

August 14, 2020

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

**Re: IN THE MATTER OF THE PETITION OF PUBLIC SERICE ELECTRIC AND GAS
COMPANY FOR APPROVAL OF ITS CLEAN ENERGY FUTURE-ELECTIC VEHICLE
AND ELECTRIC STORAGE (“CEF-EVES”) PROGRAM ON A REGULATED BASIS s
BPU DOCKET NO. EO18101111**

Dear Secretary Camacho-Welch:

Please accept this letter as the reply (the “Reply”) to PSE&G’s opposition (the “Opposition”) to Electrify America’s Motion for Leave to Intervene (the “Motion”) in this proceeding. By the Opposition PSE&G seeks to prevent what it states is one of two “of the nation’s largest owner/operators of charging stations” from having a full voice in this proceeding which according to PSE&G’s Petition will “jumpstart the electric vehicle industry and energy storage technology in New Jersey.”

The Board should hear from a major entity with a strong vested interest in this industry in making fundamental determinations that will shape this industry going forward.

**1. ELECTRIFY AMERICA’S INTEREST IS NOT SERVED BY THE OTHER
INTERVENORS**

In the Opposition PSE&G states: Electrify America does not have a direct interest that is “sufficiently different from other parties in the case so as to add measurably and constructively to the scope of the case.” That assertion is simply inaccurate.

Attached to this Reply is the Certification of Robert Barossa, Director, Utility Strategy and Operations for Electrify America (“Barossa Cert.”). Mr. Barossa states as follows:

- Electrify America operates dispensers in PSE&G’s service area that have the potential to deliver 350 kW to a single vehicle.
- As a result PSE&G’s rate structure combined with its current proposal in this docket could have a profound effect on Electrify America. For example, PSE&G’s combined summer demand charges at \$33.5672/kW can cause in excess of \$60,000 in demand charges in a

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single month from just 15-minutes of coincident charging at our East Brunswick, NJ location alone.

- Similar impacts can be expected at the other eight current and the prospective Electrify America installations in PSE&G's service area.
- The rate increases which will emanate from this proceeding may further exacerbate this issue, and potentially introduce a ratepayer-subsidized competitor into our New Jersey business.
- In comparison, the only other owner/operator of non-proprietary DCFC in PSE&G's service area, EVgo, operates at only 50 kW DCFC in the service area.
- ChargePoint, who does not own any of its chargers but does operate the charging stations on behalf of owners, also does not have any DCFC in NJ above 50 kW.
- Tesla—a proprietary DCFC charging provider—does not, at present, have infrastructure capable of achieving the same power levels in PSEG's service area. Further, on information and belief, Tesla charging stations power share, resulting in reduced power levels for simultaneous users.
- As a result, our business model is substantially different from the other intervenors.
- Our interests cannot be materially represented by other intervenors when our technology has the potential to incur 7x the demand charges of our competitors' technology in the area.
- Electrify America's interests are materially unique as a result. (Barossa Cert. at paragraphs 8 to 15)

II. ELECTRIFY AMERICA'S INTERVENTION WILL NOT MATERIALLY IMPACT THE ADMINISTRATION OF THIS PROCEEDING

In the Opposition PSE&G states: "allowing additional intervenors at this late stage with full rights to conduct discovery could cause unnecessary confusion and delay of this proceeding."

This assertion seems to disregard Electrify America's statement in the Motion that: "Nevertheless, the Movant's intervention will not add confusion to, or otherwise delay, these proceedings in any way. Electrify America will abide by the existing Procedural Schedule."

Electrify America would expect a provision to that affect in any order granting it intervention, and will abide by such a provision.

III. THE BOARD SHOULD HEAR ELECTIFY AMERICA'S CONSTRUCTIVE VIEWS AS TO HOW THE EV INDUSTRY CAN PROSPER IN NEW JERSEY

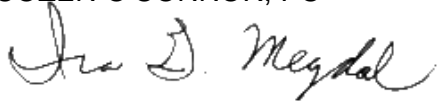
The Electric Vehicle industry is still a relative newcomer in New Jersey. However, promotion of this industry is consistent with the public policy of this State as is demonstrated in the Energy Master Plan and many pronouncements of this Board. In the Motion Electrify America stated:

“Electrify America’s participation in this proceeding is necessary in order for it to present evidence of its unique position in the market and the impact that this petition will have on its business model.”

Electrify America, a leader in this industry would like the opportunity to present evidence which will assist the Board in making its decision in this matter. The BPU should hear Electrify America’s evidence, in determining how to assist the development of this vital industry.

Respectfully,

COZEN O'CONNOR, PC

A handwritten signature in cursive script that reads "Ira G. Megdal".

By: Ira G. Megdal

IGM:

Attachment

cc: Service List (via email only)