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June 17, 2020

Aida Camacho-Welch  
Secretary of the Board  
Board of Public Utilities  
Post Office Box 350  
Trenton, NJ 08625-0350

**RE: DOCKET NO. QO20050357 - IN THE MATTER OF STRAW PROPOSAL  
ON ELECTRIC VEHICLE INFRASTRUCTURE BUILD OUT**

Dear Secretary Camacho-Welch:

Incorporated in 1933 the Fuel Merchants Association of New Jersey represents distributors of branded and unbranded motor fuel to service stations, fleets, marinas, construction, agricultural, and government customers. FMA's members also distribute heating fuel and perform HVAC services.

FMA is also submitting comments on this straw proposal under separate cover as part of a coalition. The purpose of these comments is to address an issue which is outside of the BPU's authority but is nevertheless essential if the State of New Jersey desires to build out EV charging infrastructure, the roadblock municipalities are placing on businesses that wish to currently install EV charging infrastructure.

The straw proposal is not only weighted to benefit EDC shareholders at the expense of ratepayers, it fails to recognize the contribution to EV charging infrastructure that shareholders of existing businesses are willing to make but are precluded from making.

Businesses that already provide the driving public with convenient locations to power their vehicles, have desired, at their shareholders' expense, to invest in EV charging infrastructure, even with the dim prospect of meaningful return on the investment anytime soon. Unfortunately, municipalities have determined that EV charging infrastructure at a retail gasoline service station is not an accessory use at such a location. The result is the business that wants to install EV charging infrastructure must go through the zoning process, adding needless delay and expense. When the delay and expense are combined with the lack of return on the capital deployed, businesses are not likely make the investment in EV charging infrastructure.

New Jersey must remove these municipal barriers if it hopes to maximize private sector capital investment EV charging infrastructure.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric DeGesero".

Eric DeGesero  
Executive Vice President