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November 30, 2017

**VIA FEDERAL EXPRESS and
ELECTRONIC MAIL**
EVStakeholder.Group@bpu.nj.gov

Irene Kim Asbury, Esquire
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
P.O. Box 350
Trenton, New Jersey 08625-0350

RE: New Jersey Electric Vehicle (“EV”) Infrastructure Stakeholder Group

In the Matter of the Regulatory Assistance Project Electric Vehicle Infrastructure
Report – “Getting From Here to There: Regulatory Considerations for
Transportation Electrification”
BPU Docket No. EO17070748

Dear Secretary Asbury:

On behalf of Atlantic City Electric Company (“ACE”), following for Staff’s review, consideration and posting are ACE’s responses to the four questions posed by Staff regarding the New Jersey Electric Vehicle (“EV”) Infrastructure Stakeholder Group. We look forward to reading the comments posted by interested parties on the Board’s website in the very near future.

An original and ten copies of this correspondence will follow by overnight courier. Kindly return one date and time-stamped “filed” copy to the undersigned in the self-addressed, postage-prepaid envelope provided.

1. What goals for EV Infrastructure should be established?

Response: Any infrastructure project needs to consider the purpose of the infrastructure, the people that it serves, economic impacts, potential environmental impacts, inclusion of participants, load requirements, mitigation of any impact on the local electric distribution system, and consumer protections, among others.

Proposed objectives

- lower electricity use at time of high demand;
- provide incentives to New Jersey (“NJ”) customers to charge their vehicle during off-peak hours at home;
- increase the reliability, resiliency and efficiency of the electric distribution system, taking into consideration the incremental load due to electric vehicle charging;
- decrease emissions in the State transportation sector;
- increase economic investment in the State by strategically deploying DCFC and public L2 chargers to ensure there is a place in NJ to charge for those moving away from petroleum fuel to electricity; and
- ensure consumer protections are established for all NJ residents and customers.

Based on the above objectives, a framework can be developed that will serve as a guide for the BPU and the Staff to evaluate proposed programs from all interested parties, including vendors of equipment, utilities, government agencies and other parties. This framework should include:

- Basic Information
 - EV Sales
 - Clustering implications
 - Energy use profile
 - Electric Vehicle Supply Equipment (“EVSE”) installation, operation and overall cost
- Customer Education
 - Ability to change charging behavior
 - Ability to lower peak use
 - Best charging time and prices
 - Participant preferences
 - Response to offerings and incentives
 - Channels of communication
- Pricing
 - Response to incentives
 - Ability to change behavior
 - Scale of pricing options
 - Track behavior change
 - Participant feedback to pricing options
 - Acceptance and satisfaction of price offerings
- Demand Response
 - Ability to change charging behavior at home
 - Ability to lower peak
 - Customer response to demand events
 - Number of events and load shed
 - Effectives of the technology use
 - Customer satisfaction

- Smart Technology
 - Technology and utility interconnection requirement
 - Ability to lower final cost to the customer
 - Functionality and application
 - Ability to reduce overall installation cost
 - Ability to provide customer information easily

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

Response: The electrification of vehicle transportation is a complex and important undertaking, and the Board, electric utilities, non-governmental entities and the private market all have a role to play in that process of market transformation. Summarized below are ACE's views on how each entity can contribute to fostering EV adoption in New Jersey and the region.

The Board's Role: ACE believes the Board has a pivotal role to play in creating incentives for adoption of EV technology by facilitating the timely, fair and cost-effective deployment of EV charging infrastructure. To that end, the Board should approach this issue from the perspective of eliminating barriers to EV infrastructure deployment, creating fair and open markets, and providing incentives for investment in EV infrastructure. In addition, the Board must recognize that the adoption and deployment of EVSE will inevitably place demands on utility distribution and transmission infrastructure beyond the actual charging facilities, and that there are costs related to those demands that must be recovered on a full and timely basis. All of these points will require the Board to consider the extent to which long-established regulatory approaches are consistent with the goal of facilitating EV adoption. To the extent that the current regulatory paradigm does not support that goal, then the Board will need to identify and apply alternative approaches. In short, the Board is ideally positioned to articulate an overall goal and vision for EV adoption and for the deployment of its related infrastructure, to create regulatory mechanisms that actively support and encourage the realization of that goal, and to strike a balance that protects customers, market participants, and utilities during a period of market transformation.

The Role of Electric Utilities: ACE believes that electric utilities can be instrumental in, and are uniquely positioned to facilitate, the deployment and adoption of EV charging infrastructure for a number of reasons. Electric utilities already own and operate most of the system components necessary for providing charging services, they have established relationships with all customer classes, and they have comprehensive knowledge of the distribution and transmission system which will be most impacted by widespread EV adoption. Thus, ACE believes that electric utilities should be permitted to provide a portfolio of EV charging options, to provide those options as tariffed utility services, and to recover fully and timely the costs of deploying EV charging infrastructure. ACE maintains that utility participation in the EV charging services market will help to develop that market and accelerate EV acceptance. Indeed, any effort to curtail or disadvantage utility involvement would be potentially counter-productive and might ultimately delay EV deployment in New Jersey—particularly for under-served groups.

The Role of Other Governmental Agencies: Depending on the specific application of EV charging infrastructure, there are certainly roles to play for a variety of governmental agencies. While the New Jersey Department of Environmental Protection certainly has a role to play in facilitating EV adoption given the environmental benefits of EV technology, other State entities do as well. For example, the Department of Transportation should play a role in ensuring charging facilities are easily accessible and plentiful on New Jersey's State and county highways, making interstate transportation via an EV as seamless as gasoline powered transport. In another example, State agencies responsible for public housing should consider the installation of EV charging facilities at public housing locations to make EVs a viable option for lower income residents. This will be particularly true as the cost of EVs continue to decline, and the operation of an EV is a cost-effective alternative to traditional gasoline powered transportation. Local government also has a role in encouraging the adoption of EV charging infrastructure through the development of local ordinances and building codes that facilitate the installation of EV charging equipment.

The Role of Non-Governmental Agencies and the Private Market: These entities also have an important role to play in the adoption of EV technology in New Jersey. Advocacy and industry groups, including environmental and other groups, can all help to educate and raise public awareness among their members and the general public of the environmental and cost benefits of EV ownership, and the available options for charging EVs at home, work or while travelling. The private market place can also facilitate EV adoption through the development of innovative, customer-specific applications and services, perhaps offering a level of customization that would not be possible through tariffed utility services. While these approaches could be deployed in residential applications, there are also opportunities for larger scale commercial applications. As for the whether or not these private entities should be subject to regulation as public utilities, ACE does not believe such regulation is needed or appropriate. That said, any private entity connecting to ACE's distribution system should be held to minimum technical and safety standards to ensure the electric grid is not adversely impacted by any interconnection. Private entities should also be held to appropriate consumer protection standards to prevent confusion and fraud.

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

Response: ACE hereby adopts the response of ChargeVC to this question.

4. What EV/EV infrastructure developments can be expected in the short/medium term under a Business as Usual scenario?

Response: ACE hereby adopts the response of ChargeVC to this question.

Irene Kim Asbury, Esquire

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ACE looks forward to its continued active participation in this proceeding. Thank you for your cooperation and courtesies. Feel free to contact me with any questions or if I can be of further assistance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Passanante", followed by a horizontal line and the initials "/jpr".

Philip J. Passanante
An Attorney at Law of the
State of New Jersey

Enclosure

cc: Michael Winka, BPU (Electronic Mail)
Michael Hornsby, BPU (Electronic Mail)