



To: Aida Camacho-Welch
Secretary of the Board
New Jersey Board of Public Utilities
44 S. Clinton Ave, 1st Floor
Trenton, NJ 08625

October 12th, 2021

RE: Request for Comments - Proposed Electric Vehicle “Charge-Up New Jersey” Rebate Program Changes

Dear Secretary Camacho-Welch:

I am writing on behalf of Ceres, a national nonprofit organization transforming the economy to build a just and sustainable future for people and the planet, to express our strong support for maintaining the up to \$5,000 Charge Up rebate for the purchase or lease of new, eligible zero-emission vehicles, including battery electric and plug-in hybrid electric models. The Charge Up rebate program is a critical component of the Garden State’s developing electric vehicle (EV) market, and is crucial to enabling the state to meet its ambitious emissions reduction and EV adoption goals.

Ceres leads the [BICEP \(Business for Innovative Climate and Energy Policy\) Network](#) - a group of more than 75 companies, including dozens of leading consumer brands and Fortune 500s, advocating for strong climate, clean energy, and water policies at the state and federal levels, including many with operations or business interests in New Jersey. We also lead the [Corporate Electric Vehicle Alliance](#), a collaborative group of companies focused on accelerating the transition to EVs that supports companies in making and achieving bold commitments to fleet electrification. [Our member companies support policies that accelerate the adoption of EVs in New Jersey](#) because decarbonizing transportation is essential to preventing the worst impacts of climate change and it makes good business sense.

Rather than reducing the rebate amount per vehicle, we respectfully ask the New Jersey Bureau of Public Utilities to consider increasing the Charge Up program’s funding to meet an investment of \$300 million over the next five years rather than over a ten year period. Because the cost of EVs is expected to continue to decline, accelerating the rate of investment will also mean that the rebates are available when EV price premiums are the highest. The NJBPU has the authority to accelerate program funding since the provisions in the EV law ([S.2252](#)) set a floor rather than a ceiling of \$30 million per year. Maintaining the \$5,000 rebate will also help ensure the program continues to drive new registrations at the rate necessary to reach the state’s goal of 330,000 EVs by 2025.

The median EV driver could save more than \$770 per year compared with the cost of driving the average new gasoline vehicle.¹ Electricity prices are also less volatile than the cost of gasoline. While the price of electricity varies among electricity providers and often rises in the summer,

¹ <https://www.ucsusa.org/sites/default/files/attach/2017/11/cv-report-ev-savings.pdf>

year-to-year variations are low.² This means that switching to an EV can not only increase the disposable personal income of the driver (enabling them to invest more in the local economy), it can also allow them to more reliably budget and save, leading to better financial health.

With 41% of New Jersey's greenhouse gas emissions coming from the transportation sector,³ accelerating the adoption of EVs is critical to preventing the worst impacts of climate change. In the wake of Hurricane Ida, the most recent [IPCC report's](#) warning that "human-induced climate change increases heavy precipitation associated with tropical cyclones"⁴ should serve as a dire call to action for the state's policy makers, and we urge you not to reduce the rebate amount for the Charge Up program at this time.

The program's popularity is a testament to the desire of the state's residents to transition to a more sustainable way of meeting their transportation needs, and decreasing the rebate amount will only slow progress toward meeting Governor Murphy's goal of registering 330,000 EVs by 2025. Ceres is also committed to continuing to work with the General Assembly and Administration to formalize New Jersey's participation in the Transportation and Climate Initiative Program, which would create a revenue stream that could help offset the cost to the state of maintaining the Charge Up rebate program.

Thank you for your time and consideration, and please do not hesitate to reach out with any questions.

Sincerely,

Dave Robba
Senior Associate, State Policy
Ceres
drobba@ceres.org

² Ibid.

³ <https://www.nj.gov/dep/ages/oce-ghgei.html>

⁴ https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf