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BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

<b>To:</b>	Aida Camacho, Secretary of the Board	<b>From:</b>	Kevin L. Matthews
<b>Fax:</b>	609-777-3348	<b>Pages:</b>	14 + cover
<b>Phone:</b>	609-2921554	<b>Date:</b>	11/13/2018
<b>Re:</b>	E01810111 Petition	<b>cc:</b>	Name

☐ Urgent    ☐ For Review    ☐ Please Comment    ☐ Please Reply    ☐ Please Recycle

Comments:

On behalf of Blue Bird, we respectfully file the attached motion for Blue Bird to intervene in Docket No. E01810111 – Public Service Electric and Gas Company For Approval of Its Clean Energy Storage ("CEF-EVES") Program. We are happy to answer any questions that interested parties have and look forward to working with all as this Docket moves forward.

Thank you for your consideration.

- Kevin

CMS

Energy

Legal

DAG

P. Krogman, DAG

E. Xiao, DAG

P. van Brunt, DAG



**STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES**

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IN THE MATTER OF THE PETITION

OF PUBLIC SERVICE ELECTRIC AND :  
GAS COMPANY FOR APPROVAL OF  
ITS CLEAN ENERGY STORAGE ("CEF-  
EVES") PROGRAM ON A REGULATED  
BASIS

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Docket Nos. E018101111

**MOTION OF**  
**BLUE BIRD BODY COMPANY**  
**(d/b/a BLUE BIRD CORPORATION)**

1. Blue Bird Body Company (Blue Bird), by way of this Motion, and the attached declaration of Paul Yousif, request to intervene in the above-captioned Petition for Approval of the Clean Energy Storage ("CEF-EVES") Program (the "Petition"), filed by Public Service and Gas Company ("PSE&G") pursuant to N.J.A.C. §1: 1-16.1.

All communications and correspondence concerning these proceedings  
  
should be directed to:

Kevin L. Matthews  
NSI, LLC  
1990 Kst. NW Suite 320  
Washington, DC 20005  
(202) 349-7010  
(202) 783-1041 (f)  
kmatthews@nationalstrategies.com

**I. Background**

2. Blue Bird is a school bus manufacturing company with corporate headquarters in Macon, GA and manufacturing facilities in Fort Valley, GA.

3. On or about October 11, 2018, Public Service Electric and Gas Company ("PSE&G" or "Company") filed a petition with the Board seeking approval for its Clean Energy Future-Electric Vehicle and Energy Storage Program ("CEF-EVES Program" or "Program"). The Company asserts that the Program furthers New Jersey's goals by reducing greenhouse gas emission, creating "green jobs", launching the electric vehicle industry and energy storage technologies in the state and making the electric grid more reliable, resilient and safe (Petition at 2). The Program includes a request for at least \$33,000,000.00 for a Zero Emission (ZEV) School Bus implementation project and up to an additional \$6,000,000.00 for a Vehicle-to-Grid (V2G) demonstration project utilizing ZEV School Bus deployed in PSE&G's territory through the Program.

4. Blue Bird is one of the nation's largest and leading school bus manufacturers. Blue Bird has been building and selling school buses since 1927 and sells and services school buses in all 50 states, as well as U.S. territories and internationally. Blue Bird typically manufactures and sells more than 20,000 School Bus units per year. Blue Bird is the leading supplier of alternative fuel school buses globally, building and selling more than three times as many alternative fueled school buses than its competitors combined. Blue Bird's alternative fuel school buses included; Propane, Compressed Natural Gas (CNG) and Zero Emission Battery Electric.

5. In the last five (5) years Blue Bird has sold 874 buses to school districts and school bus operators in New Jersey and estimates that there are about five thousand (5,000) Blue Bird school buses operating in New Jersey as of November, 2018.

6. Blue Bird is represented in New Jersey by our authorized dealer and service company — Hoover Truck and Bus Centers ("Hoover") with operations in Toms River, Cinnaminson and Flanders, New Jersey.

7. Blue Bird, in conjunction with Hoover, provide sells, training, and service to over six hundred (600) school districts and school bus operators in NJ and over ten thousand (10,000) employees associated with these activities.

8. Blue Bird is in a unique position to provide insight on the impact of the Program from the prospective of being an Original Equipment Manufacturer (OEM), Electric Vehicle technology provider and interface with the electric grid impacts expertise.

## II. Legal Standard

9. Under N.J.A.C. § 1: 1-16.1 (a), any person or entity substantially, specifically, or directly affected by the outcome of a contested case, may on motion, seek leave to intervene. N.J.A.C. § 1: 1-16.3(a) provides that, in ruling on a motion to intervene, consideration should be made of the nature and extent of the movant's interest in the outcome of the case, whether or not the movant's interest is sufficiently different from that of any party so as to add measurably and constructively to the scope of the case, the prospect of confusion or delay arising from the movant's inclusion, and other appropriate matters.

## III. Argument

10. Blue Bird, Hoover and our customers of school districts and school bus operators will be substantially, specifically, and directly affected by the outcome of this proceeding, Blue Bird's interest in the case differs from that of any other party, Blue Bird's interest will add measurably and constructively to the scope of the case, and inclusion of Blue Bird as an intervenor will not cause confusion or delay.

*Direct Impact to Blue Bird*

11. Blue Bird manufactures and sells approximately 150 school buses per year in New Jersey. Along with Hoovers, Blue Bird provides sells, training and service to over 600 school districts and school bus operators in New Jersey

12. Blue Bird is marketing and selling ZEV All Electric Battery School Buses in New Jersey and is therefore potentially impacted by any activity as it relates to ZEV school buses, charging requirements and grid assessment in New Jersey.

*Blue Bird's Interest Will Add Measurably and Constructively to Proceeding*

13. As an intervenor, Blue Bird has a substantial interest in knowing, understanding, and reviewing the intricacies of the Program as discussed in this proceeding, so it has the opportunity to provide input on the deployment, testing and operation of All Electric Battery School Buses as well as V2G considerations.

14. In addition to Blue Bird's decades of experience manufacturing and selling school buses, including the introduction of an All Electric Battery School Bus in 1995, Blue Bird was awarded a \$4.4 million dollar grant for the U.S. Department of Energy (DoE) in 2017.

The grant has several components that are applicable to the Program being proposed by PSE&G. Blue Bird will develop an All Electric School Bus that will have V2G capability. The V2G capability will be tested and analyzed by the National Energy Renewable Laboratory (NREL) in Boulder, CO. In addition, eight (8) production level All Electric Battery Type C school buses with V2G technology will be deployed to the Rialto Unified School District (RUSD) in Rialto, California. These V2G buses will interconnect with Southern California Edison's distribution network and provide ancillary services in the California Independent System Operator's wholesale power markets (CAISO). Blue Bird's expertise in both All Electric School Bus operations and well as developing and deploying a fully operational V2G school bus will be add measurably and constructively to the proceedings that pertain to PSE&G's Program for School Buses and V2G.

15. Blue Bird and its partners for the DoE grant (Nuvve and National Strategies, LLC) have a history of successful efforts of working with multiple state public utility commissions and utilities across the United States and internationally. These include the California Public Utility Commission, PJM, CAISO, SCE, San Diego Gas and Electric, Pacific Gas and Electric, Florida Power and Light, ComEd, ConEd, and Exelon member utilities to name a few.

16. Blue Bird is also gaining significant experience with electric charging equipment and infrastructure needs of All Electric School Buses (including V2G requirements) as Blue Bird sells and deploys its products. This is particularly important as it relates to charging needs for school districts and school bus operations. This understanding will also add to the proceedings regarding this program.

17. Permitting Blue Bird to intervene so it can offer input on School Bus and V2G and charging components under the Program, will add measurably and constructively to the scope of this proceeding and provide a substantial benefit to this Board in deciding the prudence and reasonableness of the Program.

*Blue Bird's Interests are Not Adequately Represented*

20. The above-referenced interests of Blue Bird's membership are not adequately represented by any other Party to these proceedings. As the leading school bus manufacturer and leader in All Electric and V2G technology for school buses, Blue Bird is in a unique position to provide insight on the impact of the Program having an interest in the outcome of this proceeding, as demonstrated above.



*Inclusion of Blue Bird as an Intervenor will Not Cause Delay or Confusion*

21. Intervention of Blue Bird will not cause undue delay. This Motion is being made in accordance with the November 16, 2018 deadline for motions to intervene. Additionally, no prospect of confusion arises from allowing Blue Bird to intervene. While Blue Bird's interest in the outcome of the petition is distinct from other Parties and potential Intervenors, Blue Bird will cooperate with other Parties to the proceeding to ensure a decision is made in full view of all relevant facts.

WHEREFORE, pursuant to N.J.A.C. 1:1-16, Blue Bird respectfully requests it be permitted to intervene in this matter.

Date: November 12, 2018

Respectfully Submitted

*Paul Yousif*

Paul Yousif  
General Counsel and Corporate Treasurer  
Blue Bird Body Company  
3920 Arkwright Road, Suite 200  
Macon, GA 31210

### DECLARATION OF Paul Yousif

I, Paul Yousif, declare as follows:

1. I am an Officer of Blue Bird Body Company
2. I have read the herein motion and hereby certify that the statements contained therein are true and accurate to the best of my knowledge.

*Paul Yousif*

---

Paul Yousif

Blue Bird Body Company

Dated: November 12, 2018

**CERTIFICATE OF SERVICE**

I, Kevin L. Matthews, hereby certify that copies of the herein motion were sent to all parties on the attached service list by electronic mail.

Date: November 13, 2018

A handwritten signature in black ink, appearing to read "K. L. Matthews", is written over a horizontal line.

Kevin L. Matthews

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Public Service Electric and Gas Company  
Clean Energy Future-Electric Vehicle and Energy Storage  
("CEF-EVES") Program

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EO18101111

10/29/18

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