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MEMORANDUM

TO: The Honorable Daniel Benson
Chairwoman, the Assembly Transportation and Independent Authorities
Committee

FROM: Bill Pascrell, III
Sam Weinstein

DATE: February 15, 2023

RE: *Letter of Support: A4794 (Benson D-14) – Requires request for proposal to establish demonstration program to develop electric vehicle charging depots serviced by distributed energy resource charging centers for certain electric vehicle use.*

On behalf of our client, *bp America, Inc.*, and their electric vehicle subsidiary, *bp pulse*, we respectfully express their support of your bill, **A4794** which requires request for proposal to establish demonstration program to develop electric vehicle charging depots serviced by distributed energy resource charging centers for certain electric vehicle use. The measure will be considered at your upcoming Assembly Transportation and Independent Authorities Committee meeting.

As the State begins to build out its electric vehicle infrastructure, it is vital for the Legislature to strike the balance between equitable distribution and optimizing customer energy cost as well. To that end, *bp pulse* is rolling out fast, reliable charge points to consumers and commercial fleets, and including intelligent charge management software to manage EV fleet charging from start to finish, while optimizing energy costs and vehicle utilization. As announced in the White House Fact Sheet released February 15, 2023, *bp pulse* and Hertz Corp. intend to build out a national network of EV fast charging infrastructure to accelerate the

adoption of electric vehicles.¹ The charging hubs will serve rideshare and taxi drivers, car rental customers and the general public at high-demand locations, such as airports. A number of installations are expected to include large-scale charging hubs, known as “gigahubs.”

While considering this legislation, *bp pulse* respectfully recommends deliberations and thought to:

- The definition of “distributed energy resource charging centers” could include partial EV operations when disconnected from utility service

The bill defines “centers” as “resources [that] can connect to and disconnect from a utility’s infrastructure and **can operate both connected to and independent of a utility's infrastructure.**” [Emphasis added.] At large charging hubs, full operations while disconnected from the utility may face barriers such as cost and physical footprint requirements of on-site energy storage and power generation.

- The purpose of the proposed demonstration program should include optimizing EV charging profiles to lower coincident load charging

The bill specifies the purpose of “[creating] infrastructure for the **very high coincident load charging** of electric vehicles” [Emphasis added.] The bill further requires “a validation of the cost-saving, time-saving and resilience metrics associated with the use of electric vehicle charging depots serviced by distributed energy resource charging centers, as compared to the traditional capital investment approach...” *bp pulse* uses managed charging solutions including automated, controllable EV charging loads to optimize vehicle charging load profile, avoid excess capital investment, and lower customer energy costs. On-site distributed energy resources should be used to further support operations at these optimized EV charging profiles.

Thank you for your kind consideration of our comments and suggestions. Should you have any questions or require additional information, please do not hesitate to contact us.

Cc:

Members, the Assembly Transportation and Independent Authorities Committee

¹ <https://www.whitehouse.gov/briefing-room/statements-releases/2023/02/15/fact-sheet-biden-harris-administration-announces-new-standards-and-major-progress-for-a-made-in-america-national-network-of-electric-vehicle-chargers/>