

APR 16 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY

BOARD OF PUBLIC UTILITIES

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APR 16 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

IN THE MATTER OF THE PETITION
OF ATLANTIC CITY ELECTRIC
COMPANY FOR APPROVAL OF A
VOLUNTARY PROGRAM FOR PLUG-
IN VEHICLE CHARGING.

DOCKET NO. EO18020190

MOTION TO PARTICIPATE OF GREENLOTS

In accordance with the Board's March 26, 2018 Order Designating Commissioner,
Setting a Bar Date and Manner of Service in the above referenced proceeding, Greenlots hereby
moves to participate in this proceeding pursuant to N.J.A.C. 1:1:-16.6. In support of this motion,
Greenlots states as follows:

1. The business address of Greenlots is:

Greenlots HQ
925 N. La Brea Avenue, 6th Floor
Los Angeles, CA 90038

Greenlots NJ
19 Lenape Lane
West Windsor, NJ 08550

2. In this matter Greenlots will be represented by and requests that all documents related
to this proceeding be served to:

Thomas Ashley
VP, Policy
Greenlots
925 N. La Brea Avenue, 6th Floor

CMG
Legal
C. Vachio, Esq.
T. Walker

Los Angeles, CA 90038
Phone: 802.922.5585
tom@greenlots.com

3. Greenlots is a leading provider of electric vehicle (EV) charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and is increasingly supporting programs in the workplace and residential Level 2 space. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic electric vehicle charging loads and respond to local and system conditions.

4. As an electric vehicle charging service provider, Greenlots has significant interest in the outcome of this case. Specifically, Greenlots has a significant interest in the growth of electric vehicle charging infrastructure, the role of utilities in scaling the market for electric vehicle charging infrastructure, and in regulatory developments that affect this landscape. Additionally, Greenlots has direct and substantial economic interest in the sustainable and scalable growth of New Jersey's EV and EV infrastructure markets and in the broader regulatory and business landscape that affects the prospects of current and future business endeavors in New Jersey.

5. Greenlots has been an active participant in the Board of Public Utilities' Electric Vehicle Stakeholder Group. Greenlots is a member of ChargeVC, a New Jersey based and focused industry group including utilities, NJ CAR, and environmental groups and has therefore been actively involved in the formulation of New Jersey's EV infrastructure policies.

6. Greenlots' participation will constructively add to this case as we will be able to offer our deep and broad experience in developing electric vehicle charging infrastructure based upon our work with a wide array of clients and partners, including automakers, utilities, cities, the

public and other stakeholders. We have direct experience in regulatory matters pertaining to electric vehicles and charging infrastructure across a wide range of geographies and jurisdictions.

7. Greenlots' experience and perspective includes specific issues that are likely to be within the scope of this proceeding, including whether and to what extent Atlantic City Electric's proposed Plug-In Electric Vehicle Program is likely to accelerate transportation electrification and support electric vehicle adoption; will be in the public interest; will stimulate the market for charging products and services; the roles and capabilities of different types electric vehicle supply equipment (EVSE) within the context of the proposed programs, whether ACE's proposed program is likely to integrate electric vehicle load in a manner that benefits the grid and all ratepayers, and more generally, the role of utilities in supporting and accelerating this market.

8. Greenlots' participation in this proceeding will not cause undue delay, confusion, or broaden the issues or burden the record.

9. As a provider of EV charging equipment, software and services to both consumers and utilities, Greenlots' has a direct and substantial interest in this proceeding and its interests cannot be adequately represented by any other party. Greenlots' interests will be affected by the Board's final determination in this proceeding and it is in the public interest to grant Greenlots' motion to participate in this proceeding.

For the reasons stated herein, Greenlots' respectfully requests that the Board grant this motion to participate in this proceeding, including the right to file a statement or brief, argue orally, and to file exceptions to the initial decision with the agency head.

Respectfully submitted,



Thomas Ashley
VP Policy, Greenlots
925 N. La Brea Avenue, 6th Floor
Los Angeles, CA 90038
Phone: 802.922.5585
tom@greenlots.com

Dated: April 13, 2018

CERTIFICATION OF SERVICE

I hereby certify that I have this day served an original and ten copies of this Motion of Greenlots to Participate to the Board Secretary, with copies to the two Parties of Record, via overnight delivery.

Additionally, I certify that I have this day served by electronic mail a copy of the foregoing Motion of Greenlots to Participate on all parties set forth on the service list specified in the Board's March 26, 2018 Order in this matter.

Dated at Oakland, California on this 13th day of April 2018.



Erick Karlen
Greenlots Public Policy
ekarlen@greenlots.com
Phone: 510.759.8948