

**To: Bureau of Public Utilities**  
**From: Nicholas Whitcombe**  
**Date: September 23, 2021**

**Re: Proposed NJCEP FY22 Second Budget Revision**

I am writing in regards to the Phase Two: Point-of-Sale Incentive offered New Jersey's Clean Energy Program.

The program only allowed incentive funding for new vehicles purchased after July 6, 2021 and was terminated on September 15, 2021. Vehicles reserved prior to July 6, 2021 were not allowed to participate in the incentive program, even if purchased between July 6, 2021 and September 15, 2021. There was prior notice or explanation in the program rules. This created a vary narrow window of opportunity that put electric car buyers at a disadvantage, and may in fact due to the demand scarcity created, allowed dealers to increase prices beyond the MSRP.

Due to the limited availability of the vehicle of choice, electric car buyers would have to purchase vehicles off the dealer lot, rather than making an advanced order of a vehicle. Clearly the incentive program advantages the dealers, selling cars off the lots, rather than proactive buyers seeking to purchasing the *vehicle of choice*.

In my case, On May 15, 2021, I reserved an VW ID.4 through VW's website and made a reservation payment totaling \$500 in anticipation of receiving delivery and purchase of the vehicle in August or September, after Phase Two had begun in July. The reservation with VW was placed in anticipation of receiving the \$5,000 incentive on the vehicle, which has an MSRP of \$44,495. Despite purchased on September 11, 2021, I was informed by the Charge Up New jersey program administrator of a denial of appeal.

This created a perverse circumstance. I could have cancelled the purchase, in which case the dealer could have immediately sold the car to another buyer. This buyer would receive the \$5,000 incentive. Or I could purchase the vehicle, which I did, and feel "dupped" by the BPU.

Therefore, the BPU should consider an allocation of funds for those eligible vehicles, purchased between July 6 and September 15, where a reservation had been previously been made. The program should open a priority window for incentive funding of vehicle purchases made in the circumstances I describe above, and then provide funding in the normal course.