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September 5, 2020

**Via Electronic Mail**

Ms. Aida Camacho-Welch, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 3<sup>rd</sup> Floor, Suite 314  
P.O. Box 350  
Trenton, New Jersey 08625-0350

**Re: I/M/O 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**

Dear Secretary Camacho-Welch:

On behalf of Intervenor Enel X North America, Inc. (“Enel X”), we hereby submit for  
filing the Testimony of Katie Guerry in the above-referenced matter.

Thank you for your attention to this matter.

Respectfully submitted,

**DECOTIIS, FITZPATRICK,  
COLE & GIBLIN, LLP**

By: s/ Alice Bergen  
Alice M. Bergen

Encls.  
AMB/md

cc: BPU Service List (*via e-mail only*)

2866006v1

**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**

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**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

**I/M/O 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**

**TESTIMONY OF KATIE GUERRY ON BEHALF OF  
INTERVENOR ENEL X NORTH AMERICA**



1 **TESTIMONY OF KATIE GUERRY**

2

3 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

4 **Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

5 A My name is Katie Guerry, and I am the Head of Regulatory Affairs USA & Canada for  
6 Enel North America, Inc. (“ENA”), the parent company of Enel X, North America (“EXNA”),  
7 who is a party to this proceeding. My business address is One Marina Park Drive, Boston,  
8 Massachusetts.

9 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND.**

10 A I have Bachelor of Arts degrees in Political Science and English from The College of  
11 William & Mary; and a Juris Doctor with Honors from Rutgers University.

12 **Q. PLEASE PROVIDE A SUMMARY OF YOUR RELEVANT EXPERIENCE.**

13 A I have worked in the energy market for over 17 years, spanning careers at two leading  
14 global energy companies, gaining diverse experience including commercial, legal and regulatory  
15 affairs, across multiple commodity markets including wholesale and retail electricity, natural gas,  
16 and oil. My first employer was Hess Corporation, in Woodbridge, NJ, where I worked in multiple  
17 roles supporting the retail electric, natural gas and fuel oil business selling to commercial and  
18 industrial (“C&I”) customers in de-regulated markets. This included coverage of New Jersey’s  
19 retail markets, and the wholesale markets at PJM Interconnection, Inc., the regional grid operator  
20 for Public Service Electric and Gas Company (“PSEG”). I served in a number of roles supporting  
21 the growth of that business over a ten-year period, in both regulatory affairs and sales roles with  
22 responsibilities in PSEG’s territory. My diverse roles and extensive experience as a competitive  
23 retail natural gas and electric supplier serving C&I and government customers on the PSEG

system, enhances my ability to analyze and evaluate PSEG's proposal and its implications on customers and retail markets.

In addition to my historical perspective, I am now the Head of Regulatory Affairs - USA & Canada, for Enel North America, Inc. ("ENA"), the North American business of Italy based Enel Group, the largest electric utility system operator in the world with over 70 million customers worldwide. My regulatory affairs team is responsible for the collective regulatory strategy and advocacy on behalf of each of ENA's North American businesses interests. These businesses include Enel Green Power North America ("EGPNA"), Enel Trading North America, Inc. ("ETNA"), and Enel X North America ("EXNA"); EXNA is a party to this proceeding. Within EXNA is e-Mobility, offering the Electric Vehicle ("EV") charging solutions that our smart, grid-connected EV charging network solutions make possible. My regulatory team has become increasingly active in State proceedings across the country designing programs and rules for utility Electric Vehicle ("EV") charging programs, similar to that proposed by PSEG in this proceeding. We are also an approved vendor in the EV charging program implemented by PSEG's affiliate, PSEG Long Island.

**Q. WHAT ARE YOUR VARIOUS JOB RESPONSIBILITIES AT ENEL NORTH AMERICA, INC.?**

A As stated above, I am in charge of working with my regulatory affairs team to develop and implement an integrated regulatory strategy supporting the growth of all ENA business interests in the USA and Canada. The guiding principles that inform our regulatory advocacy in each jurisdiction where we do business are sustainability; reliability; support for competitive, open and balanced markets; and the importance of a diversified and complimentary portfolio of supply to achieve cost efficiencies by maximizing resource flexibility. In pursuit of this strategy, I prioritize

coordination across ENA businesses on a regional basis to ensure we maximize the collective value and full capabilities of our investments in the next generation of supply resources.

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A The purpose of my testimony is to address PSEG's Petition for Approval of its Clean Energy Future- and Electric Vehicle Supply Equipment ("CEF-EVSE") by providing our general support and highlighting some potential changes intended to help raise the return on investment with PSEG's proposed program. I reference those potential changes in my testimony below and explain reasons for consideration. The changes identified are relatively minor, but they are related to technical matters that carry costs, so minor rule adjustments can dictate whether EXNA's cost to develop and deliver EVSE and services to customers across New Jersey justify our investment of money and resources.

**Q. WHAT ARE THE INTERESTS OF EXNA IN THIS PROCEEDING?**

A EXNA's interests that I respectfully communicate to the Board via this Testimony go beyond the important program rules and design elements I reference above and below as the purpose of my testimony. I discuss the critical importance of those details in calculating the potential return on our investment below, however I must also stress the importance of approving PSEG's Petition in some form and not rejecting outright as some parties have expressed. As an investor and operator of clean resources, above all we need regulatory stability and rule certainty to give transparency into, and a likelihood of, earning future revenue streams. A fixed revenue stream is not required, and perhaps too costly for NJ Ratepayers, but certainty of an ongoing opportunity and right to earn revenue streams through optimizing and monetizing the flexible consumption capabilities of EVSEs as the valuable, dispatchable and reliable resource for system operators that they can be. The worst-case commercial scenario for a business like EXNA would

70 be the denial of PSEG's Petition. As I discuss in my Testimony, rule details are critical, but I am  
71 confident the Board's thorough review of the record in this Petition will demonstrate benefits will  
72 far outweigh costs of implementing. Failure to approve proactively a structure under which  
73 investors can model and calculate future potential revenues from EVSE investments in New Jersey  
74 will prevent investments. These investments are necessary to reinforce the electric distribution  
75 systems ability to accommodate the changes in load patterns and usage from EV penetration.  
76 Solutions to reinforce the system after problems occur will be much more expensive than most of  
77 the potential versions of costs for PSEG's proposal. I respect and appreciate the very difficult  
78 position of the Board when deciding to commit ratepayer dollars, but all market signals indicate  
79 the Board should approve PSEG's Petition albeit with some minor adjustments I address here in  
80 my Testimony.

81 **Q. DO YOU HAVE COMMERCIAL EXPERIENCE AS AN EVSE AND PROVIDER?**

82 A Yes. EXNA, through its eMobility business, participates and is invested in many utility  
83 EV programs across the country. This includes the EV Chargers program on the sister company  
84 of the Petitioner, PSEG LI. EXNA is an approved vendor of its hardware and software in the  
85 PSEG LI program, and has been very encouraged by the success with increasing EV adoption in  
86 their territory.

87 **Q. DO YOU BELIEVE PSEG'S PROPOSAL HAS A GREATER FOCUS ON**  
88 **RESIDENTIAL THAN IN OTHER PROPOSED MODELS YOU HAVE SEEN?**

89 A Yes.

90 **Q. IF SO, WHAT ARE THE IMPLICATIONS OF A LARGE FOCUS ON**  
91 **RESIDENTIAL CUSTOMER TO OTHER CLASSES OF CUSTOMERS, OR ON THE**  
92 **FUTURE OF EVSE INVESTMENTS?**

A I believe there are multiple benefits from investing in residential EVSE and the infrastructure it requires. Doing so accomplishes promotion and adoption of EVSE across the largest number of customers for the lowest possible cost. This increases the return on investment by ratepayers in this program due to avoiding future system costs avoided through accelerated adoption facilitated the large number of residential EVSE program participants.

**Q. WHAT DO YOU BELIEVE THE IMPACT OF UP FRONT REBATES AS PROPOSED BY PSEG WILL HAVE ON THE SUCCESS OF THE PROGRAM?**

A I believe the up-front rebate offered customers will facilitate a high rate of adoption and support it.

**Q. DO YOU AGREE WITH THE BENEFITS OF THE FOUR EV SUBPROGRAMS ATTACHED AS AN EXHIBIT IN PSEG’S PETITION DATED October 11, 2018.**

A Yes, we generally agree with the five Benefits listed in the third column of that chart. Accomplishment of those benefits, even though many are not easy to quantify, is still so great that they the far outweigh the costs of this program.

**Q. DO YOU AGREE WITH THE ON BILL FINANCING OPTION PROPOSED BY PSEG?**

A I am very supportive of the on bill financing (“OBF”) PSEG has proposed, I believe it will help with the EV adoption goals of this program.

**Q. ARE THERE ANY CHANGES YOU THINK SHOULD BE CONSIDERED FOR THE OBF COMPONENT OF THIS PROPOSAL?**

A Yes, I believe it is appropriate to extend the OBF period of two years to ten. Manufacturer’s warranties typically go out ten years, as such, match the OBF period to that is both based on reasonable expectation of useful life and the reality of the state of both our economy and

116 our environment. Extending to ten years could have a demonstrable effect on adoption, with  
117 minimal costs incurred, and as previously stated, accelerated of EVSE investments will reduce  
118 costs in the long run.

119 Dated: September 4, 2020