



November 30, 2017

To: New Jersey Board of Public Utilities
EVStakeholder.group@BPU.NJ.gov

RE: Response to Task 2 Questions

EV Connect appreciates the opportunity to provide comment to the New Jersey Board of Public Utilities (BPU) on the topic of the electric vehicle (EV) market in New Jersey. We commend the BPU and its staff for organizing a stakeholder process that engages a broad range of industry partners.

EV Connect is a leading provider of **open, standards-based** electric vehicle (EV) charging solutions for commercial, enterprise, hospitality, university and government facilities. EV Connect developed and operates the industry's most robust, open, and flexible cloud-based platform for the management of the entire EV ecosystem -- charging stations, the drivers that use them, the hosts that own them and the electric utilities that feed them. The EV Connect platform provides **charge station agnostic** command & control; enterprise and energy systems integration via an open API; driver communications and support; and demand-response functionality across multiple charging stations and networks. This approach maximizes investment dollars into a variety of EV charging solutions by preventing host sites from being locked into a proprietary network and hardware relationship.

EV Connect's focus on providing a Software-as-a-Service (SaaS) solution to the EV charging industry enables it to manage across multiple charging station networks; provide integration between disparate charging station hardware; and increase feature/functionality to the charging eco-system.

As a Software-as-a-Service (SaaS) solution that supports OpenADR 2.0b, EV Connect's responses to task 1 questions presented to the EV Stakeholder Group at the September 15, 2017 Stakeholder Meeting; *1) Do EVs fall under the definition of demand-side management and energy efficiency as set forth at N.J.S.A. 48:3-51 and/or N.J.S.A 48:3-98.1.d? and 2a) Should owners and operators of EVSE that provide electric vehicle charging service be regulated as electric utilities?, and 2b) Are operators of EVSE reselling electricity or providing a charging service?* fall in-line with many of our industry partners. Therefore, EVs should be classified under the definition of demand-side management and energy efficiency. EVSE owners and operators should not be regulated as they are providing a charging service.

In response to the Task 2 questions presented to the EV Stakeholder group, EV Connect's responses are outlined below and can be available for additional in-depth conversations on the topic through an in-person meeting.



1) *What goals for EV Infrastructure should be established?*

EV Connect encourages the NJ BPU and its partner stakeholders engage the State agency and other local jurisdictions within the State to take advantage of all available funding and push for increased EV adoption and EV infrastructure. For instance, **New Jersey should commit its full 15% allowance towards the implementation of an open, robust charging infrastructure**

2) *What role should the Board other government agencies; electric utilities, non-governmental organizations and the private market have in addressing EV/infrastructure adoption?*

EV Connect believes that in order to allow for the greatest EV adoption and growth, the EV market should be structured to allow for business models that do no limit competition. A crucial role for the Board and other government agencies; electric utilities, non-governmental organizations and the private market is **to promote public-private partnerships that support industry competition and allow a variety of business models to participate in the program; insist upon an open, standards-based platform, as opposed to a proprietary, closed system where participants are restricted to one vendor/manufacturer; and ensure that incentives are structured through competitive programs.** This will allow and ensure the greatest flexibility for developing the best technologies that address, a. EV Grid Integration, b. EV Rates (ToU, Demand Charges, etc), and c. Role in EVSE a/o infrastructure today and as the market and industry grows.

As mentioned EV Connect commends the NJ BPU in its initiative to engage numerous stakeholders under this process and we see it as essential to continue to encourage and facilitate cooperation with the local electric utility, state energy and environmental agencies, local governments, and NGO's like the local clean cities coalition and private sector.

3) *What is the present status of EVs and EV infrastructure in New Jersey?*

The current 14,000 plus EVs on the road in the State of New Jersey versus number of vehicles on the road is a low figure, however, even this amount of adoption has developed with little incentive or encouragement as seen in other States. As one of the densest States in the United States, New Jersey has the opportunity to become a leader in EV adoption, which can benefit the state's environmental impact tremendously. The dense urban areas with high vehicle mileage and vehicle ownership makes New Jersey a prime location for the EV adoption. **The opportunity to make EVSE available at all MUD's, and all workplaces** should be a first step. New Jersey is not only dense in population and vehicle ownership, but also lies between the nexus of New England and

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the Mid-Atlantic States, making travel through the State a usual occurrence. Developing a robust EV infrastructure network along these corridor's will also contribute to the reduction of GHG emissions from non-NJ residents. **As such, EV Connect recommends a balanced approach between highway (DC Fast Charging) and residential/workplace and public (Level 2) charging infrastructure.**

- 4) *What EV/EV infrastructure development can be expected in the short/medium term under a Business as Usual Scenario?*

If a Business as Usual Scenario continues, New Jersey risks missing an opportunity to greatly impact the environment and improve overall air quality for NJ residents. Investing in an EV/EV infrastructure development through a strategic approach that engages all of the stakeholders provides the State, its stakeholders and residents an opportunity to capture many of the short-term incentives that are being presented through programs such as the VW State Settlement, Appendix D. A strategic and engaged approach also allows many private industry partners guidance and a roadmap for how best to invest private dollars that can better serve the residents of New Jersey.

We hope you have found this letter informative, and thank you for considering our recommendations. As you work toward moving the EV industry in NJ forward, please consider EV Connect not only as an experienced, well-qualified supplier for your EV charging infrastructure needs, but also as a resource for insight into both the EV charging industry and the broader EV industry. We welcome a continuing partnership to usher in an era of transportation innovation.

Sincerely,

A handwritten signature in black ink that appears to read "Jordan Ramer".

Jordan Ramer, CEO

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