

October 6th, 2023

Via Electronic Mail (board.secretary@bpu.nj.gov)

Ms. Sherri L. Golden
Board Secretary
New Jersey Board of Public Utilities
44 South Clinton Street, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625

Re: In the Matter of the Provision of Basic Generation Service for the Period Beginning June 1, 2024, Docket No. ER23030124, Initial Joint Comments of Electric Vehicle Service Providers (EVSPs) and partners

Dear Secretary Golden:

The undersigned parties observe that capacity demand charges for generation and transmission in the PJM wholesale power market introduce significant complexity and volatility into the operating costs of Direct Current Fast Charging (DCFC) stations. The Basic Generation Service (BGS) proposals submitted by the Electric Distribution Companies (EDCs) for service beginning June 1, 2024 include important interim steps towards addressing these capacity demand charges. The optional programs proposed by the EDCs convert wholesale capacity demand charges for generation and transmission into volumetric rates and represent an important first step towards resolving the barrier that these charges pose for DCFC operator business models. These two year pilots should provide useful data to the Board, the EDCs, and other stakeholders regarding the impact of PJM capacity demand charges on DCFC stations and ideally lead to more permanent rate design solutions.

Broadly, we urge the Board to approve these proposals with a modification to include provisions for new sites to enter the program in the second year. This will reduce risks for DCFC stations that may still be in development at the time of initial enrollment. We look forward to continued engagement on finding an appropriate alternative to demand charges.

Respectfully submitted,

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