



MEMORANDUM

TO: New Jersey Board of Public Utilities

FROM: Hilary Chebra, Manager Government Affairs, *CCSNJ*

RE: Straw Proposal on the Medium and Heavy Duty (“MHD”) EV Ecosystem

DATE: January 24, 2023

The Chamber of Commerce Southern New Jersey (CCSNJ) is the region’s largest and most influential business organization representing businesses in the seven most southern counties of New Jersey, as well as greater Philadelphia and northern Delaware. The organization has more than 1,100 member companies, approximately 85 percent of which are small businesses that employ less than 50 people, as well as approximately 130 nonprofit members.

The CCSNJ appreciates the opportunity to provide comments on the Straw Proposal for Medium and Heavy Duty (MHD) Electric Vehicle (EV) Charging. This proposal offers an exciting opportunity to expand the electric vehicle charging ecosystem and provide support for those who are looking to electrify private fleets. This proposal will also support the state’s clean energy goals by reducing greenhouse gas emissions and other air pollutants.

However, the CCSNJ would like to share our concern that this proposal may ultimately be limited in its impact statewide. As written, in order to be eligible for community charging funding, applicants must be located or operating within an Overburdened Municipalities (OBMs) as specifically defined by the proposal. Additionally, the definition is narrower than the that which has been used to define overburdened communities in New Jersey previously. As a result, the OBM language will likely limit the scope and impact of the program.

For example, essential service providers like hospitals and private educational institutions would not qualify for utility support unless located within an OBM. The CCSNJ respectfully suggests that the definition be expanded, or language added to allow for certain critical areas outside of OBMs to participate in the program. This would increase the impact of the program and further limit emissions in overburdened communities.

Additionally, requiring that the Make-Ready work on both sides of meter be completed within 12 months will limit the opportunity for fleet owners to electrify. The CCSNJ respectfully requests that the NJBPU allow for additional time to be afforded to fleet owners.

Finally, the CCSNJ believes that allowing Electric Distribution Companies (EDC)s to play a larger role in promoting electric fleets would facilitate New Jersey’s goal to reduce transportation sector emissions, combat climate change and improve the state’s air quality.

Thank you for the opportunity to provide our comments on the Straw Proposal on the Medium and Heavy Duty (“MHD”) EV Ecosystem.