

October 26, 2020

VIA E-MAIL & E-FILING

William D. Bittinger
Eastern Environmental Law Center
50 Park Place - Suite 1025
Newark, New Jersey 07102
wbittinger@easternenvironmental.org

**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. Bittinger,

On behalf of Intervenor, ChargePoint, Inc. (“ChargePoint”), enclosed please find ChargePoint’s Discovery Request CP-ENVR-CMTY-0001 in connection with the above-referenced matter. Please provide the Environmental and Community Intervenors’ response 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
ENVIRONMENTAL AND COMMUNITY INTERVENORS
REGARDING REBUTTAL TESTIMONY

CP-ENVR-CMTY-0001 – Regarding footnote 56 on page 18 of Kathleen Harris’ rebuttal testimony that references Southern California Edison’s (SCE’s) *Charge Ready 2* program, which “allowed the site hosts at MUDs to elect for utility ownership or a rebate for a charging station, without the need to go through a last-resort process”:

Was the SCE *Charge Ready 2* Own and Operate program approved by the California Public Utilities Commission designed to enable customer choice of both electric vehicle supply equipment and network services?