IN THE MATTER OF THE PETITION OF PUBLIC SERVICE ELECTRIC AND GAS COMPANY FOR APPROVAL OF ITS CLEAN ENERGY FUTURE-ELECTRIC VEHICLE AND ENERGY STORAGE ("CEF-EVES") ON A REGULATED BASIS

BPU Docket No. EO18101111

January 22, 2021

Via Electronic Mail
Aida Camacho-Welch
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Trenton, New Jersey 08625-0350
P.O. Box 350

Re: I/M/O The Petition of Public Service Electric and Gas Company for Approval of Its Clean Energy Future-Electric Vehicle and Energy Storage ("CEF-EVES") Program on a Regulated Basis, BPU Docket No. EO18101111

Dear Secretary Camacho-Welch:

Environment New Jersey, Environmental Defense Fund, Natural Resources Defense Council, and the Sierra Club (collectively, the "Environmental Intervenors") submit these comments expressing our concerns with the Stipulation of Settlement advanced by Rate Counsel, Public Service Electric and Gas Company ("PSE&G") and others in the above-referenced docket. New Jersey has set ambitious goals for vehicle electrification; achieving these goals is necessary to both address the climate crisis and ensure that the people of New Jersey realize the public health and economic benefits of electric vehicles. Similarly, electrifying the vehicle fleet will—if handled correctly to ensure added demand does not contribute to peak system load—lower electric rates for all customers. However, the proposed stipulation does not go nearly far enough to ensure that New Jersey will actually meet those goals. Instead, the proposed stipulation under-invests in charging infrastructure, and fails to set timelines—let alone deadlines—for needed action on storage and medium- and heavy-duty vehicle charging

infrastructure. Accordingly, and as explained in more detail below, Environmental Intervenors urge the Board to, if it adopts the stipulation, move forward with a concrete timeline that effectively addresses these gaps and adequately recognizes the urgency with which action is needed.

Rapid Vehicle Electrification Is Needed in New Jersey

The Plug-In Vehicle ("PIV") law, the Energy Master Plan ("EMP"),[1] and the BPU's EV Ecosystem Order[2]—as well as the New Jersey Global Warming Response Act 80x50 Report[3]—all note that the threat of catastrophic climate change is imminent, that swift action to address that threat is required, that vehicle electrification is a critical component of that action, and that vehicle electrification is in the public interest.

For example, in passing the PIV law, the legislature found that:

> [V]ehicle electrification offers a wide range of benefits, such as improved air quality, reduced greenhouse gas emissions, and savings in motor vehicle operating costs for vehicle owners; that increased use of plug-in electric vehicles can contribute significantly to the attainment of existing State air pollution and

[1] 2019 New Jersey Energy Master Plan Pathway to 2050, *available at* https://nj.gov/emp/docs/pdf/2020_NJBPU_EMP.pdf.
[2] *In the Matter of Straw Proposal on Electric Vehicle Infrastructure Build Out*, Docket No. QO20050357, *Order Adopting the Minimum Filing Requirements for Light-Duty, Publicly Accessible Electric Vehicle Charging* (Sept. 23, 2020) (hereinafter "EV Ecosystem Order"), *available at* https://www.nj.gov/bpu/pdf/boardorders/2020/20200923/8F%20-%20ORDER%20Electric%20Vehicle%20MFRs.pdf
[3] New Jersey's Global Warming Response Act 80x50 Report (Oct. 15, 2020) (hereinafter "80x50 Report"), *available at* https://www.nj.gov/dep/climatechange/docs/nj-gwra-80x50-report-2020.pdf.

energy goals, including the objectives of the "Global Warming Response Act," P.L.2007, c.112 (C.26:2C-37 et seq.) and the State's Energy Master Plan . . .[4]

The legislature then went further, "determin[ing] that it is in the public interest to establish goals for the increased use of plug-in electric vehicles in the State," and setting such goals.[5] Among others, the PIV sets the following electrification goals for the New Jersey vehicle fleet:

1) At least 330,000 of the total number of registered light duty vehicles in the State shall be plug-in electric vehicles by December 31, 2025;
2) At least 2 million of the total number of registered light duty vehicles in the State shall be plug-in electric vehicles by December 31, 2035;
3) At least 85 percent of all new light duty vehicles sold or leased in the State shall be plug-in electric vehicles by December 31, 2040;
4) By December 31, 2025, at least 400 DC Fast Chargers shall be available for public use at no fewer than 200 charging locations in the State;
5) By December 31, 2025, at least 1,000 Level Two chargers shall be available for public use across the State, and after initial installation, those EVSE may be upgraded to higher power or DC Fast Chargers as appropriate by the owner or operator of the EVSE;
6) By December 31, 2025, at least 15 percent of all multi-family residential properties in the State shall be equipped with EVSE for the routine charging of plug-in electric vehicles by residents through a combination of Level One EVSE, Level Two EVSE, or charger ready parking spaces;
7) By December 31, 2025, 20 percent of all franchised overnight lodging establishments shall be equipped with EVSE for routine electric vehicle charging by guests of the

[4] N.J. Stat. § 48:25-1.
[5] *Id*.

establishment by providing Level Two EVSE, which collectively shall serve a percentage of the guest parking spaces equal to the percentage of light duty vehicles registered in the State that are plug-in electric vehicles at the end of the preceding calendar year;

8) Electrification of 25% of State-owned non-emergency light duty vehicles by December 31, 2025, and 100% of such vehicles by December 31, 2035;
9) A rapid transition to electrify NJ Transit buses with all purchases being full electric in 2032 and a mandate that 10% of bus purchases made by the NJ Transit Corporation are electric by 2024, 50% percent by 2026 and 100% by 2032, with an initial priority for routes in low-income, urban or environmental justice communities; and,
10) Additional goals for medium- and heavy-duty ("MHD") vehicle electrification to be set by NJDEP and NJBPU by December 31, 2020.[6]

Likewise, the EMP observes that "[t]here is near unanimous scientific consensus that the global threat of climate change is grave and that it demands swift local action and focused state leadership,"[7] and that "the transportation sector accounts for 42% of the state's net greenhouse gas (GHG) emissions, making it the largest emissions source in the state."[8] To that end—and as the very first Strategy identified—the EMP directs that "[t]he transportation sector should be almost entirely electrified by 2050, with an early focus on light-duty (passenger) vehicles and short-range medium and heavy-duty vehicles, particularly in environmental justice communities."[9] The EMP observes that, far from being a burdensome transition, "[f]ortunately, these changes will also yield many economy-wide financial and health benefits."[10]

[6] N.J. Stat. § 48:25-3.
[7] EMP at 11.
[8] *Id.* at 11-12.
[9] *Id.* at 12.
[10] *Id.*

Both the BPU Staff and the Board itself have expressed agreement with the importance of rapid vehicle electrification sounded by the PIV law and the EMP. Staff has recommended that the Board "keep in mind the fierce urgency of meeting our climate goals," and the BPU has ordered that "immediate action is appropriate and necessary to achieve the stated goals."[11] Moreover, the BPU has noted that "[t]he Legislature and the Governor have made it clear that in order to combat the consequences of climate change, the electrification of the transportation sector is in the public interest. All of New Jersey—its residents, its businesses, its economy, its environment—will benefit from the widespread adoption of EVs."[12]

The New Jersey Global Warming Response Act 80x50 Report underscores the urgency of the effort needed, and the scale of the infrastructure necessary to meet these goals and secure their benefits for New Jersey's people:

> In order to promote and support the increased adoption of electric vehicles, it is urgent that New Jersey pursue a significant and visible buildout of public electric vehicle charging stations. ***Electric vehicle chargers must become as commonplace as gasoline refueling stations*** to enable wide scale acceptance and adoption of electric vehicles.[13]

This policy will enable the necessary wholesale conversion of the vehicle fleet to electric:

> In quantitative terms, the number of electric vehicles registered must increase from approximately 30,000 vehicles today to 1.8 million by 2030, 5.4 million by 2040 and over 6 million by 2050, even before accounting for any potential growth in the total number of vehicles. This requires significant increases from the current 8,000 annual electric vehicle sales and even greater growth than that set

[11] EV Ecosystem Order at 12, 25.
[12] *Id.* at 3.
[13] 80x50 Report at x.

by the EV Law (P.L.2019, c.362) to upwards of half a million sales annually by 2030.[14]

As the Report notes, these efforts will inure enormous benefits: "deeper investment in this effort will also create hundreds of new jobs, resulting in growth in New Jersey's clean energy economy, and the reduction of co-pollutants that can disproportionately impact public health in low-income and minority environmental justice communities."[15]. The other side of that coin is that failure to swiftly electrify will incur continual and mounting costs: "failing to electrify the vehicle fleet increases the cost of decarbonization from 2035 to 2050 by an average of $1.6 billion per year."[16] Electrifying the vehicle fleet—indeed, doing so rapidly—is thus critical to the environmental and economic health of New Jersey.

Further, vehicle electrification—if handled correctly to optimize the grid and ensure that vehicle charging does not add to peak load—not only provides environmental benefits, but also places downward pressure on electric rates for all customers. As Kathleen Harris explained, "EV drivers increase electricity consumption, and if increased consumption is met without increasing fixed costs, those additional kWh dilute systemwide fixed costs, meaning rates can be lower."[17] Nor is this benefit merely theoretical: a study by Synapse Energy Economics "analyzed real world date from the two utility service territories with the highest number of EVs in the country . . . and found that EVs are already putting downward pressure on rates."[18] Vehicle electrification will accordingly provide benefits to program participants and non-participants alike throughout New Jersey.

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[14] *Id.* at 20.
[15] *Id.* at x.
[16] *Id.* at 20.
[17] Harris Rbtl. Test. at 15:3-5.
[18] Harris Test. at 11:17-21; *see also* https://www.synapse-energy.com/sites/default/files/EV_Impacts_June_2020_18-122.pdf.

Indeed, public entities in New Jersey have in this very proceeding testified as to the importance of vehicle electrification in their communities. In so doing, they repeatedly stressed the critical role to be played by utilities in developing EV charging infrastructure, including chargers themselves. Mayor Adrian O. Mapp of Plainfield spoke of the "universal benefits" of vehicle electrification—particularly the "cleaner air from displacing the gas burning" of conventional vehicles that would benefit Plainfield "with so many major traffic corridors nearby."[19] Mayor Mapp noted that New Jersey "can't tackle climate change without changing our vehicles to clean running EVs,"[20] and cited the reality that "private investors are reluctant to install chargers in a state with so few EVs,"[21] and thus asked "who better to spearhead EV charging and energy storage than a utility" with a track record of "innovative initiatives in the best interest of customers?"[22] Similarly, Mayor Kristin McLaughlin of Hopewell Township testified that:

> The lack of charging stations has stymied EV adoption in New Jersey to the point where we are the last among states like New York and Massachusetts that enjoy zero vehicle emission programs . . . . Switching to electric vehicles would help New Jersey avoid about 169 premature deaths, prevent more than 2300 asthma attacks, and nearly 11,000 lost work days, and save close to two billion dollars in public health benefits annually . . . [23]

Mayor Hector Lora of Passaic likewise testified that, despite the health and environmental benefits from vehicle electrification, "many people in my community and across the state are reluctant to switch to EVs out of range anxiety, to the fear that there won't be enough EV

[19] Public Hearing Trans. at 60:12-17 (Oct. 21, 2020).
[20] *Id.* at 59:21-22.
[21] *Id.* at 60:4-5.
[22] *Id.* at 61:11-15.
[23] *Id.* at 64:3-16.

charging stations for day-to-day fill-ups for longer trips."[24] Mayor Lora connected this problem to the need for utility deployment of chargers, as that would "solve" things "by jump starting the EV charging market, paving the way for private companies to follow."[25] Mayor Lorca focused on the future in his testimony:

> But I tell you that with this next generation, and I've heard it expressed with the Youth Council that I put together, they want to see tangible evidence of our commitment to the future. These would bring great benefits to date when we're talking about children's future. And I ask that we all support it.[26]

The Proposed Stipulation

In face of this enormous opportunity, the proposed stipulation takes a significantly smaller step towards vehicle electrification than the Company's original proposal, both in terms of the size of the programs and their scope. The proposed stipulation countenances total investments in EV charging infrastructure of $166.2 million; the original program proposal was $261 million.[27] The original program proposal included $109.4 million for energy storage; the proposed stipulation includes no storage, and instead punts the question into the indeterminate future.[28] While the original program proposal included a Vehicle Innovation fund directed towards incentives for school bus electrification and transit, the proposed stipulation lacks any medium- and heavy-duty vehicle investment.[29] Finally, while the original program contemplated utility ownership of chargers, the proposed stipulation is limited to just make-ready infrastructure

[24] *Id*. at 66:15-19.
[25] *Id.* at 66:24-67:2.
[26] *Id.* at 68:5-11.
[27] *Compare* Proposed Stipulation ¶¶ 14-15 *with* PSE&G Petition at 4.
[28] PSE&G Petition at 7.
[29] *Compare* Proposed Stipulation ¶¶ 14-15 *with* PSE&G Petition at 4.

support in the hope that third-party chargers will rush in to fill the gaps that they have, thus far, avoided filling.[30]

While the proposed stipulation does include some improvements on the original program proposal such as rate design that better supports vehicle charging, the investment levels and types of investment it contemplates are wholly inadequate to address the vehicle electrification goals of New Jersey and the infrastructure challenges that the Board itself noted in its Ecosystem Order. As such the Environmental Intervenors raise the following concerns.

Additional Investment in Light Duty EVSE Beyond the Stipulation Is Needed

While it is critical that utility investments in EV charging infrastructure move forward as rapidly as possible, the level of investment in the proposed stipulation is poised to accomplish, at most, a small fraction of what is needed. As Kathleen Harris testified, modeling of charging requirements shows that "New Jersey will need over 48,000 Level 2 charging stations in public and at workplaces as well as 1,364 Direct Current Fast Charging DCFC stations on the road by 2025 to achieve and support the state's EV goals."[31] However, the investment levels in the proposed stipulation contemplate the installation of far, far fewer charging stations: just 3,500 Level 2 chargers[32] over what appears to be a six-year program—in other words, just 7% of the chargers needed by 2025, but on a timeline *slower* than by 2025.

Further, investment in more than just make-ready infrastructure will be needed. As Kathleen Harris noted in her testimony, "[f]or New Jersey to achieve its climate and zero-emission vehicle goals in a needed aggressive timeframe, the state will need investments

[30] *Id.*
[31] Harris Rbtl. Test. at 3:2-4.
[32] Proposed Stipulation at n.14.

from both the third-party private and the regulated utility sector."[33] This is because "utilities have an important role to play to fill the gaps in infrastructure deployment in the state, especially at multi-unit dwellings, where there is a market failure."[34]

Indeed, the Board has recognized that utilities must play a critical role in developing EVSE because,

> [t]o date, the private sector has not made a business case to install EV chargers without a critical mass of EVs on the road . . . . [a]s a result, the adoption of EVs has lagged. The circular problem continues as the EVSE Infrastructure Companies are disinclined to develop publicly available charging sites where there is an uncertain amount of demand for their services.[35]

Staff also recommends that the Board "keep in mind the fierce urgency of meeting our climate goals."[36] The BPU has also found that "immediate action is appropriate and necessary to achieve the stated goals."[37]

California's experience with a utility role in charging infrastructure is instructive here. There, while the Commission initially ruled that the benefits of utility ownership do not outweigh the competitive limitation that may result from utility EVSE ownership, *just a few years later* the slow pace of electrification forced the Commission to conclude that the lack of flexibility for utility ownership was stifling the EV market. The Commission accordingly reversed course in a new order.[38] It "endorse[d] an expanded role for utility activity in

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[33] Harris Test. at 11:7-9.
[34] Harris Rbtl. Test. at 10:21-11:1.
[35] EV Ecosystem Order at 3.
[36] *Id.* at 12.
[37] *Id.* at 25.
[38] Order, *Application of San Diego Gas & Electric Company (U902E) for Approval of its Electric Vehicle-Grid Integration Pilot Program*, Cal. Pub. Util. Comm. Rulemaking 13-11-007 (April 11, 2014), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M143/K682/143682372.PDF.

developing and supporting PEV charging infrastructure" while simultaneously "declin[ing] to prescriptively determine the appropriate level of utility activity." Instead, the Commission ordered that it would "evaluate utility proposals on a case-specific basis" and that the Commission would "eliminate the necessity of showing that, but for the utility program, a market failure or underserved market would result, or if already in existence, would continue."[39] This flexibility of ownership has been particularly useful for helping to get charging infrastructure at multi-unit dwellings and in disadvantaged communities.

This is a critical role for utilities to play that is unlikely to be filled by third-party companies; as Mayor Lorca put it, the utility has a commitment "to under-served markets that might not deliver the returns private companies seek."[40] Accordingly, the Environmental Intervenors want to underscore that the programs contemplated by the proposed stipulation should be viewed as a starting place, and not as programs that preclude further investments in light-duty charging infrastructure.

Investment in Medium- and Heavy-Duty Vehicle Electrification Is Needed

While the programs originally proposed by PSE&G included some investment in the medium- and heavy-duty vehicle sector in the form of a Vehicle Innovation Fund, the proposed stipulation would hold consideration of that proposed investment—along with a similar Energy Storage Fund—in abeyance, pending some "future proceeding."[41] Because action commensurate with the urgent problem posed by transportation emissions is necessary to avoid the very real jeopardy of missing New Jersey's critical vehicle electrification goals, the Environmental Intervenors urge the Board to order a rapid as feasible timeline for this future proceeding.

[39] *Id.*
[40] Public Hearing Trans. at 67:10-12 (Oct. 21, 2020).
[41] Proposed Stipulation ¶ 39.

Electrification of medium- and heavy-duty vehicles presents some of the greatest benefits to communities that are overburdened by particulate matter and NOx pollution such vehicles emit when they run on diesel fuel. Mayor Lorca thus testified as to the critical importance of electrification of public vehicles, like school buses and transit: "My city with a school population of 15,000 students would see greater improvements in air quality with electric school buses. We also envision electric commuter shuttles, making a new bus terminal on Main Avenue with the New Jersey Transit train station in Garfield and in the State of New Jersey."[42]

Cynthia Jahn, General Counsel for the New Jersey School Boards Association emphasized that electrification of heavy-duty vehicles, including school buses, was essential for protecting children's health. Jahn noted that "[e]lectrifying the state's bus fleets goes right to the heart of Governor Murphy's goals for environmental justice," and that electrifying school buses "is especially important, as the children who ride on school buses every day are a high risk population for air quality related health issues."[43] Further, such electrification "will also provide real and immediate benefits to communities . . . . [c]leaner air, healthier kids, more predictable school transportation costs, and reduced school transportation costs overall,"[44] and accordingly the BPU "shouldn't wait any longer to electrify the heaviest polluting vehicles, buses fueled by diesel."[45]

The Environmental Intervenors share this sense of urgency, as does the New Jersey legislature. The PIV law directed state agencies including the Board to have *already* set the medium- and heavy-duty vehicle goals by the end of 2020:

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[42] Public Hearing Trans. at 66:8:14 (Oct. 21, 2020).
[43] *Id.* at 70:19-71:1.
[44] *Id.* at 72:4-9.
[45] *Id.* at 70:7-10.

> By December 31, 2020, the department, in consultation with the board, shall establish other goals for vehicle electrification and infrastructure development that address medium-duty and heavy-duty on-road diesel vehicles and associated charging infrastructure, similar to the State goals for light duty vehicles and consistent with the technology and plug-in electric vehicle markets for those vehicle types.[46]

Regrettably, this statutory deadline was not met last year and, as of today, these goals have still not been established. The Proposed Stipulation's vague conditions for achieving further progress in this area double down on the lack of commitment that the Board has displayed so far. If the Board approves this proposed stipulation, the Environmental Intervenors accordingly urge the Board to additionally order a rapid timeline and a deadline for the commencement and conclusion of the "future proceeding" the stipulation contemplates being a condition precedent to evaluation of PSE&G medium- and heavy-duty EV and energy storage proposals.

PSE&G Should Be Required to Perform a Robust Distribution Grid Impact Study by a Near Future Date Certain

A distribution grid impact study ("DGIS")[47] is an important step toward optimal preparation for and achievement of electrification at minimal cost. Unfortunately, the proposal in the stipulation to tie a DGIS for the Company's system to the larger Integrated Distribution Plan ("IDP") on an indeterminate timeline does not advance the ball, and could even hobble efforts to achieve New Jersey's vehicle electrification goals. The Board can remedy this defect by adding specificity to the DGIS concept and setting a target date by which such a study is completed, irrespective of the status of the IDP. To ensure that the results of such a study are

[46] N.J. Stat. § 48:25-3(a)(10).
[47] *See* Proposed Stipulation at ¶ 38.

able to inform timely preparations for electrification as they accelerate, it may be prudent to set a very near-term target date for completion of such a study, such as December 31, 2021, or to at a minimum incorporate the timeline for a DGIS into the forthcoming medium- and heavy-duty ecosystem proceedings.

The Board should also clarify the requirements for a DGIS. A proper DGIS should, first, include a truck and bus electrification load study along the lines of what is recommended in the CALSTART Study,[48] addressing the market readiness and potential for medium- and heavy-duty electrification in the school bus, transit authority, ports & airports, and medium-duty charging depot (serving private sector fleets) sectors; and second, consider the impact of incremental electric load on the transmission and distribution system and ability to meet EV-related load growth in a timely manner. This analysis of load growth and how it can be met most efficiently should include a forecast of required electric system investments and the associated costs, as well as consideration of non-wires alternatives that can reduce the need for electric system investments, including those that enable load flexibility unlocked by improved rate design. A robust examination of non-wires alternatives as part of preparing the grid for vehicle electrification is important not only to ensure that the costs of this transformation are not higher than necessary, but also to enable effective vehicle-grid integration that will provide an important, low-cost means for integrating higher levels of intermittent renewable electric generation. Therefore, it is an indispensable tool for meeting New Jersey's clean energy goals.

By providing the Company with a clear directive to perform a useful DGIS and set a target near-term date for completion, the Board can ensure that the information it yields will be

[48] Jean-Baptiste Gallo, "Electric Truck & Bus Grid Integration, Opportunities, Challenges & Recommendations," (June 2016), *available at* https://www.mdpi.com/2032-6653/8/1/45/pdf.

available to the Company, the public, and the Board, as future decisions are being made about EVSE infrastructure development.

Future Public Funding Should Be Additive to Program Funding under the Proposed Stipulation

Finally, the Environmental Intervenors have significant concerns about the Public Funding provision in the proposed stipulation.[49] While it is helpful that the provision includes language making it clear that "[n]othing in this paragraph shall reduce the Company's ability to invest up to $166.2 million pursuant to the program, as described" in the proposed stipulation, the somewhat confusing language of the paragraph as a whole might lead to future misinterpretations. The Board should, if it approves the stipulation, make it clear in its order that the intent of the Public Funding paragraph is to ensure that the Company does not double-recover (i.e., recover from ratepayers funds invested under the stipulation's programs that were in fact paid for using funds from public sources), and that it is *not* intended to either reduce the size of the programs authorized by the stipulation on the one hand, or hobble the use of future public funding to achieve additional vehicle electrification on the other. Particularly given New Jersey's aggressive electrification goals and the speed by which the state must achieve them, it is vital that the various funding mechanisms for that electrification be additive.[50]

[49] *See* Proposed Stipulation ¶ 40.

[50] The Environmental Intervenors also have a concern with the lack of definition of public funding in the Applicable Public Funding provision. While the Board has approved a somewhat similar provision to the Applicable Public Funding paragraph in the proposed stipulation in the past, it is important to note that prior provision was more limited in scope. In the Board's Decision and Order Approving Stipulation in *In the Matter of Energy Efficiency Programs and Associated Cost Recovery Mechanisms and In the Matter of the Petition of Public Service Electric and Gas Company Offering an Energy Efficiency Economic Stimulus Program in its Service Territory on a Regulated Basis and Associated Cost Recovery Mechanism Pursuant to N.J.S.A. 48:3-98:1*, Dockets Nos. EO09010056 and EO09010058 (July 1, 2009), a paragraph was included addressing spending on energy efficiency from federal funding. However, that paragraph only referred to such funding flowing from the federal American Recovery and Reinvestment Act of 2009 that had been passed into law earlier that year. The Applicable Public

Conclusion

For the foregoing reasons, Environmental Intervenors urge the Board to, in adopting the proposed stipulation, not foreclose additional programs and to set timetables for future proceedings and studies necessary to achieve New Jersey's vehicle electrification goals.

Respectfully Submitted,

/s/ Daniel Greenhouse
Daniel Greenhouse
(New Jersey Attorney ID # 016102005)
Eastern Environmental Law Center
50 Park Place, Suite 1025
Newark, New Jersey 07102
Tel: (973) 424-1166
dgreenhouse@easternenvironmental.org

/s/ Zachary M. Fabish
Zachary M. Fabish (admitted *pro hac vice*)
Senior Attorney
The Sierra Club
50 F Street, NW - 8th Floor
Washington, D.C. 20001
Tel: (650) 388-8446
zachary.fabish@sierraclub.org

Cc: Service list

Funding provision of the proposed stipulation is far broader, embracing "funding or credits," from any "state or federal action or program," "subsequent" to the stipulation. The Environmental Intervenors thus worry that this nominally extremely open-ended language could cast uncertainty on the effect of the Applicable Public Funding provision, and urge the Board to make clear that the provision is not intended to result in reductions of funding available for vehicle electrification either under the approved programs or from public sources.