

November 8, 2021

**Submitted VIA E-FILING & EMAIL**

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

RE: Medium and Heavy-Duty Electric Vehicle Charging Ecosystem, Docket No. QO21060946

Dear Secretary Camacho-Welch:

Zeem Solutions appreciates the opportunity to provide feedback on the Board of Public Utilities' (BPU) New Jersey Electric Vehicles Infrastructure Ecosystem 2021 Medium and Heavy-Duty Straw Proposal. The Straw Proposal is a critical development to support the electric vehicle market by expanding infrastructure investments in New Jersey to meet the state's MHD zero-emission vehicle, climate and air quality goals.

Zeem provides zero-emission vehicles, infrastructure and logistic solutions to small and medium-size businesses to support and accelerate the deployment of MHD ZEVs for fleets throughout the country, with New Jersey being a major focus. Small, medium and disadvantaged fleets often lack the resources to navigate difficulties and costs associated with deploying electric vehicles and building charging infrastructure. Zeem simplifies this process by providing equitable access to turnkey solutions through our e-fleet-as-a service model and shared depot facilities. Our solution relies in large part on private capital, but because of the risk, complexity, and uncertainty in the nascent market for MHD EVs and EV charging, substantial and long-term investment by the state's electric distribution companies is essential to success.

The following comments provide recommendations to strengthen the Straw Proposal and position New Jersey as the preeminent transportation electrification state on the East Coast.

- One of the primary risks to the successful launch of this effort is not investing enough initially. It is critical to provide more funding and incentives upfront to support improvements to the electric grid and overall fleet electrification on the timeline and scale envisioned by the state.
- Establish a long-term dedicated commitment of funding including demand charge reductions and other incentives that will support MHD charging infrastructure to help utilities and private companies continue planning and investing in the electric transportation future. New Jersey needs to aim high to provide the funding certainty that private sector partners can rely on to invest and plan accordingly.
- Clarify that the BPU's definition for Publicly Accessible MHD Charging would apply only to commercial electric vehicles in this context and if a depot that provides shared or opportunity charging would be eligible for make-ready infrastructure incentives.
- Provide an option for customer or third-party ownership of behind-the-meter infrastructure under the shared responsibility and beneficiary pays models. The rebates for such infrastructure





should be comparable to incentive structures allowed under utility-ownership option. Zeem looks forward to discussing this model further with BPU staff and EDCs to collectively stimulate the development of make-ready infrastructure.

New Jersey has taken a significant step forward through the BPU’s proposal of make-ready infrastructure financing, fleet planning services and utility rate reform. However, it is important to recognize that other states are currently developing or advancing more aggressive programs. Private sector partners in the clean energy industry are attracted to expand and conduct business in states with favorable policies. This would further incentivize collaborative investment that will support decarbonizing transportation, create jobs and generate economic growth. Zeem is well-positioned to partner with New Jersey to facilitate the conversion from diesel fueled transport to environmentally efficient ZEVs by providing fleet operators with a single source solution for leasing, servicing, parking, charging and energy storage at our depots.

Zeem supports and applauds Governor Murphy’s ambitious plan to combat climate change helping to make New Jersey a clean energy leader in the United States. Electrifying the transportation sector is a key component of that plan and the state’s emissions reduction goals. This straw proposal has incredible potential to prepare New Jersey for the transition to a cleaner transportation network as well as accelerate and build on existing programs and progress. At Zeem, we are determined to facilitate the conversion from diesel fueled transport to environmentally efficient ZEV’s and excited to expand our business in New Jersey.

We appreciate the opportunity to provide comments on the BPU MHD Straw Proposal and look forward to collaborating with the BPU as well as additional public and private sector partners in New Jersey.

Thank you for your consideration.

Sincerely,

Nicholas Raspanti  
Government and Regulatory Affairs Manager  
Zeem Solutions, Inc.

