



May 6, 2020

Via Electronic Mail

Honorable Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

**RE: 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
BPU Docket No. EO18101111**

Dear Secretary Camacho-Welch:

Please accept this opposition response from Blue Bird Body Corporation (Blue Bird) to the motion by the New Jersey Division of Rate Counsel submitted on April 17, 2020 in the above-referenced matter. Copies of the response are being provided to all parties on the service list by electronic mail only.

Thank you for your consideration and attention to this matter

Respectfully submitted

Paul Yousif
Blue Bird Body Company

Enclosure

cc: Service List

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

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Electric and Gas Company for Approval of its
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Blue Bird Body Corporation’s Opposition to Motion to Dismiss

Blue Bird Body Corporation (Blue Bird) respectfully requests that the New Jersey Board of Public Utilities (“Board”) deny the Motion to Dismiss filed by the Division of Rate Counsel on April 17, 2020. In Support of this request, Blue Bird submits the following.

1. A motion to dismiss is premature. The EV subprograms proposed by Public Service Electric and Gas Company (PSE&G) should be addressed on their merits, within the established protocol of a docketed proceeding before the Board. The EV subprograms includes multiple offerings and approaches, including battery electric school buses, many of which implicate different regulatory considerations as to the appropriate role for the utility, appropriate treatment of cost recovery, and other important matters. To summarily dismiss the entire EV subprogram would do a disservice not only to the matters at hand, but also work against the State’s broader public policy goals relating to transportation electrification.
2. The EV subprogram is directly relevant to New Jersey’s statutory electrification commitments. The Plug-in Vehicle Act (“PIV Act”), P.L. 2019, c. 362 (Jan. 17, 2020), *N.J.S.A. 48: 25-1, et seq.*, enacted by the legislature and signed into law by the Governor earlier this year, established bold, urgent, and clearly defined requirements for transportation electrification, and moreover, identifies critical roles for both the Board and the state’s electric public utilities in meeting those commitments. The EV subprogram proposed by PSE&G, including the School Bus program, is an important step toward achieving the State’s goals. Blue Board fully believes that the Board has an obligation to the citizens of New Jersey, including children who ride school buses, to afford PSE&G’s petition full and fair consideration on the

merits, and only after receiving substantial stakeholder input from which the Board may evaluate the EV subprogram strengths and weaknesses of PSE&G's proposed EV programs.

3. Investing in Electric School Bus Charging Infrastructure would be used and useful. The Rate Counsel's motion indicates that their belief is that the EV School Bus Charging Infrastructure would not be "used and useful" to the rate payers. We contend this not accurate at all. The EV school bus infrastructure would be frequently used to benefit rate payers through the deployment of Vehicle-to-Grid (V2G) technology. V2G would allow for the EV school bus to be used as grid resources for PSE&G and the rate payers. A properly created charging system with V2G could avoid a variety of issues for PSE&G and the grid and could potentially be used to forgo other resources that would have to be deployed to support the grid. That the EV school buses could also be deployed to benefit children's health and improved air quality provide additional benefits that other resources that are used to benefit the grid could not. We believe the motion to dismiss will prevent the Board from considering all the benefits and uses this portion of the EV subprogram could support.
4. Blue Bird and other parties in this proceeding have direct and material interests in the EV subprograms outcome. The Board, in granting Blue Bird's and other parties' motions to intervene, has already acknowledge these parties, including Blue Bird, "will be directly affected by the outcome of this proceeding and will measurable and constructively contribute to the cope of the Board's case." Blue Bird as one of the nation's leading school bus manufacturer and provider of Battery Electric school buses with Vehicle-to-Grid (V2G) capability, in New Jersey, as well as across the United States, contributions to this proceeding are critical to the Board's informed consideration and judgment as to how this proceeding can further the state's goals.

For the above reasons, Blue Bird respectfully requests that the Board deny the Division of Rate Counsels' motion to dismiss.

Dated: May 6, 2020

Respectfully submitted,

Paul Yousif

Paul Yousif
General Counsel & Treasurer
pyousif@blue-bird.com
Office: (478) 822-200
Fax: (478) 822-2609