

# GENERAL MOTORS

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Aida Camacho-Welch  
Secretary of the Board  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 1st Floor  
Post Office Box 350  
Trenton, NJ 08625-0350  
Email: board.secretary@bpu.nj.gov

**Re: Charge Up New Jersey Program Revised FY22 Compliance Filing**

Dear Secretary Camacho-Welch:

General Motors LLC (GM) appreciates the opportunity to comment on the “Charge Up New Jersey; Revised Fiscal Year 2022 Compliance Filing.” GM commends the state’s ambitious goal of increasing electrical vehicle adoption and the continued focus on incentives to address electric vehicle cost and charging availability, two of the primary adoption barriers for potential customers. These sorts of incentives are essential for accelerating the market, reaching new customer segments, and supporting New Jersey’s electrification goals.

GM is working toward an all-electric future with “Everybody In” and we have taken several steps to accelerate this transition. We have announced \$35 billion in investment in capital and engineering resources in EV and autonomous vehicles through 2025 and will offer more than 30 new EVs globally by 2025. We are also supporting charging infrastructure deployment and recently announced a \$750 million investment to support key charging priorities. However, we cannot do this alone. State programs such as those outlined in the Charge Up New Jersey proposal are essential to complement industry efforts and support the market.

GM is a member of the Alliance for Automotive Innovation (Auto Innovators) and we support the Auto Innovators recommendations calling for an increased program budget, exploration of complementary programs such as low carbon fuel standards, and additional analysis and transparency before replenishing the budget under current program rules. Our goal with this letter is to provide additional input on program design considerations for both the vehicle and charger incentives.

**Structure EV Incentives to Reward the Cleanest Technologies**

At a high level, GM supports the overall structure of the vehicle incentive program. Stable incentive programs are important for both EV customers and dealers. Basing incentives on range (or battery capacity) and providing higher incentives for all-electric vehicles allows the state to steer limited funds toward the longer-range EVs that maximize emissions reductions. Given funding limitations, New Jersey Board of Public Utilities (BPU) might consider whether additional changes to vehicle eligibility or per-mile incentives might further enhance the impact of the program. We note that the incentive currently “maxes out” once vehicles hit 100

miles of range for battery electric or 40 miles for plug-in hybrid. Customer demand and automaker offerings are increasingly going well beyond those electric range thresholds, but the associated larger battery packs remain more expensive in the near-term. Reducing the per-mile incentive (currently set at \$25 per mile) while maintaining the upper limits (currently set at \$2,500 for battery electric and \$1,000 for plug-in hybrids) could simultaneously stretch limited dollars and steer incentives toward the cleanest and most-capable vehicles. Similarly, NJ BPU might consider whether adjustments to vehicle eligibility limits (e.g., minimum range requirements) could help improve program effectiveness.

#### **Broaden Residential Charger Incentives to Support Additional Customer Options**

GM appreciates the goals of the residential charger incentive program. Given recent developments in the industry, we recommend NJ BPU consider broadening the incentive to support other low-cost residential charging technologies and business models. Many automakers, including GM, offer a dual charge cord that allows customers to charge at Level 2 if the cord is plugged into a 240V outlet. This dual charge cord – often provided free with the vehicle – offers a low-cost alternative to a wall-mounted, networked charger while maintaining the ability to do managed charging through OEM telematics. Along with several other OEMs, GM is actively participating in multiple utility programs that allow for event-based or managed charging programs using telematics. NJ BPU might consider options for expanding the residential charger incentive program to support this alternative charging technology. For example, a rebate could support installation of the 240V outlet for customers that choose this option.

In summary, GM strongly supports New Jersey's commitment to EV incentives and investments. These are the sorts of policies and programs that are needed to help us accelerate the transition to an all-electric future that leaves no one behind. I would appreciate the opportunity to (virtually) meet to discuss how GM can help the state meet its light-duty electrification goals.

Sincerely,



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General Motors