



New Jersey | Independent Electrical Contractors

21 Commerce Drive Suite 202 Cranford NJ 07016

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Carmen D. Diaz
Acting Secretary of the Board
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, NJ 08625-0350
board.secretary@bpu.nj.gov

RE: Docket No. QO21060946 – IN THE MATTER OF MEDIUM AND HEAVY DUTY ELECTRIC VEHICLE CHARGING ECOSYSTEM

Dear Acting Secretary Diaz:

The New Jersey Independent Electrical Contractors Association (NJ-IEC) represents electrical contractors in the state. NJ-IEC opposes the straw proposal for the reasons outlined below.

NJ LICENSED ELECTRICAL CONTRACTORS - SCOPE OF PRACTICE

The scope of practice of New Jersey licensed electrical contractors begins immediately on the customer side of the electric meter and continues until the final connection to a fixture, appliance, machine, outlet, or any other device which consumes electrical power. Furthermore, all electrical contracting work in the state can only be performed by a New Jersey licensed electrical contractor who holds a valid business permit pursuant to NJSA 45:5A-9.

The straw proposal definition of “Make-Ready” states:

- *“Make-Ready” means the pre-wiring of electrical infrastructure at a parking space, or set of parking spaces, to facilitate easy and cost-efficient future installation of EVSE, including, but not limited to, Level Two EVSE and DC Fast Chargers. “Make-Ready” includes expenses related to service panels, junction boxes, conduit, wiring, etc., necessary to make a particular location able to accommodate EVSE on a “plug and play” basis. “Make-Ready” is synonymous with the term “Charger Ready.” (p.8)*

As it relates to the installation, repair, service, and maintenance of electric vehicle service equipment, “...service panels, junction boxes, conduit, wiring, etc...” are on the customer’s side of the electric meter. Therefore, the work may only be performed by a New Jersey licensed electrical contractor who holds a valid business permit pursuant to NJSA 45:5A-9.

In light of the above fact, NJ-IEC was surprised to see the straw proposal make the following comments:

- *“ Staff recommends a modified “shared responsibility” model for the deployment of a MHD EV Ecosystem, building on the model used for light-duty EV rules. For MHD, Staff recommends that EDCs invest in (and earn on) the wiring and backbone infrastructure necessary to enable a robust MHD EV Ecosystem...”(p.11)*

- *“In many ways, Make-Ready sites look like an extension of the distribution system and mimic the utility’s ownership of meters on customer-owned land.” (p.12)*
- *“Further, by allowing the EDCs to build-out (and earn on) the Make-Ready infrastructure...” (p.12)*
- *“Specifically, under the Shared Responsibility model, the EDCs would be responsible for:*
“Wiring various locations upon request by an EVSE Infrastructure Company, an operator of a MHD fleet, or a state, local, or municipal entity, with priority given to sites which serve publicly- accessible and/or public serving fleets, in a process consistent with the “Make-Ready definition;” (p.12)

The above list is not exhaustive, but is more than representative of the fact that the straw proposal aims to allow electric distribution companies (EDC) to get into the business of electrical contracting.

NJ-IEC requests answers to the following questions:

1. What is the justification to give this work to EDCs?
2. What is the legal authority to give this work to the EDCs?
3. What is the process by which the NJ BPU will give this work to the EDCs?
4. What were the comments of the NJ Board of Examiners of Electrical Contractors when they were informed that the NJ BPU will allow EDCs to get in the business of electrical contracting?
5. Electrical contractors have a competency that EDCs do not when it comes to MHD EV charging installations because we are licensed to perform this work. If it is determined that the cost of demand charges for MHD EV charging is so expensive that it must be socialized (i.e., buried in our electric rates), why would that necessitate the “Make Ready” MHD EV charging build out be performed by those who are not licensed? Why wouldn’t the EDC charge the ratepayer and have a New Jersey licensed electrical contractor who holds a valid business permit pursuant to NJSA 45:5A-9 perform it?

GENERIC DOCKET MHD EV CHARGING

Below are two quotes from the straw proposal.

- *“Staff anticipates that coordinated planning around MHD vehicle electrification as part of a generic docket will be more expeditious than addressing these same policy issues in isolated EDC filings. This proceeding seeks to encourage uniform treatment and standard footprint solutions in all EDC territories, which should greatly accelerate commercial scaling. Using a generic docket also ensures a consistent statewide approach to the electrification of the MHD EV Ecosystem, which is critical to the health of New Jersey residents and the successful fulfillment of New Jersey’s EV adoption goals.” (p. 4)*
- *“Additionally, this Straw recommends that, comparable to the requirements of the Light-Duty program, each EDC develop a demand charge program that addresses the unique needs of MHD vehicle charging. As noted in the context of the Light-Duty program, charging infrastructure may not see use in the nascent days of adoption, which has the potential to create burdensome demand charges that may slow adoption of these critical technologies. Staff acknowledges that tariff demand charges remain a hurdle to private investment and will require each EDC to propose its own method to address demand charges concerns...”(p.18)*

1. These two statements contravene one another. Please clarify.

COST OF MHD EV CHARGING

“As noted in the EMP, affordability of EV infrastructure is also critically important. To keep these efforts affordable, this Straw Proposal follows the framework laid out in the EMP that New Jersey should seek to... Attract private capital into the EV infrastructure sector and substitute shareholder dollars for ratepayer capital wherever possible;” (p. 11)

- Exelon Corporation (Atlantic City Electric is their EDC in NJ) has a market capitalization of approximately \$41 billion.
 - Public Service Enterprise Group (PSE&G is their EDC in NJ) has a market capitalization of approximately \$30 billion.
 - First Energy Corporation (JCP&L is their EDC in NJ) has a market capitalization of approximately \$23 billion.
1. When isn't it possible this possible to “substitute” shareholder dollars for ratepayer dollars?
 2. Governor Murphy's policy is to electrify everything. His policy creates an annuity for shareholders of the Public Service Enterprise Group, First Energy, and Exelon, why should ratepayers have to contribute to any of the cost to build out the MHD EV charging ecosystem?
 3. How much have the shareholders of the Public Service Enterprise Group, First Energy, and Exelon contributed to exiting aspects of the EMP which have been already implemented - wind, solar, EVs, or nuclear; let alone their environmental remediations from the 19th Century?
 4. From the perspective of ratepayers, as it relates to the MHD EV charging straw proposal, do shareholders of the Public Service Enterprise Group, First Energy, and Exelon have any responsibility other than cashing their dividend check?

On behalf of electrical contracting business in the state, NJ-IEC eagerly awaits your reply.

Sincerely,

Joe Spinella

Joe Spinella

President

NJ-IEC