984	8,988,142
C & I DC Fast Charger	3,141,856	6,113,752	6,571,458	5,862,715	21,689,781
DC Fast Charger Last Resort	-	-	3,339,921	3,339,921	6,679,842
Total	\$ 5,804,740	\$ 11,502,858	\$ 16,696,135	\$ 15,920,625	\$ 49,924,358

Jersey Central Power & Light
EV Driven Program
Calculation of Rates

Schedule KMS-4

<u>Revenue Requirement</u>	2022	2023	2024	2025	2026	Total
Residential	\$ 642,463	\$ 1,112,765	\$ 1,586,192	\$ 1,777,643	\$ 982,040	\$ 6,101,103
Multi-Family	267,155	490,397	734,703	811,476	460,917	2,764,648
Multi-Family LMI	267,155	490,397	727,977	810,013	466,406	2,761,948
C & I Level 2 Charger	340,719	1,284,948	2,179,856	2,543,327	1,795,130	8,143,981
C & I DC Fast Charger	1,335,073	4,242,541	5,310,075	4,692,529	3,205,838	18,786,056
DC Fast Charger Last Resort	-	-	1,359,404	1,598,957	806,148	3,764,509
Total	\$ 2,852,566	\$ 7,621,048	\$ 11,898,207	\$ 12,233,945	\$ 7,716,480	\$ 42,322,246

<u>Allocation of Revenue Requirement</u>	2022	2023	2024	2025	2026	Total
RS	\$ 1,541,322	\$ 4,117,866	\$ 6,428,935	\$ 6,610,344	\$ 4,169,431	\$ 22,867,898
RT	29,714	79,387	123,941	127,438	80,381	440,860
RGT	2,151	5,746	8,971	9,225	5,818	31,912
GS	916,050	2,447,362	3,820,895	3,928,711	2,478,008	13,591,026
GST	54,839	146,509	228,735	235,189	148,344	813,616
GP	125,828	336,167	524,834	539,643	340,376	1,866,848
GT	95,058	253,961	396,492	407,680	257,142	1,410,334
OL	16,599	44,346	69,235	71,188	44,901	246,269
STLG	71,006	189,703	296,170	304,527	192,078	1,053,483
Total	\$ 2,852,566	\$ 7,621,048	\$ 11,898,207	\$ 12,233,945	\$ 7,716,480	\$ 42,322,246

<u>Billing Determinants</u>	2022	2023	2024	2025	2026	
RS	8,902,792,061	8,905,717,275	8,898,634,903	8,885,761,143	8,885,761,143	KWH
RT	184,218,073	184,233,011	183,988,240	183,630,878	183,630,878	KWH
RGT	14,346,922	14,347,001	14,325,959	14,296,104	14,296,104	KWH
GS	6,207,450,911	6,299,323,257	6,292,130,693	6,194,288,869	6,194,288,869	KWH
GST	1,210,192	1,228,497	1,227,408	1,209,917	1,209,917	KW
GP	3,589,955	3,646,497	3,645,688	3,605,446	3,605,446	KW
GT	4,473,848	4,566,081	4,597,974	4,566,792	4,566,792	KW
OL	24,181,539	24,160,484	24,160,484	24,160,484	24,160,484	KWH
STLG	90,947,020	90,970,957	90,970,957	90,970,957	90,970,957	KWH

<u>EV Charger Rate w/o SUT</u>	2022	2023	2024	2025	2026
RS (\$ per KWH)	\$ 0.000173	\$ 0.000462	\$ 0.000722	\$ 0.000744	\$ 0.000469
RT (\$ per KWH)	\$ 0.000161	\$ 0.000431	\$ 0.000674	\$ 0.000694	\$ 0.000438
RGT (\$ per KWH)	\$ 0.000150	\$ 0.000401	\$ 0.000626	\$ 0.000645	\$ 0.000407
GS (\$ per KWH)	\$ 0.000148	\$ 0.000389	\$ 0.000607	\$ 0.000634	\$ 0.000400
GST (\$ per KW)	\$ 0.05	\$ 0.12	\$ 0.19	\$ 0.19	\$ 0.12
GP ((\$ per KW)	\$ 0.04	\$ 0.09	\$ 0.14	\$ 0.15	\$ 0.09
GT (\$ per KW)	\$ 0.02	\$ 0.06	\$ 0.09	\$ 0.09	\$ 0.06
OL (\$ per KWH)	\$ 0.000686	\$ 0.001835	\$ 0.002866	\$ 0.002946	\$ 0.001858
STLG (\$ per KWH)	\$ 0.000781	\$ 0.002085	\$ 0.003256	\$ 0.003348	\$ 0.002111

<u>Revenues Received w/o SUT</u>	2022	2023	2024	2025	2026
RS	\$ 1,540,183	\$ 4,114,441	\$ 6,424,814	\$ 6,611,006	\$ 4,167,422
RT	29,659	79,404	124,008	127,440	80,430
RGT	2,152	5,753	8,968	9,221	5,819
GS	918,703	2,450,437	3,819,323	3,927,179	2,477,716
GST	60,510	147,420	233,207	229,884	145,190
GP	143,598	328,185	510,396	540,817	324,490
GT	89,477	273,965	413,818	411,011	274,008
OL	16,589	44,334	69,244	71,177	44,890
STLG	71,030	189,674	296,201	304,571	192,040
Total	\$ 2,871,900	\$ 7,633,614	\$ 11,899,981	\$ 12,232,306	\$ 7,712,004

<u>Revenue shortfall</u>	2022	2023	2024	2025	2026
RS	\$ (1,139)	\$ (3,425)	\$ (4,121)	\$ 662	\$ (2,009)
RT	(55)	18	67	2	50
RGT	1	7	(3)	(4)	0
GS	2,653	3,075	(1,571)	(1,531)	(293)
GST	5,671	910	4,473	(5,305)	(3,154)
GP	17,771	(7,982)	(14,437)	1,174	(15,886)
GT	(5,581)	20,003	17,325	3,331	16,866
OL	(10)	(12)	9	(11)	(11)
STLG	24	(28)	32	44	(39)
Total	\$ 19,334	\$ 12,566	\$ 1,774	\$ (1,638)	\$ (4,476)

Jersey Central Power & Light
EV Charging Program
Rate Impact Summary

Schedule KMS-5

CLASS INCREASES

Class Average Rate w/SUT (\$/kWh)

<u>Period</u>	RS	RT	RGT	GS	GST	GP	GT	Lighting
Current	\$ 0.14033	\$ 0.13234	\$ 0.13638	\$ 0.13021	\$ 0.11914	\$ 0.09796	\$ 0.08945	\$ 0.23011
2022	\$ 0.14052	\$ 0.13251	\$ 0.13654	\$ 0.13037	\$ 0.11928	\$ 0.09805	\$ 0.08951	\$ 0.23092
2023	\$ 0.14083	\$ 0.13280	\$ 0.13681	\$ 0.13063	\$ 0.11950	\$ 0.09819	\$ 0.08961	\$ 0.23156
2024	\$ 0.14110	\$ 0.13306	\$ 0.13705	\$ 0.13086	\$ 0.11969	\$ 0.09831	\$ 0.08972	\$ 0.23349
2025	\$ 0.14113	\$ 0.13308	\$ 0.13707	\$ 0.13089	\$ 0.11969	\$ 0.09834	\$ 0.08972	\$ 0.23358
2026	\$ 0.14083	\$ 0.13281	\$ 0.13681	\$ 0.13064	\$ 0.11950	\$ 0.09819	\$ 0.08961	\$ 0.23230

Class Average Annual Increase

<u>Period</u>	RS	RT	RGT	GS	GST	GP	GT	Lighting
2022	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.4%
2023	0.2%	0.2%	0.2%	0.2%	0.2%	0.1%	0.1%	0.3%
2024	0.2%	0.2%	0.2%	0.2%	0.2%	0.1%	0.1%	0.8%
2025	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2026	-0.2%	-0.2%	-0.2%	-0.2%	-0.2%	-0.2%	-0.1%	-0.5%

Cumulative Class Average Annual Increase

<u>Period</u>	RS	RT	RGT	GS	GST	GP	GT	Lighting
2022	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.4%
2023	0.4%	0.3%	0.3%	0.3%	0.3%	0.2%	0.2%	0.6%
2024	0.5%	0.5%	0.5%	0.5%	0.5%	0.4%	0.3%	1.5%
2025	0.6%	0.6%	0.5%	0.5%	0.5%	0.4%	0.3%	1.5%
2026	0.4%	0.4%	0.3%	0.3%	0.3%	0.2%	0.2%	1.0%

TYPICAL BILL INCREASES

Typical Customer Monthly Bill

	RS	RT	RGT	GS	GST	GP	GT
Typical Average Customer U	783	1,076	2,242	4,445	246,416	361,532	1,067,426
Current Typical Bill	\$ 108.26	\$ 139.29	\$ 291.01	\$ 579.41	\$ 29,358.70	\$ 35,414.62	\$ 95,481.82
2022 typical bill	\$ 108.40	139.48	291.36	580.11	29,392.14	35,449.00	95,540.01
2023 typical bill	\$ 108.64	139.79	291.97	581.26	29,445.64	35,500.56	95,656.39
2024 typical bill	\$ 108.86	140.07	292.51	582.29	29,492.46	35,543.53	95,772.77
2025 typical bill	\$ 109.12	140.09	292.56	582.42	29,492.46	35,552.13	95,772.77
2026 typical bill	\$ 108.89	139.80	291.99	581.31	29,445.64	35,500.56	95,656.39

Typical Customer Average Annual Increase

<u>Period</u>	RS	RT	RGT	GS	GST	GP	GT
2022	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%
2023	0.2%	0.2%	0.2%	0.2%	0.2%	0.1%	0.1%
2024	0.2%	0.2%	0.2%	0.2%	0.2%	0.1%	0.1%
2025	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2026	-0.2%	-0.2%	-0.2%	-0.2%	-0.2%	-0.1%	-0.1%

Cumulative Typical Customer Average Annual Increase

<u>Period</u>	RS	RT	RGT	GS	GST	GP	GT
2022	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%
2023	0.3%	0.4%	0.3%	0.3%	0.3%	0.2%	0.2%
2024	0.5%	0.6%	0.5%	0.5%	0.5%	0.3%	0.3%
2025	0.7%	0.6%	0.5%	0.5%	0.5%	0.3%	0.3%
2026	0.5%	0.4%	0.3%	0.3%	0.3%	0.2%	0.2%

**Jersey Central Power & Light
JCP&L Electric Vehicle Program
Journal Entries**

Schedule KMS-6

**Rider EV
Accounting Treatment for Proposed Cost Recovery**

<u>Item</u>	<u>Description of Accounting</u>	<u>FERC Account Name</u>	<u>FERC Acct #</u>	<u>Debit</u>	<u>Credit</u>
1)	Utility Make-Ready Work	Property Plant & Equipment	101	\$XX	
		Cash	131		\$XX
2)	Customer Incentives	Outside Services	923	\$XX	
		Cash	131		\$XX
3)	Regulatory Asset Deferral - Customer Incentives	Regulatory Asset	182.3	\$XX	
		Regulatory Credits	407.4		\$XX
		Regulatory Debits	407.3	\$XX	
		Outside Services O & M	923		\$XX
4)	Carrying Charge on Customer Incentives	Other Regulatory Asset	182.3	\$XX	
		Interest Income	419		\$XX
5)	Program O&M Expense-Current Period expense of Program O&M Expense	Outside Service O&M	923	\$XX	
		Cash	131		\$XX
6)	Depreciation of Utility Asset	Depreciation Expense	403	\$XX	
		Accumulated Book Reserve	108		\$XX
7)	Amortization - Customer Incentives	Regulatory Debits	407.3	\$XX	
		Regulatory Asset	182.3		\$XX
8)	Deferred Income Tax Recognition	Provision for Deferred Income Tax	410.1	\$XX	
		Deferred Income Taxes Other	283		\$XX
9)	Revenue Recognition -Receipt of Revenue requirement comprised of Rate of Return, Amortization of Regulatory Asset, and O&M	Customer Accounts Receivable	142	\$XX	
		Revenue EV	440-444		\$XX
10)	To Record Over/Under Recovery	Other Regulatory Asset	182.3	\$XX	
		Regulatory Credits	407.4		\$XX
		Regulatory Liability	253		\$XX
		Regulatory Debits	407.3	\$XX	
11)	To Record Carrying Costs on Over/Under Recovered Balance	Other Regulatory Asset	182.3	\$XX	
		Interest Income	419		\$XX
		Regulatory Liability	253		\$XX
		Other Interest Expense	431	\$XX	

Jersey Central Power & Light
EV Driven Program
Proforma Income Statement & Balance Sheet
For Program Year Ending December 31st of Each Year

Schedule KMS-7

INCOME STATEMENT

	Program Year Ending				
	<u>31-Dec-22</u>	<u>31-Dec-23</u>	<u>31-Dec-24</u>	<u>31-Dec-25</u>	<u>31-Dec-26</u>
Operating Revenues w/ SUT	\$ 3,041,549	\$ 8,125,943	\$ 12,686,463	\$ 13,044,443	\$ 8,227,696
less SUT	(188,983)	(504,894)	(788,256)	(810,499)	(511,217)
Net Operating Revenues	\$ 2,852,566	\$ 7,621,048	\$ 11,898,207	\$ 12,233,945	\$ 7,716,480
<u>Operating Expenses</u>					
Operating & Maintenance Expense	\$ 2,798,106	\$ 5,241,825	\$ 7,133,969	\$ 6,347,958	\$ 1,592,062
Amortization of Program Incentives Expense	0	2,136,334	4,090,833	4,654,766	4,648,067
Depreciation Expense	10,907	47,336	131,644	245,013	297,057
Total Operating Expense	\$ 2,809,013	\$ 7,425,496	\$ 11,356,446	\$ 11,247,737	\$ 6,537,186
Operating Income	43,553	195,552	541,761	986,208	1,179,293
Interest Expense	19,756	73,596	170,726	287,816	315,483
Income before Income Taxes	23,796	121,957	371,035	698,392	863,811
Income Tax Expense	(6,689)	(34,282)	(104,298)	(196,318)	(242,817)
Net Income	17,107	87,675	266,737	502,074	620,993

BALANCE SHEET

	<u>Assets</u>	Program Year Ending				
		<u>1-Jan-22</u>	<u>31-Dec-22</u>	<u>31-Dec-23</u>	<u>31-Dec-24</u>	<u>31-Dec-25</u>
Property Plant and Equipment	\$ -	\$ 870,300	\$ 3,040,500	\$ 7,947,900	\$ 12,872,500	\$ 25,745,000
less Accumulated Depreciation	-	10,907	58,244	189,888	434,901	731,957
Regulatory Asset - Customer Incentives		2,144,577	4,114,915	4,688,646	4,684,141	0
Net Regulatory Assets	\$ -	\$ 3,003,970	\$ 7,097,171	\$ 12,446,658	\$ 17,121,740	\$ 25,013,043
Total Assets	\$ -	\$ 3,003,970	\$ 7,097,171	\$ 12,446,658	\$ 17,121,740	\$ 25,013,043
	<u>Liabilities & Capitalization</u>					
	<u>Liabilities</u>					
Deferred Income Taxes	\$ -	\$ 1,903	\$ 14,759	\$ 57,057	\$ 151,893	\$ 295,462
	<u>Capitalization</u>					
Debt	-	1,457,804	3,439,219	6,016,390	8,240,558	12,002,857
Common Equity	-	1,544,263	3,643,192	6,373,211	8,729,289	12,714,723
Total Capitalization	\$ -	\$ 3,002,067	\$ 7,082,411	\$ 12,389,601	\$ 16,969,847	\$ 24,717,581
Total Liabilities & Capitalization	\$ -	\$ 3,003,970	\$ 7,097,171	\$ 12,446,658	\$ 17,121,740	\$ 25,013,043

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Balance Sheet at
December 31, 2017, 2018 and 2019
ASSETS AND OTHER DEBITS

FERC Account	2017	DECEMBER 31 2018	2019
<u>UTILITY PLANT</u>			
101-106 Utility plant	6,487,200,762	6,841,472,584	7,147,126,493
107 Construction Work in Progress	187,195,788	182,155,357	243,841,527
Total Utility Plant	6,674,396,550	7,023,627,941	7,390,968,020
108,111 Less Accumulated Provision for Depreciation	2,020,679,040	2,148,322,401	2,193,788,005
Net Utility Plant	4,653,717,510	4,875,305,540	5,197,180,015
120.1 -			
120.4 and			
120.6 Nuclear Fuel			
120.5 Accum. Provision for Amortization			
Net Nuclear Fuel			
Net Utility Plant	4,653,717,510	4,875,305,540	5,197,180,015
<u>OTHER PROPERTY AND INVESTMENTS</u>			
121 Nonutility Property	16,979,653	16,979,653	18,034,911
122 (Less) Accum. Prov. For Deprec. And Amort.	15,826,573	15,829,051	15,891,539
123 Investment in Associated Companies	-	-	-
123.1 Investment in Subsidiary Companies	899,110	897,102	892,666
124 Other Investments	1,809	1,791	1,048
128 Special Funds	238,470,050	229,140,287	256,101,540
175 Long-Term Portion of Derivative Assets	96,832	43,797	11,224
Total Other Property and Investments	240,620,881	231,233,579	259,149,850
<u>CURRENT AND ACCRUED ASSETS</u>			
131 Cash			
132-134 Special Deposits	251,203,661	255,897,586	269,941,752
135 Working Funds	1,025	1,025	1,300
136 Temporary Cash Investments	-	-	-
142 Customer Accounts Receivable	140,004,701	138,064,097	117,905,200
143 Other Accounts Receivable	24,235,954	34,248,612	32,681,347
144 (Less) Accum. Prov. For Uncollectible Accounts-Credit	4,516,190	4,436,362	3,968,306
145 Notes Receivable from Associated Companies	76,019,310	-	-
146 Accts. Receivable from Associated Companies	25,426,370	62,710,890	79,174,030
151 Fuel Stock	-	-	-
154 Plant Materials and Operating Supplies	-	-	-
165 Prepayments	24,718,681	26,386,710	25,368,289
171 Interest and Dividend Receivable	-	-	-
172 Rents Receivable	3,776,239	4,785,226	2,784,305
173 Accrued Utility Revenues	81,353,005	86,376,550	80,271,694
174 Miscellaneous Current and Accrued Assets	-	-	-
175 Derivative Instruments Assets	-	-	-
175 (Less) Long Term Portion of Derivative Instrument Assets	-	-	-
Total Current and Accrued Assets	622,222,756	604,034,334	604,159,611
<u>DEFERRED DEBITS</u>			
181 Unamortized Debt Expenses	6,058,777	5,101,815	7,038,741
182.1 Extraordinary Property Losses	-	-	-
182.2 Unrecovered Plant and Regulatory Study Costs	4,234,903	4,125,895	4,016,887
182.3 Other Regulatory Assets	495,789,462	779,264,940	685,875,416
183 Prelim. Survey and Investigation Charges	2,150,583	2,328,212	2,254,808
184 Clearing Accounts	92,064	149,166	191,011
185 Temporary Facilities	407,128	520,035	588,827
186 Miscellaneous Deferred Debits	1,815,631,330	1,814,479,673	1,815,752,095
188 Research, Devel. And Demonstration Expend.	48,170	41,466	42,510
189 Unamortized Loss on Reacquired Debt	7,390,722	5,593,655	4,519,534
190 Accumulated Deferred Income Taxes	1,024,928,555	952,319,382	946,426,983
Total Deferred Debits	3,356,731,694	3,563,924,239	3,466,706,812
TOTAL ASSETS	8,873,292,841	9,274,497,692	9,527,196,288

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Balance Sheet at
December 31, 2017, 2018 and 2019
LIABILITIES AND OTHER CREDITS

FERC Account	DECEMBER 31			
	2017	2018	2019	
<u>PROPRIETARY CAPITAL</u>				
201	Common Stock Issued	136,284,470	136,284,470	136,284,470
204	Preferred Stock Issued	-	-	-
207	Premium on Capital Stock	2,511,652,419	2,665,143,711	2,665,143,901
208-211	Other Paid-In Capital	40,953,128	46,295,786	51,334,517
215, 215.1, 216	Retained Earnings	501,961,546	671,510,121	715,180,021
216.1	Unappropriated Undistributed Subsidiary Earnings	(36,428)	(38,436)	(42,871)
219	Accumulated Other Comprehensive Income	(2,044,696)	(5,575,366)	(5,576,306)
	Total Proprietary Capital	<u>3,188,770,439</u>	<u>3,513,620,286</u>	<u>3,562,323,732</u>
<u>LONG-TERM DEBT</u>				
221	Bonds			
223	Advances From Associated Companies			
224	Other Long-Term Debt	1,700,000,000	1,550,000,000	1,650,000,000
225	Unamortized Premium on Long-Term Debt	-	-	5,122,874
226	(Less) Unamortized Discount on Long-Term Debt	5,356,305	4,799,265	4,311,070
	Total Long-Term Debt	<u>1,694,643,695</u>	<u>1,545,200,735</u>	<u>1,650,811,804</u>
<u>OTHER NON-CURRENT LIABILITIES</u>				
227	Obligations Under Capital Leases	8,053,404	7,687,074	73,448,851
228.2	Accumulated Provision for Injuries and Damages	5,286,625	4,773,214	4,556,331
228.3	Accumulated Provision for Pension and Benefits	445,815,952	227,999,377	249,527,392
	Long-Term Portion of Derivative Instrument Liabilities	-	-	-
230	Asset Retirement Obligation	124,452,131	172,830,642	180,982,559
	Total Noncurrent Liabilities	<u>583,608,112</u>	<u>413,290,307</u>	<u>508,515,133</u>
<u>CURRENT AND ACCRUED LIABILITIES</u>				
231	Notes Payable	-	-	-
232	Accounts Payable	124,138,487	181,139,989	182,856,413
233	Notes Payable to Associated Companies	-	143,086,743	114,140,939
234	Accounts Payable to Associated Companies	3,709,730	4,958,531	4,819,842
235	Customer Deposits	45,850,825	46,891,725	48,508,305
236	Taxes Accrued	20,293,169	3,729,369	2,875,611
237	Interest Accrued	23,488,664	23,213,454	21,968,437
238	Dividends Declared	-	-	-
241	Tax Collections Payable	1,298,608	8,838,256	5,829,671
242	Misc Current and Accrued Liabilities	67,343,151	59,283,167	56,235,608
243	Obligations Under Capital Leases	334,345	392,405	8,221,544
244	Derivative Instrument Liabilities	-	-	-
	(Less) Long-Term Portion of Derivative Instruments-Hedges	-	-	-
	Total Current and Accrued Liabilities	<u>286,456,979</u>	<u>471,533,639</u>	<u>445,456,370</u>
<u>DEFERRED CREDITS</u>				
252	Customer Advances for Construction	35,427,361	38,217,911	46,857,198
255	Accumulated Deferred Investment Tax Credits	1,917,347	1,786,148	1,654,949
253	Other Deferred Credits	529,427,454	557,458,644	579,126,337
254	Other Regulatory Liabilities	956,536,886	1,090,926,449	1,056,027,502
257	Unamortized Gain on Reacquired Debit	57,934	38,217	18,502
282	Accum. Deferred Income Taxes-Other Property	1,015,488,312	1,061,347,417	1,118,422,785
283	Accum. Deferred Income Taxes-Other	580,958,322	581,077,939	557,981,976
	Total Deferred Credits	<u>3,119,813,616</u>	<u>3,330,852,725</u>	<u>3,360,089,249</u>
	TOTAL LIABILITIES AND OTHER CREDITS	<u>8,873,292,841</u>	<u>9,274,497,692</u>	<u>9,527,196,288</u>

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Income Statement at
For the Years 2017, 2018 and 2019

FERC Account	DECEMBER 31			
	2017	2018	2019	
UTILITY OPERATING INCOME				
400	Operating Revenues	1,801,101,333	1,841,851,146	1,819,359,776
Operating Expenses:				
401	Operation Expenses	1,139,152,514	1,167,145,472	1,203,841,935
402	Maintenance Expenses	87,916,073	241,399,996	167,710,218
403	Depreciation Expenses	143,382,168	176,483,809	167,161,187
	Depreciation Expenses for Asset Retirement Costs (403.1)	-	111,397	82,159
404-405	Amortization and Depl. Of Utility Plant	6,145,923	7,070,460	9,193,205
406	Amortization of Utility Plant Acq. Adjustment	-	-	-
407.3	Regulatory Debits	142,746,615	143,485,033	92,563,881
407.4	(Less) Regulatory Credits	34,145,524	250,587,370	74,050,578
408.1	Taxes Other Than Income Taxes	11,025,411	11,748,308	10,925,531
409.1	Income Taxes Federal	79,491,408	(55,417,639)	10,779,066
409.1	Other	1,948,427	(563,717)	(47,380)
410.1	Provision for Deferred Income Taxes	792,991,357	693,756,037	324,847,432
411.1	(Less) Provision for Deferred Income Taxes-Cr	796,402,219	570,415,918	311,601,610
411.4	Investment Tax Credit Adj.- Net	(131,199)	(131,199)	(131,199)
411.1	Accretion Expense	-	8,015,272	9,027,856
	Total Utility Operating Expenses	<u>1,574,120,954</u>	<u>1,572,099,941</u>	<u>1,610,301,703</u>
	NET UTILITY OPERATING INCOME	<u>226,980,379</u>	<u>269,751,205</u>	<u>209,058,073</u>
OTHER INCOME AND DEDUCTIONS				
Other Income:				
415	Revenues from Merchandising, Jobbing and Contract Work	2,586,248	5,452,426	626,213
416	(Less) Costs and Expenses of Merch., Job and Contract Work	2,238,663	5,457,474	1,005,794
417	Revenues from Nonutility Operations	-	-	-
417.1	(less) Expenses of Nonutility Operations	-	-	223
418	Nonoperating Rental Income	(2,945)	(3,178)	(3,498)
418.1	Equity in Earnings of Subsidiary Companies	7,690	11,291	15,818
419	Interest and Dividend Income	3,435,022	4,514,328	4,950,565
419.1	Allowance for Other Funds Used During Construction	8,839,677	1,377,486	7,369,721
421	Misc. Nonoperating Income	1,329,033	448,644	1,302,648
421.1	Gain on Disposition of Property	135,840	-	6,703,305
	Total Other Income	<u>14,091,902</u>	<u>6,343,523</u>	<u>19,958,755</u>
Other Income Deductions:				
421.2	Loss on Disposition of Property	-	121,207	1,046,036
426.1	Donations	189,511	180,098	215,126
426.2	Life Insurance	(886,658)	94,695	(1,230,557)
426.3	Penalties	45,234	25,920	43,956
426.4	Exp. For Certain Civic, Political & Related Activities	52,166	67,267	56,844
426.5	Other Deductions	28,164,392	236,885	841,258
	Total Other Income Deductions	<u>27,564,645</u>	<u>726,072</u>	<u>972,663</u>
Taxes Applicable to Other Income and Deductions:				
408.2	Taxes Other Than Income Taxes	-	-	-
409.2	Income Taxes - Federal	(6,483,614)	1,342,032	1,716,721
409.2	Income Taxes - Other	(1,888,072)	567,717	752,535
410.2	Provision for Deferred Income Taxes	213,020	162,118	2,063,291
411.2	(Less) Provision for Deferred Income Taxes - Cr.	774,405	116,732	169,181
411.5	Investment Tax Credit Adjustment - Net	-	-	-
	Total Taxes on Other Income and Deductions	<u>(8,933,071)</u>	<u>1,955,135</u>	<u>4,363,366</u>
	NET OTHER INCOME AND DEDUCTIONS	<u>(4,539,672)</u>	<u>3,662,316</u>	<u>14,622,726</u>
INTEREST CHARGES				
427	Interest on Long-Term Debt	100,939,056	90,992,663	82,769,722
428	Amort. Of Debt Disc and Expense	1,723,301	1,514,001	1,571,078
428.1	Amortization of Loss on Reacquired Debt	2,018,270	1,797,068	1,074,120
429	(Less) Amort. Of Premium on Debt-Credit	-	-	761,126
429.1	(Less) Amortization of Gain on reacquired Debt-Credit	19,716	19,716	19,716
430	Interest on Debt to Assoc. Companies	1,592,957	5,281,075	2,519,686
431	Other Interest Expense	5,488,432	7,432,257	7,671,938
432	(Less) Allowance for Borrowed Funds Used During Construction-Cr.	4,424,505	3,340,778	4,810,368
	Net Interest Charges	<u>107,317,795</u>	<u>103,656,570</u>	<u>90,015,334</u>
	Income Before Extraordinary Items	<u>115,122,912</u>	<u>169,756,951</u>	<u>133,665,465</u>
	NET INCOME	<u>115,122,912</u>	<u>169,756,951</u>	<u>133,665,465</u>

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Balance Sheet at
September 30, 2020
ASSETS AND OTHER DEBITS

Schedule KMS-10
Page 1 of 2

FERC Account		Sept. 30, 2020
	<u>UTILITY PLANT</u>	
101-106	Utility plant	7,360,356,669
107	Construction Work in Progress	350,683,627
	Total Utility Plant	<u>7,711,040,296</u>
108,111	Less Accumulated Provision for Depreciation	<u>2,260,746,142</u>
	Net Utility Plant	<u>5,450,294,154</u>
120.1 - 120.4 and 120.6	Nuclear Fuel	
120.5	Accum. Provision for Amortization	0
	Net Nuclear Fuel	<u>0</u>
	Net Utility Plant	<u>5,450,294,154</u>
	<u>OTHER PROPERTY AND INVESTMENTS</u>	
121	Nonutility Property	18,034,911
122	(Less) Accum. Prov. For Deprec. And Amort.	15,897,116
123	Investment in Associated Companies	-
123.1	Investment in Subsidiary companies	890,520
124	Other Investments	403
125-128	Special Funds	255,559,422
175	Long-Term Portion of Derivative Assets	-
	Total Other Property and Investments	<u>258,588,140</u>
	<u>CURRENT AND ACCRUED ASSETS</u>	
131	Cash	
132-134	Special Deposits	280,798,083
135	Working Funds	1,300
136	Temporary Cash Investments	
142	Customer Accounts Receivable	177,094,628
143	Other Accounts Receivable	30,553,340
144	(Less) Accum. Prov. For Uncollectible Accounts	10,304,502
145	Notes Receivable from Associated Companies	-
146	Accts. Receivable from Associated companies	70,717,655
151	Fuel Stock	-
154	Plant Materials and Operating Supplies	-
165	Prepayments	42,031,702
171	Interest and Dividend Receivable	-
172	Rents Receivable	4,865,996
173	Accrued Utility Revenues	74,394,002
174	Miscellaneous Current and Accrued Assets	-
175	Derivative Instruments Assets	-
175	(Less) Long Term Portion of Derivative Instrument Assets	-
	Total Current and Accrued Assets	<u>670,152,204</u>
	<u>DEFERRED DEBITS</u>	
181	Unamortized Debt Expenses	6,192,692
182.1	Extraordinary Property Losses	-
182.2	Unrecovered Plant and Study Costs	3,935,131
182.3	Other Regulatory Assets	812,902,119
183	Prelim. Survey and Investigation Charges	2,107,518
184	Clearing Accounts	28,695
185	Temporary Facilities	649,400
186	Miscellaneous Deferred Debits	1,818,746,042
188	Research, Devel. And Demonstration Expend.	42,510
189	Unamortized Loss on Reacquired Debt	3,861,501
190	Accumulated Deferred Income Taxes	991,140,771
	Total Deferred Debits	<u>3,639,606,379</u>
	TOTAL ASSETS	<u><u>10,018,640,877</u></u>

JERSEY CENTRAL POWER & LIGHT COMPANY
Comparative Balance Sheet at
September 30, 2020
LIABILITIES AND OTHER CREDITS

Schedule KMS-10
Page 2 of 2

FERC Account		Sept. 30, 2020
	<u>PROPRIETARY CAPITAL</u>	
201	Common Stock	136,284,470
204	Preferred Stock Issued	
207	Premium on Capital Stock	2,665,505,519
208-211	Other Paid-In Capital	55,274,476
215, 215.1, 216	Retained Earnings	838,175,251
216.1	Unappropriated Undistributed Subsidiary Earnings	(45,017)
219	Accumulated Other Comprehensive Income	(5,578,804)
	Total Proprietary Capital	<u>3,689,615,895</u>
	<u>LONG-TERM DEBT</u>	
221	Bonds	
223	Advances From Associated Companies	
224	Other Long-Term Debt	1,650,000,000
225	Unamortized Premium on Long-Term Debt	4,486,638
226	(Less) Unamortized Discount on Long-Term Debt	3,947,285
	Total Long-Term Debt	<u>1,650,539,353</u>
	<u>OTHER NON-CURRENT LIABILITIES</u>	
227	Obligations Under Capital Leases	67,802,656
228.2	Accumulated Provision for Injuries and Damages	4,576,137
228.3	Accumulated Provision for Pension and Benefits	275,121,314
	Long-Term Portion of Derivative Instrument Liabilities	-
230	Asset Retirement Obligation	188,109,619
	Total Noncurrent Liabilities	<u>535,609,726</u>
	<u>CURRENT AND ACCRUED LIABILITIES</u>	
231	Notes Payable	-
232	Accounts Payable	152,819,187
233	Notes Payable to Associated Companies	420,946,450
234	Accounts Payable to Associated Companies	4,659,817
235	Customer Deposits	44,659,430
236	Taxes Accrued	5,136,751
237	Interest Accrued	28,672,378
238	Dividends Declared	-
241	Tax Collections Payable	87
242	Misc Current and Accrued Liabilities	58,577,719
243	Obligations Under Capital Leases	11,987,431
244	Derivative Instrument Liabilities	-
	(Less) Long-Term Portion of Derivative Instruments-Hedges	-
	Total Current and Accrued Liabilities	<u>727,459,250</u>
	<u>DEFERRED CREDITS</u>	
252	Customer Advances for Construction	46,145,136
255	Accumulated Deferred Investment Tax Credits	1,556,550
253	Other Deferred Credits	587,408,823
254	Other Regulatory Liabilities	1,001,128,176
257	Unamortized Gain on Reacquired Debit	3,714
282	Accum. Deferred Income Taxes-Other Property	1,163,500,219
283	Accum. Deferred Income Taxes-Other	615,674,035
	Total Deferred Credits	<u>3,415,416,653</u>
	<u>TOTAL LIABILITIES AND OTHER CREDITS</u>	<u>10,018,640,877</u>

JERSEY CENTRAL POWER & LIGHT COMPANY

Statement of the Amount of Total Revenue Derived in Calendar Year 2019
From Intrastate Sales and Services at Current Rates

Line #	Description	FERC Form-1 Page	FERC Form-1 Line	2019
1	Total Electric Operating Revenues	300	27	\$ 1,819,359,776
2	Exclude:Contra Revenue Amounts in FERC 445	300	7	\$ (17,550,063)
3	Revised Total Electric Operating Revenues			\$ 1,836,909,839
4	Exclude: Sales for Resale Revenues	300	11	\$ 28,262,917
5	Revised Total Electric Operating Revenues			\$ 1,808,646,922
6	Total Add Back: Intrastate Sales for Resales			\$ 3,648,201
7	Total Intrastate Revenues			\$ 1,812,295,123

JERSEY CENTRAL POWER & LIGHT COMPANY
Transactions with Associated (Affiliated) Companies
For the 12 Months Ended December 31, 2019

Schedule KMS-12

DESCRIPTION OF SERVICE	NAME OF AFFILIATED COMPANY	AMOUNT
Provide Chairman of the Board Support	First Energy Service Co	761
Provide Chief Executive Officer Support	First Energy Service Co	308,124
Provide President, FE Utilities Support	First Energy Service Co	743,835
Provide Transmission, Distribution Support	First Energy Service Co	33,295,770
Provide Utility Operations Support	First Energy Service Co	769,787
Provide Compliance & Regulatory Services Support	First Energy Service Co	2,179,986
Provide Customer Service Support	First Energy Service Co	15,400,779
Provide Energy Efficiency Support	First Energy Service Co	502,130
Provide Environmental Support	First Energy Service Co	1,018,101
Provide Chief Financial Officer Support	First Energy Service Co	191,944
Provide Corporate Services & Chief Information Officer Support	First Energy Service Co	21,710,772
Provide Supply Chain Support	First Energy Service Co	676,418
Provide Accounting Support	First Energy Service Co	8,062,966
Provide Treasury Support	First Energy Service Co	385,783
Provide Business Development Support	First Energy Service Co	484,032
Provide Integrated System Planning Support	First Energy Service Co	465,509
Provide Corporate Risk Support	First Energy Service Co	585,370
Provide Internal Audit Support	First Energy Service Co	514,938
Provide Legal Department Support	First Energy Service Co	4,557,874
Provide Rates & Regulatory Affairs Support	First Energy Service Co	1,610,666
Provide Corp/Real Estate Record Management Support	First Energy Service Co	3,730,071
Provide Corporate Affairs Support	First Energy Service Co	1,234,654
Provide External Affairs & Communication Support	First Energy Service Co	3,124,901
Provide Federal Affairs & Energy Policy Support	First Energy Service Co	242,936
Provide Local Affairs & Economic Development Support	First Energy Service Co	189,294
Provide State Affairs Support	First Energy Service Co	375,348
Provide Human Resource Support	First Energy Service Co	7,396,700
Provide Marketing & Branding Support	First Energy Service Co	1,468,609
Provide Generation Related Support	First Energy Service Co	2,770,776
Inventory Carrying Charges on Service Company Assets	First Energy Service Co	1,142,008
Interest Expense - Regulated Money Pool	First Energy Corp	2,519,684
Rent - Wadsworth Facility	American Transmission Systems Inc	500,927
Rent - Akron Control Facility	American Transmission Systems Inc	1,097,732
Rent - Pottsville Pike	Metropolitan Edison Company	749,709
Rent - Farimont Call Center	Monongahela Power Company	543,336
Rent - Greensburg Corporate Center	West Penn Power Company	808,512
Transmission Charge - TMI Unit 1	Mid-Atlantic Interstate Transmission, LLC	1,998,563
Transmission Investment - Power Pool Agreement	Mid-Atlantic Interstate Transmission, LLC	1,762,524
TMI Charges for Miscellaneous General and Outside Services	GPU Nuclear, Inc	2,038,527
	TOTAL	<u>127,160,359</u>
ACCOMMODATION OR CONVENIENCE PAYMENTS:		<u>2019</u>
Purchased Power	First Energy Service Co	940,856,879
Interest	First Energy Service Co	81,087,336
Taxes	First Energy Service Co	122,783,237
Outside Contractors	First Energy Service Co	40,113,847
Employee Benefits	First Energy Service Co	37,891,799
Customer Expenses	First Energy Service Co	40,147,508
NJ Agent Payments	First Energy Service Co	64,388,463
Inventory/Equipment Costs	First Energy Service Co	8,098,657
Lease Costs	First Energy Service Co	6,100,159
Other Convenience Payments*	First Energy Service Co	284,964,205
	TOTAL	<u>1,626,432,090</u>

JERSEY CENTRAL POWER & LIGHT COMPANY**BPU No. 13 ELECTRIC – PART III****Original Sheet No. xx****RIDER EV
ELECTRIC VEHICLE CHARGER RIDER****Electric Vehicle Charger Off-Peak Credit**

Availability: Available to Residential and Multi-Family Customers who install a Company-qualified smart Electric Vehicle (“EV”) Level 2 (“L2”) charger (“Eligible Customer”). This provision within Rider EVC is voluntary and offers qualified customers the opportunity to receive a credit by charging an EV battery with a Company-qualified smart EV L2 charger during Off-Peak hours. Customers must agree to share the charging data from their smart EV L2 charger via remote access with the Company. Customers are not required to receive their energy supply through Basic Generation Service to be eligible for this Rider. This Rider is limited to 2,000 eligible residential and 75 eligible multi-family Customers on a first-come, first-serve basis.

Rate: Eligible Customers electing this provision within this Rider will receive a credit of 2 cents per Kilowatt-hour (“kWh”) for Net Off-Peak kWh Usage at their smart EV L2 charger. Net Off-Peak kWh Usage is calculated as kWh usage recorded by the Customer’s smart EV Level 2 charger during Off-Peak hours less kWh usage recorded by the Customer’s smart EV L2 charger during On-Peak hours. Net Off-Peak kWh Usage must be a positive value for the Customer to receive a credit. In the event Off-Peak kWh less On-Peak kWh is less than zero, the Net Off-Peak kWh Usage shall be considered zero for the measurement period. A third-party vendor will determine and remit the credit to customers on a quarterly basis, separate from the Customer bill.

On-Peak hours are Monday through Friday 6:00 AM to 11:00 PM Eastern Standard Time, Monday through Friday. All other hours including weekend hours will be considered off-peak. The Company reserves the right to change the on-peak hours from time to time as the on-peak periods of the supply system change. The Company may also selectively stagger the on-peak hours up to one hour in either direction when required to alleviate local distribution system peaking within high-density areas. The off-peak hours will not, however, be less than 7 hours daily.

Term: Month to month basis. This provision within this Rider will be available until the earlier of the Company modifying the Off-Peak Credit program or December 31, 2025.

Electric Vehicle Charger Incentive:

Availability: Available to all Eligible Customers located in the territory served by the Company. Eligible Customers must install an EV L2 charger or Direct Current Fast Charger (“DCFC”), subject to the limitations outlined below.

Incentives:

Smart Charger Incentives: The Company will provide an incentive to Customers served under Schedule RS, RT/RGT, GS, GST, GP, and GT who install a Company-qualified smart EV Level 2 charger or DCFC. The smart EV L2 charger or DCFC must be located after the Company meter and must be owned by the Customer receiving the incentive. The smart EV L2 charger or DCFC must be located on Customer-owned property, or in the case of rental property, with approval from the property owner. Customers are not required to receive their energy supply through Basic Generation Service to be eligible for the incentive. Qualifying smart EV L2 chargers are available on the Company's website at www.firstenergycorp.com.

In order to qualify for the Company incentive, the Customer must submit an application with all necessary supporting documentation within 30 days of installation (including copies of receipts and/or invoices of the smart EV L2 charger or DCFC purchase and installation costs) and agree to share the charging data from the smart EV L2 charger or DCFC with the Company. The Customer is responsible for maintenance and enabling the smart capabilities of the EV L2 charger or DCFC. Once the Company receives the Customer's completed application and confirms that the Customer's smart EV L2 charger or DCFC has been installed and is available for service and remote communication, the Company shall issue the applicable incentive. The program only applies to eligible smart EV L2 chargers and DCFCs purchased and installed on or after January 1, 2022. Only Customers who qualify for and are accepted into the JCP&L EV Driven Program will be eligible for incentives.

Utility Make-Ready Work:

The Company will be responsible for any utility upgrades to its facilities necessary to meet the adequate character and capacity of its electric service requirements to the Customer at the Company's reasonable discretion and subject to the BPU's notification and approval requirements. Only Customers who qualify for and are accepted into the JCP&L EV Driven Program will be eligible for Utility Make-Ready Work.

EV Charger Rates:

Rider EV provides a charge applicable to all KWH usage of any Full-Service Customer or Delivery Service Customer. The costs that may be included in calculating the EV Charge are, but not limited to, customer incentives, utility upgrades necessary for Make-Ready EV charging, rate discount offers, innovation fund and all administrative expenses necessary to implement the EV Program. All other applicable Rates and Riders not itemized in this Rider within the Rate Schedule shall apply. The Company will make periodic filings to reset the EV Charges. All subsequent filings will adhere to the Company's recovery periods as approved in the BPU Order and will be filed no later than July 1st to be effective January 1st of the following year. The initial recovery period will be by Rate Schedule for service rendered effective January 1, 2022 through December 31, 2022:

<u>Rate Schedule</u>	<u>Billed Distribution Rate</u>
RS	\$0.000184 per kWh
RGT	\$0.000160 per kWh
RT	\$0.000172 per kWh
GS	\$0.000158 per kWh
GST	\$0.05 per KW
GP	\$0.04 per KW
GT	\$0.02 per kWh
OL	\$0.000731 per kWh
SVL, MVL, ISL, LED	\$0.000833 per kWh

Other Recovery and Billing Issues:

All EV Charger Incentives paid to will be expensed in the current calendar year with recovery in the next calendar year over 12 months. Any under- or over-collected EV Charger Incentives shall accrue interest at the interest rate based on a two-year constant maturity Treasuries as published in the Federal Reserve Statistical Release on the first day of each month (or the closest day thereafter on which rates are published), plus sixty basis points, but shall not exceed the Company's overall rate of return as approved by the BPU. Such interest rate shall be reset each month. The interest calculation shall be based on the net of tax beginning and end average monthly balance, compounded annually.

Term:

Rider EV shall remain in effect until the Company has recovered all revenue requirements associated with the EV Program. The EV program will terminate on December 31, 2025. The Company does reserve the right to extend the use of Rider EV past the termination date.