



By Email Only to [board.secretary@bpu.nj.gov](mailto:board.secretary@bpu.nj.gov)

January 24, 2023

Ms. Carmen Diaz, Acting Secretary of the Board  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 1st floor  
Trenton, NJ 08625-0350

Re: I/M/O Medium and Heavy Duty Electric Vehicle Charging Ecosystem  
Docket No. QO21060946

Public Comments of Climate Change Mitigation Technologies LLC

Dear Acting Secretary Diaz:

Climate Change Mitigation Technologies LLC (CCMT) welcomes the opportunity to submit these public comments to the official record for I/M/O Medium and Heavy-Duty Electric Vehicle Charging Ecosystem, Docket No. QO21060946 ("MHD Straw"). CCMT has participated in the MHD Straw proceedings, including as a subject matter expert during the August 24, 2021 Medium and Heavy-Duty Ecosystem stakeholder meeting and panel discussion.

In the main, CCMT supports the "modified share responsibility" public-private business model that underlies the MHD Straw in which local electric distribution companies (EDCs) would be responsible for the provision of "Make-Ready Infrastructure" (MRI) and private EVSE companies would be responsible for providing the charging equipment and related services. However, CCMT is unclear about various elements of the MHD Straw and requests Board clarification on the following points and issues:

Comment No. 1: Definitional Question / Recommendation as to Lateral Extent of EDC MRI on Both Sides of the Customer Meter at Private Depot Fleet Charging Locations

CCMT requests clarification on the extent of the MRI that the EDCs are going to provide. Page 15 of the current MHD Straw indicates that EDC MRI will be limited to only the utility side of the meter. CCMT strongly recommends that the EDC MRI include all necessary work on both sides of the customer meter and that the EDCs hire the private depot owner's electrical engineers and contractors to do the work.

## Comment No. 2: EDC MRI Should be Made Available at all Private Fleet Depots Regardless of Location

CCMT commends the Board for including EDC MRI at private fleet depot locations, but strongly recommends that EDC MRI be made available at all private fleet depot charging locations. As observed by Mr. Kellen Schefter of the Edison Electric Institute during the August 24, 2021 MHD Straw Ecosystem panel discussion: “[private] depot charging is the focus in the short-term...it is the critical path and cannot be a 3 year wait.” What was true nearly two years ago is even more true today: private depot charging has got to be the focus in the short term. If the goal is to eliminate CO<sub>2</sub>e emissions, then the entire State of New Jersey is the same airshed and EDC MRI should be made available at any private fleet depot location that wants to go electric.

## Comment No. 3: The VMT Requirements Limitations are Onerous and Unworkable

Page 17 of the current MHD Straw indicates that rate payer funding will only be provided to fleets that are replacing their diesel trucks with electric on a 1:1 basis, but not for fleets that are increasing in size unless they commit to a 25% reduction in vehicle miles travelled (VMT) within two years. All the data from the Port Authority is that there is an on-going expansion of truck fleets in northern New Jersey in parallel with the expansion of port commerce. So the fleets are expanding in size and they are travelling more miles, making the VMT limitations onerous and unworkable.

## Comment No. 4: The \$200/kw Limit on EDC MRI at Private Fleet Depot Locations is Too Low

Pages 17 – 18 of the current MHD Straw indicate that EDC MRI at private fleet depot charging locations will be limited to \$200/kw of charger capacity. If understood correctly, this would mean that a 60kW DCFC would get \$12,000. CCMT is unsure how the \$200/kw limit was deduced, but as a guide to the Board and staff, CCMT routinely budgets \$50,000 per charger for installation costs on the customer side of the meter for a 60kW DCFC.

## Comment No. 5: The Recommended EDC-Industry Working Group Should be Charged with Making Recommendations for Vehicle-to-Grid (V2G) interconnection requirements and Commercial Fleet Charging Tariffs within one (1) Year of its Appointment

Page 5 of the current MHD Straw indicates that a EDC-Industry Working Group will be created to address concerns about time varying rates, demand charges, and other technical issues. As everyone know, the FERC and PJM are implementing Order No. 2222 relating to vehicle-to-grid (V2G) interoperability between the batteries in the truck fleets and the grid.

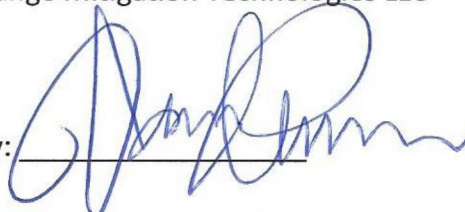
CCMT has multiple projects now under development or construction that include trucks and chargers that will be V2G equipped. One such project is for four (4) Type A battery electric

school buses for D&M Tours, Inc. in Paterson, New Jersey. This project is being funded with NJDEP VW consent order funding and will be one of the first V2G projects in New Jersey and should come on line in the next eighteen months or so. The EDC-Industry Working Group needs to establish the V2G interconnection protocol as soon as possible for the D&M Tours Inc. project and multiple other projects across New Jersey. It is for this reason that CCMT strongly recommends that the EDC-Industry working group be required to report its recommendations within one (1) year of its appointment. Further, the Board should consider constituting this working group as soon as possible and CCMT would volunteer its service.

Thank you for this opportunity to comment.

Respectfully,

Climate Change Mitigation Technologies LLC

By:   
James Sherman, CEO