

5/7/18



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SHEILA OLIVER
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CASE MANAGEMENT

BOARD OF PUBLIC UTILITIES
TRENTON, NJ
STEFANIE A. BRAND
Director

MAY 04 2018

May 4, 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

VIA HAND DELIVERY AND ELECTRONIC MAIL

Hon. Upendra Chivukula, Commissioner
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
P.O. Box 350
Trenton, NJ 08625-0350

**Re: In the Matter of the Petition of Atlantic City Electric Company for
Approval of a Voluntary Program for Plug-In Vehicle Charging
BPU Docket No. EO18020190**

Dear Commissioner Chivukula:

Please accept this letter on behalf of the New Jersey Division of Rate Counsel ("Rate Counsel") in response to the April 27, 2018 electronic communication from Legal Specialist Andrea Hart, Esq., of the Board of Public Utilities ("the Board" or "BPU") requesting that all parties to the above-mentioned matter ("ACE PIV") submit proposed procedural schedules by May 9, 2018. Pending resolution of Rate Counsel's Motion to Stay ("Motion") the instant proceeding, filed on April 6, 2018, and pending anticipated policy guidance by the Board in the Electric Vehicle ("EV") Stakeholder Group ("EVSG") process, Rate Counsel respectfully submits that establishing a procedural schedule at this time is premature.

As detailed in Rate Counsel's Motion and Reply to Atlantic City Electric Company's Answer to the Motion, guidelines and policy direction are needed before considering utility-specific EV programs. The EVSG process should provide that guidance. For example, if the EVSG results in a report or recommendation from Staff that utilities should build "make ready" charging infrastructure, the issues and witnesses in this case will be different than if the report or recommendation is that the utilities should not build infrastructure beyond the customer's meter. Thus, in order to adequately define the issues raised by the ACE PIV filing, and determine the necessary witnesses and amount of days for hearing, we need to see the Board's decision on the scope of electric utility involvement in electric vehicle infrastructure development. Moving forward with individual cases prior to obtaining that direction from the Board threatens to

AMS
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squander limited agency resources and may result in a hodgepodge of conflicting and confusing utility-specific approaches to handle the anticipated proliferation of EVs. Therefore, Rate Counsel respectfully requests that scheduling in this matter should not proceed until the Board rules on Rate Counsel's Motion or the EVSG is concluded.

Respectfully submitted,

STEFANIE A. BRAND
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By: 
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c: Service List (via electronic and regular mail)

**In the Matter of the Petition of
Atlantic City Electric Company
for Approval of a Voluntary
Program for Plug-In Vehicle
Charging
BPU Docket No. EO18020190**

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