

## Camacho, Aida

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**From:** Jeanne Fox <jeanne.fox52@gmail.com>  
**Sent:** Wednesday, June 17, 2020 4:51 PM  
**To:** Comments, Rule; Secretary, Board; Camacho, Aida  
**Cc:** Mooij, Kelly; Silverman, Abe; Witherell, Benjamin; Sadovy, Christine; Peterson, Stacy; Flanagan, Paul  
**Subject:** [EXTERNAL] Re: Comments: In the Matter of Straw Proposal on Electric Vehicle Infrastructure Build Out

First I commend the BPU Clean Energy staff for putting together three fine panels on June 3rd. I participated in the entire day and was impressed by the balanced information provided. Overall the panelists represented their points of view well. The staff moderators did quite well and asked good questions of their panelists.

The Straw goal of "substituting non-utility investor supplied capital for ratepayer capital wherever possible" is the correct one. New Jersey can accomplish the State's purpose of aggressively developing an Electric Vehicle Infrastructure that will allow us to meet the State's bold objectives. Having as much competition as possible on the EV front is just plain common sense. Other states have private Electric Vehicle Service Equipment (EVSE) investors now ready to compete in New Jersey. The utilities should only be involved in their traditional roles of efficiently providing the numerous distribution system upgrades that will be required for the new EV ecosystem.

The Board must focus on what is in the public interest and the benefits to the customers and ratepayers. The staff rightfully wants to avoid utility stranded costs. **Stefanie** Brand properly emphasized the grim financial situation of so many families. And, now, Covid-19 has many more families living hand-to-mouth - choosing between food and rent. The Board cannot do business as usual now and for the foreseeable future. Thankfully, S.2252 befittingly involves the utilities only as a last resort. "Last resort" must mean last resort. An EDC should only end up being a "party of last resort" if the private sector, i.e. no qualified EVSE - steps up. The BPU should aggressively recruit EVSEs and also consider some additional benefit/compensation in those few areas that may appear to be "last resort" before a utility is allowed to provide charging service in that area (due to the rate-basing costs that would later be charged to ratepayers). Also, as recommended by a number of stakeholders, if there is a "last resort" area, the EDC must bear the burden in a traditional rate case that the investment is reasonable & prudent. And, such areas should not be designated by the EDCs early on - at the beginning of this EV process (as appears to be the case with the Straw) - but much later. Otherwise, as Ms. Brand stated "it would be a sham." I am please that the Straw states that these locations cannot be an EDC or affiliate or controlled by an EDC (unless approved by the Board). So, before the Board approves via Board Order, any such "Last Resort" action, you should know for certain that, in fact, there is no other viable option.

We are all proud that New Jersey has done a good job over the last 30 years of dramatically reducing GHG emissions from electricity

generation. And, as we know, the #1 cause of New Jersey's CO2 emissions now is transportation. The major purpose of our EV program is to reduce the Carbon emissions from fossil fuels. An important secondary outcome is to dramatically lessen other fossil fuel pollutants, e.g. PM10 and PM2.5, which cause serious health issues, e.g. asthma - most especially in our Environment Justice(EJ)/urban communities. The EV program will be our first big step forward to electrification of the State as set forth in the 2019 Energy Master Plan.

I strongly concur with the Greenlots' Scott Fisher that the Straw focuses way too much on light duty EVs. Studies show that there would be more significant pollutant reductions, including CO2, by targeting heavy duty vehicles and by eliminating diesel fuel usage. The next area that should be addressed after that, before concentrating on personal EVs, should be mid-level EVs, e.g. smaller trucks and cargo vans. Studies also show that many low income communities rely upon public transportation rather than cars. DEP's Peg Hanna pointed out that 23% of our State's Black and Latino population do not have personal vehicles. And, Isles' Kate Miguel said that 30% of Trenton residents, 30/40% of Jersey City residents and 50% of Newark residents have no cars. Thus, my educated guess is that the 23% statistic includes rural LMI people. So, many urban LMI really will not benefit much from locating charging stations in their neighborhoods. With Covid-19 they can hardly afford to live. So, to truly benefit LMI/EJ urban communities, vehicles that serve that community, e.g. Head Start and senior shuttles as well as urban fleets should be prioritized for electrification. As Pam Frank stated fleets account for 9% of all New Jersey vehicles and many of them are in the port areas. To help reduce idling/pollution/CO2, the State should concentrate on the urban fleets first, e.g. governments, Federal Express. Use the Clean Energy Fund for these EVs rather than for personal cars. And, urban school bus fleets may also be used as energy storage - during the summer & during school season's late afternoon/early evening peak hours (helping the taxpayers and helping to cut the peak).

I urge the Board to reconsider the \$5000 rebates for all personal EVs. If the BPU truly wants to help the EJ/equity areas, electrify the most polluting vehicles that negatively impact their communities. Covid-19 has changed the situation of many New Jersey's people. Our situation is quite different than it was when the EMP was first being developed. The \$5000 rebate for light duty vehicles is handing the more affluent individuals money that we do not need. Possibly consider rebates for people who live in urban areas and who commute to jobs in urban areas but not to suburbia. Locate charging station where a large volume of people work in urban areas, e.g. the colleges, Prudential, the PAC, government buildings, etc. This would lessen the pollution that the urban residents experience. We all know that California is the state most advanced with EVs. The California Air Resources Board (CARB) is most aggressively addressing the large vehicles as their priority for good reason. Our State should target the dirty, congested area first and foremost!

As Environment New Jersey's Doug O'Malley stated the long-term costs of E-buses is much lower than that of fossil fuel buses. So government and school bus fleets would benefit in the long term as would the taxpayers.

New Jersey Transit really must step up with electrifying their bus fleet - starting, again, first in our urban centers. I again recommend that all new NJT buses purchased going forward be EVs.

As in the past, I again highly recommend that the BPU target EV electrification efforts in the most congested areas of the State - both traffic congestion-wise and electricity congestion-wise. This would help relieve rush hour traffic as well as lessen public health issues. It would also help lower rates for all electricity customers in that congestion area. The utilities should be asked to provide to the BPU as well as to the public the locations of those electricity congestion areas. Also, the V program should focus on the PANYNJ, NJT & bus terminals. Please review closely the Rutgers 2018 report on Public Health and our Ports. Work with Rutgers - most especially in Newark and Camden as well as with NJIT & Essex County College in the Heights section of Newark. Encourage them to go EV with almost all new vehicles.

Concerning Rate design reform - getting the utility tariffs correct is critical. New Jersey has to get it right. I suggest that the Board seriously consider doing “pilot” tariffs for maybe two years and then analyze the results. As stated by RMI’s Stephanie Green, there should be dedicated EV tariffs and separate EV (smart)meters. The cost shifts should be measured/tracked/reported/demonstrated and then reviewed. The costs should be modeled so that it remains at least slightly under the gasoline price. One possibility could be, as done by P,G&E would be a “Subscription Charge” where there would be more certainty for the customer. Mark Warner encouraged consistency with public charging and multifamily charging. While the EDCs certainly have different tariffs, their EV tariffs should be as consistent statewide with each other as possible. Their peak periods may differ but that can be worked out before the EV tariffs are implemented or at least after the first 2 years. The staff should probably convene the stakeholder group to review any inconsistencies between the EDC’s EV tariffs. This should be done most especially when pilot results (e.g. 2 years) are reviewed.

Time of Use residential tariffs are OK but it would likely be better to spread the usage out over time. I recommend a “Managed” or "Smart Charging" pilot (or pilots) wherein a utility controls the overnight residential charging during off-peak periods. Incentives could be given such as, in the pilot case, customers who voluntarily sign up would pay no

more than what they would have otherwise paid on the typical residential tariff.

EVgo, reportedly the largest EVSE in the country (in a dozen states), recommended cost-based/no subsidy tariffs, minimization of the demand charge and limiting the monthly fixed charges. He also recommended the commercial EV rates should be technology neutral. These recommendations, which would be prospective for new charging stations, appear to be reasonable. And, as noted by Tesla, commercial EV rates should signal the best times to charge, provide some level of certainty and should effectuate \$/kWh on par with the commercial class average. It seems that EVSE should charge either on per-kWh-hour or on a time basis. However, the Board may, again, want to try some commercial tariff pilots as well.

Regarding Multifamily dwellings, I concur with Pam Frank that having the EDC put the infrastructure into place for existing multifamily dwellings is "putting the cart before the horse." The EDCs probably should do so with most new multifamily construction. Otherwise, wait until existing multi-family units request such infrastructure. We don't need any unnecessary additions to rate base for at least the next several years. Not when New Jersey's rates are already so high. The Board may want to do several pilots regarding the issue of where parking spots are assigned in multifamily situations.

I urge that only EVs be approved to serve as ride sharing vehicles, e.g. Uber, Lift. I note that these vehicles are primarily used during rush hours. The State should work with the urban municipalities to adopt this requirement.

I concur with IBEW's Ian Leonard that there needs to be continuity across the state for both the electricians and also for the vehicle owners and the EVSEs.

The proposed Travel Corridors plan makes sense. And, clearly, based upon the significant improvements in technology, the Straw is, properly, only locating public fast chargers along the travel corridors.

As EDF's Elizabeth Stein suggested, the BPU should conduct a Distribution Grid Impact Study so that all actually know the impact of this ongoing aggressive EV effort, which will help keep costs more manageable, better deal with coincidental peak and more fairly allocate the costs. This could also help provide high value services to the Grid via aggregators. And, as Pam Frank said, we need to be careful about creating a coincidental peak for residential customers which at the end of the work day would double peak demand. EV charging should end up being Grid reinforcing, if done

properly, so that unnecessary costs will be avoided. The system should be designed so that ancillary services can help build more flexibility into our electric system that will benefit ratepayers as well as the environment.

I highly commend the Staff Straw that has charging station infrastructure costs should be borne by the private sector and not by utility ratepayers. Competition is clearly the way to go. Attract private capital into the EV market. Utilities certainly should strategically “make ready” but, as required by EDECA, competition should occur in every other part of the EV ecosystem.

Thank you for this opportunity to comment on this important Straw.

Sincerely,

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