

May 8, 2020

VIA E-FILING

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

Re: I/M/O PSE&G Clean Energy Future-Electric Vehicle and Energy Storage ("CEF-EVES")
Docket No. EO18101111

Dear Secretary Camacho-Welch:

Please accept this letter on behalf of Burns & McDonnell Engineering Company, Inc. (BMcD), an intervenor in this case, in lieu of a formal opposition to the pending Motion to Dismiss filed by the Division of Rate Counsel.

In its motion to intervene, which was granted by Commissioner Chivukula on April 22, 2020, BMcD explained that it is a leading utility design and construction firm that provides critical infrastructure for the power, gas, and communication markets throughout North America. BMcD has broad experience in all areas of utility design and construction, and specific extensive experience in electric vehicle charging infrastructure design and construction. BMcD argued, and by granting its motion Commissioner Chivukula implicitly agreed, that BMcD could constructively assist the Board in evaluating, among other things, the value of the program being proposed by PSE&G.

Should Rate Counsel's motion be granted, BMcD would be prevented from offering to the Board its insights regarding the need for electric vehicle charging infrastructure to prepare for the growing demand of the electric vehicle market. Rather than allowing the development of a full record that would address all relevant factual and policy issues, Rate Counsel seeks to block this process by assuming that the investments proposed by PSE&G could not possibly be "used and useful" from the standpoint of PSE&G's retail customers.

BMcD respectfully disagrees with Rate Counsel. It is confident that widespread electric vehicle charging infrastructure will encourage a more efficient use of the existing electric distribution grid, to the benefit of all customers, both those who own electric vehicles and those who do not. Seen in that light, the EV program will fit comfortably within a long-established stream of investments that PSE&G has been allowed to make in order to improve the performance of the grid.

In addition, the benefits to all PSE&G customers of greater deployment of electric vehicles cannot be denied. The role of these vehicles in terms of achieving the goals of the Energy Master Plan is crucial, indeed essential. It would be an absurd contradiction to charge

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the Board with implementation of the EMP yet simultaneously deprive it of an all-important arrow in its quiver to overcome a serious barrier to the widespread deployment of electric vehicles.

At this juncture of the case, of course, it is not for the Board to decide this issue of what might be "used and useful." That is what the remainder of the proceeding will be devoted to. Rather, the Board simply needs to decide whether to accept Rate Counsel's invitation to short-circuit the deliberative process. BMcD is eager to contribute constructively to the development of a full record. It urges the Board not to deprive BMcD of this opportunity. Accordingly, Rate Counsel's motion to dismiss should be denied.

Please acknowledge receipt of this letter in accordance with the e-filing procedures approved by the Board on March 19, 2020.

Very truly yours,

NORRIS McLAUGHLIN, P.A.

A handwritten signature in black ink, appearing to read "James H. Laskey". The signature is written in a cursive style with a large, looping initial "J".

James H. Laskey

cc: Service List