



Submitted via Email

October 5, 2021

Aida Camacho-Welch,
Secretary, NJ Board of Public Utilities
Post Office Box 350
Trenton, New Jersey 08625

RE: Medium and Heavy Duty Electric Vehicle Charging Ecosystem, Docket No. QO21060946

Secretary Camacho-Welch:

The Natural Resources Defense Council and Sierra Club are pleased to submit comments in the above referenced matter.

Sincerely,

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NRDC

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NRDC

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I. Introduction

We appreciate the opportunity to provide input on the Board of Public Utilities' ("BPU, or Board") New Jersey Electric Vehicles Infrastructure Ecosystem 2021 Medium and Heavy Duty Straw Proposal (hereinafter, "Straw Proposal").¹ The Straw Proposal is an important step to support the developing electric vehicle ("EV") market by increasing infrastructure investments in the Garden State to increase the deployment of trucks, buses, and other larger vehicles, particularly the "make ready" or "charger ready" aspect of the EV Ecosystem. However, we believe there is an opportunity to strengthen the Straw Proposal to ensure it provides clean transportation opportunities to all residents, helps to optimally integrate EVs onto the electric grid, and develops this infrastructure in a deliberate and flexible manner that will allow New Jersey to achieve its transportation electrification goals.

The transportation sector accounts for 42% of greenhouse gas emissions in New Jersey.² To achieve the state's climate goals under the Global Warming Response Act ("GWRA"),³ electrifying the state's medium- and heavy- duty vehicles ("MHDVs") is a critical part of the equation. New Jersey has begun to move towards MHDV electrification, such as signing a bipartisan, multistate Memorandum of Understanding in July 2020,⁴ and announcing plans to adopt the California Advanced Clean Truck rule.⁵ Moreover, New Jersey's 2019 Energy Master Plan ("EMP") states that "the transportation sector should be almost entirely decarbonized by 2050."⁶ It also recommends that the state take "concrete steps to start to phase out motor gasoline and conventional diesel consumption as *quickly as possible*."⁷

While light-duty vehicles are the largest source of pollution on the roads, MHDVs are significant sources of criteria air pollutants including NO_x, SO_x, and PM_{2.5}. Therefore, the electrification of these vehicle types provides opportunities for clean transportation of goods and people, especially for those who may not have access to a personal vehicle. MHDV electrification is a triple-win; it is good for the

¹NJ BPU, New Jersey Electric Vehicles Infrastructure Ecosystem 2021- Medium and Heavy Duty Straw Proposal, Docket No. QO21060946 (Aug. 12, 2021) [*hereinafter*, Straw Proposal], available at, <https://www.nj.gov/bpu/pdf/publicnotice/Notice%20Medium%20Heavy%20Duty%20EV%20Straw%20Proposal.pdf>

² NJ DEP, Statewide Greenhouse Gas Emissions Inventory. available at: <https://www.nj.gov/dep/ages/occe-ghgei.html>

³ N.J.S.A. 26:2C-37 et seq.

⁴ NJ Office of the Governor, *15 States and the District of Columbia Join Forces to Accelerate Bus and Truck Electrification* (Jul. 14, 2020).

⁵ NJ DEP, Notice of Rule Proposal, *Advance Clean Trucks Program and Fleet Reporting Requirements*. Available at: [nj.gov/dep/rules/proposals/20210419a.pdf](https://www.nj.gov/dep/rules/proposals/20210419a.pdf)

⁶ NJ BPU, 2019 Energy Master Plan Pathway to 2050, at 12.[*hereinafter*, EMP], available at: https://nj.gov/emp/docs/pdf/2020_NJBPU_EMP.pdf

⁷ EMP at 59. (emphasis added).

environment, good for fleets' bottom lines, and can provide jobs and economic growth.⁸ In addition to the environmental and health benefits, supporting the electrification of MHDVs provides economic benefits to New Jersey businesses. According to a recent analysis conducted by CalETC, electric trucks and buses will have the lowest total cost of ownership in 2030, even without purchase incentives in California. We expect a similar total cost of ownership nationwide, including in New Jersey.⁹

We support the Board for working to advance the goal of transportation electrification in New Jersey. Our ensuing comments provide suggestions for modifications to strengthen the Straw Proposal and set New Jersey up to be an EV and transportation electrification leader throughout the country. Additionally, we submitted comments related to this matter with the Environmental Defense Fund, Sierra Club, CalSTART, and Environment New Jersey on September 9, 2021 on the August 24 and 26th technical conference panels that we incorporate here by reference.

II. Comments

1. It is Vital That the Board Acknowledge That These Are Minimum Filing Requirements

The Board should clearly articulate in its Final Order on MHDV electrification that the Minimum Filing Requirements ("MFRs") are just that; the minimum amount of information needed to accept a utility filing as "complete," rather than a ceiling on the types of programs any utility could propose in its plan filing. In order to maximize the effectiveness of filed utility programs, and ensure flexibility, we recommend that in addition to the MFRs, the Board also include criteria to help intervenors, participants, and the presiding Commissioner determine whether utility proposals further the state's clean energy goals such as:

- Increasing charging station deployment
- Maximizing fuel cost savings
- Reducing GHG emissions from the MHDV sector
- Integration with other clean energy policy objectives
- Optimizing EV load, for instance shifting load to off-peak hours, and
- Supporting MHDV electrification in Overburdened Communities, among others.

A broad and flexible approach that is responsive to changes in market conditions is especially important given the nascent stage of the MHDV infrastructure deployment. If the Board were to commit to a hard

⁸ ICF, Comparison of Medium- and Heavy- Duty Technologies in California (Dec. 2019).

⁹ *Id.*

limit, or ceiling, on what types of programs utilities could propose in their plan filings, it could potentially prevent New Jersey from utilizing new technologies and best practices as they emerge.

2. The BPU Should be Flexible in its Approach to the Role of Regulated Utilities in the EV Space

Regulated electric utilities have several characteristics that make them well-suited to play a central role in EV infrastructure buildout. First, their specific and expert knowledge of the distribution system and the potential impact of vehicle charging on load shape and shifting. It is critical that New Jersey's investment in the distribution system happen in close coordination with its build out of EV charging infrastructure ("EVSE") given the potential load impacts of widespread EV adoption. Moreover, utilities are able to optimize the electric grid and ensure that most electric vehicle charging occurs during off-peak hours, if implemented alongside demand response, education programs, programs and tariffs that allow for managed charging or rate design.¹⁰

The MHDV sector includes not only a diverse type of fleet owners and operators, but also a variety of different vehicle types and charging and infrastructure needs. Therefore, it is important that BPU not be overly prescriptive in the programs that utilities can propose, but instead allow for adequate flexibility for the utilities to best address the needs of different fleet and vehicle types in their service territory. For example, a large, multi-state fleet (such as IKEA) will have different charging schedules and needs as they travel throughout New Jersey and the region compared to more local mom and pop shops that only do local deliveries and return to the same garage every night and therefore may require different levels and types of support from utilities. Further, as discussed in more detail above, utilities will need flexibility to propose additional programs beyond the MFRs that may support and better reflect future best practices and available technologies

3. Expand Eligibility to Include Private Fleets and Depot Charging

We recommend that the Final MHDV Order provide support for Private Fleets and Depot Charging. Currently, the Straw Proposal is specifically focused on public charging. While this is a key piece of supporting the EV Ecosystem, it is also vital to ensure that utilities support all MHDVs in the state, including those that may need to only utilize charging "behind the fence" as

¹⁰ The Clean Energy Act directs the Board and utilities to create programs that will reduce peak load. Programs that accomplish that objective are crucial of the state to meet its clean energy goals. Such programs should extend beyond energy efficiency, and instead be incorporated to all distributed energy resources, including both light and MHD EVs

many fleet vehicles “return home” to charge overnight. Therefore, it is important that fleets have the necessary infrastructure available to recharge their vehicles. As this infrastructure can be expensive, the BPU should provide similar make-ready programs to support private fleet and depot electrification.

For example, local last mile delivery vehicles likely will not need to utilize public charging but can charge overnight and while some instate fleets may need public charging, these will most likely be utilized by vehicles traveling between states. Instead, the BPU should ensure that the fleets who are traveling throughout the state—especially those that are coming “home” to warehouses and other depots in New Jersey have the ability to charge their fleets at night. Without support to install charging “at home,” some fleets may be unable to convert to zero-emission vehicles. Supporting depot charging can also help to ensure that fleets that are driving through communities when they “come home” can electrify and charge at their depots, which often are located in communities.

Depot charging can also help to maximize the total cost of ownership of the vehicles, thus providing an additional incentive for fleets to switch to zero-emission versions of their vehicles. This is because the cost of electricity may be cheaper than diesel, especially if the fleets are able to shift charging to off-peak hours or participate in load management programs, underscoring the importance of utilities developing rates that maximize the benefits to fleets and the electric grid.

4. Strengthen and Ensure Investments in Overburdened Communities

Regarding the overburdened communities/ EJ communities portion of the Straw Proposal, NRDC recognizes and supports the leadership and expertise of the NJ based environmental justice organizations and allies and incorporates by reference the comments submitted by the New Jersey Environmental Justice Alliance and Clean Water Action addressing the Straw Proposal.

5. Provide clarity on the “Last Resort Model”

As previously discussed, utilities have a unique role to play to support the build out of EVSE infrastructure throughout the state. While we support and agree on the importance of private investments in this space, during the nascent market, the BPU should also ensure that there is flexibility in the utilities’ role. While Staff acknowledges the role of utilities, the Straw Proposal only offers a broad definition of “Last Resort”¹¹ without providing any specifications as to how this process would work.

¹¹ “Last Resort” are locations that have not generated private investment interest for a minimum of 12 months after an EDC program has begun for Overburdened Communities, or 18 months for other areas. EDCs may petition the Board to own and operate MHD specific EV charging stations in these areas after those timeframes.” Straw Proposal at 6.

Therefore, the BPU should make sure this last resort process is clearly outlined with clear guidance and expectations from utilities, the private sector, and site hosts. For example, what does a utility consider “private investment interest.”

6. Utility MHDV Filing Cost-Effectiveness Analysis Must Count Societal and non-Economic Benefits

The Board’s Final Order should enumerate the types of costs and benefits to be considered as part of MHDV program filings. Moreover, those benefits should include a broad range of societal benefits including non-energy benefits, such as the social cost of carbon, reduction in criteria pollutants, public health benefits, and specific benefits that accrue to low-income communities, among others. The inclusion of such benefits is consistent with more recent policy guidance and Board Orders issued by the Board, as well as New Jersey’s energy policy.

The inclusion of societal and non-energy impacts (“NEIs”) is required by recent legislation, Board Orders, and policy guidance.¹² In its Final Order on light-duty vehicle MFR’s the Board made a determination that New Jersey’s residents, businesses, economy, and environment would benefit from the widespread adoption of EVs.¹³ The Board further concluded that “. . . electrification of the transportation sector **benefits all New Jersey residents.**” (emphasis added).¹⁴ Based on this, we recommend the Board utilize the NJ Cost Test (“NJCT”) as the starting point for the types of costs and benefits to be evaluated as part of utility MHDV filings.

The benefits enumerated in the NJCT reflect the most up-to-date thinking on non-energy benefits in New Jersey and should be the starting point for the types of benefits and costs included in the MHDV Final Order. On August 8, 2020, the Board issued an Order on the NJCT; a test that, in addition to traditional energy costs and benefits, included “non-energy impacts that are relevant to New Jersey’s policy goals and can be applied based on readily available research and industry consensus.”¹⁵ In designing the test, the Board created 4 categories of costs and benefits: (1) utility system costs, (2) utility system benefits; (3) non-energy impacts, and; (4) global inputs.¹⁶ The Board further justified the inclusion

¹² For instance, the Clean Energy Act requires cost-effectiveness testing to include non-energy benefits.

¹³ See Board Order, Electric Vehicle Minimum Filing Requirements, at 24.
<https://www.nj.gov/bpu/pdf/boardorders/2020/20200923/8F%20-%20ORDER%20Electric%20Vehicle%20MFRs.pdf>

¹⁴ *Id.* at 26.

¹⁵ NJ Cost Test Order, at 4.

¹⁶ *Id.* at 6-7.

of NEIs because they, “will ensure that the NJCT reflects a symmetrical treatment of costs and benefits and accounts for the full range of benefits that are not captured in traditional avoided costs.”¹⁷

At a minimum, the Final Order should include the same categories of benefits and costs, and inputs from the NJCT including:

- Avoided emission impacts using a 3% discount rate
- Low-income benefits
- Non-energy benefits such as public health and economic benefits.

Additional NEI’s that the Board should include are discussed in more detail in section 7 *infra*.

7. Ensure Beneficial Rate-Design—Including Load Management—to Maximize Benefits

The Straw Proposal notes that it is following the framework from the EMP, which states that New Jersey should “Design EV infrastructure policies that are fair to both EV-driving ratepayers and non-EV driving ratepayers, to ensure that the benefits of EVs are shared by all ratepayers.”¹⁸ To fully realize all of these benefits, the BPU needs to consider not only rate impacts, but also all potential societal benefits of electrification. Positive externalities (such as improved health and air quality) need to be considered as well in any cost-benefit analysis, especially the health benefits and decreased emissions that benefit all utility customers.

The Straw Proposal also notes the importance of considering other societal benefits by stating that “Such socialization is appropriate since, as noted in the 2019 EMP, EV adoption for the transportation sector will have a significant impact on the health of New Jersey residents.”¹⁹ According to a 2016 American Lung Association report, “Clean Air Future: Health and Climate Benefits of Zero Emission Vehicles,” pollution from motor vehicles resulted in \$4.6 billion in public health and climate costs to New Jersey residents in 2015.”²⁰ Additionally, a recent study by MJ Bradley and Associates found that electrifying 59% of the state’s MHDV would reduce unhealthy smog and air toxics by cutting NOx emissions by more than 144,000 metric tons and PM_{2.5} pollution by 245 metric tons and improve public

¹⁷ QO20060389, In the matter of the Clean Energy Act of 2018 – New Jersey Cost Test, Order Adopting the First New Jersey Cost Test at 16 (Aug 24, 2020) (“There are three general types of non-energy impacts (‘NEIs’): (1) utility NEIs, such as reduced arrearages and debt collection costs; (2) participant NEIs, such as reduced operations and maintenance costs; impacts on occupant health and productivity; and increased property values; and (3) societal NEIs, such as economic development, environmental, and public health impacts.”), *available at* https://publicaccess.bpu.state.nj.us/DocumentHandler.ashx?document_id=1224602.

¹⁸ Straw Proposal, at 10.

¹⁹ *Id.*

²⁰ American Lung Association, Clean Air Future, Health and Climate Benefits of Zero Emission Vehicles, at 14. (Oct. 2016).

health by avoiding nearly 136,000 respiratory-related illnesses, 250 hospital admissions and emergency room visits, and 230 premature deaths.²¹

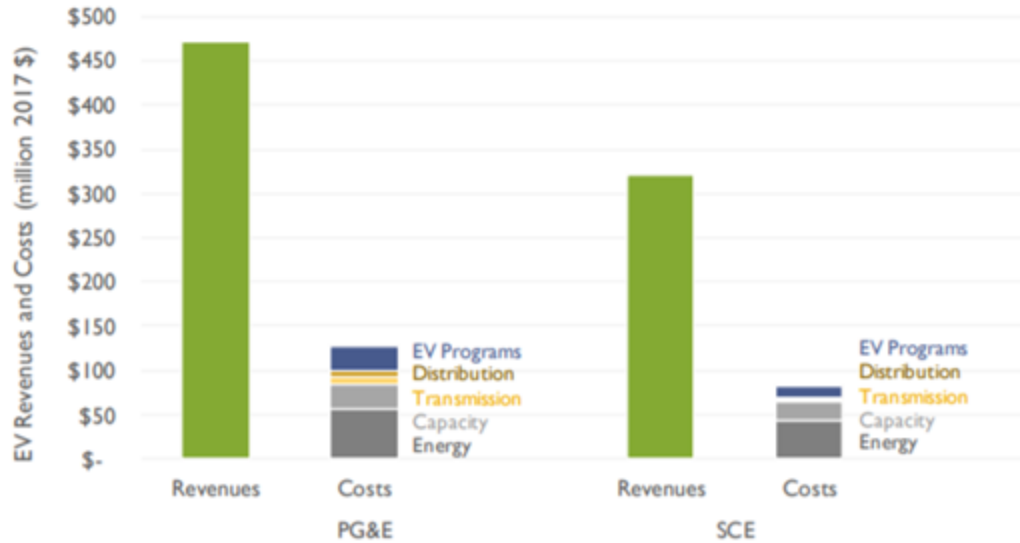
In addition to the air and health benefits, a well-designed EV program will provide benefits to all New Jersey utility customers. EV investments, including those by utilities, can put downward pressure on rates for all utility customers—regardless of whether they own an EV. An analysis by Synapse Energy Economics entitled “Electric Vehicles are Driving Electric Rates Down” analyzed real world data from the two utility service territories with the highest number of EVs in the country (PG&E and SCE) and found that EVs are already putting downward pressure on rates—with EV drivers in PG&E and SCE territory contributing nearly \$600 million more than associated costs to serve them.²² Accordingly, the benefits of EVs are not just environmental; as that study appropriately concluded: “EVs offer a key opportunity to reduce harmful emissions and save customers money at the same time.”²³

Synapse evaluated the revenues and costs associated with EVs from 2012 through 2018 in PG&E and SCE service territories. They compared the new revenue the utilities collected from EV drivers to the cost of the energy required to charge those vehicles, plus the costs of any associated upgrades to the distribution and transmission grid and the costs of utility EV programs that are deploying charging stations for all types of EVs. In total, EV drivers contributed an estimated \$584 million more than the associated costs. And this finding is not merely a result of the fact that most EV drivers in PG&E and SCE territory remain on default rates and pay high upper-tier prices as a result. Even if three in four were on time-of-use rates designed for EVs, those drivers would still have provided approximately \$450 million in net-revenues.

²¹ M.J. Bradley & Associates, *New Jersey Clean Trucks Program* (Oct. 2021) available at <https://www.ucsusa.org/sites/default/files/2021-10/nj-clean-trucks-report.pdf>

²² Synapse Energy Economics, *Electric Vehicles are Driving Electric Rates Down* (Feb. 2019) available at <https://www.synapse-energy.com/sites/default/files/EVs-Driving-Rates-Down-8-122.pdf>

²³ *Id.*



Were comparable analysis done in New Jersey, the results would almost certainly be similar, though the net revenue would be smaller given the lower number of EVs in New Jersey. EV drivers in New Jersey are likely already putting downward pressure on utility rates to the benefit of all customers. And those benefits will continue to grow in the future as additional vehicles are added to the grid.

To fully ensure that low-income customers are not burdened with additional rates and costs, the BPU should direct utilities to rate base M&HDV electrification for the Commercial and Industrial rates only and now allow residential rates to be impacted for these use cases.

8. Consider Additional Rate Design and Load Management Options Beyond TOU Rates and the “set-point”

The Straw Proposal notes the importance of rate design reform to “encourage rapid deployment for MHD vehicles across the state,” and recommends that utilities propose voluntary “EV-only TOU rates” as well as mechanisms to “mitigate demand charges associated with EV charging.”²⁴ However, the BPU should consider additional long-term sustainable rates that consider best practices from around the county, as well as consider specifications to maximize the benefits of a TOU rate.

a. Demand Charge Mitigation

The Straw recommends that each utility propose a mechanism to mitigate demand charges for EV charging “in the early days of adoption.” and that the “methodology may include an EV charging rate, or a rebate methodology that ensures that the effective \$/kW-hour rate (i.e., the demand charge averaged

²⁴ Straw Proposal at 16.

over the number of kW-hours used in a given month added to the standard \$/kW-hour rate) remains below a specified “set point.” Or alternatively, that the utility could waive a percentage of demand charges for 5 years.²⁵

However, this is a blunt and short-term solution that does not address the larger issues concerned with demand charges and placing charging stations in the same rate class as commercial and industrial buildings. The Board should look to implement long-term, sustainable solutions in lieu of open-ended subsidies and band-aid approaches. It is important to note that even with high EV penetration, some societally beneficial charging locations will never experience the high levels of utilization that would enable the site host or fleet operator to assimilate current demand charges and build a viable business model. Consequently, time-limited demand charge relief is not a viable long-term solution to overcoming the issues demand charges pose to site-hosts and fleet operators.

For public charging infrastructure, it is critical to develop rates that more accurately reflect the unique characteristics and costs of EV charging, rather than forcing stations to take service on commercial and industrial rates designed for large buildings and factories. Rate designs for high-powered transportation electrification use cases should impose demand charges only to the extent absolutely necessary, and instead recover costs through more predictable rates where possible.

Synapse Energy Economics recently released a report on best practices for C&I EV rate reform. In its report, Synapse notes that “[t]raditional C&I rates were generally designed for large buildings, rather than for public fast charging of passenger vehicles or for depot charging of truck and bus fleets” and those rates “do not reflect the unique costs or flexibility of EV charging and can charge commercial EV customers much more than their true cost of service.”²⁶ Time-limited discounts are not a sustainable solution, and utilities and regulators should develop new C&I rates designed with EV use cases in mind that are both cost-reflective and take advantage of the unique characteristics and flexibilities of EV load. Synapse offers the following principles for C&I rates:

- Rates should promote efficient use of fixed system resources, which will reduce rates for all utility customers;
- Rates should be easy to understand and predictable;
- Rates should be designed with end users in mind;

²⁵ *Id.*

²⁶ Synapse Energy Economics, prepared for NRDC, *Best Practices for Commercial and Industrial EV Rates*, at 1. (Jul. 13 2020) available at: https://www.synapse-energy.com/sites/default/files/Best_Practices_for_Commercial_and_Industrial_EV_Rates_18-122.pdf

- Time-varying volumetric rates are generally preferable to demand charges;
- Non-coincident peak demand charges should generally be avoided;
- It may be appropriate to set rates to recover marginal costs rather than embedded costs; and
- Programs that rely on price signals inherent in rate design to deliver grid and user benefits should ensure users actually see those price signals.²⁷

Synapse recommends time-of-use energy charges or critical peak pricing over coincident demand charges for recovering the costs of shared infrastructure, since energy charges better capture the duration of time that a customer is using that infrastructure. And Synapse cautions that, while limited non-coincident demand charges may be appropriate for recovering distribution infrastructure costs sized to meet the maximum demand of a single customer, “non-coincident demand charges are often set too high and recover costs that are not truly driven by individual customer peaks.”²⁸ We urge the Board to consider Synapse’s recommendations in moving forward with new C&I rate design, including the prioritization of time-varying volumetric rates over demand charges and to avoid non-coincident peak demand charges altogether.

b. TOU Rates for MHD Fleet EV Chargers

Time-of-use rates can be an effective strategy to shift charging load to off-peak hours and during times where there is excess electricity on the grid. To increase uptake on this rate, the utilities should make TOU rates part of the program design, with an opt-out option for fleets who do not wish to get on this rate. However, price signals are only effective if they are seen by the right people. Accordingly, utilities must be able to condition participation in their EV program upon terms needed to manage EV load, including making the default arrangement one in which drivers are encouraged to charge in a manner that supports the grid by actually seeing the underlying TOU price signals to change their behavior. Site hosts who do not wish to abide by such conditions need not participate in such voluntary, customer-funded programs.

The BPU should also direct utilities to consider additional programs that can help support the grid, such as actively managed charging programs. Further, for fleets with vehicles with set schedules and long dwell times, the BPU should direct utilities to consider vehicle-to-grid technology opportunities.

²⁷ *Id.*

²⁸ *Id.* at 9.

9. Ensure Coordination with Other NJ Programs

The Final Order, and eventual filings, under this program should be required to explain how and why utility investments in this sector will interface and support other transportation electrification programs in New Jersey, such as the NJ ZIP program at EDA, and the PACT proceeding underway at the DEP. In addition to coordinating with other vehicle programs, the Board must coordinate with other clean energy programs, including its solar successor program, community solar program, AMI program, energy efficiency programs, and eventual energy storage and building electrification program. All of these programs touch on resources that exist “behind the meter,” and therefore all of the programs impact the state’s distribution system and achievement of the state’s clean energy goals. Therefore, no program should operate in a silo, but instead, operate in a synergistic manner to maximize the benefit for every dollar spent. To that end, utilities with multiple filings or active programs in those clean energy areas should be encouraged to leverage their multitude of programs to provide energy customers with a broad array of mutually beneficial clean energy options.

10. Establish a Working Group with Stakeholder Input and a Robust Pathway for Program Modification

In order for the MHDV proposal and future programs to be successful, the Board should establish several stakeholder working groups composed of utilities, government agencies, the private sector, and Non-governmental Organizations, to evaluate, provide input, and iterate on program design. Coupled with the standing stakeholder working groups, the final order should provide a clear pathway for utilities to modify existing programs, modify incentive levels, and add or subtract programs to maximize the benefit from utility investment in the programs.

We recommend that the Board require utilities to report on program performance on a semi-annual basis, with annual program year reports due to the stakeholder working group, which could evaluate program success and identify areas for improvement. Then, those stakeholders should be permitted to provide recommendations to the utilities and to the Board. Following the evaluation of stakeholder recommendations, the Board should then direct utilities to modify or retire existing programs or launch new programs to address the concerns and areas for improvement identified in stakeholder recommendations.

11. Reject the Parallel Policy Development Track

To expedite the process and ensure consistency across the State, the Board, utilities, and stakeholders should work to avoid a parallel policy development track. In particular, it is crucial that the full requirements of utility MHDV filings are determined before the utilities file program plans. This will

allow full evaluation of utility proposals against current law and current policy guidance provided by the Board. Importantly, it will also provide a pathway for cases to be fully adjudicated or settled without holding portions in abeyance pending future policy determinations. The ultimate effect of this effort would be a more holistic approach to EV infrastructure and a smoother timeline from program filing to program launch.

12. Utilize the SBC funds to think holistically about charging station initiatives

The Board should inventory all *existing* sources of funding to determine what, if any, additional funding sources exist to assist in the build out of charging stations. The funding source with the most flexibility is the Clean Energy Fund, funded by the SBC and administered by the Division of Clean Energy. Spending for programs utilizing the SBC are determined annually through the Comprehensive Resource Analysis Process and can be modified through various compliance filings and true ups. The BPU should undertake a process to identify areas that are underfunded and “gap fill” with SBC funds. Given the broad societal benefits from vehicle charging initiatives, it is an appropriate use of SBC funds

III. Conclusion

We appreciate the opportunity to provide input on the Straw Proposal and applaud the Board for moving forward on a program to rapidly expand New Jersey’s EVSE infrastructure. The state, EDCs, and EVSE companies all have critical roles to play for New Jersey to meet the ambitious targets contained in the EMP, GWRA and PIV Law. As the Board further develops its Straw Proposal, the Commenters urge the Board to act with an open-mind and prioritize the principle of flexibility that will allow New Jersey to electrify its transportation sector rapidly.