

June 17, 2020

Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
Post Office Box 350
Trenton, New Jersey 08625

RE: Docket # QO20050357, Straw Proposal on Electric Vehicle Infrastructure

Dear Secretary Camacho-Welch,

On behalf Consumer Energy Alliance (CEA), a diverse group representing families, small businesses and men and women from various industries, including labor, manufacturing, small business and conservation, I write today to share our comments on the Straw Proposal on Electric Vehicle Infrastructure issued by the New Jersey Board of Public Utilities.

CEA has long supported energy and technological diversity. Our organization's main concern with the Straw Proposal is the truncated timeline for implementation, resulting in limited opportunity for robust public engagement to help inform the process. The legislature's extremely ambitious deadlines from Senate Bill 2252 to rapidly expand the requirement that 330,000 electric vehicles be in use across the state (up more than ten times from some nearly [31,000](#) registered vehicles today) in just five years will require tremendous investment and carefully thought-out answers to several key questions that have yet to be fully addressed. As the Board heard during the June 3rd technical conference, many of the questions raised by the selected participants on the Proposal revolved around the following themes:

- How much will the proposal cost? Who pays and why?
- How will equity issues and charging locations be resolved?
- How is the rate design going to be structured?

Considering the significant public policy implications before the Board, it's clearly more important that regulators get this done right rather than getting it done fast. Unfortunately, as we understand the current stakeholder process, there was little notification before the last public meeting (and the only one set so far) and only two weeks have been provided for the public to give comments on the numerous complex issues raised in the Proposal. All parties and stakeholders involved would tremendously benefit from more time to examine and respond to the topics outlined in the Proposal. Scheduling an additional technical conference to address the feedback that may be offered during the public comment period would be fruitful for the Board to more thoroughly assess the ramifications of what may ultimately be implemented.

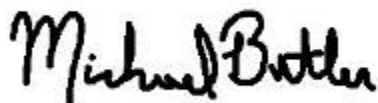
As the Governor's Energy Master Plan noted, the goals of the Straw Proposal are to:

- Attract private capital into the EV infrastructure sector;
- Minimize the risk of ratepayers, and implement infrastructure that does not quickly become obsolete or under-utilized; and
- Design EV infrastructure policies that are fair to both EV-driving ratepayers and non-EV driving ratepayers, to ensure the benefits of EVs are shared by all ratepayers.

The Straw Proposal's planned regulatory structure is anticipating that all electric distribution companies must have a proposed plan submitted by December 31st, roughly six months from today, and final implementation must be done by April 1, 2021. Setting such an ambitious timeline for largely unresolved and highly technical issues creates the likelihood of future problems and unintended consequences, especially if the burden of these outcomes fall on the shoulders of small businesses and families in New Jersey.

We certainly appreciate the fact that Board has been given a small window of time due to the authorizing legislation that was passed, and we also appreciate the general direction toward greater energy diversity. However, adding additional comment and input sessions would ensure more public buy-in and a greater chance that the Board will meet the goals and objectives outlined in the Energy Master Plan. This would likely create an environment for a more effective rollout of EV infrastructure and deployment that is fair for all consumers, families and stakeholders that are involved.

Sincerely,



Michael Butler
Executive Director
CEA Mid-Atlantic