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Aida Camacho-Welch
Secretary
NJ Board of Public Utilities
P.O. Box 350
Trenton, New Jersey 08625

Re: 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

Dear Secretary Camacho-Welch:

Please accept this letter as the reply (the "Reply") to Atlantic City Electric Company's ("ACE") opposition (the "Opposition") to Electrify America's Motion for Leave to Intervene (the "Motion") in this proceeding. By the Opposition, ACE seeks to prevent Electrify America, one of the nation's largest owner/operators of charging stations, from having a full voice in this proceeding, which according to ACE's Amended Petition will support the growth of electric vehicles and the development of electric vehicles 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.

I. ELECTRIFY AMERICA'S INTEREST IS NOT SERVED BY THE OTHER INTERVENORS

In the Opposition ACE states: "Electric Vehicle Service Equipment ('EVSE') providers similar to EA are already well represented by Intervenors in this proceeding. EVgo Services, LLC, Tesla, Inc., and ChargePoint, Inc. already represent companies who are "building a nationwide network of ultra-fast direct current fast charging stations" (as EA describes its operations in the Motion)." This assertion by ACE is simply inaccurate.

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

- Electrify America chargers are open to vehicles that can support CCS and CHAdeMO charging standards, and many have the potential to deliver 350 kW to a single vehicle.

- This is significantly greater than the capabilities of the existing intervenors in this proceeding, and therefore the implementation of ACE's PIV Program will have a greater impact on Electrify America than on the existing intervenors.

- ACE's Amended Petition explained that that it would seek to incentivize customers to install electric vehicle supply equipment ("EVSE"), including chargers, and that it would "provide for the development of ACE-owned EVSE," which could provide ratepayer-subsidized competition, and "support development of EVSE by third-parties," which if properly constructed could become beneficial for Electrify America.

- ACE's Opposition fails to appreciate that because Electrify America can deliver significantly more power to electric vehicles than the other intervenors in this proceeding, its interests are not adequately represented by existing intervenors.

- For example, changes in demand charges will impact Electrify America more than its competitors because of the difference in power that can be supplied by Electrify America to compatible electric vehicles.

- The resulting rate increases from implementation of the 13 Program Offerings, without incentives to offset the increase, will make it more costly for Electrify America to operate in the ACE service territory and have a disproportional impact on Electrify America because of the difference in the amount of power it can supply.

- In comparison, EVgo operates at only 50 kW DCFC in the ACE service area.

- ChargePoint also does not have any DCFC in New Jersey above 50 kW.

- Tesla—a proprietary DCFC charging provider—does not, at present, have infrastructure capable of achieving the same power levels in ACE's service area.

- 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 seven times the demand charges to a single vehicle of our competitors' technology.

- Electrify America's interests are materially unique as a result. (Barossa Cert. at paragraphs 11 to 18)

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

In the Opposition ACE states: "allowing additional Intervenors . . . at this late stage with full rights to conduct discovery could result in unnecessary confusion and delay of this proceeding." This assertion seems to disregard Electrify America's statement in its 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." In the attached Certification, Mr. Barrosa also states that Electrify America "would abide by the existing procedural schedule if granted intervenor status." (Barrosa Cert. at paragraph 7)

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 PIV INDUSTRY CAN PROSPER IN NEW JERSEY

The Plug-In 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 ACE's petition will have on its business model."

Electrify America, a leader in this industry respectfully requests 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.

This letter and the attached certification are being submitted electronically, consistent with the Board's Order dated March 19, 2020 (Docket No. EO20030254) directing that all submissions to the Board, of any kind, be submitted electronically.

Respectfully,

COZEN O'CONNOR, PC

/s William Lesser

By: William Lesser
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Enclosure

Cc: Service List