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Attorneys for Movants,

Natural Resources Defense Council, Environment New Jersey, Sierra Club, Tri-State  
Transportation Campaign, New Jersey Work Environment Council, GreenFaith, and  
Isles.

IN THE MATTER OF THE PETITION OF ATLANTIC CITY ELECTRIC COMPANY FOR APPROVAL OF A VOLUNTARY PROGRAM FOR PLUG-IN VEHICLE CHARGING	STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES  COMMISSIONER UPENDRA J. CHIVUKULA PRESIDING  BPU DOCKET# E018020190
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**CERTIFICATION OF KATHLEEN HARRIS IN SUPPORT OF  
MOTION FOR INTERVENTION BY NATURAL RESOURCES  
DEFENSE COUNCIL**

I, Kathleen Harris, certify as follows:

1. I have been employed at Natural Resources Defense Council ("NRDC") since June 2019.
2. NRDC is a global nonprofit membership organization that combines the power of more than three million members and online activists with the expertise of over 500 scientists, lawyers, and policy advocates across the globe to ensure the rights of all people to the air, the water, and the wild. NRDC has more than 410,000 dues-paying members.

globally, including more than twelve thousand in New Jersey and many in ACE's New Jersey service territory.

3. I hold a Bachelor of Science in Environmental Science with a concentration in marine science and a minor in Political Science and a Master of Marine Policy: both from the University of Delaware. At the University of Delaware, I worked as a research assistant at the Center for Carbon-free Power Integration and served as project manager for a study around off-shore wind integration into the PJM grid. Additionally, I led a program to install electric vehicle charging stations throughout the state of Delaware to ensure no electric vehicle driver was more than 50 miles from a charging station anywhere in the state. For my Master's thesis, "Improving the Electric Vehicle Drivers Experience," I interviewed electric vehicle drivers to understand the challenges of using public electric vehicle charging stations.
4. Prior to working for NRDC, I was the Clean Transportation Planner for 4 years at the Delaware Department of Natural Resources and Environmental Control's (DNREC's) Division of Climate, Coastal, and Energy. During my tenure there, I managed the state's Clean Vehicle Rebate and Electric Vehicle Charging Equipment Rebate Programs, which provided rebates for alternative fuel vehicles, including electric vehicles, and electric vehicle charging stations. Additionally, I helped the Department intervene in matters with the Delaware Public Service Commission and developed and supported legislation related to transportation electrification. I also served as Delaware's Clean Cities Coordinator, which brought together over 50 stakeholders from around the state to promote clean transportation efforts.
5. My current position at NRDC is Eastern Clean Vehicles and Fuels Advocate. I manage the organization's legislative, regulatory, and administrative efforts to expand transportation electrification on the East Coast. In this position, I am also personally familiar with NRDC's efforts on transportation electrification around the country. Transportation electrification is a key issue in NRDC's energy platform.
6. I lead NRDC's transportation electrification work, in part, through intervention in utility regulatory proceedings related to electric vehicles, submission of expert testimony and public comments, and presentation of NRDC's policy positions at stakeholder events.

7. I have presented testimony in transportation electrification proceedings in Delaware (17-1094 and 19-0377), as well as provided comments on several utility transportation electrification proceedings, including New York (18-E-0138) and Maryland (Case No. 9478).
8. If this Motion is granted, I will present expert testimony in this case on behalf of NRDC.
9. The economic interests, environmental interests, and health of NRDC and its members (especially those within New Jersey) will be substantially, specifically, and directly affected by the outcome of this case.
10. NRDC shares the goals of the Board of Public Utilities ("BPU") to "ensure the provision of safe, adequate and proper utility at reasonable, non-discriminatory rates", and to develop an energy policy that "promotes responsible growth and clean renewable energy sources while maintaining a high quality of life in New Jersey."
11. BPU has granted intervenor status to NRDC in several matters involving clean energy and energy efficiency programs, due to NRDC's expertise in these fields. For example:
  - Public Service Electric and Gas Company, Docket # E009010058
  - South Jersey Gas Company, G01110651
  - Elizabethtown Gas Company, G010070446 and G010100735
  - 2011: South Jersey Gas Company, G010110861
  - 2009: Rockland Electric Company, E009010056 and E009010061
  - 2009: New Jersey Natural Gas, E009010057
12. NRDC's goal in this case is to assist the parties in ensuring that the Plug-In Vehicle Program, if approved, is implemented in the method most beneficial to customers. As in the above-noted BPU cases, NRDC would provide material and unique contributions to this matter, particularly with respect to strategic deployment of charging infrastructure, load management, consumer pricing protections, public education on Plug-In Vehicles, data collection, and performance metrics.

13. NRDC has longstanding expertise in the field of transportation electrification, having studied this topic even before the introduction of mass-market Plug-In Vehicles in 2010. NRDC and ACE are both members of ChargeEV, a nonprofit organization dedicated to transportation electrification in New Jersey.
14. NRDC is an integral member of the Electric Vehicle Stakeholder Group convened by BPU in the September 2017
15. NRDC has been involved in regulatory proceedings on Plug-In Vehicles in California, Oregon, Washington, Nevada, Colorado, Michigan, Ohio, Missouri, Massachusetts, Rhode Island, New York, Delaware, and Maryland.
16. NRDC has published numerous comprehensive analyses on the air quality benefits and greenhouse gas reductions associated with Plug-In Vehicles, as well as papers and reports on transportation electrification policy. For example, see Guiding Principles for Utility Programs to Accelerate Transportation Electrification, August 2017, by Max Baumhefner. Some of NRDC's writings on this topic are collected in a Resource Center at <https://www.nrdc.org/issues/clean-vehicles-and-fuels>
17. As it has in previous cases, NRDC will strictly abide by the schedules and other rulings made by BPU.
18. NRDC will limit its submissions and testimony to the relevant topics, as determined by this Court.
19. NRDC will work with all parties to ensure an efficient hearing process, and avoid duplication of efforts, confusion, or any delays.

I certify that the above statements are true. I understand that if the above statements are willfully false, I am subject to punishment.

Date: 4/28/2020

Kathleen Harris  
Kathleen Harris  
Clean Vehicles and Fuels Advocate  
Natural Resources Defense Council