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CASE MANAGEMENT

NOV 21 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

November 13, 2018

Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Trenton, New Jersey 08625

Attention: Aida Camacho-Welch, Secretary

**Re: 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
Docket No. EO18101111**

Dear Secretary Camacho-Welch:

Our office represents the Alliance for Transportation Electrification ("Alliance") in connection with the above captioned matter. Enclosed herewith, on behalf of the Alliance, please find an original and ten (10) copies of its Request to Participate in the instant proceeding. In addition, please find an annexed Certification of T. David Wand, Esq., in support thereof. Kindly return a copy stamped “filed” in the enclosed self-addressed envelope.

I trust you will find the foregoing to be in order. Should you require any additional information, please do not hesitate to contact me.

Respectfully,

CMS
list of copies

[Signature]
T. DAVID WAND

TDW/jmr
Enclosures
cc: Service List (via email)

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CASE MANAGEMENT

NOV 21 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BEFORE THE BOARD OF PUBLIC UTILITIES

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BOARD OF PUBLIC UTILITIES
Docket No. EO1810111
TRENTON, NJ

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

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

**REQUEST FOR PARTICIPANT STATUS
OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION**

The Alliance for Transportation Electrification ("the Alliance"), by its undersigned counsel, pursuant to the Order issued by the New Jersey Board of Public Utilities ("Board") on October 29, 2018, hereby formally requests that the Board grant the Alliance's request herein to participate with "participant" status in the above-captioned proceeding. The Alliance states in support thereof the following:

1. The Alliance, a 501(c)(6) organization, is a broad and diverse coalition of about 40 organizations overall in many states across the country, including utilities (30) both investor-owned and publicly-owned, auto manufacturers, EV supply equipment (EVSE) firms, and related trade associations and other non-profit organizations involved in electric vehicles. The Alliance's overall goals are to engage with state commissions and other agencies to encourage a collaborative and open approach to accelerate the deployment of EV infrastructure, complement

the private/competitive market by supporting an appropriate utility role, and promote interoperability and open standards in all parts of the EV ecosystem.

2. The Board's decision in this proceeding is expected to have precedential effect on the Alliance's members in New Jersey. A variety of issues that will be addressed in this case may have an impact on the Alliance's members by serving as precedent. The Alliance will therefore likely be directly and specifically affected by the relief provided herein. Accordingly, the Alliance has a significant interest in the Board's review of PSE&G's CEF-EVES filing, which proposes to commit up to \$261 million of investment and \$103 million in expenses over six years to support four Electric Vehicle subprograms, including incentives for the installation of approximately 40,000 chargers and investment in associated IT infrastructure.

3. The Alliance's focus is distinct from other parties or participants in this case. Thus, no other party will represent the interests of the Alliance in this case.

4. The Alliance has a history of coordinating its activities in dockets at the Board with other similar entities where appropriate. The Alliance will coordinate its representation with other similarly situated entities in this docket to the extent it finds such action appropriate.

5. In making this request, the Alliance asks that all communications and correspondence for this proceeding be directed to the following individuals:

Michael I. Krauthamer
Alliance for Transportation
Electrification
michael@evTransportationAlliance.org

Barbara Koonz
T. David Wand
Wilentz, Goldman & Spitzer, P.A.
90 Woodbridge Center Drive, Suite 900
Woodbridge, New Jersey 07095
Tel: (732) 855-6050/6093
bkoonz@wilentz.com
dwand@wilentz.com

6. Due to the Alliance's experience in the electric industry, its participation as a Participant in this proceeding is likely to add constructively to the proceeding.

7. The Alliance will abide by any schedule set for this proceeding.

8. The granting of this Motion will not cause undue delay or confusion.

WHEREFORE, the Alliance respectfully submits that all factors for participation set forth in N.J.A.C. 1:1-16.6 weigh in favor of the granting of the Alliance' motion in the above-captioned proceeding, because the Alliance will provide a unique perspective and insight regarding the proposed CEF-EVES Program and will add constructively to the case without causing undue delay and confusion.

Respectfully submitted,

WILENTZ, GOLDMAN & SPITZER, P.A.
A Professional Association
Attorneys for Proposed Participant the
Alliance for Transportation Electrification

By: 

T. DAVID WAND

Dated: November 13, 2018

CERTIFICATION OF SERVICE

I hereby certify that I have this day served via electronic mail copies of the foregoing Motion to Participate to the parties identified on the service list. An original and 10 copies have been forwarded via first class mail to Aida Camacho-Welch, Secretary, Board of Public Utilities.

Dated at Woodbridge, New Jersey, this 13th day of November, 2018.

By: 
T. DAVID WAND

NOV 21 2018

STATE OF NEW JERSEY
BEFORE THE BOARD OF PUBLIC UTILITIES

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**CERTIFICATION OF T. DAVID WAND, ESQ.
IN SUPPORT OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION'S
REQUEST FOR PARTICIPANT STATUS**

1. I am an attorney-at-law in the state of New Jersey and at the law firm of Wilentz, Goldman & Spitzer. We represent the Alliance for Transportation Electrification (the “Alliance”).
2. This certification is submitted in support of the Alliance’s motion for participation in the above-captioned matter.
3. The basis for the Alliance’s motion and information demonstrating that the Alliance’s motion satisfies the New Jersey Board of Public Utilities’ standard for participation is set forth in the Motion filed herewith.
4. The Alliance has reviewed the Order dated October 29, 2018, and understands that if participant status is granted, the Alliance will be bound to the requirements of the Order, as may be amended during the proceeding.

I certify that the above statements made by me are true and accurate to the best of my knowledge. I am aware that if any of the above statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

WILENTZ, GOLDMAN & SPITZER, P.A.
A Professional Association
Attorneys for Proposed Participant the
Alliance for Transportation Electrification

By: 
T. DAVID WAND

Dated: November 13, 2018

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Docket No. EO18101111

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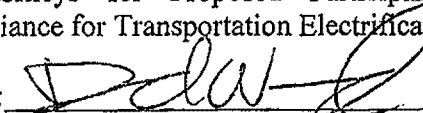
8. The granting of this Motion will not cause undue delay or confusion.

WHEREFORE, the Alliance respectfully submits that all factors for participation set forth in N.J.A.C. 1:1-16.6 weigh in favor of the granting of the Alliance' motion in the above-captioned proceeding, because the Alliance will provide a unique perspective and insight regarding the proposed CEF-EVES Program and will add constructively to the case without causing undue delay and confusion.

Respectfully submitted,

WILENTZ, GOLDMAN & SPITZER, P.A.
A Professional Association
Attorneys for Proposed Participant the
Alliance for Transportation Electrification

By:



T. DAVID WAND

Dated: November 13, 2018

CERTIFICATION OF SERVICE

I hereby certify that I have this day served via electronic mail copies of the foregoing Motion to Participate to the parties identified on the service list. An original and 10 copies have been forwarded via first class mail to Aida Camacho-Welch, Secretary, Board of Public Utilities.

Dated at Woodbridge, New Jersey, this 13th day of November, 2018.

By: _____

A handwritten signature in black ink, appearing to read 'T. David Wand', written over a horizontal line.

T. DAVID WAND

NOV 21 2018

STATE OF NEW JERSEY
BEFORE THE BOARD OF PUBLIC UTILITIES

Docket No. EO18101111

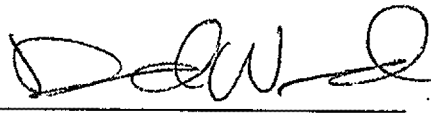
T. David Wand, of full age, hereby certifies and says:

1. I am an attorney-at-law in the state of New Jersey and at the law firm of Wilentz, Goldman & Spitzer. We represent the Alliance for Transportation Electrification (the “Alliance”).
2. This certification is submitted in support of the Alliance’s motion for participation in the above-captioned matter.
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Respectfully submitted,

WILENTZ, GOLDMAN & SPITZER, P.A.
A Professional Association
Attorneys for Proposed Participant the
Alliance for Transportation Electrification

By: 
T. DAVID WAND

Dated: November 13, 2018

PUBLIC SERVICE ELECTRIC AND GAS COMPANY - 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

DOCKET NO. EO18101111

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