

October 26, 2020

VIA E-MAIL & E-FILING

Matthew M. Weissman, Managing Counsel - State Regulatory
Law Department
PSEG Services Corporation
80 Park Plaza – T5
Newark, New Jersey 07102-4194

**Re: I/M/O the Petition of PSE&G for Approval of its Clean Energy Future –
Electric Vehicle and Energy Storage (“CEF-EVES”) Program on a
Regulated Basis**

BPU Docket No. EO18101111

Dear Mr. Weissman,

On behalf of Intervenor, ChargePoint, Inc. (“ChargePoint”), enclosed please find ChargePoint’s Discovery Requests, CP-PSEG-0008 through CP-PSEG-0011 in connection with the above-referenced matter. Please provide PSE&G’s responses in accordance with the procedural schedule for this matter.

Please do not hesitate to call me should you have any questions.

Thank you.

Very truly yours,



Murray E. Bevan

Enclosure

cc: Service List (via e-mail & e-filing)

**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**

INSTRUCTIONS

1. Please designate an individual witness who is sponsoring your response to each discovery request.
2. Where a request calls for an answer in more than one part, the parts should be presented in the answer in a manner, which is clearly understandable.
3. All discovery requests are ongoing in nature and you are under a continuing duty to update and supplement your responses during the course of the case.
4. If you claim any form of privilege as a ground for not completely answering any discovery request, state the nature of the privilege and the general subject of the information withheld.
5. For any document that you decline to produce because of a claim of privilege or any other reason, provide the date, author, and type of document, the name of each person to whom the document was sent or shown, a summary of the contents of the document, and a detailed description of the grounds for the claim of privilege or objection to producing the document. If a claim of privilege is made only to certain portions of a document, please provide that portion of the document for which no claim of privilege is made.
6. If any document responsive to a request for production of documents is no longer in your possession or control, please state why the document is no longer in your possession or control, explain the circumstances surrounding the disposition of the document, identify the individual responsible for the disposition of the document, and state whether the document or copies thereof still exist.
7. Please identify all responses to requests for production of documents by the number of the request.
8. Where a discovery request asks that a date be given, but you cannot recall the specific date, please respond by giving an approximate date or time frame, indicating that the date or time frame is approximate.

DEFINITIONS

1. “Communication” is used herein in its broadest possible sense and means any occurrence in which information is related between persons by means or an oral or written statement, including, without limitation, any, meeting, conversation, correspondence, memoranda, discussion, negotiation, telephone conversation, voicemail message, electronic mail message, proposal, or presentation, in whatever form.
2. “Document” is used herein in its broadest possible sense and means any information memorialized in any way, however stored, including, but not limited to, bills, correspondence, electronic mail, electronic files, memoranda, notes, writings, meeting minutes, spreadsheets, graphs, charts, and drafts of any of the foregoing, and computer files, audio recordings, video recordings and photographs, in whatever form. All documents should be fully functional and provided in their native format, with all metadata included, and not locked or otherwise encrypted.
3. “Identify” means:
 - a. When used in reference to a natural person, to state the full name, the present or last-known address, and the present or last-known employer or business affiliation of the person;
 - b. When used in reference to an entity, department, or division, to state the full name of the entity, department, or division, the present or last-known address of the entity, department, or division, and to identify the natural person or persons who represent such entity, department, and division, in connection with the above-captioned proceeding;
 - c. When used in reference to a document, to state the date, author, addressor, addressee, type of document, title, if any, or some other means of identifying the document, a general description of its subject matter, and its present or last known location and custodian.
 - d. When used in reference to a communication, to state all persons involved in the communication, the time, date, and location of the communication, a general description of the subject matter of the communication, and the nature of the communication (e.g., telephone, e-mail, in person).

DISCOVERY REQUESTS
OF INTERVENOR CHARGEPOINT TO
PUBLIC SERVICE ELECTRIC AND GAS COMPANY (PSE&G)
REGARDING REBUTTAL TESTIMONY

CP-PSEG-0008 – Regarding Witness Reif’s rebuttal testimony that PSE&G will only, “serve as POLRs in limited circumstances.” (11:3), please provide detailed responses to the following questions:

- a. How will PSE&G determine when POLR (provider of last resort) development is necessary?
- b. At what point in time will PSE&G begin its process to determine whether POLR development is necessary?
- c. Does PSE&G anticipate setting annual DCFC development targets within the public DCFC sub-program?
- d. Does PSE&G anticipate exploring alternative incentive levels/models prior to undertaking POLR development?

CP-PSEG-0009 – Regarding Witness Reif’s rebuttal testimony that “[t]he Company is currently considering how these factors might align with the criteria the MFR Order recommends and whether and how such criterion should be included in the Company’s implementation of the utility-owned aspect of this sub-program.” (12:1-3), please provide detailed responses to the following questions:

- a. When will PSE&G complete its consideration and determine “whether and how” the process for utility-owned DCFC deployment will be implemented?
- b. When will PSE&G’s final process for utility-owned DCFC deployment be made publicly known?
- c. Will PSE&G invite interested stakeholders to be involved in further refining the details of this sub-program?
- d. If so, when and by what mechanism or process?
- e. Please provide examples of the BPU approving a program before it has been developed.

CP-PSEG-0010 – Regarding page 10 of Witness Reif’s rebuttal testimony, please provide any research or analysis conducted by, or on behalf of, PSE&G that examines the potential impacts upon residents at MUDs if their residential EV charging stations are required to be publicly available at all times.

CP-PSEG-0011 – Regarding Witness Reif’s rebuttal testimony about PSE&G’s proposed competitive solicitation process (beginning on page 27):

- a. From PSE&G’s perspective, what are the most important characteristics to ensure that a DCFC corridor location delivers/provides a positive driver experience?
- b. How will the characteristics identified by PSE&G be reflected in the scoring criteria for its competitive procurement to participate in its EVSE program?
- c. Will PSE&G assign greater weight to driver-centric characteristics or to on-site load serving capacity in the scoring criteria for its competitive procurement?

- d. Based on the anticipated design of PSE&G's competitive solicitation process, is it possible that locations for EVSE that would otherwise be commercially viable and support a positive driver experience would be excluded from participating in PSE&G's program?
- e. Please provide any analysis conducted by, or on behalf of, PSE&G to determine that operating cost barriers presented by its demand-based rate structures will be solved at the end of the program for all DCFC deployed through this program.