

March 18, 2013

**VIA ELECTRONIC MAIL AND UPS**

Kristi Izzo, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, NJ 08625-0350

**Re: Board Staff's Utility Consolidated Billing/Purchase of Receivables Proposal**

Dear Secretary Izzo:

In accordance with the New Jersey Board of Public Utilities ("Board" or "BPU") notice of opportunity to comment regarding the Utility Consolidated Billing and Purchase of Receivables Proposal<sup>1</sup> offered by the Board's Staff ("Staff"), Jersey Central Power and Light Company ("JCP&L" or the "Company") submits the following written reply comments to issues raised in National Energy Market Association ("NEMA"), Interstate Gas Supply Inc. ("IGS") and New Jersey Gas & Electric ("NJG&E"), FirstEnergy Solutions ("FES"), and Retail Energy Supply Association ("RESA") Initial Comments.

JCP&L also incorporates by reference its March 11, 2013 initial comments requesting that if the Board chooses to adopt all or part of the Staff's proposal, it should recognize that the Company will need adequate time to implement any necessary changes and must be provided full and current cost recovery to implement those changes.

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<sup>1</sup> Board Staff circulated its proposal via an email dated February 25, 2013.

**I. Reply Comments**

- A. The Board should allow EDCs to terminate customers subject to the consumer protections included in N.J.A.C 14:3-3A, and/or other applicable regulations if the dual billing requirement is eliminated.**

FES, NEMA, IGS and NJG&E proposed that Staff reconsider its proposal to eliminate dual billing altogether.<sup>2</sup>

If the Board eliminates the EDCs' ability to remove a customer from consolidated billing to dual billing, then EDCs must have the ability to terminate service to a customer for the customer's non-payment of TPS charges in the same manner and to the same extent that the Company could terminate service to such a Customer for non-payment of EDC charges. Residential customer termination would be subject to the consumer protections included in N.J.A.C 14:3-3A, and/or other applicable regulations.

- B. The current practice of an EDC providing payment to a TPS five days after the due date shown on a customer's electric bill should be maintained.**

RESA proposes in its initial comments that EDCs should make payment to TPSs twice a month.<sup>3</sup> No other party has made this request. In fact, all other parties that have submitted initial comments supported the EDCs' ability to maintain their current practice. RESA has not offered any specific support for this proposal in its initial comments.

JCP&L supports the BPU Staff's proposal of maintaining the current practice to provide payment to TPSs five days after the due date shown on the customer's electric bill and requests that the current practice be maintained.

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<sup>2</sup> FES Initial Comments at 2-3, NEMA Initial Comments at 2 and 6-7, and IGS and NJG&E Initial Comments at 3.

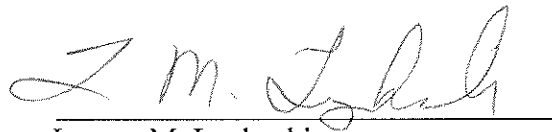
<sup>3</sup> RESA Initial Comments at 3.

## II. Conclusion

JCP&L continues to believe that the Board's existing CAS policies strike an appropriate balance between the interests of customers and competition and urges the Board to carefully consider how the changes within Staff's proposal may impact that balance. Should the Board choose to adopt all or part of the Staff proposal, it should recognize the Company will need adequate time to implement any necessary changes and must be provided with full and current cost recovery to implement those changes. Furthermore, if the Board decides to eliminate dual billing altogether then the Board must give EDCs the ability to terminate service to a customer for the customer's non-payment of TPS charges in the same manner and to the same extent that the Company may terminate service to such a Customer for non-payment of EDC charges.

Respectfully submitted,

Dated: March 18, 2013



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