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By Email Only to board.secretary@bpu.nj.gov

January 12, 2024

Ms. Christine Guhl-Sadovy, President
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
At December 15, 2023 Public Hearing Regarding the Need to Conclude the Medium
and Heavy-Duty Electric Vehicle ("MHD") Make-Ready Infrastructure ("MRI")
Proceedings

Dear Madam President:

I. Overview

The world and New Jersey are in a climate emergency and require the rapid deployment of multiple forms of renewable energy and clean technologies to mitigate the worst ravages of a rapidly changing climate. Here in New Jersey, the transportation sector accounts for 40% of CO2 emissions and MHD diesel trucks account for a substantial portion of those CO2 emissions. As an example, a single diesel garbage truck in New Jersey emits between 50 and 100 tons of CO2 per year, every year, for 15 or more years. This is why the MHD Make-Ready Infrastructure (MRI) proceeding is so important.

CCMT pioneered the MHD battery electric truck and bus fleet space and is now the leading MHD electric truck and bus fleet developer and management firm here in New Jersey. CCMT is responsible for the delivery of some of the first-ever electric truck fleets in New Jersey, including the 2021 delivery of ten heavy-duty BYD battery electric terminal tractors to the Red Hook Container Terminal in Port Newark which are used to haul 80,000 lbs. sea containers around the Port all day long. CCMT is also responsible for the 2022 delivery of 5 MHD BYD battery electric garbage trucks to the Jersey City DPW. Both fleets are working perfectly. CCMT has a number of other projects in the

planning, design, and or construction phases underway for Hoboken, Woodbridge, the Elizabeth Board of Education and others.

II. Formal Comments to the Board

To date, virtually all of CCMT's projects have been funded with VW settlement and/or RGGI funds. The VW and RGGI funds for vehicle acquisition costs were supposed to be complemented by utility MRI to cover costs of necessary infrastructure work on the utility-side, and vehicle-to-grid (V2G) revenues. VW/RGGI funding, utility MRI, and V2G revenues were, together, supposed to be the three legs of the public and private fleet electrification business-economic model. Two of the legs are still missing and are within the BPU's regulatory jurisdiction.

The NJBPU has been working on fleet electrification and MRI since at least 2017 and a 2018 proceeding was settled back in 2020 when CCMT and all the other intervenors agreed to settle the Electric Vehicle and Energy Storage Program Proceeding Docket No. E018101111 and the Board agreed to commence the MHD MRI proceeding in 2021. While the Board technically complied with the settlement agreement by commencing a new docket in 2021, there has been no visible further progress and no Board Order on MHD MRI.

This is now a real problem. CCMT is working with Woodbridge, where the Township was just handed a \$21,000 bill to re-locate a utility pole to accommodate a bank of 3 EV chargers for 3 MD shuttle buses for the Woodbridge Senior Citizen Center. The \$21,000 was not included in the NJDEP VW/RGGI budget, since you cannot begin work until there is a fully-executed Grant Agreement. So Woodbridge now has to figure out where it is going to find the \$21,000. It goes almost without saying that New Jersey's cities and towns don't have \$21,000 just lying around to pay for a utility pole re-location. This cost is a classic example of what a utility MRI program should be covering so the cost does not have to be borne by the cities and towns, at least not directly.

The \$21,000 MRI cost for Woodbridge is just the tip of the problem. I expect we will continue to run into this problem, but with much more costly utility-side of the meter work running into the hundreds of thousands of dollars for new 1,200 or 1,600 amp service as municipal DPWs and private truck and bus fleets begin to adopt electric trucks and buses at scale.

Here's another foreseeable MRI problem coming right up with major foreseeable consequences here in New Jersey if the Board does not take action and conclude the MHD MRI proceeding in short order. CCMT had filed an \$18 million USEPA Clean School Bus Group application on behalf of the Newark, Elizabeth, Union City, Bloomfield, and Lakewood BOE school districts for a total of 42 buses. I have no doubt that several or all of these BOEs bus depots will require substantial electrical infrastructure work on both sides of the meter and so these first-ever USEPA CSB projects in New Jersey will be in jeopardy unless the BPU moves forward with the MHD MRI program expeditiously. The MHD MRI Order should provide for MRI on both sides of the customer meter.

Note: Since the time of the December 15, 2023 public hearing, CCMT has been tentatively notified of a USEPA Clean School Bus award. So this is now a live issue that requires the Board's immediate attention and action or the Board's inaction will jeopardize the success of these projects.


During the December 15 public hearing, the Board President stated several times that MHD MRI is a complex rulemaking. That is true, but not that complex, and the Board has been at it for multiple years now. Several utilities in California have long-standing MHD MRI programs in place. *PSE&G already has a public fleet MHD MRI program in effect in New York State*, which I understand is getting ready to expand into private fleets in the 1Q24. Surely if PSE&G can do it on Long Island in New York State, it and all the other electric utilities in New Jersey should be ordered to implement MHD MRI programs here in New Jersey. The Board's MHD MRI Order should issue and the utilities should be required to submit compliant regulatory filings by no later than December 1, 2024.

So time really is now of the essence if we are going to achieve New Jersey's transportation electrification, climate change, and resiliency goals. ***I am requesting an in-person meeting with the Board President and staff to address the impending MHD MRI situation vis-à-vis the upcoming USEPA Clean School Bus projects.***

Thank you for the opportunity to offer these comments and I will be glad to work with the Board and staff to assist in the preparation and finalization of the BPU's MHD MRI program.

Sincerely,

Climate Change Mitigation Technologies LLC

By: 

James Sherman, CEO

Copies to:

Mayor John McCormac, Woodbridge Township
Mr. George Brew, DPW Director, Woodbridge Township
Newark, Union City, Elizabeth, Bloomfield, and Lakewood Boards of Education
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