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May 7, 2020

Via Email

Aida Camacho-Welch, Secretary of the Board New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor Trenton, New Jersey 08625

> Re: I/M/O the Petition of Atlantic City Electric Company for Approval of Voluntary Program for Plug-In Vehicle Charging, Docket No. EO18101115

Motion for Participation by Alliance for Transportation Electrification

Dear Secretary Camacho:

On behalf of the Alliance for Transportation Electrification ("Alliance") attached please find a Motion for Participation to be filed in the above-captioned matter pending before the New Jersey Board of Public Utilities ("Board"). Commissioner Upendra J. Chivukula has been designated as the presiding commissioner for the proceeding.

This motion is being filed electronically pursuant to the Board's March 19, 2020, Order responding to the COVID-19 pandemic. In that Order, the Board waived the requirement that entities file paper documents with the Board and required that all submissions be submitted electronically.

Should you have any questions, please contact the undersigned.

Respectfully submitted,

BARBARA I KOONZ

Copy:

Honorable Upendra J. Chivukula (e-mail) Service List (E-mail)

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

)	
IN THE MATTER OF THE PETITION OF)	
ATLANTIC CITY ELECTRIC COMPANY)	
FOR APPROVAL OF A VOLUNTARY)	Docket No. EO18020190
PROGRAM FOR PLUG-IN VEHICLE)	
CHARGING)	
)	

To: Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Trenton, New Jersey 08625

MOTION FOR PARTICIPANT STATUS OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION

The Alliance for Transportation Electrification ("the Alliance"), by its undersigned counsel, hereby formally requests that the New Jersey Board of Public Utilities ("Board") grant the Alliance's within motion pursuant to N.J.A.C. 1:1-16.6 for permission to participate in the above-captioned proceeding. The Alliance states in support thereof the following:

1. The Alliance is a 501(c)(6) non-profit corporation that engages policymakers at the State and local government level throughout the United States to: (i) remove barriers to Electric Vehicle ("EV") adoption; (ii) encourage a collaborative and open approach to accelerate the deployment of EV charging infrastructure; (iii) support an appropriate utility role by complementing the private/competitive market, and (iv) promote interoperability and open standards in all parts of the EV charging ecosystem. The Alliance's members consist of about 50 organizations including utilities, automobile and bus manufacturers, EV charging infrastructure providers and network operators, and related trade associations.

- 2. In this proceeding, Atlantic City Electric Company's (ACE) seeks Board approval of a Voluntary Program for Plug-In Vehicle Charging (PIV) program. In its Amended Petition, ACE proposes a multi-year, \$42.107-million-dollar PIV program to, among other things, incentivize off-peak charging of PIVs, develop PIV infrastructure, provide grants to foster innovation in electrifying the transportation sector, support for electrifying school buses, initiatives that consist of Time of Use rates for residential customers, and properly sited PIV charging infrastructure to alleviate "range anxiety."
- 3. The Alliance's goals are to engage with state commissions, such as the Board, and other regulatory agencies to promote the removal of barriers to EV adoption. The Alliance promotes the implementation and development of EVs and the related infrastructure through participation in agency policy-making proceedings and agency proceedings such as this Petition. As mentioned above, the Alliance seeks to advance the deployment of EVs by encouraging a collaborative approach to accelerate the deployment of EV charging infrastructure, supporting an appropriate utility role by complementing the private/ non-utility sector, and promoting open standards in all parts of the EV charging ecosystem to provide consumer benefits and reduce potential risk of stranded assets.
- 4. The Board's decision in this proceeding is likely to have significant precedential effect on the Alliance's members in New Jersey. There are a variety of policy-related issues and EV development issues that will be addressed by the Board in this case. How those issues are decided will likely impact the Alliance's members because the Board's decision will establish requirements and practices that effect the operation of the EV-related industry in the State of New Jersey; thereby resulting in important precedent. The Alliance will therefore likely be directly and specifically

affected by the relief provided herein. Accordingly, the Alliance has a significant interest in the Board's review of ACE's filing and the outcome of this proceeding.

- 5. The Alliance's focus to encourage a collaborative approach among divergent parties to reduce barriers to EV development is distinct from other parties or participants in this case. Thus, no other party will represent the interests of the Alliance in this case. As a participant in the proceeding, the Alliance will play a focused role that will provide the Board the benefit of the Alliance's experience and perspective, especially related to the best practices and "lessons learned" from early pilot programs in other jurisdictions.
- 6. The Alliance has a history of coordinating its activities in dockets at the Board with other similar entities where appropriate. The Alliance affirms that it 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.
- 7. The Alliance acknowledges that the date for filing motions for intervention as set forth in the Pre-hearing Order was March 13, 2029. Notwithstanding the foregoing, the Alliance respectfully requests that the Board accept this Motion for Participation as timely because of the significant impact this proceeding may have on the Alliance's membership. The Alliance also notes that the Pre-hearing Order in this matter contemplates the continuation of motion practice by the parties through May 18, 2020. The Alliance's participation in this matter and the Board's approval of this motion will not in any way delay the schedule already stipulated in this Docket or prejudice the parties' interests.
- 8. In making this request, the Alliance asks that all communications and correspondence for this proceeding be directed to the following individuals:

Phil Jones, Executive Director Michael I. Krauthamer, Senior Advisor Alliance for Transportation

Electrification

1402 Third Avenue, Suite 1315,

Seattle, WA 98101

phil@EVtransportationalliance.org

michael@EVtransportationalliance.org

Barbara J. Koonz, Esq. Greenbaum, Rowe, Smith & Davis 75 Livingston Avenue Roseland, New Jersey 07068 Tel: (732) 549-5600 bkoonz@greenbaumlaw.com

9. Due to the Alliance's experience in the electric industry, its participation as a Participant in

this proceeding is likely to add constructively to the proceeding.

10. The Alliance will abide by any schedule set for this proceeding.

11. The granting of this Motion will not cause undue delay or confusion.

WHEREFORE, the Alliance respectfully submits that all factors for participation set forth in N.J.A.C. 1:1-16.6 weigh in favor of the granting of the Alliance's motion in the above-captioned proceeding, because the Alliance will provide a unique perspective and insight regarding the

ACE's filing and will add constructively to the case without causing undue delay and confusion.

Respectfully submitted,

GREENBAUM ROWE SMITH & DAVIS, LLP Attorneys for Proposed Participant the Alliance for Transportation Electrification

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Dated: May 7, 2020

CERTIFICATION OF SERVICE

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

Dated this 7th day of May, 2020.

Porhoro I Koonz

STATE OF NEW JERSEY BEFORE THE BOARD OF PUBLIC UTILITIES

)	
IN THE MATTER OF THE PETITION OF)	
PUBLIC SERVICE ELECTRIC AND GAS)	
COMPANY FOR APPROVAL OF ITS)	Docket No. EO18101111
CLEAN ENERGY FUTURE-ELECTRIC)	
VEHICLE AND ENERGY STORAGE)	
("CEF-EVES") PROGRAM ON A)	
REGULATED BASIS)	
)	

CERTIFICATION OF MICHAEL KRAUTHAMER. IN SUPPORT OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION'S MOTION FOR PARTICIPANT STATUS

Michael Krauthamer, of full age, hereby certifies and says:

- 1. I am a Senior Advisor for the Alliance for Transportation Electrification (the "Alliance").
- 2. The Alliance is a 501(c)(6) non-profit corporation that engages policymakers at the State and local government level throughout the United States to remove barriers to the adoption and development of electric vehicles (EV). The Alliance's members include about 50 organizations including utilities, automobile and bus manufacturers, EV charging infrastructure providers and network operators, and related trade associations.
- 3. This certification is submitted in support of the Alliance's motion for participation in the above-captioned matter.
- 4. The basis for the Alliance's motion and information demonstrating that the Alliance's motion satisfies the New Jersey Board of Public Utilities' standard for participation is set forth in the Motion filed herewith.
- 5. The Alliance understands that if participant status is granted, the Alliance will be bound to the requirements of all Orders that have been, and will be, issued in the proceeding.

I certify that the above statements made by me are true and accurate to the best of my knowledge. I am aware that if any of the above statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

ALLIANCE FOR TRANSPORTATION **ELECTRIFICATION**

By: Michael Krauthamer

Michael Krauthamer

Dated: May 7, 2020