

January 24, 2023

**Submitted VIA EMAIL**

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 NJBPU Staff:

Zeem Solutions (Zeem) 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.

Zeem enables fleet operators to transition from diesel to zero-emission through cost-effective financing options. For example, we exchange the high upfront capital expense of vehicle and infrastructure acquisition for an immediate operational savings through vehicle leasing with a manageable, fixed monthly rate covering the vehicle, charging, servicing, parking, energy storage, and reporting requirements for funding programs as an all-in-one solution. Additionally, Zeem depots offer opportunity charging contracts to non-resident commercial fleets which increases utilization of the infrastructure, especially during daytime hours when resident fleets are typically on the road. Our first depot is in Inglewood, CA near the LAX airport and has been operational since December 2021. Our customer fleets include last-mile delivery, shuttles, freight, drayage, and transportation network companies.

In New Jersey, we are partnering with Ørsted Wind to enable the rollout of 50 electric drayage trucks and associated vehicle infrastructure and mobility training programs for area residents at the Port of Newark. The \$11 million partnership is a part of Ørsted's Ocean Wind 2 winning bid. This site will be the first of several deployments across New Jersey. New Jersey is a key market for Zeem because of the high concentration of customers and available incentives; we envision that all our NJ depots will serve as

hubs for clean mobility and workforce development. In the Northeast, Zeem was a part of a winning grant through NYSERDA's Clean Transportation Prize as a part of CALSTART's Freight Electrification-as-a-Service for Transformation (FEaST) grant.

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

- We applaud the efforts of staff in deploying the NJBPU Make Ready Pilot Grant to ensure make-ready funding is available as soon as possible for first-movers in the NJ market like Zeem. It is crucial that utility-specific programs are also launched as soon as possible.
- We encourage staff to 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.
- A depot that shared charging for multiple private fleets should be eligible for the 'public' make-ready infrastructure incentives and prioritized above private fleet charging. This type of shared charging meets the definition outlined by the BPU: "This charging may or may not be co-located with private MHD vehicle charging, but is open to the public either by appointment, subscription or on a first-come, first-served basis."
- We recommend that both the \$200/kw cost cap and private fleet managed charging requirements are eliminated and echo the reasons ChargeEVC New Jersey cites in their comments.
- For section "ii. Avoiding Additional Concentration of MHD Vehicles in Overburdened Municipalities" we recognize the intention of this provision but are concerned that it adds complexity and is difficult to track and enforce. Additionally, we do not endorse a vehicle scrappage requirement because it adds complexity to programs and limits the role of 3<sup>rd</sup> parties to support fleets. We recommend that this requirement be eliminated.

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 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,

Paul Gioupis  
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Zeem Solutions, Inc.

Nicholas Raspanti  
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Zeem Solutions, Inc.