



October 6, 2021

Aida Camacho-Welch
Secretary, New Jersey Board of Public Utilities
Post Office Box 350
Trenton, New Jersey 08625
Email: board.secretary@bpu.nj.gov

RE: New Jersey League of Conservation Voters Testimony on Medium- and Heavy-Duty Electric Vehicles Charging Ecosystem Docket No. QO21060946

Dear Secretary Camacho-Welch:

New Jersey League of Conservation Voters is the statewide political voice for the environment. We represent democratic, republican, and independent voters who elect environmentally responsible candidates to state and local offices, advocate for strong environmental policies and hold our elected officials accountable to safeguard the health of our communities, the beauty of our state, and the strength of our economy.

New Jersey has set an ambitious but achievable goal of reaching 80% emissions reductions by 2050. Through modeling conducted by the department, it was concluded that in order to achieve this goal, New Jersey would have to substantially reduce emissions across all sectors, including in the transportation sector. In fact, New Jersey's largest contributor of greenhouse gases (GHGs) is our transportation sector, contributing approximately [42%](#) of GHGs alone. Commercial trucks make up only about 6% of the vehicles registered on New Jersey roads, however emit more than [18%](#) of all transportation related emissions, and are a disproportionate emitter of primary criteria air pollutants that directly diminish localized air quality.

We fully support the BPU's initiative to establish a comprehensive system for public access to charging stations on travel corridors and workplaces. This proposal to jump start and develop medium- and heavy-duty vehicle charging station infrastructure plays complementary to the Advanced Clean Truck (ACT) Rule that the New Jersey Department of Environmental Protection is currently reviewing. The ACT Rule is designed to help transition thousands of diesel-fueled medium- and heavy-duty vehicles in New Jersey to electric zero-emissions starting in [2025](#).

Part of meeting the state's Energy Master Plan's goal of achieving emissions reductions goals by 2050 includes meeting the administration's goal of getting 330,000 plug-in electric vehicles on New Jersey roads by 2025, and reaching 2 million plug-in electric vehicles by [2035](#). This also must include a 25% conversion of State-Owned Non-Emergency light-duty vehicles to plug-in electric vehicles by 2025, and reaching 100% of plug-in electric vehicles by [2035](#). It is essential that New Jersey not only convert its diesel-fueled vehicles to zero-emission electric vehicles, but also provide a more precise definition of, and distinction made between light-duty vehicles and medium- and heavy-duty vehicles to be adopted



by all state agencies in New Jersey. Currently the New Jersey Department of Environmental Protection defines the medium- and heavy- duty vehicle segment to include vehicles at or above class two.

However, in the released straw proposal, medium- duty vehicles are defined as classes 4 – 6, and heavy-duty vehicles as class 7 – 9. This means that classes 2b and 3, approximately 60% of what was previously being considered as part of the medium- duty vehicles segment, would fall within the light- duty vehicles segment. This also creates a lack of guidance to utilities on make- ready programs for many of the segments that are most viable for electrification today, including local delivery trucks. We support the adjustment of BPU’s definition of light- duty vehicle and medium- and heavy- duty vehicle to match the DEP’s current definition, which considers class 2b and 3 as medium- and heavy- duty vehicles. Providing a precise and standard definition of medium- and heavy- duty vehicles and light- duty vehicles segments across state agencies is necessary for meaningful program development.

As New Jersey’s government agencies work in collaboration with one another to achieve a renewable energy future for all residents, it is crucial that our state’s environmental justice communities, predominately low-income and BIPOC communities, be made a central priority in the final rule making regarding charging station infrastructure. Our environmental justice communities are among the hardest hit in New Jersey regarding the effects of emissions pollution. Annually fine particulate matter accounts for between 85,000- 200,000 premature [deaths](#) in the U.S. Black, Hispanic, and Asian Americans face a higher level of exposure than average to fine particulate matter from light-duty vehicles, industry, diesel-fueled heavy trucks, and construction. The conversion to zero-emission medium- and heavy-duty, as well as light-duty zero-emission vehicles, would prevent approximately [200](#) premature deaths and more than 2,300 asthma attacks here in New Jersey.

The larger picture here is the implementation of this proposal can greatly help low-income and BIPOC communities that have for too long been our state’s most overburdened communities when it comes to deadly diesel emissions including black carbon, nitrogen oxides, sulfur oxides, and fine particulate matter. The current straw proposal fails to directly address the electrification of school buses or NJ Transit fleets. Segments that are ready for electrification, it is crucial that BPU place more attention on the development of an electric school bus program, and to provide equitable accessibility for our environmental justice communities.

In order to expedite the infrastructure and electric vehicle service equipment (EVSE) necessary to meet the administration’s electric vehicle goals, and better ensure equitable access for environmental justice communities, we need the investment participation from both electric distribution companies (EDCs) and private charging companies of EVSE to both contribute.

We want to be mindful of the effects public investment for charger ready infrastructure could potential have on ratepayers, but this public investment is a necessity to ensure our growing medium-and heavy-duty vehicle fleets, along with our light-duty vehicles, have the infrastructure and EVSE needed to operate and combat consumer range anxiety. With EDC involvement, the State can also better ensure that environmental justice communities are not ignored by private sector investment. We urge the BPU to work alongside EDCs to carefully consider any charger ready and EVSE investments that would fall



within the ownership and operation of EDCs to ensure affordable rates for ratepayers, especially low-income communities.

Thank you for your attention to these issues that are critical to addressing the climate crisis, equity, building a stronger and fairer 21st-century economy. If you have any questions, please feel free to contact Henry Gajda, Public Policy Director, New Jersey League of Conservation Voters at henry.gajda@njlcv.org or at 609-331-9922.

Best,
Henry Gajda
Public Policy Director