



MAHER TERMINALS LLC

1210 CORBIN STREET
ELIZABETH, NJ 07201
(908) 527-8200

By Electronic Mail

September 13, 2021

**Re: BPU Hearings for Electric Vehicles Medium and Heavy-Duty Stakeholders
in PSE&G/NJ Territory**

To Whom It May Concern:

As a stakeholder within the PSE&G service territory, Maher Terminals LLC (Maher) operates the largest marine container terminal in North America. To function as one of the most efficient terminals in the nation, the terminal utilizes various vehicles and equipment to handle cargo and support its operations, including Medium and Heavy Duty (MHD) vehicles. Maher recognizes the need to build an equitable, reliable EV infrastructure for MHD Electric Vehicles (EV) and supports the efforts by the Board of Public Utilities (BPU) and PSE&G.

It is one of Maher's top priorities to reduce GHG emissions, and it has done so for many years by working with and supporting the Federal, State, and local agencies as well as the local communities such as the City of Elizabeth and Newark's Ironbound Community Corporation. MHD EVs provide overburdened Environmental Justice communities such as these an opportunity for a cleaner environment, especially air quality. Maher has reduced its diesel consumption per container by 43% between the years 2006 and 2019, and reduced its gas consumption per container by 22% for the same period through the conversion to electric cranes, upgrading to significantly more efficient straddle carriers, and other operational efficiency improvements. To further support these efforts, Maher seeks to transition from even more diesel equipment & vehicles to diesel/electric hybrids and all electric (where feasible). An example of this includes the implementation of the fully electric straddle carrier demonstration project, the first in North America. The demonstration project is assisted through the NJDEP's Volkswagen Mitigation Trust program, however, even with the additional funding, installation of the infrastructure and technology is very costly.

Quicker conversions of MHD EVs fleets and adoption of electric technology can be done through voluntary programs such as expanding technology demonstrations, funding programs, supporting infrastructure installation, and other incentives that overcome the heavy cost associated with EV vehicle technology and associated infrastructure upgrades. In order to support a robust EV fleet required by a container terminal, it would need a system of costly on-site charging equipment and will also likely require upgrades to transformers and other underlying infrastructure due to the amount of power that larger vehicles and equipment draw from the grid. The power supply that serves our facility is already under immense stress. Maher, and the port, sits on the end of the regional transmission area and currently faces power quality

and capacity issues, which will need to be upgraded as MHD EVs and equipment is integrated. Maher's over-arching strategy is to efficiently load and off-load containers from ships, rail cars, and trucks in a manner that is safe and efficient for all. Any glitches or delays caused by the grid may disrupt the operations of the terminal and pose a risk to safety and potentially worsen local air quality. Incorporating renewables and storage would help greatly, especially with power quality and capacity issues, but would require incentives and public/private partnerships to support the cost of infrastructure and implementation. Additionally, the use of energy storage can be used to explore potential Vehicle to Grid capabilities to further support grid reliability and quality. Maher will continue to work with local agencies such as the NJDEP, NJBPU, NJEDA, the Port Authority, as well as PSE&G to provide a stronger and more resilient power supply in order to advance increased electrification.

As a terminal operator, Maher supports the efforts outlined by the BPU's straw proposal and the integration of MHD Electric Vehicles. Maher's investments, future projects, GHG and emission goals, all lead to a continued path towards air quality improvements. The implementation of MHD EVs would be more efficient and cost effective if the hurdles of infrastructure implementation and technology cost and challenges could be overcome in a manner that is equitable to all involved.

Respectfully submitted,

MAHER TERMINALS LLC

A handwritten signature in black ink, appearing to read "Jay Ruble", written in a cursive style.

Jay Ruble
Senior Vice President & General Counsel