Submitted Via Email

October 5, 2021

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

RE: In the Matter of Medium and Heavy-Duty Electric Vehicles Charging Ecosystem Docket No. QO21060946

Dear Secretary Camacho-Welch:

These comments on the NJBPU Electric Vehicle Straw Proposal Process (Docket # QO21060946) are submitted on behalf of Jersey Renews and seven partner groups below, all committed to building an inclusive green economy that lifts people out of poverty by creating good, union jobs and prioritizes the health of New Jerseyans who live and work on the frontlines of our transportation and logistics industries. Jersey Renews is a state-based coalition of 70 labor, environmental and community groups fighting for climate action and good, family-sustaining jobs in the transition to a green economy. We wish to stress that the electrification of medium and heavy-duty vehicles (MHDVs) specifically is essential for our climate, our communities, and our health.

The transportation sector represents the largest source of GHG emissions in New Jersey, at 42% of statewide emissions. Throughout the State, millions of New Jersey residents are suffering from the damaging effects of living with unhealthy air quality -- in the American Lung Association's 2021 State of the State Report eight counties received an "F" for air quality. Due to a history of discriminatory land use policies and structural racism, the worst of this pollution burden is concentrated in New Jersey's low income communities and communities of color, with the majority of bus and freight depots located near or within BIPOC and low-income neighborhoods.

Electrification of medium and heavy-duty vehicles is critical to put New Jersey on a path to reduce GHG emissions, particulate matter (PM2.5), Black Carbon, and NOx in port and freight-adjacent communities. According to a MJ Bradley report, emissions of PM2.5, black carbon, and NOx from non-roadway sources, particularly locomotives and port operations, have the highest air quality impact in the total study area, followed by medium- and heavy-duty vehicles. The emissions exposure from these vehicles tends to be more concentrated than from passenger vehicles - for example, given that most port trucks do short distance hauls, the localized public health and environmental benefits of electrifying port vehicles will be particularly significant for the surrounding communities, whose populations are often predominantly low-income and people of color.

Governor Murphy has set ambitious medium- and heavy-duty (MHD) electrification goals, such as 30% of all new MHD vehicle sales being electric by 2030 and creating numerous programs such as NJZIP to get these vehicles out on the roads. However, the charging infrastructure has yet to follow. The two biggest barriers to medium- and heavy-duty electrification in New Jersey right now are a lack of charging

infrastructure and cost. Programs such as NJZIP and the RGGI and VW Settlement funding provided by NJDEP help address the cost issue. This straw proposal is the first real attempt to address the lack of charging infrastructure.

Increasing the number of electric trucks on the road can also create good new jobs in EV infrastructure such as charging station installation and grid upgrades, as well as in the trucking and logistics industries themselves. As part of creating good jobs, labor standards must be followed and there must be recognition of properly trained installers of infrastructure including charging stations.

In the wake of a public health crisis that's worsened by air pollution and that has left thousands of New Jerseyans unemployed, we need policies like this one that can put people back to work tackling climate change and making our communities healthier. NJBPU should target investments in medium and heavy-duty vehicle electrification to ensure jobs, economic, health and environmental benefit to those worst impacted by our climate, public health and inequality crises -- BIPOC and low-income communities.

Following are a set of recommendations to make that happen:

1. Utility investment and public-private partnerships are critical to jumpstart the market for charging infrastructure. At the August 26th stakeholder meeting, three different speakers spoke about electric vehicle programs they have underway and how instrumental the utilities were in getting them off the ground by helping to provide charging stations. Additionally, the majority of medium- and heavy-duty vehicles in New Jersey are trucks, not buses, that can utilize depot charging. This should be the main focus of public investment.
2. The definition of MHDV should be expanded from 4-6 for medium-duty and 7-9 for heavy-duty to also include classes 2b and 3. This is necessary to achieve program goals and to offer clear guidance. It would also then standardize the definition of MHDV and LDV across state agencies.
3. Invest in electrification for the NJ Transit bus fleet at its bus depots. As of now, the released proposal does not address the electrification of NJ Transit buses, despite the fact the 2020 EV Law, (P.L. 2019, c.362), requires the agency to electrify half of its new bus purchases by 2032. Fulfilling this ambitious mandate will require a significant expansion of charging infrastructure, and the straw proposal should include a plan for the build-out of this infrastructure. NJ Transit is set to launch two pilot EV bus programs which include eight electric buses in Camden and additional buses on the #25 route in Newark. Currently, four NJ Transit bus garages in Jersey City, Camden, Maplewood and Hamilton are slated to be the first to be retrofitted with charging infrastructure.
4. Invest in the electrification of school buses across the state. School bus electrification is an extremely important step to protect the health of children, drivers and school staff equitably across districts and provides an ability to test energy storage through vehicle to grid. Funding for electric school buses and infrastructure should be prioritized in the updated proposal.
5. Leverage all federal funding once it becomes available. EPA announced that they will fund $7 million for electric school bus rebates in underserved communities through the American Rescue Plan, which reinforces the prior point on the omission of school buses. As more money is made available, the BPU must ensure the state is in a position to take full advantage of available federal dollars to push forward the state's transportation electrification goals.

Finally, in order to meet climate reduction goals and ensure that workers and communities are not left behind in the process, MHDV electrification should be undertaken alongside measures to:

- **Support workers and communities** who may experience job loss due to the transition to a renewable energy-based economy to ensure they are not harmed.
- **Bolster the domestic manufacturing** supply chain for EV transportation, infrastructure and renewable energy generation.
- **Address cyber security** issues proactively.
- **Modernize the grid strategically** to ensure that it can meet the increased demand from transportation electrification in a reliable and resilient manner.

Thank you for the opportunity to comment.

If you have any questions or require clarifications, please do not hesitate to contact Berenice Tompkins at btompkins@njwec.org.

Sincerely,

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