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FORWARD
CASE MANAGEMENT

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2020 MAR 16 A 9:59

2020 MAR 13 P 3:59

March 13, 2020
BOARD OF PUBLIC UTILITIES
TRENTON, NJ

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

VIA HAND DELIVERY AND EMAIL

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

Re: BPU Docket No. EO18020190

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MAR 13 2020

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Dear Secretary Camacho-Welch:

We have recently been retained to represent Greenlots in the above-referenced matter. Please find enclosed for filing an original and 10 copies of Greenlots' Motion to Intervene in BPU Docket No. EO18020190, *In the Matter of the Petition of Atlantic City Electric Company for Approval of a Voluntary Program For Plug-in Vehicle Charging*. An amended petition was submitted by Atlantic City Electric Company on December 17, 2019.

Thank you, and please feel free to contact me with any questions or concerns.

Respectfully submitted,

Nathan Howe

Enclosures

Cc: See attached service list

Case mgmt

list copied

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY

BEFORE THE BOARD OF PUBLIC UTILITIES

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MAR 13 2020

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

In the Matter of the Petition of)
Atlantic City Electric Company for)
Approval of a Voluntary Program)
For Plug-In Vehicle Charging)

BPU Docket No.
EO18020190

GREENLOTS' MOTION TO INTERVENE

Zeco Systems, Inc. d/b/a Greenlots ("Greenlots"), through counsel, hereby moves before the New Jersey Board of Public Utilities ("Board") pursuant to N.J.A.C § 1:1-16.1, *et seq.*, for intervention in the above-captioned matter. In support of its motion, Greenlots states the following:

1. Greenlots is a corporation organized and existing under the laws of the State of Delaware, headquartered in California with the following address:

Zeco Systems, Inc. d/b/a Greenlots
767 S. Alameda Street
Suite 200
Los Angeles, CA 90021

2. Greenlots is a leading provider of electric vehicle ("EV") charging software and services, and is committed to accelerating transportation electrification in New Jersey. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and a growing amount of Level 2 charging, including locations in New Jersey. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing, while helping utilities, cities, fleets, other site hosts, and grid operators manage

dynamic EV charging loads and respond to local and system conditions. The Greenlots footprint spans 13 countries and is accelerating the electric mobility future through the delivery of innovative software and services to empower the deployment of EV charging infrastructure at scale.

3. On December 17, 2019, Atlantic City Electric Company (“ACE”) filed an Amended Petition seeking approval of ACE’s proposed Voluntary Program for Plug-In Vehicle Charging (“PIV Program”). The original Petition that initiated this proceeding was filed on February 22, 2018. As per the Amended Petition, the PIV Program includes a portfolio of offerings collectively designed to reduce barriers to EV adoption. Some of the proposed offerings include both rebates for customer-owned and operated EV charging stations and ACE deployment of utility-owned and operated EV charging stations.

4. N.J.A.C. § 1:1-16.1(a) allows entities “who will be substantially, specifically and directly affected by the outcome of a contested case” to seek leave to intervene. N.J.A.C. § 1:1-16.3 further provides the standards that guide the Board’s evaluation of a request seeking intervention, and establishes four factors:

- a. The nature and extent of the movant’s interest in the outcome of the case,
- b. Whether or not the movant’s interest is sufficiently different from that of any party so as to add measurably and constructively to the scope of the case,
- c. The prospect of confusion or undue delay arising from the movant’s inclusion, and
- d. Other appropriate matters.

5. As a provider of EV charging software, equipment, and services to a range of clients, including both consumers and utilities, Greenlots has a direct and substantial interest in this proceeding. Specifically, Greenlots has a significant interest in the growth of electric vehicle

charging infrastructure and the role of utilities in scaling the market for electric vehicle charging infrastructure. Accordingly, Greenlots has a special interest in the proposed PIV Program proposed by ACE.

6. Greenlots also has a direct and substantial economic interest in the sustainable and scalable growth of New Jersey's EV and EV infrastructure markets and in the broader regulatory and business landscape that affects the prospects of current and future EV-related business endeavors in New Jersey. As a provider of EV charging software, equipment, and services, including to several electric utility customers across the country. Greenlots' interests will be affected by the Board's final determination in this proceeding as it relates to ACE's PIV Program.

7. Greenlots' interest is also sufficiently different from that of any party, and will add measurably and constructively to the scope of the case. Indeed, no other party can adequately represent the interests of Greenlots in this proceeding. While other companies within the broader EV charging industry such as ChargePoint, Inc., and Tesla have also filed motions to intervene in this docket, those companies and Greenlots all have differentiated business models and product offerings, and different market perspectives that substantively and directly pertain to the issues at hand in this proceeding. A small number of charging companies have a business model in which they own and operate their own network of charging stations and provide charging to the end-use driver. In contrast, Greenlots' business model is largely one in which the company sells its products and services to a client that owns charging stations, who, in turn provides charging to the end-user – the driver. Greenlots' core product is EV charging technology – a software platform to manage EV charging and unlock the potential of EVs and EV charging as a managed grid asset. More broadly, Greenlots' services include turnkey

charging station deployment as well as ongoing network and charging station operations and support.

8. In some regulatory proceedings in other states, Greenlots has seen stakeholders and even regulators be unsupportive of utility ownership of EV charging systems based upon well-intended but mistaken presumption that such ownership will stifle competition and the growth of the private market. In fact, the opposite is the case. The more charging stations there are and the more EVs that are on the road, the bigger the market becomes for all providers and market participants. Moreover, the private market is not monolithic. It includes a diversity of business models, products and services. Restricting utility ownership and operation of EV charging infrastructure distorts the market by favoring certain business models and limiting others.

9. Greenlots will assist in the Board's review of this matter by fostering a robust and fully-informed discussion related to the broader EV charging industry and market and to what extent the PIV Program will reduce market barriers and facilitate EV adoption within ACE's service territory, and elsewhere in the state. Greenlots' intervention in this matter will neither complicate or disrupt the proceedings, as Greenlots desires to play a constructive role in this matter by isolating the issues of utmost importance, and offering valuable input into possible resolutions. Simply put, Greenlots has no desire to delay or obstruct the proceedings. This narrow focus has been demonstrated by Greenlots' productive and active intervention in regulatory proceedings in other jurisdictions involving EV charging infrastructure programs:

- Duke Energy Indiana, Cause No. 45253 (Indiana Utility Regulatory Commission)
- Potomac Electric Power Company, Formal Case No. 1143 (Public Service Commission of the District of Columbia)
- Pacificorp dba Pacific Power, Docket UM-1810 (Public Service Commission of Oregon)
- Portland General Electric, Docket UM-1811 (Public Service Commission of Oregon)

10. All correspondence and communications in this proceeding should be addressed to the following individuals, whose names should be entered on the official service list in connection with these proceedings:

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WHEREFORE, because Greenlots has a special interest in this case that is not otherwise adequately represented and because it is likely to provide informed input that will assist the Board in fully considering the matter without unduly complicating or disrupting the proceedings, Greenlots respectfully requests intervention in this proceeding.

Respectfully submitted,



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Attorneys for Zeco Systems, Inc.
d/b/a Greenlots.

Dated: March 13, 2020

STATE OF NEW JERSEY
BEFORE THE BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of)	BPU Docket No:
Atlantic City Electric Company for)	EO18020190
Approval of a Voluntary Program)	
For Plug-in Vehicle Charging)	

CERTIFICATION OF JOSHUA J. COHEN

Joshua J. Cohen, of full age and upon my oath, deposes and says:

1. I am Joshua J. Cohen, Director of Policy at Zeco Systems, Inc. d/b/a Greenlots ("Greenlots")
2. I am a person with authority to make representations on behalf of Greenlots
3. I have reviewed the attached Motion to Intervene and certify that the facts set forth therein are true and accurate to the best of my knowledge and belief. I am aware that if any of the above statements made by me are willfully false, I am subject to punishment.


JOSHUA J. COHEN

Dated: March 13, 2020

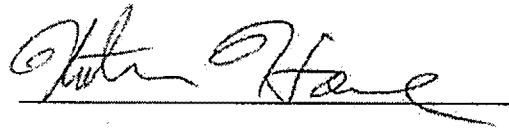
STATE OF NEW JERSEY
BEFORE THE BOARD OF PUBLIC UTILITIES

In the Matter of the Petition of)
Atlantic City Electric Company for)
Approval of a Voluntary Program)
For Plug-in Vehicle Charging)

BPU Docket No:
EO18020190

CERTIFICATION OF SERVICE

I hereby certify that copies of the foregoing Motion to Intervene were served via electronic mail on this day, March 13, 2020, to all individuals and entities as provided on the attached service list.



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Attorneys for Zeco Systems, Inc.
d/b/a Greenlots

Dated: March 13, 2020

I/M/O Petition of Atlantic City Electric Company for Approval of a
Voluntary Program for Plug-In Vehicle Charging
BPU Docket No. EO18020190

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