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Via electronic submission to emp.comments@bpu.nj.gov

September 16, 2019

Aida Camacho, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350,
Trenton, New Jersey 08625

RE: Comments on the 2019 Draft State Energy Master Plan

Secretary Camacho,

EVgo thanks Governor Murphy and the Board of Public Utilities (BPU) for their leadership in accelerating New Jersey's advancement in clean transportation technologies, and for the opportunity to comment on the draft Energy Master Plan. EVgo operates America's largest and most reliable public EV fast charging network, with over 1,200 DC fast chargers (DCFC) operating across the nation in 66 metropolitan markets and 34 states. EVgo public charging stations provide 90 miles of drivable range in 30 minutes in areas. With more than 75 million electric miles charged in 2018, EVgo fast charges more drivers for more miles than any public charging network in the nation.

Today, roughly three quarters of New Jersey residents live within a 20 minute drive of one of our approximate 40 New Jersey fast chargers. In the last quarter alone, EVgo has energized several new fast charging stations in New Jersey, including six chargers in Edison at Menlo Park Mall and an additional station at the Vince Lombardi Service Area. With further interstate corridor builds along the New Jersey Turnpike and Garden State Parkway and a partnership with PSE&G, as well as further corridor buildout on the way from the Volkswagen "Dieselgate" settlement, EVgo is well on its way in reducing the threat of range anxiety as an obstacle to near-term EV adoption in New Jersey.

As the state develops its next iteration of EV charging programs, it is critical that it sees fast charging as more than a "rest stop" application. Fast charging infrastructure is critical to reach the state's increasing population of EV drivers and is especially crucial to enable electrification for drivers without reliable access to charging at home or in the workplace, residents of multi-unit dwellings who rely on public charging for the majority of their charging needs, as well as light duty vehicle (LDV) fleets, including car sharing and ride sharing applications.

We must continue to deploy charging infrastructure apace to meet New Jersey clean transportation and climate goals. With more than 15 models of fully electric sedans, SUVs, crossovers and minivans from every major automaker in the market, more than 800,000 Americans have made the switch to electric cars. In New Jersey, battery electric vehicle registrations have increased from about 500 in 2011 to more than 15,000 today.

The Draft Energy Master Plan

Naturally, EVgo was pleased to see that the Draft Energy Master Plan set as its first strategy the need to reduce emissions and energy consumption in the transportation sector, which represents 46% of the

state's greenhouse gas emissions and is the largest emissions source in the state. The Plan correctly observes that electric vehicles are three to five times more efficient per mile traveled than their gasoline fueled counterparts, that New Jersey's growing reliance upon renewable energy and nuclear power will provide substantial "net emission" and air pollution benefits, and better utilization of the existing electric distribution grid.

EVgo was also pleased to see New Jersey's continuing commitment to support the deployment of 330,000 zero emission vehicles by 2025 as Governor Murphy became a signatory of the State Zero-Emission Vehicles Programs MOU in 2018. This summer's announcement of the "New Jersey Partnership to Plug-in" also proves this administration's commitment to implementing the strategies contained in this Energy Master Plan.

EVgo also appreciates the Plan calling out the need for identifying a clear role for regulated utilities in building out the charging infrastructure, and identifying tangible sources of funding to support both EV purchases through rebate programs as well as programs that will subsidize the cost of installing the electric charging infrastructure. It is important to remember that the utilities can be a powerful force in the marketplace – either enabling and leveraging public investment as we have done with PSE&G, or, if a program is less well-designed, competing against private developers with ratepayer funding.

We believe that the Board in particular has relevant experience to draw on in its guidance and encouragement of customer-sited distributed solar technologies; many of the same rebate, interconnection and utility role issues will be similar, and we hope that the state builds on its previous learning. In particular, EVgo looks forward to participating in stakeholder processes related to the $7 million fast charging allocation in the Partnership to Plug-In and thanks the administration for acknowledging the importance of fast charging in enabling a zero emission vehicle future.

EVgo finally notes its full support for increasing clean transportation options in low and moderate-income and environmental justice communities. As many EVs come off lease and the secondary market continues to emerge, not only will the number of available EVs expand, but used EVs will offer a wider range of EV models to a wider range of income levels. Moreover, mechanisms to scale EV rebate programs in highly polluted neighborhoods and facilitating electric charging infrastructure through public private partnerships can ensure that low and moderate income and environmental justice communities will have equitable access to clean transportation. Options that include "last mile" ride sharing, electric taxis, and public charging that support multi family and community charging hubs are actionable now, and we will continue to work with the Partnership to Plug-in to support these programs in these communities.

Recommendations

In order to assist in the tactical planning to achieve these important goals, EVgo respectfully submits the following suggestions to assist in the successful execution of the Energy Master Plan.

1. **The Fast Charging Incentive Program should focus on addressing urban areas, residents of multi-unit dwellings, and enabling cities to become "fleet ready" to eventually welcome new mobility options such as ride sharing and car sharing**. As we emphasized above, fast charging is not just for long trips, and it is not just for corridors. Fast charging plays a critical role in accelerating the transition to electrified transportation by reducing the need for "one car one charger" infrastructure buildout that is common at longer dwell time locations. Placing chargers

where they are heavily used also significantly increases their clean air benefits. As mentioned above, EVgo applauds the administration's decision to allocate $7MM in funding to public fast charging, which is critical to providing access to electrification to residents of multi-unit dwellings without access to charging at home or in the workplace[1], as well as fleet drivers who drive 3-7 times that of personal use drivers. Based on EVgo data from 34 states, fast chargers see the highest use in urban locations due to the presence of renters and fleet drivers, and EVgo applauds the administration for its focus on expanding access through a specific allocation to fast charging.

2. **Utilities can enable electrification through "make-ready" investments**. EVgo appreciates the language in the plan that that seeks to convey the role of the utility. One area where consensus exists on this topic is on make-ready. Utilities investing in the conduit and other electrical infrastructure leading up to the charger is a logical role and a "win-win." The utility gets to focus on its core competency, enable more load for it to serve, reduce capital costs for third party providers, and increase private investment.

   Make-ready also avoids potential issues with ownership such as the monopoly entity's ability to set its public pricing at rates too low for the private market to compete, which may undercut competition, or through overbuild, to effectively "consume" the usage that, in early years, electric vehicle service providers rely upon to support their financial modeling. EVgo applauds the BPU for its deep consideration of the respective roles of the private sector and utilities and feels strongly that utilities should work in partnership with experienced EV charging partners to deliver the infrastructure EV to consumers.

3. **Utility rate structures are critically important to providing tariff structures that will ensure that EV fueling costs are competitive with internal combustion engines**. EV load profiles must be taken into account in commercial EV tariff rate design, and most importantly utility demand charges need to be carefully reevaluated or competitive fueling rates simply cannot be achieved. Commissions across the country have either approved or are reviewing such rates, including but not limited to, California, Colorado, Connecticut, Massachusetts, Minnesota, Rhode Island, New Jersey, New York, Nevada, Hawaii, Washington, Wisconsin, and Pennsylvania. EVgo would be pleased to offer our assistance in this vital area of concern. It is entirely possible to design an electric rate that enables buildout in early years without cross-subsidization or a persistent subsidy.

4. **Municipal permitting continues to persist as an obstacle to efficient deployment of EV charging infrastructure, and should be addressed in the plan**. In EVgo's experience in New Jersey, permitting issues have seriously bogged down the build-out of charging infrastructure, adding significant cost and frustrating future development. We are prepared to work with the Board and others to resolve these issues, and have already begun speaking to New Jersey Department of Environmental Protection on this topic, with the goal of promoting a uniform system of inspection and permit administration. Charging infrastructure, particularly three phase DC fast charging, is a new and unfamiliar technology to many local jurisdictions. This new technology across New Jersey's hundreds of municipal jurisdictions, needs to be addressed

[1]International Council on Clean Transportation, Quantifying the Electric Vehicle Charging Infrastructure Gap Across U.S. Markets (January 2019), p. 9,
https://www.theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf

uniformly. EVgo will continue to work with the Board and others to create a common inspection process and permitting platform, and we ask that the Plan recognize this urgent need.

In closing, EVgo once again thanks Governor Murphy for his leadership, and the Board of Public Utilities and staff for their hard work in moving his vision forward. EVgo looks forward to continuing to partner with the Murphy administration to advance a new era of clean transportation in New Jersey. Please do not hesitate to reach out to EVgo as a resource moving forward.

Sincerely,

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