STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE PETITION OF PUBLIC SERVICE ELECTRIC AND GAS COMPANY FOR APPROVAL OF ITS CLEAN ENERGY FUTURE – ELECTRIC VEHICLE AND ELECTRIC STORAGE PROGRAM ON A REGULATED BASIS

BPU Docket No. EO18101111

PUBLIC SERVICE ELECTRIC AND GAS COMPANY REBUTTAL TESTIMONY OF STEPHEN SWETZ SENIOR DIRECTOR – CORPORATE RATES AND REVENUE REQUIREMENTS

October 16, 2020

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PUBLIC SERVICE ELECTRIC AND GAS COMPANY REBUTTAL TESTIMONY OF STEPHEN SWETZ SENIOR DIRECTOR – CORPORATE RATES AND REVENUE REQUIREMENTS

INTRODUCTION

Q. Please state your name, affiliation and business address.
 A. My name is Stephen Swetz, and I am the Senior Director – Corporate Rates and
 Revenue Requirements for PSEG Services Corporation. My principal place of business is 80
 Park Plaza, Newark, New Jersey 07102. My professional experience and responsibilities are
 described in Schedule SS-CEF-1, which was submitted along with my direct testimony.

6 Q. Have you previously submitted direct testimony in this proceeding?

A. Yes. On October 11, 2018, I submitted direct testimony on behalf of Public Service
Electric & Gas Company ("PSE&G" or the "Company") in support of PSE&G's Petition
requesting the New Jersey Board of Public Utilities ("BPU" or "Board") approve PSE&G's
proposed Clean Energy Future – Electric Vehicle and Energy Storage Program ("CEF-EVES"
or the "Program"). The defined terms in my direct testimony have the same meanings here.

12 Q. What was the purpose of your direct testimony in this proceeding?

A. In my direct testimony, I provided the details for the calculations of the Program's revenue requirements, the associated cost recovery methodology, and rate design for the CEF-EVES Petition filed with the Board. Specifically, I recommended that the Company establish a Technology Innovation Charge ("TIC") to be assessed to all customer classes on an equal cents per kilowatt hour ("kWh") basis to recover the costs of its Electric Vehicle ("CEF-EV") program. My direct testimony also provided detailed schedules setting forth the projected
 revenue requirements, rates, and bill impacts over the Program's life.

3

Q.

What is the purpose of your rebuttal testimony?

A. In my rebuttal testimony, I respond to certain assertions in the direct testimonies of
witnesses on behalf of other parties concerning the Company's cost recovery and rate design
proposals. Specifically, I respond to the testimony of:

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(i) Ezra D. Hausman, David E. Peterson and Dante Mugrace on behalf of the New Jersey Division of Rate Counsel ("Rate Counsel");

9 (ii) William Erlich on behalf of Tesla, Inc. ("Tesla");

10 (iii) Kathleen Harris of Environment New Jersey, the Environmental Defense Fund,
11 Natural Resources Defense Counsel and Sierra Club ("collectively the "Environmental
12 Intervenors");

- 13 (iv) Jinga J. Shah on behalf of Electrify America, LLC ("Electrify America");
- 14 (v) R. Thomas Beach on behalf of EVGO Services, LLC ("EVGO"); and
- 15 (vi) Kevin George Miller on behalf of ChargePoint.
- 16 Q. Please summarize your rebuttal testimony.

A. As discussed more fully below, while Rate Counsel's witnesses broadly oppose the Company's proposals in these proceedings, the remaining witnesses generally support the goals of the Company's filing but propose changes to the rate mechanism that the Company proposes to effectuate the expansion of electric vehicles ("EVs") in the Company's service territory. In response, I first explain why Rate Counsel's witnesses' claims and recommendations are unfounded or unreasonable and should be rejected. I then address various recommendations by other witnesses and explain why the Company's proposals
represent a reasonable and balanced approach to encouraging the expansion of the EV market.
As more fully discussed below, none of the witnesses presenting rate design recommendations
in this proceeding has presented a persuasive basis for the Board to reject the Company's
proposals in this case.

RESPONSE TO RATE COUNSEL'S WITNESSES

6 7 8 Q. What arguments do Dr. Hausman and Mr. Mugrace advance in support of their position that PSEG Shareholders should contribute to the funding of Electric Vehicle Sub-Program?

9 A. Dr. Hausman claims that increased adoption of EVs will lead to increases in kWh sales 10 which would lead to greater revenues and profits, which would classify the proposed program 11 as market development activities. He further states that in competitive markets, the costs for 12 market development activities are typically absorbed by shareholders in anticipation of future 13 profits. Mr. Mugrace reiterates and agrees with Dr. Hausman's claims that shareholders should 14 fund some or all of the CEF-EV program.

15Q.Do you agree that it would be reasonable to require shareholders to absorb a16portion of the cost of funding the CEF-EV Program?

A. No I do not. Dr. Hausman fails to recognize that increases in distribution kW demand
and kWh energy sales arising from the expanded use of electric vehicles will likely lead to a
need for additional investments in distribution system infrastructure, such as adding capacity
to sub-stations. This will impose costs on the Company that are incremental to the costs that
will be recovered in the rates to be charged for this Program.

22 In addition, under the Company's new Conservation Incentive Program approved

recently by the Board in the settlement of PSE&G's CEF-Energy Efficiency Program ("CEF-EE"), revenue from increased usage per customer by existing customers above the levels set for each rate schedule in PSE&G's prior base rate case will be credited back to customers.¹ Therefore, only EV revenue from new customers will be incremental. This minor amount of incremental revenue from new customers between base rate cases would likely be offset by the capital costs associated with those required infrastructure investments noted above until new base rates are set in subsequent base rate cases.

8 Finally, over the long term, as a regulated company, PSE&G's return is set by the BPU 9 and rates are reset in each base rate case on a cost-of-service basis so that the Company has an 10 opportunity to earn its allowed return. Thus, over the long term, rather than creating a source 11 for incremental profits, the revenues from service to electric vehicle customers, like all other 12 revenues, will be used to offset the Company's overall cost of service, eliminating the 13 Company's ability to realize increased profits from increased sales after each subsequent base 14 rate case. Therefore, all other things being equal, the only result that would be achieved by 15 adopting Rate Counsel's witnesses' recommendation that shareholders should be required to 16 fund a portion the CEF-EV program is that the Company would not have a reasonable 17 opportunity to earn its allowed return.

18

Q. How does Mr. Mugrace propose PSE&G recover the CEF-EVES investments?

A. Mr. Mugrace has proposed to have the Company recover all the proposed investments
over ten years, similar to the recently approved CEF-EE Program. As indicated in my direct

¹ See I/M/O the Petition of PSE&G for Approval of its Clean Energy Future/Energy Efficiency Program on a Regulated Basis, Docket No. GO18101112 and EO10121113, Order Adopting Stipulation (September 23, 2020), at 16-17.

testimony the Company has proposed to recover the costs associated with utility depreciable assets over their respective book depreciation lives, which vary from 5 years to 40 years.² The costs associated with EV chargers, which will be owned by program participants, would be treated as a regulatory asset and amortized over ten years, in line with expected charger lives and consistent with Mr. Mugrace's recommendation.

6 **Q.** 7

Why do you disagree with Mr. Mugrace's proposed single recovery period of 10 years?

A. Consistent with fundamental regulatory cost recovery principals, the Company proposes recovering investments in depreciable assets in accordance with the depreciation rates approved in the Company's last base rate case. The regulatory asset related to EV chargers owned by program participants, which is not directly covered under the Company's approved current depreciation rates, is proposed to be amortized over ten years which is consistent with the expected lives of the chargers.

14Q.Rate Counsel witnesses Hausman (at 29) and Mugrace (at 9-11) assert that the15costs of the EV program should be recovered solely from EV customers. Do you16agree?

A. No. As explained by Company witness Karen Reif, adoption of this recommendation
would result in rates to EV customers that are unlikely to encourage widespread participation
in the EV market. As discussed by Ms. Reif, this result would unreasonably deprive the
Company's customers and all other New Jersey residents of the benefits of improved air quality
resulting from increased use of EVs.

 $^{^2}$ Swetz Direct Testimony, at pg 4. See also Schedule SS-CEF-EVES-1; RCR-RD-0009, which sets forth the current depreciation rates.

1Q.In your experience, is it unusual for the Board to set a single rate across all2customer usage for activities that promote societal benefits such as energy3efficiency?

A. No. Both the legislature and the BPU have recognized that it is appropriate to assess
the costs of activities that have the potential to create broad societal benefits to all customer
classes. Indeed, the Board has specifically recognized in the recent Clean Energy Program
proceeding that programs to promote the increased use of EVs should be funded through the
broad-based Clean Energy Fund.³

9 **Q.** 10 11

If the Company were to design rates that recovered the costs to serve electric vehicles solely from the EV owners/drivers, what would be the likely impact of the rates?

12 A. The likely impact would be that the State would be unable to achieve the goals for 13 expansion of the electric utility market that are shared by the State of New Jersey and most of 14 the participants in this proceeding. The main purpose of the CEF-EV program is to "jump 15 start" EV adoption and help achieve the New Jersey Energy Master Plan "Net Zero" carbon 16 emission goal by 2050. If all the costs for the EV program were collected from EV 17 owners/drivers, including the high costs that would be incurred due to low utilization in the 18 early stages of market penetration, the resulting rate would provide a greater barrier than 19 current rates to EV adoption.

20 **Q** 21

Q. Rate Counsel witness Peterson (at 7) asserts that PSE&G proposes to retain all revenues derived from EVES service until its next base rate case. Do you agree?

A. No I do not. Mr. Peterson misinterprets my testimony, which is that revenues that
 PSE&G receives from customers using Company-owned CEF-EV charging stations and from

³ See I/M/O The Clean Energy Programs and Budget For Fiscal Year 2021, BPU Docket QO 20080539 (September 23, 2020).

1	participation in the PJM frequency market would be reflected in the calculation of the TIC as						
2	a cost offset for the CEF-EV Program.						
3 4	Q.	Rate Counsel witness Mugrace (at 18-19) recommends that PSE&G's administrative costs should be capped. Do you agree?					
5	A.	No. Given the uniqueness of these programs the administrative costs are uncertain at					
6	this time. Having administrative costs reviewed as part of an annual filing for prudence will						
7	ensure that only costs that are deemed prudent and reasonable by the BPU will be recovered						
8	by the Company.						
9 10	Q. Rate Counsel witness Mugrace (at 20-21) recommends that PSE&G's weighted average cost of capital should be updated in future rate cases. Do you agree?						
10		average cost of capital should be updated in future fate cases. Do you agree.					
11	A.	Yes. That is consistent with the Company's standard ratemaking practice.					
10 11 12 13	А. Q.	Yes. That is consistent with the Company's standard ratemaking practice. Rate Counsel witness Peterson (at 9) recommends that the Company should establish a separate tariff for EV service. Do you agree?					
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RESPONSE TO OTHER WITNESSES

1 2 3	Q.	Electrify America, LLC witness Jigar Shah (at 6) asserts that public charging stations should be exempt from paying the Technology Innovation Charge ("TIC"). Do you agree?			
4	A.	No. Similar to the Company's existing Societal Benefits Charge and Green Programs			
5	Recov	very Charge, TIC charges should be generally non-bypassable, and should apply to every			
6	kWh consumed, as they benefit the entire State, not just specific customers. In addition, the				
7	participants in the programs funded by the SBC and PSE&G's Green Program Recovery				
8	Charge pay those charges as well. The TIC should apply to all kWh consumed.				
9 10 11 12	Q.	Chargepoint witness Miller asserts (at 32) that the Company's proposed "set point" subsidy ignores the root causes of unsustainable demand charges in PSE&G's Commercial and Industrial ("C&I") rates for DC fast charging customers. Do you agree?			
13	A.	No. Demand charges in PSE&G's C&I rates are cost-based and fairly allocate costs to			
14	custor	mers based on how much they use and when they use it. The fact that low capacity factors			
15	that may be realized during the early implementation of DC fast charging service could result				
16	in electric bills with high \$/kWh average rates is the reason the Company has proposed				
17	Dema	and Charge Rebates. The Company's proposal will help overcome this barrier to EV			
18	adoption and give DC fast charging customers time to increase their utilization factors to assist				
19	in low	vering their average \$/kWh electric rates without unreasonably modifying the Company's			
20	longs	tanding cost-based rate design.			
21 22	Q.	Mr. Miller further asserts (at 32) that PSE&G is inappropriately seeking to regulate the price of DC fast charging services. Do you agree?			

A. No. PSE&G is not trying to regulate the price of DC fast charging service. PSE&G is
rather trying to reduce cost barriers to early adoption of DC fast charging services. As

previously described, demand charge rebates will reduce customers' "dollars per kWh" cost during the initial 5 years of the EV program. As the customers' utilization increases, the demand charge rebate is a "self adjusting" subsidy that phases out once the customer's electric bill average rate is less than \$0.40/kWh.

5 6 О.

Mr. Miller also claims (at 32) that PSE&G's proposal provides discriminatory relief from demand charges. Do you agree?

7 No. The purpose of the demand charge rebate is to incent new charging stations to be A. 8 built to help facilitate EV adoption. As Mr. Reif stated in her response to discovery question 9 DE-PSEG-0001⁴, at current EV adoption rates, the goal of 1,400 public charging stations being 10 available for public use by the end of 2025 as required in the Plug In Vehicle ("PIV") Act 11 would likely be unattainable. While Mr. Miller appears to assert that it would be unduly 12 discriminatory for PSE&G to fail to provide rebates to all program participants, I disagree. 13 The Company's proposal is consistent with the goal of adding new program participants and 14 reasonably designed to achieve that goal without providing benefits to customers who have not 15 demonstrated a need for them.

16 **Q. M**

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Mr. Miller recommends (at 36) that PSE&G should develop and file one or more C&I rate options that provide alternatives to traditional demand-based C&I rates. Do you agree?

A. No. The demand charge rebate is a non-discriminatory, self-adjusting mechanism to help reduce high \$/kWh rate during periods of low utilization, which has been a significant barrier to EV adoption. Neither Mr. Miller nor any other witness has either provided a persuasive reason to require PSE&G to modify its demand rate structure or any meaningful

⁴ See Schedule SS-CEF-EVES-1.

1 evidence that the proposed demand rebates will not accomplish the goal of assisting the electric

2 vehicle market.

Q. Mr. Shah asserts (at 25) that the BPU should approve rates for investments in
public electric vehicle charging infrastructure that are commensurate with, if not
lower than, those for residential charging in order to create what he characterized
as "equitable incentive for adopting electric transportation amongst those that
have access to charging at home and those that do not." Do you agree?

8 A. No. I do not. The rates charged to residential customers (kWh energy only) and those 9 assessed to commercial and industrial customers (kWh energy and kW demand) are 10 significantly different for reasons that have nothing to do with EV charging. This case is not 11 the proper forum to address these issues, which should be addressed in base rate cases. In this 12 case the Company has proposed demand charge rebates for DC fast charging services to help 13 mitigate cost barriers that will result from low load factor utilization of EV charging during 14 the early stages of EV market development. The Company selected a proposed rebate set point 15 that balances the interests in removing barriers to EV adoption with the interests of all 16 customers who fund the rebate. The Company does not believe it is in the best interest of any 17 market participant for the Company to arbitrarily reduce rates to levels that may not reflect the 18 Company's cost of service to equalize rates that may be paid for EV charging among different 19 classes of customers, as Mr. Shah appears to be suggesting.

20Q.Tesla witness William Erlich (at 6) recommends that any target rate for the Public21DC Fast Charging Program be set at the commercial customers' class average22price of electricity or the commercial class average cost per kilowatt hour. Do you23agree?

A. No. As described in my response regarding Mr. Shah's assertions, the Company selected a proposed rebate set point that balances the interests of removing barriers to EV

- 10 -

adoption with the interests of the customers who fund the rebates by holding them to the minimum level necessary to attract new EV customers. For instance, if the class average rate, which is currently about \$0.13 per kWh, was used as the set point for the DC fast charger third party owned sites sub-program versus the proposed set point of \$0.40 per kWh, the corresponding rebate funded from customers for the life of the Program would increase by \$111 million, from \$39 million to \$150 million, or 290%.

7 8 9 Q. Mr. Erlich (at 7) recommends that a term-limited pilot mechanism should be adopted in this proceeding and that PSE&G should commit to designing a permanent EV rate after a six year pilot program period. Do you agree?

A. The Company has proposed a limit of five years on the demand charge rebate. This will provide time to increase utilization of charging stations and expand the use of electric vehicles. The main tenet of proper rate design is that rates should not discriminate based upon the customer's end use, but be based upon cost causation, which is mainly based upon quantity and when it is consumed. The Company will be monitoring the results of its EV program over the next five years and as the Company approaches the end of the program, it will determine, based on the results, whether and how to continue and/or modify the program.

Q. EVGO witness R. Thomas Beach (at 6) expresses a variety of concerns about the utility making judgments necessary to establishing a set point rate. Do you agree with his concerns?

A. The Company has proposed a demand charge rebate with a set point of a maximum electric bill rate of \$0.40/kWh for five years. While the Company has suggested that it could change the set point rate, any such changes would be dictated by market conditions and directed at achieving the goal of expanding the use of electric vehicles.

1Q.Mr. Beach recommends (at 10) a waiver or reduction of demand charges for five2to ten years. Do you agree?

A. As I have stated previously, the Company has proposed a demand charge rebate with a
set point of a maximum electric bill rate of \$0.40/kWh for five years. Mr. Beach has provided
no reason why ten years is necessarily more appropriate.

Q. Mr. Beach recommends (at 17) that the adopted rate structure should be available to all Electric Vehicle customers. Do you agree?

8 A. No. There are many factors that go into rate design, which include existing rate 9 structures and metering technology as well as voltage served. The Company believes that its 10 proposed program of demand charge rebates, off-peak rebates and the existing Residential 11 Load Management ("RLM") rate schedule, which has time of use ("TOU") rates, are 12 appropriate at this time to spark the development of the EV market in a reasonable manner. At 13 the same time, it is not in any party's best interests for the Company to provide rebates or 14 discounts to EV market participants that have not required them in the past or demonstrated 15 any need for them in this proceeding.

16Q.Environmental Intervenors' witness Kathleen Harris recommends (at 32) that17PSE&G should be required to develop revised cost-based rates for C&I EV18customers in lieu of short-term rebates. Do you agree?

A. No. Currently the Company's C&I rates are reasonably accurate in aligning rates to cost causation, especially for the Large Power and Light ("LPL") rate schedules that use kWh TOU rates to recover energy based costs, kW demand rates to recover local and system distribution delivery cost, and kW obligation rates to recover generation capacity and transmission costs. One of the main challenges currently facing EV adoption is during initial periods low utilization results in high electric \$/kWh average rates. That is why the Company has proposed demand charge rebates. From the Company's perspective, it is more appropriate
to address the rate issue with rebates than to develop a new set of rates, which could result in
higher rates than we have proposed with the rebate.

4

5

Q.

Ms. Harris also recommends (at 31, 33) that PSE&G should look at other options for time of use ("TOU") rates. Do you agree?

6 Not currently. The Company currently has a number of TOU rate options available. A. 7 As previously stated, a residential customer can select to be served under our TOU RLM rate 8 schedule. Also, smaller C&I customers served under the Company's General Light and Power 9 ("GLP") rate schedule can opt to be served under the "Night Use" special provision that can 10 lower the cost of off-peak charging because it eliminates summer demand charges during "Off-11 Peak" hours (Weekdays 8PM to 8AM and all weekend). In addition all C&I customers can 12 choose Basic Generation Service – Commercial and Industrial Energy Pricing ("CIEP") where 13 they could possibly reduce their capacity, transmission and energy charges by avoiding 14 charging during certain peak periods.

Notwithstanding the Company's current service offerings, if PSE&G's pending CEFEnergy Cloud ("CEF-EC") filing is approved, the Company may be able to implement rate
design alternatives in future base rate cases.

- 18 Q. Does this conclude your testimony at this time?
- 19 A. Yes, it does.

Public Service Electric and Gas Company Case Name: CEF-EVES Docket No(s): EO18101111

Response to Discovery Request: RCR-RD-0009 Date of Response: 7/21/2020 Witness: Swetz, Stephen Book Recovery

Question:

Refer to the tables shown in Mr. Swetz's Direct Testimony, pages 4 and 9. Please provide the source documents or analyses supporting the "Book Recovery" amounts shown on the schedule. In all cases do the Book Recovery amounts shown in the tables reflect currently authorized depreciation/amortization amounts approved by the Board? If not, please explain how the amounts were determined.

Attachments Provided Herewith: 0

Response:

The book recovery of the Make-Ready Infrastructure Investment, which includes distribution circuits, service drops, transformers, conductors, conduits, electric meters and breaker panels, were based on the composite book recovery period for all utility property at the time of the Company's filing. The Company's book recovery period for utility property has changed since the original CEF-EVES filing was submitted as a result of the conclusion of the 2018 base rate case. As a result, the book recovery used to calculate revenue requirements would use the latest authorized depreciation/amortization rates for the appropriate asset classes. The asset classes and approved depreciation rates are shown below.

FERC Asset Class Name	Depreciation Rate
LINE TRANSFORMERS	3.40%
METERS	9.90%
POLES, TOWERS AND FIXTURES	3.70%
UNDERGROUND CONDUCTORS AND DEVICES	1.70%

The Chargers and Battery are utilizing 10-year and 15-year lives, respectively, based upon the manufacturers estimated life. IT software is set to a 5 year life based upon expected obsolescence.

Inverters and Communication Equipment book recovery lives are equal to the manufacturers recommended life, consistent with the Company's experience in its existing Solar Programs. Solar Panels are equal to 20 years based upon the Board's decision in EO16050412 and Meter book recovery life is equal to 20 years to set equal to the Solar panel book life as in the decision in EO16050412.

Public Service Electric and Gas Company Case Name: CEF-EVES Docket No(s): EO18101111

Response to Discovery Request: DE-PSEG-0001 Date of Response: 7/21/2020 Witness: Reif, Karen Residential Private Market Competition

Question:

Refer to Karen Reif's Direct Testimony, page 3.

(a) Why does PSE&G propose to subsidize and provide rebates to residential and other sector locations for EV charging infrastructure when a competitive market already exists to provide such solutions to consumers?

(b) What market data or other indicia of interest does PSE&G possess that supports PSE&G, a public utility, providing a competitive service that is currently being offered by non-utility third parties?

(c) Does PSE&G propose to provide financial support or incentives to residential homeowners whose BTM electrical systems does not support a Level 2 charger?

Attachments Provided Herewith: 0

Response:

- a. PSE&G objects to the assumption in this request that a competitive market already exists to provide the level of EV infrastructure build-out that is required to help timely meet New Jersey's aggressive electrification of transportation goals. Notwithstanding and subject to this objection, PSE&G is proposing a public utility program to help support and accelerate electrification of transportation. To meet the PIV Act goals for EV adoption, the charging infrastructure in New Jersey needs to be increased substantially versus the current level. There has been no significant progress to date in the development of EV charging infrastructure in New Jersey, which continues to rank lowest in the density of public chargers relative to population among states participating in California's Zero Emission Vehicle (ZEV) partnership.¹
- b. Please see answer to (a.) above.
- c. Yes, PSE&G proposes to support the cost of the EV charger and the installation thereof. This would include behind the meter (BTM) installation costs. The Company proposes to cap the rebate at \$2,000 per installation, but retain the flexibility to adjust the cap in response to market trends on notice to Board Staff and Division of Rate Counsel.

¹ Data obtained from United States Department of Energy, Alternative Fuels Data Center, available at https://www.afdc.energy.gov/data_download and United States Census Bureau, State Population Totals and Components of Change: 2010-2019, available at <u>https://www.census.gov/data/tables/time-series/demo/popest/2010s-state-total.html</u>. Data obtained on April 22, 2020.