

*J. Welch*  
11/8/18



RECEIVED  
CASE MANAGEMENT

NOV 05 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

RECEIVED  
MAIL ROOM

NOV 05 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

October 31, 2018

Aida Camacho-Welch, Secretary of the Board  
Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Trenton, New Jersey 08625

Dear Secretary Camacho-Welch:

Enclosed please find for filing an original and 10 copies of Tesla Inc.'s motion to intervene in BPU Docket No. EO18101111, *In the Matter of the Petition of Public Service Electric and Gas Company for Approval of its Clean Energy Future- Electric Vehicle and Energy Storage ("CEF-EVES") Program on a regulated Basis*. PSEG's application was filed on October 11, 2018.

If you have any questions or if I may be of assistance, please do not hesitate to contact me.

Thank you,

Kevin Auerbacher  
Senior Counsel  
Tesla, Inc.  
Kauerbacher@tesla.com  
Ph: 202-657-3155  
1050 K St, NW, Ste 101  
Washington, DC 20001

*Case mgmt*  
*Legal*  
*DAG*  
*S. Peterson*

**State of New Jersey  
Board of Public Utilities**

In the Matter of the Petition of Public  
Service Electric and Gas Company for  
Approval of its Clean Energy Future-  
Electric Vehicle and Energy Storage  
("CEF-EVES") Program on a regulated  
basis.

BPU Docket No. EO18101111.

**Tesla, Inc's Motion to Intervene**

Tesla, Inc. ("Tesla") is a developer and manufacturer of the world's most advanced electric vehicles ("EV"), electric vehicle charging stations ("EVCS"), and energy storage facilities, among other clean energy products and services. To support the world's transition to sustainable energy and accelerated adoption of electric vehicles and energy storage deployment, Tesla has established a worldwide presence of electric vehicle sales centers, service stations, charging stations, and retail locations.

On October 11, 2018, Public Service Electric & Gas Company City ("PSEG") filed a petition for approval of a proposed clean energy future-electric vehicle and energy storage program on a regulated basis. In its application, PSEG states that its proposed program will "further the State's goals by, among other benefits: (a) reducing greenhouse gas emissions; (b) creating 'green jobs;' (c) launching the electric vehicle industry and energy storage technology in New Jersey; and (d) making the electric grid more reliable, resilient, and safe. Taken together, these programs will allow New Jersey to take the first steps toward becoming a leader in the development of a Clean Energy Future."<sup>1</sup> Tesla applauds PSEG's efforts through this application and respectfully asks the Commission for full intervention status because Tesla is an international leader on all of the issues that PSEG presents for the Commission's consideration in this application. Tesla has substantial experience and expertise that it can provide to develop a robust and effective program.

N.J.A.C. 1:1-16.3(a) requires that the decision-maker consider the following factors when evaluating a motion to intervene:

1. The nature and extent of the moving party's interest in the outcome of the case;
2. Whether that interest is sufficiently different from that of any other party so as to add measurably and constructively to the scope of the case;

---

<sup>1</sup> Application at 2 (Oct. 11, 2018).

3. The prospect for confusion and delay arising from inclusion of the party; and
4. Other appropriate matters.

Tesla has a strong and unique interest in electric vehicle, charging infrastructure, and battery storage technology policy and development which could be directly impacted in this above-captioned proceeding. Tesla has EV and storage customers and EVCSs in New Jersey and in PSEG's service area. Tesla and its customers are also rate paying customers of PSEG. The outcome of PSEG's proposals will directly impact how and when Tesla can deploy additional EVs, EVCSs, and storage in PSEG's service area and throughout New Jersey.

Tesla has intervened in a number of regulatory proceedings across the U.S. and internationally related to the development of electric vehicle, charging infrastructure, and storage. When needed, Tesla has provided included in-depth expert testimony in various jurisdictions in support of a robust evidentiary record. Tesla's experience in developing infrastructure and related policy offers to provide meaningful and constructive insight to this proceeding. Tesla's interests are substantially different from those of any other party seeking intervention. Further, it is unlikely that any other intervening party in this proceeding could bring the level of insight or experience that Tesla seeks to offer here.

Tesla has no desire to delay these proceedings and is well-versed in participating in such proceedings. Tesla seeks to measurably and constructively advance this case and will work cooperatively with other parties on this proceeding wherever possible and practical. No confusion or delay will result from Tesla active intervention in this proceeding.

In accord with the above, Tesla respectfully requests that the New Jersey Board of Public Utilities grant this motion to intervene.

Respectfully,



Kevin Auerbacher  
Senior Counsel  
Tesla, Inc.  
Kauerbacher@tesla.com  
Ph: 202-657-3155  
1050 K St, NW, Ste 101  
Washington, DC 20001