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VIA ELECTRONIC MAIL ONLY

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue
Trenton, New Jersey 08625
Board.secretary@bpu.nj.gov

**Re: Jersey Central Power & Light Company Comments on the Medium and Heavy Duty Vehicle (“MHDV”) Straw Proposal – Charging and Use
BPU Docket No. QO21060946**

Dear Secretary Camacho-Welch:

On behalf of Jersey Central Power & Light Company (“JCP&L” or the “Company”), please accept these comments for filing in the above-referenced matter related to the Straw Proposal on the electrification of Medium and Heavy-Duty Vehicles (“MHDV”) issued by the Staff of the New Jersey Board of Public Utilities (“Board” or “BPU”). The Company’s comments at this time are general in nature and intended to address the items raised in the Straw Proposal and the Technical Conference panelists’ comments with respect to MHDV Charging and Use. JCP&L reserves the right to offer further comments on these issues as the MHDV stakeholder proceeding continues and in response to any actions taken by the Board with respect to MHDV electrification.

A. The Board should provide flexibility for the Electric Distribution Companies (“EDCs”) to propose MHDV charging solutions as part of their plan filings.

As indicated by multiple stakeholders at the MHDV stakeholder meeting on Understanding Vehicle Charging and Use, the MHDV market is highly varied and will require many different electric charging solutions to meet its needs. As such, JCP&L encourages the Board to not be overly prescriptive in defining the charging solutions that the EDCs can or must propose as part of their MHDV programs. Rather, the Board should provide the EDCs with flexibility to propose MHDV charging solutions that meet the varied needs of their customers.

Flexibility is key in the electrification of the MHDV market because MHDV customers are all different. It includes the public transit industry, municipalities and schools, ports and cargo facilities, corporate fleets of various sizes, and a variety of independent operators. The market is also nascent and fragmented such that many different charging models may potentially be implemented to meet different customer needs. Further, competitive capital for these various solutions will follow the incentives offered by the utilities. EDC incentives for the charging solutions that meet the specific customer’s needs will lower barriers and reduce uncertainty for

customers looking to electrify their fleet. Accordingly, JCP&L encourages the Board to be flexible and nonprescriptive in the charging solutions for which the EDCs can offer incentives under their MHDV programs in order to meet their customers' charging needs.

B. The Board should promote charging solutions that efficiently utilize the EDCs' transmission and distribution systems.

As set forth above, JCP&L encourages the Board to permit the EDCs flexibility when it comes to offering incentives to customers for charging solutions that meet their needs. However, JCP&L also believes that the Board should look favorably upon charging solutions proposed by the EDCs that efficiently utilize the EDCs' transmission and distribution systems. JCP&L presented its proposal for one such solution, the installation of joint use charging depots, at the Charging and Use stakeholder meeting. Joint use charging depots could be placed along travel corridors near population centers and transmission facilities, which will allow for both the efficient use of the EDCs' systems and provide the broader public with access to charging.

The utilization of joint use charging depots addresses stakeholder concerns and provides several benefits. First, joint use charging depots will promote higher utilization by placing charging stations in a single convenient location that allows for broader use by many parties. Second, joint use charging depots present a great opportunity to utilize economies of scale by building a few large charging stations rather than many smaller charging stations for individual needs. Third, because there will be fewer joint use charging depots, they can be built more expeditiously than the many charging stations that would be necessary if customer charging was addressed on an individual basis only. Fourth, co-location of large loads will promote the efficient use of the EDCs' system and minimize impact by virtue of being more predictable and by relieving the load increase on the distribution system. Fifth, joint use charging depots provide an alternative to fleet operators who are concerned about either the cost or feasibility of getting the necessary make-ready or charging infrastructure at their own sites. Finally, joint use charging depots can be more efficiently maintained because there are fewer of them at centrally placed locations.

Joint use charging depots also present an opportunity for multi-party collaboration, which does not necessarily exist if those looking to electrify their fleet and the EDCs are limited to addressing customers' charging solutions on an individual basis only. JCP&L believes that the joint use charging depot model could be a valuable tool for New Jersey's electrification of the transportation sector and encourages the Board to permit the EDCs to develop proposals for same as part of their MHDV electrification proposals.

C. The Board should authorize EDCs to provide Fleet Technical Advisory Services.

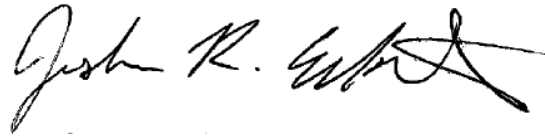
EDCs are well positioned to advise fleets and independent operators of the benefits of electrification, impacts to the grid and upgrade requirements, charging and usage patterns, electric rates, total costs of ownership, and available incentives. As fleets and independent operators shift from internal combustion to delivered electricity as their fuel source, they will increasingly turn to their utility for insights on how to best manage their fuel requirements. As anticipated by the Straw Proposal, JCP&L agrees that EDCs will play an important role in advising customers on these

issues through various means and should be permitted to recover the costs associated with same as part of their proposed MHDV electrification programs.

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JCP&L thanks the Board for the opportunity to provide these comments. Please do not hesitate to contact me should you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua R. Eckert", with a stylized flourish at the end.

Joshua R. Eckert
Counsel for Jersey Central Power & Light Company