

**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

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**IN THE MATTER OF MEDIUM AND  
HEAVY DUTY ELECTRIC VEHICLE  
CHARGING ECOSYSTEM**

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**Docket No. QO21060946**

**IN THE MATTER OF THE  
PETITION OF PUBLIC SERVICE  
ELECTRIC AND GAS COMPANY  
FOR APPROVAL OF ITS CLEAN ENERGY  
FUTURE-ELECTRIC VEHICLE MEDIUM  
HEAVY-DUTY(“CEF-HV MHD”)  
PROGRAM ON A REGULATED BASIS**

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**Docket No. QO25020101**

**MOTION FOR INTERVENTION OF CALSTART, INC.**

CALSTART, Inc. (“CALSTART” or “Movant”), a 501(c)(3) corporation of the State of California, having its principal offices at 48 S. Chester Ave., Pasadena, California, by its undersigned counsel, pursuant to the Order issued by the New Jersey Board of Public Utilities (“Board”) on April 23, 2025, in the above-captioned matter, hereby requests that the Board grant CALSTART’s Motion to Intervene pursuant to N.J.A.C. 1:1-16.3. CALSTART respectfully submits that all factors for intervenor status in N.J.A.C. 1:1-16.3 support granting this motion. CALSTART states in support thereof the following:

1. CALSTART, headquartered in California and operating in the Northeast out of a regional office in Brooklyn, New York, is a globally renowned 501(c)(3) nonprofit organization dedicated to the advancement of zero-emission vehicle and infrastructure technology. With a global member consortium of nearly 250 technology, government, industry, and community partners, CALSTART has worked for 30+ years to accelerate the commercialization and deployment of

advanced vehicle technologies and transportation solutions. Through policy development, incentive program administration, and first-of-its-kind deployment partnerships, CALSTART has played a key role in driving the market toward clean technologies to transform the transportation sector and reduce greenhouse gas and criteria pollutant emissions. CALSTART is one of the only global non-profits specifically dedicated to the ecosystem of transportation electrification.

2. Petitioner Public Service Electric and Gas Company (“PSE&G” or “Petitioner”), pursuant to the Board’s Order dated October 23, 2024,<sup>1</sup> filed a Petition for approval of a program that provides incentive plans for medium and heavy-duty electric vehicle (“MHD-EV”) charging infrastructure. More specifically, the Petition and its supporting testimony request that the Board approve a program referred to as the “PSE&G Clean Energy Future-Electric Vehicle Medium and Heavy-Duty (“CEF-EV MHD”) Program (“PSE&G Program”).” The proposed PSE&G Program consists of the following five components:

- Public MHD Charging Solution, which will provide electric vehicle charging stations for public fleets;
- Private MHD Charging Solution, which will provide electric vehicle charging stations for private/commercial fleets primarily operated by or serving Overburdened Municipalities or primarily operating or serving Overburdened Communities;
- Rate Incentives, which are intended to promote managed charging and help minimize grid impact from MHD charging by providing a demand charge rebate and Managed Charging Bonus;
- Additional Components, which will examine various non-wire solutions, such as Battery Energy Storage Systems and Vehicle to Everything; and
- Fleet Advisory Services, which will provide technical planning support to assist customers in evaluating appropriate load requests (i.e., vehicle selection, duty cycle review, optimal charging plan, etc.).

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<sup>1</sup> *In the Matter of Medium and Heavy Duty Electric Vehicle Charging Ecosystem*, BPU Docket No. QO21060946, Order Dated October 23, 2024, (“MHD Order”).

PSE&G asserts that its Program “will advance a clean energy future for New Jersey that furthers the State’s goals by: (a) lowering fossil fuel consumption; (b) reducing greenhouse gas emissions; (c) creating “green jobs;” (d) advancing the electric vehicle industry technology in New Jersey; and (e) making the electric grid more reliable, resilient, and safe.” (Petition at 2-3.) The PSE&G Program proposes to invest \$30 million over a period of approximately four years, and approximately \$10.2 million in operations and maintenance (“O&M”) expenses, necessary for implementing the five CEF-EV MHD programs. The PSE&G Program proposes that PSE&G’s investment and expenses be recovered through a cost recovery mechanism discussed in its testimony.

3. In this proceeding, the Board is likely to make important policy decisions regarding the implementation of programs that are critical to the successful deployment of MHD-EV’s in New Jersey. The decisions made by the Board will have a direct and significant impact on the State’s ability to achieve its emission reduction goals, which will, in turn, have a direct impact on CALSTART achieving its policy goals in New Jersey.

4. CALSTART has a long history of advancing the development of MHD-EVs and related EV infrastructure. CALSTART regularly engages with state commissions, such as the Board, and other regulatory agencies to promote the removal of barriers to MHD-EV adoption and to promote the implementation and development of EV infrastructure through participation in agency policy-making and agency proceedings such as this matter. In fact, CALSTART submitted comprehensive comments to the Board on October 5, 2021, and on January 24, 2023, in response to the Board’s straw proposals *In the Matter of Medium and Heavy Duty Electric Vehicle Charging Ecosystem*, Docket No. QO21060946. The comments received by the Board during the straw proposal phase of this docket helped to inform the establishment of the minimum filing

requirements mandated by the Board in this proceeding. CALSTART has also participated in proceedings related to utility support for transportation electrification, including make-ready programs and incentive programs in California, Maryland, North Carolina, New York, Michigan, and Washington. In several of those state regulatory proceedings CALSTART engaged on EV rate design, including rate design for MHD-EVs. CALSTART was involved in some of the first commercial EV rate setting proceedings in the country, one of the earliest being Pacific Gas & Electric (PG&E). In that proceeding, CALSTART provided testimony regarding the duty cycles of different types of vehicles which informed the time-of-use pricing and tiered rate structure adopted by PG&E.

5. CALSTART has also provided input and information to New Jersey Department of Environmental Protection (“NJDEP”) regarding the implementation of programs and policies applicable to MHDVs. For example, CALSTART publicly supported the adoption of the Advanced Clean Trucks (ACT) rule before the NJDEP.<sup>2</sup> The Board’s determination in this docket will likely influence whether the ACT will be implemented successfully.

6. Further, CALSTART has been actively involved in fleet electrification in New Jersey. The CALSTART Regional Office in Brooklyn is responsible for operating the “NJ Fleet Advisor” program on behalf of NJ DEP.<sup>3</sup> This program provides fleet electrification assistance to fleets across the state (in all utility service territories). Offering this assistance requires a thorough understanding of each utility’s rates and incentive programs to effectively advise participating fleets and provide accurate total cost-of-ownership (“TCO”) analysis. Because CALSTART is familiar with the economics of fleet electrification, CALSTART has a unique understanding of the

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<sup>2</sup> See N.J. Admin. Code § 7:27-31.1 (2023); and N.J. Stat. Ann. §§ 13:1B-3(e), 13:1D-9, 26:2C-1 to -68, particularly §§ 26:2C-8.1 to -8.53, 26:2C-37 to -58, 48:25-1 to -11.

<sup>3</sup> Drive Green NJ | NJ Fleet Advisor, N.J. Dep’t of Env’t Prot., <https://dep.nj.gov/drivegreen/njfleetadvisor/>.

“break even” point for fleets adopting EVs and therefore can provide the Board credible information regarding rate structures that will be supportive of electrification compared to those that may be cost prohibitive.

7. CALSTART’s purpose for intervening in this proceeding is to represent the interest of its members by advancing the acceleration of clean transportation and to advance New Jersey’s ambitious climate goals and zero-emission vehicle adoption targets. Through its intervention, CALSTART will provide insight developed from its members regarding the EV-related needs and the perspective of commercial and public fleets, and other industry stakeholders, including shared charging infrastructure developers working to expedite charging station development for MHD-EV fleets. CALSTART is able to provide this unique perspective because many of its member companies are focused on fleet electrification. These member companies have formed a coalition to support and inform CALSTART’s utility policy work and ensure that utilities design and implement effective rates and make-ready programs that efficiently support fleet electrification.

8. CALSTART’s participation will add measurably and constructively to the scope of this matter. Its extensive experience in utility proceedings across multiple states, including California, Maryland, North Carolina, and New York, equips CALSTART with the expertise necessary to inform effective rate design for MHD-EVs. Further, CALSTART member companies currently have numerous projects under development around the Port of Newark and throughout New Jersey’s trucking corridors. As a result, CALSTART is well positioned to contribute meaningful testimony and information regarding the economic impact on proposed rate designs by developing detailed cost analyses that capture multiple fleet types, vehicle drive cycles, and charging patterns.

9. CALSTART should be permitted to intervene because it and its members will be directly affected by the outcome of this proceeding. The success of fleet electrification in New Jersey may

hinge on the BPU's decisions in this proceeding. If the Board adopts a MHD program that makes adopting electric fuels cost competitive with diesel/gasoline, New Jersey's vehicle adoption targets will progress and it will be more likely that New Jersey can successfully implement the ACT rule. If however the Board adopts a rate structure that makes electrifying cost-prohibitive for fleets, it will be extremely difficult for New Jersey to implement ACT or achieve its climate goals. Furthermore, CALSTART's member companies are currently making major investments in charging depots in New Jersey, and if these projects fail due to poor regulatory policy or implementation, it will adversely impact CALSTART's members and CALSTART's ability to continue to advance MHD electrification in New Jersey. In short, the Board's decision in this proceeding is likely to have significant precedential effect on CALSTART's interests as well as its members in New Jersey. There are a variety of policy-related issues and MHD-EV development issues that may be addressed by the Board in this matter as it evaluates the Petition. How those issues are decided will likely impact the CALSTART's members because the Board's decision may establish requirements and practices that affect the operation of the MHD-EV-related industry in the State, thereby resulting in important precedent and policy implementation.

10. As an intervenor in the proceeding, CALSTART will play a focused role that will provide the Board the benefit of its experience and perspective, especially related to the best practices and "lessons learned" from programs in other jurisdictions, specifically with regards to utility incentives and tariff designs.

11. CALSTART will abide by the schedule set for the proceeding and will coordinate its representation with other similarly situated entities in this docket to the extent it finds such action appropriate.

12. CALSTART's Motion to Intervene in this matter is timely and consistent with the Board's April 23, 2025 Order requiring motions for intervention and participation to be filed on or before May 14, 2025.

13. In making this request, CALSTART requests that all communications and correspondence for this proceeding be directed to the following individuals:

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and

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and

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14. The granting of this Motion will not cause undue delay, confusion or prejudice to the parties.

**WHEREFORE**, CALSTART respectfully submits that all factors for intervention set forth in N.J.A.C. 1:1-16.3 weigh in favor of granting CALSTART's Motion in the above-captioned

proceeding. Further, CALSTART will provide a unique perspective and insight regarding PSE&G's Petition and will add constructively to the proceeding without causing undue delay or confusion. CALSTART is committed to contributing its unique expertise and perspective to support the successful implementation of New Jersey's climate goals and zero-emission vehicle adoption targets. For the foregoing reasons, CALSTART respectfully requests that the Board grant its Motion for Intervention.

Respectfully submitted,

GREENBAUM ROWE SMITH & DAVIS, LLP  
Attorneys for Proposed Intervenor CALSTART, Inc.

A handwritten signature in cursive script, reading "Barbara Koonz".

By: \_\_\_\_\_  
BARBARA J. KOONZ

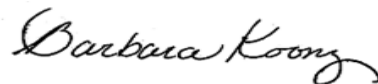
Dated: May 14, 2025



**CERTIFICATION OF SERVICE**

I hereby certify that I have this day served via electronic mail copies of the foregoing Motion to Intervene to the parties identified on the service list.

Dated this 14<sup>th</sup> day of May, 2025.



By: \_\_\_\_\_  
Barbara J. Koonz