

Ecogy Energy
315 Flatbush Ave. #393
Brooklyn, NY 11217

January 24, 2023

VIA ELECTRONIC FILING

Carmen Diaz
Acting Secretary of the Board
44 South Clinton Ave, 1st Floor
PO Box 350
Trenton, NJ 08625-0350

RE: QO21060946 - Response to Request for Comments on the Medium and Heavy Duty Electric Vehicle Charging Ecosystem

Dear Secretary Camacho-Welch,

Ecogy Energy, based in Brooklyn, NY and founded in 2010, is an experienced developer, financier, and owner-operator of distributed generation projects across the U.S. and Caribbean.

Ecogy's focus and niche is on the <1 MW arena, particularly on systems sited on rooftops, parking lots, and brownfields. Ecogy is committed to developing distributed energy resources, including battery storage both in front of the meter and behind the meter. Ecogy believes that with sound planning, proper development, and fair incentives for these types of projects, the State, its residents, and the clean energy industry as a whole will ultimately be more successful. Ecogy firmly believes that by focusing on such projects constructed in and on the built environment, the development community can preserve precious and limited natural resources while directing the benefits of local solar to small businesses, property owners, nonprofits, low-income individuals, and other organizations that need them most.

Ecogy appreciates and supports the New Jersey Board of Public Utilities ("NJBPU," "BPU," or "Board") in its leadership in advancing the infrastructure necessary for electric vehicle adoption in the state. Without ample infrastructure planning, the efforts to electrify all MHD vehicles sold by 2050 in the state will be impossible. We commend the Board for engaging with stakeholders on this important issue.

Please accept the document below as Ecogy Energy's response regarding docket No. QO21060946 entitled IN THE MATTER OF MEDIUM AND HEAVY DUTY ELECTRIC VEHICLE CHARGING ECOSYSTEM.

Shared Responsibility Business Model

- *EDCs will invest in, and earn on, the wiring and backbone infrastructure necessary to prepare MHD Make-Ready locations that are publicly accessible MHD charging depots, public-serving fleets, or Private Fleet Charging Depots located in or primarily operating in Overburdened Municipalities;*
- *EDCs would have the ability to own and operate EVSE in specified circumstances, as further described in Section IV of this Straw Proposal, if adequate adoption of charging for MHD vehicles and light-duty fleets does not occur; and*
- *EVSE Infrastructure Companies would expect to see returns from their sales of electric charging equipment and services, as well as enabling grid services.*
- *Although the assumption is that private investors will typically install, operate, and market the charging stations, assigning responsibility for Make-Ready sites across the state takes advantage of existing EDC expertise and existing infrastructure.*
- *Staff proposes to direct each EDC to adopt programs that accommodate co-location of MHD vehicle charging with energy storage devices, renewables, or other distributed energy resources (collectively, "load-modifying technologies").*

EDC investment is crucial for a successful infrastructure program. In addition to EDC contributions, Ecogy appreciates that the Board specified a greater role for distributed generation developers in the EV infrastructure plan for New Jersey on page 20. As stated in the Straw on page 13, attracting private capital into the EV infrastructure sector could help alleviate monetary burdens on ratepayers.

Per the EV Act signed on January 17, 2020, by Governor Murphy, the Board has the authority to utilize Societal Benefit Charge ("SBC") funds to effectuate programs to provide funding for "energy efficiency, plug-in EVs, and plug-in EV charging infrastructure, as well as Class I renewable energy programs that provide environmental benefits above and beyond those provided by standard offer or similar programs" in effect as of the effective date.¹ Class I renewable energy programs exist in New Jersey already, so it would be favorable to both the EV Infrastructure Ecosystem and the Class I programs to collaborate and coordinate efforts to increase renewable energy and electric vehicles in the state. Ecogy agrees with some of the comments relayed verbally in the January 17th webinar which speak to the need for coordination and aligned planning between this EV Infrastructure Ecosystem Straw Proposal, the Energy Storage proceedings, the Energy Efficiency proceedings, the NEVI program, the RGGI Grant Funding Program, and the SuSI Program, specifically the ADI Program.

For example, solar carports or solar canopies are an effective way to both progress electric vehicle infrastructure forward and work toward achieving New Jersey's clean energy goals. These structures harness solar energy, while being sited on the already built environment instead

¹ [NJ Rev Stat § 48:25-7 \(2019\)](#)

of taking up agricultural and forest land, and can deliver energy directly into the electric vehicles parked beneath them.

Case Study: Lyndhurst Solar (NJ)

Location: Lyndhurst, NJ

System Size: 444 kW DC

Installation Type: Parking Lot Canopy

Installation Year: 2018

Ecogy Lyndhurst is a 444 kW DC project consisting of 8 parking lot canopies serving the Town of Lyndhurst, NJ. These carport canopies are sited at the town recreation center. The canopy systems utilize the already existing asphalt parking lot as their site, taking advantage of the built environment without causing extreme environmental degradation, as other solar systems may cause if poorly sited.



We applaud the Straw for trying to achieve an equitable, affordable, and effective EV infrastructure ecosystem, and Ecogy knows that can't be achieved without distributed generation, like solar energy and battery storage.

Ecogy wholeheartedly believes that electrification is the way forward for reducing carbon dioxide emissions 80% below 2006 levels by 2050 and meeting state clean energy goals. We support this revised Straw Proposal for the EV Ecosystem in New Jersey and encourage the Board to have a clear focus on coordinating distributed energy resources, like solar systems and battery storage, with this infrastructure plan.

We thank you for your efforts toward achieving New Jersey's clean energy goals.

Respectfully submitted,

/s/

Twiggy Mendenhall
Policy Manager
Ecogy Energy
www.ecogyenergy.com
Tel: 718-304-0945