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VIA E-FILING & EMAIL

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
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RE: In the Matter of Medium and Heavy-Duty Electric Vehicle Charging Ecosystem (BPU Docket No. QO21060946)

Dear Secretary Camacho-Welch:

On behalf of ChargePoint, Inc. ("ChargePoint"), we appreciate the opportunity to offer the enclosed comments of ChargePoint in the above referenced matter.

Consistent with the Board's Order dated March 19, 2020, in Docket No. EO20030254 temporarily waiving certain requirements for non-essential obligations, we are submitting only electronic copies of this filing.

Thank you.

Respectfully submitted,

Murray E. Bevan

Enclosure

I. Introduction & Background on ChargePoint

On June 30, 2021, the New Jersey Board of Public Utilities ("BPU" or "Board") Staff ("Staff") released its *New Jersey Electric Vehicles Infrastructure Ecosystem 2021 Medium and Heavy Duty ("MHD") Straw Proposal* ("Straw Proposal").

ChargePoint applauds BPU Staff for the proposed MHD EV Ecosystem ("Ecosystem") Straw Proposal. We appreciate the opportunity to offer these comments in response to the proposed program design, as well as related issues raised in the Straw Proposal. In addition to our comments below, ChargePoint respectfully requests stakeholders be afforded an opportunity to submit reply comments. ChargePoint recommends reply comments be submitted no later than October 25, 2021.

In summary, our comments are as follows:

- The Shared Responsibility Model provides a practical framework for the growth of MHD EVs in New Jersey;
- The Board should reconsider the exclusion of Private Fleets that are not designed for public use from any Make-Ready support in addition to its proposal for an EDC-Industry working group to address non-public MHD EV Ecosystem Infrastructure;
- The BPU should establish a longer horizon for designating "Last Resort" sites to ensure that the Straw Proposal's intent to develop a private MHD EV market is not lapsed by the limited window outlined;
- Site planning in preparation of MHD EV charging infrastructure deployment should be an interactive, non-prescriptive process led by a partnership between private-industry hosts and EDCs;
- Fleet Planning Services should emphasize that fleet operations and grid impacts of high-draw loads can be most efficiently managed through smart EVSE;
- Tariff-based solutions should address the adverse effects of demand charges particularly on MHD EV adopters and provide on-ramps as utilization scales; and
- We recommend certain modifications to Staff's proposed terminology.

A. Background on ChargePoint

ChargePoint is the leading electric vehicle (EV) charging network in the world, with scalable solutions for every charging need and for all of the places that EV drivers go: home, work, around town, and on the road. ChargePoint's network offers more than 113,000 places to charge, including more than 1,696 spots in New Jersey, and those numbers continue to grow. With thousands of customers in several verticals including workplaces, cities, retailers, apartments, hospitals, and fleets, ChargePoint provides an integrated experience enabling consistent performance, efficiency and reliability at every touchpoint whether one is using a mobile app, plugging into a charger, managing the station or analyzing charging data. On the network, drivers

have completed more than 78 million charging sessions, saved upwards of 93 million gallons of fuel, and driven more than 2.2 billion electric miles.

ChargePoint delivers scalable solutions that enable businesses to support more drivers, add the latest software features, and expand their electric vehicle and fleet needs with minimal disruption to overall business. Hardware offerings include Level 2 (L2) and DC fast charging ("DCFC") products, and ChargePoint provides a range of options across those charging levels for specific use cases including light and medium duty and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. All products are UL-listed, ENERGY STAR® and CE ("EU") certified, and the modular design minimizes downtime and makes maintenance and repair more seamless.

ChargePoint's primary business model consists of selling its smart charging solutions directly to businesses and organizations while offering tools that empower site hosts and station owners to deploy charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven and cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

II. Comments on Medium and Heavy Duty Electric Vehicle Ecosystem Straw Proposal

A. The Shared Responsibility Model provides a practical framework for the growth of MHD EVs in New Jersey.

In the Straw Proposal's modified "shared-responsibility" model for MHD infrastructure, "EDCs would be responsible for the wiring and backbone infrastructure necessary to enable a robust number of publicly accessible or public-serving MHD Make-Ready locations… EVSE Infrastructure Companies, site owners, and industry using private capital, would be primarily responsible for installing, owning and/or operating, and marketing MHD EVSE to customers."

ChargePoint supports that the foundation of the "shared-responsibility" model can appropriately highlight the respective strengths of the EDCs and the competitive market, including site hosts, vendors, and EV infrastructure companies. Transitioning NJ's MHD market requires the coordination of all players across the EV ecosystem to meet the state's MHD electrification goals.

While ChargePoint supports that transportation electrification at this scale requires a robust deployment of private capital, we caution the Board against adopting a "shared responsibility" model that excludes appropriate incentives to support the investments non-public serving private fleets will also be required to make in this transition. The technical, complicated nature of the behind-the-meter work requires infrastructure investments whose impact stretches beyond the private fleet operator. Moreover, providing no behind-the-meter support to private fleet operators not serving the public will present businesses with a level of investment cost uncertainty that could discourage how rapidly they choose to transition to electric vehicles. Given the extent to which the benefits of electrifying MHD vehicles will be shared, ensuring that businesses have the support to upgrade their utility-facing infrastructure is critical to promoting the electrification of all fleets. Further, providing EDC incentives for utility-facing infrastructure can be coupled with the operators' management of the large charging profiles of MHD vehicles, ensuring that these loads are safely integrated onto the electrical grid.

ChargePoint believes that the "shared responsibility" model can be effectively employed by incenting private capital for "Last Resort" cases rather than using ratepayer funds to allow for EDC ownership. By leveraging EDC incentives before conferring "Last Resort" status to these sites, ChargePoint believes these locations and communities will effectively attract private sector investment to deploy MHD EVs and equitably scale and distribute the benefits of clean, electric transit to all New Jerseyans.

Lastly, ChargePoint also requests clarification of how Board Staff has defined 'publicly accessible' with respect to private fleets. In the Board Staff's Section 3 for the "Proposed Role for Private Investment and EDCs for Private Fleets," Staff states that "EDCs should not incentivize charging infrastructure for private fleets." The recommendations in Section 3 do not clarify nor specify whether these are non-public serving private fleets and is inconsistent given the distinction made throughout the Straw with respect to private fleets and their eligibility for EDC support. We ask for clarification on how to interpret and apply a definition of 'publicly accessible.'

B. The Board should reconsider the exclusion of Private Fleets not for public use from any Make-Ready support in addition to its proposal for an EDC-Industry working group to address non-public EV Ecosystem Infrastructure.

The Straw Proposal states that "while EDCs should not incentivize charging infrastructure for private fleets, the EDCs should provide technical assistance, including the development and hosting of customer accessed fleet planning and modeling tools, to private fleets interested in EV adoption to ensure adequate charging infrastructure is planned for and incorporated into the grid." However, the Straw Proposal's stated intent is to "encourage uniform treatment and standard footprint solutions in all EDC territories." ChargePoint submits that the exclusion of incentives for private fleets that are not designed for public use will prevent MHD EV deployment from evolving at equitable scale across the state, particularly in areas defined as Overburdened Communities, which are more likely to have greater exposure to emissions from MHD vehicles in general. Additionally, while some businesses will be able to incorporate public charging

infrastructure into day-to-day operations, the majority of MHD fleets will use private depots to charge their vehicles. As MHD charging in NJ develops, a fleet's home base will be where the majority of charging happens. Businesses cannot rely on public infrastructure given the unpredictability of scheduling and charger availability at a public site, which bolsters the need for utility-side support. In this early market, EDC incentives for non-public charging can incentivize private investment in the market.

ChargePoint suggests a modification to the Straw Proposal to pair the prescribed technical assistance with measured EDC incentives to support private MHD EV operators looking to electrify their vehicles. ChargePoint agrees that there is an appropriate role for shareholder over ratepayer funds in the development of this market but cautions the Board from a myopic outlook on the needs of private sector actors that may discourage electrification and diminish the potential benefits of clean transit across NJ. During the August 26, 2021, Medium and Heavy Duty EV Stakeholder Meeting, Assistant Deputy Rate Counsel Maura Caroselli shared that developing infrastructure particularly in Overburdened Communities will require that all stakeholders employ creative solutions to reduce the burden on ratepayers, including providing "incentives to the private companies who drive the bulk of the medium and heavy-duty delivery trucks through overburdened communities on a daily basis." With the support of EDC incentives, private industry can effectively deploy EV charging infrastructure to respond to community needs and enable more equitable access to electric transportation.

The bulk of the emissions from the transportation sector often traverse through the most concentrated, low-income communities and the impact of private investment can greatly affect how the benefits of clean transit are shared. In the Straw Proposal, Staff highlights the overwhelming human health and environmental benefits associated with the MHD sector. In NJ, MHD vehicles account for 42% of transportation-related emissions of nitrogen oxides and 63% of sulfur oxides, contaminants that cause asthma and premature death. The American Lung Association estimates that transitioning MHD transit in NJ would account for $2 billion a year in public health benefits by preventing 200 premature deaths, at least 2,300 asthma attacks and 11,000 lost workdays in the state.[1] By excluding non-public serving private fleets from EDC incentive programs, the Straw omits a critical element for the state to meet its transportation electrification goals, as well as the critical health and environmental benefits associated with increased electric transit.

ChargePoint supports that "partial" rebates can be leveraged to encourage businesses to electrify their fleets, while still promoting a competitive private market and keeping the onus of the investment on the site host. However, the proposed "shared responsibility" model disqualifies a need for private sector incentives, which will, in turn, manifest as a deterrent for investors in the NJ MHD EV market.

[1] https://blogs.edf.org/energyexchange/2021/05/19/new-jerseys-road-to-clean-transportation-revs-up-with-advanced-clean-truck-rule/

Within the modified "shared-responsibility" model, Staff has also proposed that, "an EDC-Industry working group be created to address concerns regarding non-publicly accessible MHD EV Ecosystem infrastructure, which may not be eligible for direct ratepayer support, but still involves complicated interconnection, local generation and storage, potential wholesale market participation, and other technical issues."

As addressed above, ChargePoint proposes amending the Straw Proposal to allow direct ratepayer support for non-publicly accessible MHD EV investments. Where EDC incentives are not applied, ChargePoint believes that this working group is a suitable complement to support the MHD EV Ecosystem in NJ. The development of NJ's MHD EV market will require cooperation of all stakeholders across the EV ecosystem and targeted stewardship of businesses converting their fleets to electric transit. NJ's goal that 100% of all new MHD vehicles be zero emission vehicles by 2050 necessitates that the station operators and hosts have access to resources that will streamline their transition to electric-fueled vehicles. In many scenarios, businesses will have had limited experience engaging with their utilities and managing issues such as site EV-readiness and encouraging off-peak charging behavior. In tandem with the technical information EDC's can provide, ChargePoint encourages the working group to lean primarily on private fleet operators to guide businesses moving towards electric transit. Ultimately, private industry will seek out and make the least-cost investments. Providing a forum where peer-to-peer information can be shared will make the working group a valuable resource for best practices as operators consider these investments.

C. The BPU should establish a longer horizon for designating "Last Resort" sites to ensure that the Straw Proposal's intent to develop a private MHD EV market is not lapsed by limited window outlined.

ChargePoint agrees with Staff's assessment of the parameters defining the appropriate role of the EDCs as ensuring that sites are EV-ready, and that the EDCs would be entitled to request recovery of such upgrade costs through rates.

However, ChargePoint does not support an undefined broader role for the EDCs to deploy beyond Make-Ready when the market has not (yet) responded in a designated area. As detailed earlier in these comments, ChargePoint supports EDC incentives for private industry in the defined "areas of last resort." Moreover, leveraging such incentives in Overburdened Communities can help support the Straw Proposal's intention to limit the EDCs' role given that "they have no particular expertise in maintaining, marketing or operating EVSE."

The Straw Proposal defines Last Resort as "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." While ChargePoint echoes the concerns of stranded or unsuitable investments on behalf of the EDC, the short

deadline outlined for EDC investment to overtake in "Last Resort" scenarios will present as a strategic business impediment for private sector investment.

ChargePoint urges the Board to modify the above language and discourages consideration of EDC ownership of charging infrastructure before 3 years in such locations to avoid undue harm to the market prompted by setting a short window for the development of Last Resort areas. The timeline in the "shared responsibility" model must be modified to allow for private investment – as clearly defined as integral to MHD EV development in Overburdened Communities and for the whole NJ market – to take place across the state before allowing EDC ownership of EV charging stations.

Authorizing EDC expansion after only 18 months presents private actors with a zero-sum business opportunity where if they have not successfully developed – by uncertain metrics – new market for MHD EV vehicles or expressed interest in designated areas within a year and a half, the EDC can directly own and operate these low impact areas' market for MHD EV charging. Private industry will likely not be encouraged to invest, nor will they overtly express interest in developing these locations if the EDCs are essentially guaranteed access to this market. Moreover, the limited timeline preceding EDC intervention is being proposed as – at the time of the submission of these comments – Congress is negotiating a comprehensive federal infrastructure package with $15 billion earmarked for EVSE, electric transit and school buses.[2] This bill will undoubtedly create a significant shift in the MHD market. Premature EDC intervention in advance of the potential disbursement of federal dollars could unduly dispense ratepayer funds where federal funds could be applied.

ChargePoint stresses this looming jump to EDC ownership will not only nullify the Straw Proposal's intent for private capital to substitute ratepayer dollars where possible, but will also contribute to higher ratepayer costs than capital costs incentives. As explained by The Utility Reform Network ("TURN"), a leading consumer advocate, "utility ownership of charging stations is more costly for ratepayers than a customer ownership model. This is because under a utility ownership model, the costs of the charging stations are included in rate base and subject to a...rate of return for the charging station's useful life, which [is assumed to be] 10 years."[3] TURN further explains that utility ownership of charging stations necessitates ongoing operation and maintenance costs, which would be borne by ratepayers.[4]

Furthermore, Atlantic City Electric's ("ACE's") testimony regarding its approved Plug-In Vehicle ("PIV") program made apparent that privately-owned charging stations deployed under ACE's PIV program provide more than double the net benefits than utility-owned and operated

[2] https://static.politico.com/0a/08/398515524e38ab4807521dcfbd92/bipartisan-infrastructure-framework-two-pager-final-7.pdf

[3] Opening Brief of The Utility Reform Network (TURN) on San Diego Gas & Electric's Power Your Drive Extension Program at 22. Application 19-10-012. (October 28, 2019).

[4] Id. At 22.

stations.[5] Given the reduced ratepayer costs for private ownership of stations, ChargePoint asks the Board to consider appropriate incentives that will reduce the need for EDC ownership and cultivate a more level playing field for the development of the MHD EV market in NJ.

ChargePoint maintains that measured, targeted incentives can effectively drive private sector interest in the development of MHD EV ecosystems in these communities. This sentiment is echoed in the Board's Order adopting the minimum filing requirements for the *Build Out for Light-Duty, Publicly Accessible Electric Vehicle Charging* with respect to Last Resort Locations. Once the Last Resort process has been triggered, Staff recommends that once a utility begins construction for a site to be EV-ready, "[the utility] must publicly advertise the location and offer private EVSE owners with the opportunity to own the charger, with an incentive of up to 50% of the utility's capital costs for installing the charger."[6]

ChargePoint recommends the Board allow the MHD EV ecosystem to develop in the same manner and provide as many avenues as possible for the development of a competitive, private market in Last Resort locations. Barring any measure of EDC rebates for private investment would be inconsistent and would attenuate future private investment in the areas most impacted by transportation related pollution.

While we reiterate our support for EDC incentives to the private sector as the most cost-effective mechanism to advance the development of "last resort" locations, in the instance where the Board has determined a site requires EDC intervention, ChargePoint recommends the Board make case-by-case considerations to determine the best way to catalyze MHD EV adoption at such sites. Through this process, ChargePoint urges that each filing for utility ownership of chargers in areas of Last Resort include, at minimum: justification for each site as an area of last resort, including available data for MHD thru-traffic; the proposed costs for installation, forecasted ownership and maintenance expenses for the anticipated life of the asset; site host choice of at least two vendors for both hardware and software; and site host ability to establish pricing for EV charging services.

Consistent with recent Board decisions approving PSE&G and ACE's "EV programs,"[7] ChargePoint requests that the Board continue to ensure that any utility-owned Last Resort EV chargers allow

[5] ACE Direct Testimony, Mark Warner at 54-59.

[6] New Jersey Board of Public Utilities, *Order Adopting the Minimum Filing Requirements for Light-Duty, Publicly-Accessible Electric Vehicle Charging*, BPU Docket No. QO20050357 at 14, September 30, 2020.

[7] New Jersey Board of Public Utilities, *Decision and Order Approving Stipulation in the Matter of the Petition of the Public Service Electric and Gas Company for Approval of its Clean Energy Future and Electric Vehicle and Energy Storage ("CEF-EVES") Program on a Regulated basis*, BPU Docket No. EO18101111 at 8 and 46, January 30, 2021.
New Jersey Board of Public Utilities, *Order Approving Stipulation of Settlement in the Matter of the Petition of Atlantic City Electric Company for Approval of a Voluntary Program for Plug-in Vehicle* Charging, BPU Docket No. EO18101111 at 42 (of PDF), February 25, 2021.

the local site host to have a choice of at least two vendors for both EV charging hardware and software, as well as the ability to establish pricing for EV charging services.

Protecting customers' ability to choose their preferred solution – rather than providing a "one-size, fits-all" solution – is essential to protecting the competitive market for EV charging stations in New Jersey. When customers can choose the charging solution that works best for them, charging solution vendors will compete to make high-quality, innovative products that customers want. Creating ongoing competition between vendors through customer choice within utility programs is essential to ensuring that a competitive market can thrive and sustainably continue after they cease. In doing so, market forces can still be in play, private market actors will be encouraged to invest their own capital, and local site hosts will be able to maximize station utilization and optimize the driver experience.

D. The competitive market currently provides alternatives to utility ownership of EVSE for site hosts that do not desire to own EVSE.

There may be instances where a site host or fleet operator would like to have a charging option on their property but cannot or does not want to own or operate the charging infrastructure. In these cases, utility ownership is not the only solution. The private sector offers many different business models and products to provide turnkey solutions for site hosts, coordinating all aspects of the charging experience from installation to operation and maintenance, including solutions for site hosts that are not seeking to own or operate their own charging equipment. For example, ChargePoint offers customers a subscription solution for EV charging, "ChargePoint as a Service" ("CPaaS") that is similar to "Software as a Service" ("SaaS") models, which offer access to smart solutions at a reduced cost through subscription pricing. Under the CPaaS option, ChargePoint coordinates the installation, operation, and any needed maintenance of the charging infrastructure, providing a single point of contact for site hosts and drivers using the station. Make ready programs, and/or customer rebates for charging equipment, can enable this type of third-party ownership offering by reducing installation costs and helping to reduce the subscription cost to site hosts. ChargePoint recommends the Straw Proposal be revised to expressly encourage EDCs to enable third party turnkey solutions for all deployment options, including areas identified as Last Resort.

E. Site planning to prepare for MHD loads should be an interactive, non-prescriptive process led in partnership between private-industry hosts and EDCs.

In the Straw Proposal, Staff outlines that EDCs are responsible for developing hosting maps to identify Make-Ready sites for potential depots and where distribution upgrade costs can be minimized and concurrently, private investment, from its own determination, will develop sites to maximize accessibility in conjunction with EDC's hosting maps.

ChargePoint supports a central role for utilities in managing the grid as the development and adoption of MHD EVs in NJ increases. However, in the spirit of the Straw Proposal's intent to rely on private investment in deploying EVSE, ChargePoint recommends that the process of developing hosting maps be non-prescriptive to best leverage private industry's experience in deploying EVSE. As the private market and the EDCs concurrently develop mapping processes, where location overlap does not appear, ChargePoint urges that precedence is not given only to EDC sites, nor should a site be excluded if not identified by both parties.

The Straw Proposal outlines that the role of private investment will be to "determine where charging can be sited to maximize accessibility *in conjunction with* their own market research and the EDC's hosting maps." ChargePoint seeks assurance from the Board that the proposed EDC hosting map process will not inadvertently exclude critically important EV charging locations or participants. EDC hosting maps must be informative rather than peremptory, meaning Make-Ready MHD sites not identified on the EDC prepared maps shall not be precluded from receiving applicable incentives pursuant to ChargePoint's recommendations in these comments or from future BPU approved EDC incentives. The mapping process should integrate private industry market research – as the Straw Proposal recommends – and locations should be developed to make sites operational, even if the EDC has not identified the same site. Additionally, MHD operators and EVSE companies should not be excluded from actively informing the EDC's mapping effort and the process should allow for their input in identifying where to prioritize Make-Ready sites.

F. Fleet Planning Service should emphasize that fleet operations and grid impacts of high-draw loads can be most efficiently managed through smart EVSE.

As the "shared responsibility" model outlines, private investors will be the primary drivers for the installation, operation, and marketing of charging stations, employing EDC experience to pre-wire electrical infrastructure for future charging stations. While ChargePoint believes there is an important role for the utilities in raising awareness of the available EV charging infrastructure, many of the unique and complex factors that go into fleet electrification decisions and investments can and should be resolved through collaboration with private market actors such as a site's EVSE provider.

Future EDC fleet planning services should leverage the expertise of private actors in the MHD EV ecosystem to guide site hosts and fleet operators most efficiently in their EV transition. Beyond providing a technical education tool, ChargePoint cautions that blurring the lines between an EDC offering necessary assistance and an EDC offering input on site design could adversely affect the market for charging equipment or services. As the Straw Proposal advises, the EDC fleet planning tools and offerings should provide technical guidance that can simultaneously help businesses navigate the transition while abating grid instability. For example, questions that future site hosts may have, such as whether to integrate storage, location design, or vehicle procurement and management, fall far beyond the scope of an EDC advisory tool. As such, EDC fleet planning services should focus on education for MHD and fleet operators on how to effectively integrate

newly electrified vehicles while mitigating disruptions to business operations. To best manage many of the hurdles that users will face in the early stages of MHD EV adoption, ChargePoint encourages fleet operators to utilize the integrated support provided by networked EVSE to optimize businesses financial management and grid stability.

Additionally, ChargePoint trusts that the EDCs can be effective partners for all interested EVSE providers in their territory to share their current offerings and market to prospective customers. ChargePoint recommends that the EDCs ensure that all marketing materials and communications with customers through any fleet planning services be vendor neutral. While it is appropriate for the EDCs to encourage its fleet customers to "embrace MHD fleet electrification," it would distort the competitive markets for charging equipment and services, and for MHD vehicles, if EDCs were to promote specific vendors or vendor-specific technologies. Further, EDCs should not pick preferred providers or influence fleet operators' choice of equipment and service providers as long as the providers are capable of meeting the Company's operational requirements. In addition to our comments below on demand charges, ChargePoint also recommends that any fleet planning service integrate network services to promote managed charging at these sites given their high-anticipated draw.

G. Demand Charges.

ChargePoint is encouraged by Staff's request for demand charge alternatives. Across the EV industry, there is broad consensus that demand charges present a significant barrier to the electrification of vehicles, including MHD EV fleets. While many MHD EV vehicles have predictable charging patterns and return to their 'bases' at night, allowing for charging during off-peak sessions, those who adopt early as the industry develops will be burdened by steep demand charges.

Numerous states offer innovative alternatives to traditional, demand-based distribution electricity rates and some have passed or advanced legislation to require EDCs to develop alternatives to demand-based distribution rates to support transportation electrification. These states include New Jersey, and: California, Colorado, Connecticut, Florida, Massachusetts, Michigan, Nevada, Oregon, Pennsylvania, Utah, Virginia, Washington, and Wisconsin.

Critically, operators and hosts of MHD EV infrastructure in NJ should not be penalized by low load factors as the market moves from nascency to full-scale EV adoption. Providing on-ramps for demand charges as utilization scales at these sites ensures that businesses can accommodate charging their fleets without overburdening the grid or incurring prohibitive demand charges. ChargePoint believes that it is critical for the Board to ensure the development of long-term, sustainable, tariff-based solutions that reflect the actual costs to fleet operators and the cumulative benefits to the grid of EV load, rather than narrow solutions that delay addressing these barriers to electrifying MHD vehicles.

ChargePoint would recommend that the EDCs include the following considerations in the design of rates:

- Alternative rate designs should be optional
- Demand charges phased in over time as site utilization increases
- An EDC rate where demand charges can be converted to an equivalent $/kWh charge
- Employing demand charge limiters
- Allowing low-usage sites to qualify for non-demand general service rate

H. Recommended changes to Staff's proposed terminology.

Based on the comments above, ChargePoint recommends the following modifications, deletions and/or additions to Board Staff's proposed terminology.

"EVSE Infrastructure Company" refers to an entity that offers EVSE and/or associated software/cloud and other services in support of operating EV charging stations. ~~using private capital to deploy Electric Vehicle Service Equipment (i.e., "charging station infrastructure").~~ An EVSE Infrastructure Company cannot be an EDC, affiliated with an EDC, or controlled by an EDC, unless otherwise approved by the Board.

"Operational" means a charging location that an EVSE Infrastructure Company, or site host, would be required to maintain and promptly fix, in accordance with industry standards, in the event of malfunctioning hardware or software that would impede the use of the equipment by a consumer.

"Smart charging station" is defined as a charging station that is capable of collecting charging data and has a network connection capable of conveying that data to the cloud. Smart charging stations can support users' managed charging.

III. Conclusion

ChargePoint appreciates the opportunity to provide comment on Board Staff's MHD Straw Proposal. We look forward to continuing to work with Board Staff, the EDCs, and other stakeholders to successfully implement the State's electric vehicle goals to help meet New Jersey's statewide energy, climate, and transportation goals. ChargePoint reserves its rights to provide additional reply comments as this process develops, and additional stakeholders weigh in.