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VIA ELECTRONIC FILING

**Enervee Comments on "NJ Electric Vehicle Infrastructure Ecosystem 2020 Straw Proposal"**

Enervee appreciates this opportunity to provide comments on the New Jersey Board of Public Utilities (NJBPU) New Jersey Electric Vehicle Infrastructure Ecosystem 2020 Straw Proposal (Straw Proposal,) and we applaud New Jersey's efforts to accelerate electric vehicle (EV) adoption by developing a comprehensive EV ecosystem.

Enervee is a software-as-a-service company that empowers consumers to make better energy-related buying decisions – and nudges them to choose the most energy efficient consumer products. Enervee pioneered the use of Choice Engines in the energy industry, and we're at the forefront of using new data, energy and consumer data and analytics, software technology and behavioral insights – coupled with state-of-the-art digital marketing – to transform how utilities engage their customers and how all of us shop. With the belief that transparent markets work better for consumers, Enervee seeks to eliminate market barriers to billions of efficient purchases annually. Utilities across the US use Enervee's suite of applications and services to engage consumers, save energy and transform markets. A link to Enervee's blog is found in the footnote below that provides an overview of the Enervee "Cars" Choice Engine Marketplace, and the consumer research that underpins the Enervee approach<sup>1</sup>. Enervee's comments today focus on the important role that consumer awareness and education play in EV adoption and utilization of the charging infrastructure that utilities support.

As noted by Advanced Energy Economy (AEE) in *EVs 101: A Regulatory Plan for America's Electric Transportation Future*, "the evolution of transportation will depend to a large extent on the choices of consumers"<sup>2</sup>. This may seem self-evident, but the consumer perspective can easily get lost in the

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<sup>1</sup> <https://blog.enervee.com/from-2-to-36-in-under-60-seconds-a8c76762d5c0>

Link to an AEE webinar on the topic of what utilities have learned about driving EV purchases:  
<https://blog.enervee.com/what-utilities-have-learned-about-driving-ev-purchases-c8fb14503313>

<sup>2</sup> <https://info.aee.net/advanced-energy-policy-brief-ev-101>

high-stakes discussions surrounding EV charging infrastructure – what’s needed where and when, who should provide it, and how to pay for it. But when it comes to cars, consumers are king – and the overwhelming majority believe that their energy provider should help them understand the benefits of EVs over conventional vehicles<sup>3</sup>. That’s something regulators should capitalize on as they prepare to grow the market for EVs.

AEE’s EV issue brief underscores the importance of improving market transparency and developing data-driven customer engagement programs that leverage behavioral insights to stimulate consumer demand for EVs. Although consumers desire key attributes provided by EVs – in particular, saving money on fuel costs and reducing environmental impacts – the vast majority of people remain completely unaware of the existence of EVs<sup>4</sup>.

The relatively brief time that electric vehicles have been available in the mass market, a shortage of automobile manufacturer marketing, unavailability of EV models in specific markets, and a lack of market transparency in terms of the relative operational efficiency and emissions of vehicles across fuel and engine types are some of the reasons cited by AEE for lack of consumer awareness. Conversely, when consumers are armed with a simple and credible way to choose vehicle models that are zero-emission, inexpensive to operate, and do not cost more to purchase, 84% say they would be likely (45% extremely likely) to opt for an electric over a conventional car model<sup>5</sup>.

The Enervee team has tackled these challenges head on, by introducing the Enervee Score for Cars and embedding it in a powerful cloud-based vehicle Choice Engine available to consumers via their utilities. Spanning internal combustion engine (ICE), hybrid and plug-in electric vehicles, the zero-to-100 Enervee Score allows consumers to readily compare individual models on their relative efficiency – without having to think too hard about it.

It will be vital to have a robust consumer education and awareness program in place in order to achieve Governor Murphy’s stated goal of having 330,000 electric vehicles on New Jersey’s roads by 2025. Enervee believes it would be consistent with the shared responsibility model articulated in the Straw Proposal for regulators to encourage utilities to use their unique relationship with customers as an unbiased and trusted advisor to improve access to EV information. We also believe that a comprehensive education and marketing program is critical in achieving New Jersey’s

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<sup>3</sup> <https://www.fortnightly.com/fortnightly/2018/02-0/utilities-passion-and-hard-work-ev-future>

<sup>4</sup> <https://blog.enervee.com/driving-electric-vehicle-awareness-envy-and-purchases-b552fd35ff11>

<sup>5</sup> <https://blog.enervee.com/revving-up-the-ev-market-8c90d21610f0>

commitment in the Straw Proposal that all communities within the State of New Jersey have equitable access to the EV Ecosystem. It's worth noting that there is substantial relevant experience with this type of customer outreach and engagement in utility energy efficiency and EV programs in other jurisdictions.

Utilities are critical partners in helping car buyers understand the benefits of EVs and make informed purchasing decisions – considering tariffs, solar and home charger options. According to Lisa Wood, VP of Customer Solutions for the Edison Electric Institute, the role of investor-owned utilities is “to help to create a level playing field for EVs”. People already have a contractual relationship with their energy provider, and the overwhelming majority (69%) believe that their energy provider should do more to help them understand the benefits of EVs over conventional vehicles. And EV manufacturers agree. General Motors' former director of advanced commercialization policy, Britta Gross, said: “It's critical that all utilities are fully involved and directly engaged in growing the EV market”<sup>6</sup>.

In addition, utilities are uniquely placed to provide information on the complex web of considerations that come into play with respect to EVs. Consumers need not only to understand the EV options available in the auto market, but also need information about:

- Charging options available for buyers and information on electrical installation options in residential situations,
- Public charging station locations,
- EV-specific rate options and demand response programs,
- Potential Financial incentives, and
- The benefits of EVs.

We strongly recommend that the NJBPU direct utilities to integrate the vehicle and EV charger categories into the statewide utility marketplace (ordered in the recently approved NJBPU Comprehensive Energy Efficiency Program). This will provide consumers with a seamless experience across all consumer products, from appliances to home chargers and vehicles. A decision-based online marketplace for vehicles would allow customers to compare vehicles across engine and fuel types with respect to their efficiency and personalized total cost of ownership<sup>7</sup>.

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<sup>6</sup> <https://www.fortnightly.com/fortnightly/2018/02-0/car-manufacturers-are-moving-fast>

<sup>7</sup> For an example, see Con Edison's Cars Choice Engine (<https://cars.coned.com/>), embedded in their broader online marketplace featuring the EV charger category (<https://marketplace.coned.com/>).

This will improve market transparency and empower all car shoppers to explore EV options and choose EVs on their merits, including those who would not qualify for potential EV incentives.

Envervee appreciates the opportunity to provide comments on the EV Straw Proposal and we look forward to working with you on potential EV marketplace and EV related consumer education and awareness programs going forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Gordon", with a long horizontal flourish extending to the right.

Jon Gordon, Director Regulatory Affairs

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