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May 7, 2020

**Via Email**

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

**Re: *I/M/O the Petition of Atlantic City Electric Company  
for Approval of Voluntary Program for Plug-In  
Vehicle Charging, Docket No. EO18101115***

Motion for Participation by Alliance for  
Transportation Electrification

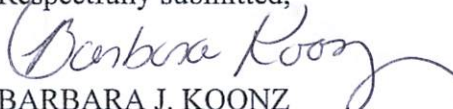
Dear Secretary Camacho:

On behalf of the Alliance for Transportation Electrification ("Alliance") attached please find a Motion for Participation to be filed in the above-captioned matter pending before the New Jersey Board of Public Utilities ("Board"). Commissioner Upendra J. Chivukula has been designated as the presiding commissioner for the proceeding.

This motion is being filed electronically pursuant to the Board's March 19, 2020, Order responding to the COVID-19 pandemic. In that Order, the Board waived the requirement that entities file paper documents with the Board and required that all submissions be submitted electronically.

Should you have any questions, please contact the undersigned.

Respectfully submitted,

  
BARBARA J. KOONZ

Copy:  
Honorable Upendra J. Chivukula (e-mail)  
Service List (E-mail)



2. In this proceeding, Atlantic City Electric Company's (ACE) seeks Board approval of a Voluntary Program for Plug-In Vehicle Charging (PIV) program. In its Amended Petition, ACE proposes a multi-year, \$42.107-million-dollar PIV program to, among other things, incentivize off-peak charging of PIVs, develop PIV infrastructure, provide grants to foster innovation in electrifying the transportation sector, support for electrifying school buses, initiatives that consist of Time of Use rates for residential customers, and properly sited PIV charging infrastructure to alleviate "range anxiety."

3. The Alliance's goals are to engage with state commissions, such as the Board, and other regulatory agencies to promote the removal of barriers to EV adoption. The Alliance promotes the implementation and development of EVs and the related infrastructure through participation in agency policy-making proceedings and agency proceedings such as this Petition. As mentioned above, the Alliance seeks to advance the deployment of EVs by encouraging a collaborative approach to accelerate the deployment of EV charging infrastructure, supporting an appropriate utility role by complementing the private/ non-utility sector, and promoting open standards in all parts of the EV charging ecosystem to provide consumer benefits and reduce potential risk of stranded assets.

4. The Board's decision in this proceeding is likely to have significant precedential effect on the Alliance's members in New Jersey. There are a variety of policy-related issues and EV development issues that will be addressed by the Board in this case. How those issues are decided will likely impact the Alliance's members because the Board's decision will establish requirements and practices that effect the operation of the EV-related industry in the State of New Jersey; thereby resulting in important 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 ACE's filing and the outcome of this proceeding.

5. The Alliance's focus to encourage a collaborative approach among divergent parties to reduce barriers to EV development is distinct from other parties or participants in this case. Thus, no other party will represent the interests of the Alliance in this case. As a participant in the proceeding, the Alliance will play a focused role that will provide the Board the benefit of the Alliance's experience and perspective, especially related to the best practices and "lessons learned" from early pilot programs in other jurisdictions.

6. The Alliance has a history of coordinating its activities in dockets at the Board with other similar entities where appropriate. The Alliance affirms that it will abide by the schedule set for the proceeding and will coordinate its representation with other similarly situated entities in this docket to the extent it finds such action appropriate.

7. The Alliance acknowledges that the date for filing motions for intervention as set forth in the Pre-hearing Order was March 13, 2029. Notwithstanding the foregoing, the Alliance respectfully requests that the Board accept this Motion for Participation as timely because of the significant impact this proceeding may have on the Alliance's membership. The Alliance also notes that the Pre-hearing Order in this matter contemplates the continuation of motion practice by the parties through May 18, 2020. The Alliance's participation in this matter and the Board's approval of this motion will not in any way delay the schedule already stipulated in this Docket or prejudice the parties' interests.

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

Phil Jones, Executive Director  
Michael I. Krauthamer, Senior Advisor  
Alliance for Transportation  
Electrification  
1402 Third Avenue, Suite 1315,  
Seattle, WA 98101  
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9. 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.
10. The Alliance will abide by any schedule set for this proceeding.
11. 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's motion in the above-captioned proceeding, because the Alliance will provide a unique perspective and insight regarding the ACE's filing and will add constructively to the case without causing undue delay and confusion.

Respectfully submitted,

GREENBAUM ROWE SMITH & DAVIS, LLP  
Attorneys for Proposed Participant the Alliance for  
Transportation Electrification

By:   
BARBARA J. KOONZ

Dated: May 7, 2020

**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.

Dated this 7th day of May, 2020.

By:   
Barbara J. Koonz



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,

ALLIANCE FOR TRANSPORTATION  
ELECTRIFICATION

By:   
Michael Krauthamer

Dated: May 7, 2020