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TO: Aida Camacho-Welch, Secretary of the Board
FROM: Pamela Frank, CEO, ChargeVC-NJ
DATE: January 28, 2022
SUBJECT: In the Matter of The Clean Energy Programs and Budgets for FY 2022 – True-Up, Revised Budgets and Program Changes (Docket No. Qo21040720)

INTRODUCTION

ChargeVC-NJ appreciates the opportunity to provide comments on the Proposed FY 2022 True-Up, Revised Budgets and Program Changes. Our comments are directed at those budget items that focus on electric vehicle (EV) initiatives.

COMMENTS

The establishment of residential charging infrastructure rebate program will not help us reach our statewide goals and is not mandated in law.

This budget proposal would establish and provide a \$3 million allocation to a residential EV charger rebate program. The compliance filing states the following: “The Charge Up New Jersey Program was developed in accordance with S-2252, L. 2019, c. 362, codified at N.J.S.A. 48:25-1 to -11 (“EV Act”), and amending, in relevant part, N.J.S.A. 48:3-60(a)(3), which directed the Board to establish and implement a program...as well as develop an incentive for residential, at-home EV charging equipment”.

While it was clear in the EV Law (S2252) that the BPU *was mandated* to establish a rebate program for the purchase of EVs, the establishment of a charger rebate program was *at BPU’s discretion*, not required. Given the recent announcements of charging infrastructure rebate programs becoming available through multiple utilities, the \$3 million allocated to this program is not only redundant but will also cause customer confusion. Just as important, establishing this program consumes *limited BPU resources* better spent in more impactful places. Funding levels for the EV rebate program, for example (discussed in more detail in the next point) a program *mandated in the law and with specific goals in law*, should be properly resourced to meet those goals.

Funding should be focused on EV rebate program.

Funding should be focused on ensuring proper funding for the EV rebate program in order to realize our statewide EV adoption goals codified in law.

It is worth highlighting the rebate program is currently New Jersey’s most impactful and strategic state program regarding electrifying transportation in the nation. None of the benefits from EVs will materialize – including the progress we need to meet our climate and clean air statutory goals

– without an aggressive increase in the EVs on our roads. It is therefore crucially important to approach any program decisions and changes with evidence and make decisions cognizant of these goals.

Given the high demand for EVs that was demonstrated in the first two years of the program and the continued rapid growth of the EV market, additional budget allocation over the next five years is necessary. In [ChargEVC-NJ's newly released Roadmap 2.0](#), ChargEVC-NJ calls for an acceleration of the Charge Up New Jersey program timeline, to target distribution of this \$300M LDV purchase incentive fully by the end of 2025. This will maximize the impact on 2025 goal attainment and align deployment when the incentives have the most impact – when EV price premiums are the highest. The NJBPU has the authority to accelerate funding since the provisions in the EV Law state “... *no less than* \$30 million a year...” funding levels, not funding limits. It should be noted that this statutory language has been misstated in the past in public forums by BPU officials as funding limits.

Given this recommendation in ChargEVC-NJ's roadmap update, we recommend focusing on ensuring proper funding for the EV rebate program immediately. Even if the program does not re-launch in this fiscal year, it is important to have a strong base of funding budgeted in this current fiscal year that can carry over and bolster the EV rebate program when it relaunches for its 3rd year (FY2023).

Funding should be allocated for ride share and car share services that serve LMI customers

As we have recommended in past comments, we emphasize again the recommendation for a new budget line that would fund electric ride and car share services serving low- and moderate-income communities. Consistent with BPU's focus on environmental justice and electrification of transportation, and complementary to the Department of Environmental Protection's (DEP) recent grant awards that support electric car-share and ride-share projects, the BPU should set aside budget to support and subsidize these types of programs.

ChargEVC-NJ appreciates the opportunity to provide comments and we will make ourselves available to discuss our recommendations further.