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PLEASE REPLY TO LIVINGSTON

May 8, 2020

VIA E-MAIL

Aida Camacho-Welch, Secretary
NEW JERSEY BOARD OF PUBLIC UTILITIES
44 South Clinton Avenue, 9th Floor
Trenton, New Jersey 08625

Re: IMO Petition of Public Service Electric & 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:

This office represents intervenor Mid-Atlantic Solar and Storage Industries Association ("MSSIA"), formerly known as the Mid-Atlantic Solar Energy Industries Association ("MSEIA"). MSSIA hereby respectfully requests that the New Jersey Board of Public Utilities (Board) deny the Division of Rate Counsel's ("DRC's") motion to dismiss the electric vehicle charging "sub programs" ("EV Sub-programs") of the above-captioned proceeding. Please accept this letter brief in lieu of a more formal brief in opposition to the motion to dismiss.

MSSIA is an industry trade organization that has represented solar energy and storage companies in New Jersey, Pennsylvania, and Delaware since 1997. MSSIA can bring resourceful information and analysis to the complex issues involved in these proceedings but submits that a full and complete record must be developed in order to properly address these issues. The DRC's motion to dismiss is simply premature and should not be granted. MSSIA

joins in the arguments set forth by the other intervenors in the numerous submissions. These arguments are not repeated at length, however the attached letter directly from the President of MSSIA, Lyle K. Rawlings, P.E., is submitted for the Board's consideration. On behalf of MSSIA it is respectfully requested that the Board deny the DRC's motion to dismiss. Thank you for your consideration of this matter.

Respectfully submitted,

SLOWINSKI ATKINS, LLP
Attorneys for MSSIA f/k/a MSEIA

By: s/James Sherman
James Sherman

MSS/af
cc: All Counsel and Parties at attached Service List

***IMO Petition of Public Service Electric & 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***

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May 8, 2020

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

Via email to:
board.secretary@bpu.nj.gov

Re: MSSIA's Opposition to the Division of the Rate Counsel's Motion to Dismiss the PSEG CEF-EVES Petition
BPU Docket No. EO18101111

Dear Secretary Camacho-Welch:

The Mid-Atlantic Solar & Storage Industries Association (MSSIA) is an industry trade organization that has represented solar energy and storage companies in New Jersey, Pennsylvania, and Delaware since 1997. During that 23-year period, the organization has spearheaded efforts in the Mid-Atlantic region to make solar energy and storage major contributors to the region's energy future. Its fundamental policy goals are to: (1) grow solar energy and storage in our states as quickly as practicable; (2) do so at the lowest possible cost to ratepayers, while delivering the greatest possible benefit as a public good; and (3) preserve diversity in the market, including opportunity for Jersey companies to grow and create local jobs (<https://mseia.net/fundamental-principles/>).

MSSIA is concerned about the Division of the Rate Counsel's Motion to Dismiss the PSEG CEF-EVES Petition. MSSIA believes that consideration of this petition, and the attendant creation of a full record on the issues it raises, is of great importance to our industry and to the state.

An emerging reality that is dawning upon the MSSIA Board and its members is that the current state of New Jersey's infrastructure for handling renewable electricity looms large as a serious barrier to the state's ability to handle high-penetration renewable energy. This is a serious threat to the future growth that is both our purpose as an industry organization and the requirement of New Jersey law. Unfortunately, the state's grid infrastructure challenges are already upon us; many areas of the state are already closing to any further solar energy development, or severely restricted. Little-known is the fact that as of now, during bright, sunny days such as those we may see this month, solar energy during peak production in the middle of the day (11:00 to 3:00) can provide in excess of 25% of the state's power.

These infrastructure challenges are extremely complex, and potentially very expensive to resolve. The need to consider creative solutions *beyond the obvious (e.g., build a whole lot of grid-connected battery capacity)* is correspondingly great. In recent years MSSIA has begun to study the potential for electric vehicles to play a leading role in creating the renewable energy-friendly grid of the future. Electric vehicles are batteries on wheels. Our preliminary analysis indicates that the potential to use these batteries to stabilize the grid in high-renewable conditions is vast. For example, it is estimated that once a third of the state's vehicles are EV's the total EV battery capacity will reach about 180,000 megawatt-hours – a figure that dwarfs the 2,000 MW (or roughly 6,000 to 8,000 MWH) required in the Clean Energy Act. With the right technology and systems in place, these batteries on wheels, and the charging infrastructure to charge them, can be available as elements in the new grid infrastructure. We do not believe the state can afford not to use them as a part of its strategy to achieve its goals.

It is clear that electric vehicles perform a public service. Their development is one of the most important ways of combatting climate change and reducing local pollution, with all the economic, environmental, and health benefits that entails. If, as we believe, electric vehicle batteries and charging infrastructure will become an active element in the electric grid, they also perform a public service in maintaining the reliability of the grid. It therefore stands to reason that they can be considered used and useful.

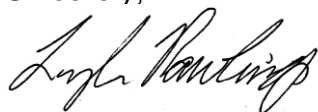
MSSIA and its members tend to guard the role of private business in developing renewable energy and storage. Researchers and thought leaders in the industry, however, realize clearly that utility companies have a vital role to play in keeping the distribution system working for renewables. We support a balanced approach to such issues, including those contained in the CEF-EVES petition.

MSSIA looks forward to offering much more detailed information and analysis of these issues during the course of the consideration of the petition. We believe that the very complexity of the issues requires that the points of view, knowledge, experience, and interests of the petitioner and all of the intervenors will be needed in order to determine the best outcome. We do not believe the best outcome is likely to be achieved without engaging in the process at all.

In particular, the interests of MSSIA and its member companies would not be served fairly without continuing with the proceeding.

MSSIA respectfully requests that the Division of the Rate Counsel's Motion to Dismiss be denied.

Sincerely,

A handwritten signature in black ink, appearing to read "Lyle K. Rawlings". The signature is fluid and cursive, with the first name "Lyle" being more prominent.

Lyle K. Rawlings, P.E.
President