

The New Jersey EDCs
Case Name: BGS 2021
Docket No(s): ER20030190

Response to Discovery Request: RCR-BGS-0006

Date of Response: 8/5/2020

Witness: N/A

Amounts Held by EDCs

Question:

With reference to page 4 of the Proposal for Basic Generation Service Requirements to be Procured Effective June 1, 2021 dated July 1, 2020, please indicate if the EDCs have verified Exelon Generation Company LLC (“ExGen”) and Hartree Partners, LP’s (“Hartree”) assertion that the shortfall of non-reimbursed costs is at approximately \$125 million since 2017. If so, please provide the amounts held by each EDC. If not please explain why not.

Attachments Provided Herewith: 0

Response:

The table below provides the amounts held by each EDC as of May 31, 2020 pertaining to: (i) the reallocation of costs due to the termination of a long-term firm point-to-point transmission service agreement between PJM Interconnection, LLC (“PJM”) and Consolidated Edison Company of New York, Inc. (“ConEd Wheel”); (ii) the reallocation of costs due to the conversion of Firm Transmission Withdrawal Rights (“FTWRs”) to Non-Firm FTWRs for both Hudson Transmission Partners (“HTP”) and Linden Variable Frequent Transformer Project (“Linden VFT”); and (iii) costs attributed to the implementation of the Yorktown Reliability Must Run (“RMR”) charge. JCP&L also includes amounts pertaining to the implementation of its formula rate.

EDC	Amounts Held 2017 to May 31, 2020
PSE&G	\$120,245,541
JCP&L	\$1,371,162
ACE	\$454,379
RECO	\$3,896,704
TOTAL	\$125,967,786

The non-reimbursed costs to BGS suppliers will be higher than the amounts held by the EDCs and shown above for two reasons. First, the EDCs’ receipt of approval by the Board to begin collecting an increase in transmission rates from customers occurs weeks or months after PJM starts to charge BGS suppliers for that increase. For example, Hartree and ExGen may have included the Seventh Circuit Settlement in their calculations as BGS suppliers were charged for these amounts but not reimbursed at the time of their comments. Second, the EDCs are providing amounts held only for those matters where the EDCs continue today to track amounts for the benefit of BGS suppliers. There are other matters that Hartree and ExGen may have

included in their calculations but which the EDCs have excluded from theirs because the Board has since authorized payment to BGS suppliers following issuance of a Final FERC Order (including amounts pertaining to the formula rate filing by PECO Energy Company and pertaining to the formula rate filing by American Electric Power Service Corporation).