

chargepoint.com



ChargePoint, Inc.

254 East Hacienda Avenue | Campbell, CA 95008 USA  
+1.408.841.4500 or US toll-free +1.877.370.3802

September 16, 2019

Aida Camacho, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue  
Trenton, New Jersey 08625

**Re: 2019 Draft Energy Master Plan – Comments by ChargePoint**

Dear Secretary Camacho,

Please find attached comments by ChargePoint regarding the 2019 Draft Energy Master Plan.  
Please let me know if I can provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Miller".

Kevin George Miller  
Director, Public Policy  
ChargePoint

## **2019 Draft Energy Master Plan – Comments by ChargePoint**

### **I. INTRODUCTION**

ChargePoint appreciates the opportunity to provide comments on the Draft 2019 Energy Master Plan (EMP). We applaud the comprehensive vision laid out in the Draft EMP for New Jersey’s energy future, particularly regarding the beneficial electrification of transportation.

Our comments will provide background on ChargePoint, electric vehicles (“EVs”) and EV charging, regulatory best practices, and recommendations for accelerating transportation electrification across New Jersey.

### **II. BACKGROUND ON CHARGEPOINT**

ChargePoint is the nation’s leading and most open EV charging network, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. The ChargePoint network features more than 100,000 charging spots, over 1,300 of which are in New Jersey.

ChargePoint drivers have completed more than 62 million charging sessions, saving upwards of 71 million gallons of gasoline and driving more than 1.6 billion gas-free miles on our network.

### **III. BACKGROUND ON ELECTRIC VEHICLES & EV CHARGING**

Transportation electrification is an unprecedented opportunity for New Jersey to achieve statewide environmental, economic development, energy, transportation, and environmental justice goals. Supporting the deployment of EVs, buses, and trucks can make transportation cheaper and cleaner, create jobs, and support the state’s innovation economy. EVs can make New Jersey’s electric and transportation infrastructure more resilient in a time of increasingly unpredictable and powerful climate events.

EVs are creating a paradigm shift in mobility and refueling. Unlike drivers of traditional gas cars, who refuel on their way to a destination, EV drivers tend to charge their vehicles when they arrive at their destination. Over 90% of LDV charging takes place at home and at work. However, the remaining 10% is incredibly important to support charging in communities and local businesses, longer-distance trips, and the electrification of fleets.

The EV charging market in New Jersey is growing and dynamic, and there is no one static business case or operating model for the EV charging industry. ChargePoint manufactures and sells EV charging equipment to independent owner-operators, or “site hosts”. We also provide software solutions, or “network services”, that site hosts use to operate and manage their smart charging stations on our network, as well as other ongoing services.

Publicly-available EV charging stations are primarily owned and operated by site hosts that participate in the competitive EV charging market. Site hosts provide EV charging services for a

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variety of reasons, including but not limited to offering a valuable employee benefit, attracting new tenants and customers, minimizing operating costs for vehicle fleets, and others.

The evolution of New Jersey’s EV and EV charging markets will be impacted by improvements in technology, business models, and services. There is no *one-size-fits-all* solution to EV charging.

### IV. REGULATORY BEST PRACTICES

States across the country are considering appropriate roles for regulated electric utilities in the competitive EV charging market. There are many important roles for utilities in transportation electrification. Firstly, utilities are ideally situated to ensure that the associated new load is incorporated in a safe, reliable, and efficient manner.

When considering whether to expand the role for utilities in the competitive EV charging market, we recommend looking to key examples in other states. Successful states like California and Massachusetts have established clear, consistent criteria for evaluating transportation electrification proposals by regulated utilities to:

- i. Minimize costs and maximize benefits to ratepayers,
- ii. Expand equitable access to electric transportation,
- iii. Maintain healthy market competition by ensuring continued customer choice in equipment, network services, and EV charging providers.

### V. RECOMMENDATIONS

ChargePoint offers the following recommendations to ensure that New Jersey establishes a framework that accelerates sustainable and scalable growth in transportation electrification:

- Set high-level and flexible goals and avoid overly-prescriptive mandates;
- Support the electrification of heavier-duty, transit, taxi and ride-share, and non-road vehicle fleets to ensure equitable access to the full range of benefits from transportation electrification. This is particularly pressing for communities that are disproportionately impacted by transportation emissions.
- Establish clear criteria at the BPU to evaluate utility proposals and ensure that they support innovation, competition, and site host customer choice of EV charging equipment and services to avoid pushing out *one-size-fits-all* charging solutions;
- Ensure that the electric grid and utilities are prepared to incentivize the new load from EVs that both (i) puts a downward pressure on electricity rates and (ii) encourages continued investment in EV charging infrastructure by the private market;
- Commit additional funding for DEP’s successful workplace charging program;
- Update statewide building codes to ensure that new parking spaces have the necessary conduit and wiring in place to dramatically decrease installation costs compared to retrofitting existing buildings; and



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- Ensure that residents in multifamily buildings aren't unjustifiably prevented from installing home charging, which is referred to as the "Right to Charge"

**VI. CONCLUSION**

Thank you for the opportunity to provide comments on the 2019 Draft EMP. We look forward to continue working with the State of New Jersey and stakeholders to make it easier for riders and drivers throughout the state to "go electric".