

NJ Board of Public Utilities
EV Stakeholder Group
44 S Clinton Ave
Trenton NJ 08625
October 16, 2017

Subject: AF Mensah Inc.'s Comments on Task 1 Questions for the EV Stakeholder Group.

AF Mensah Inc. (AFM) appreciates the opportunity to present our views and suggestions to the New Jersey Board of Public Utilities (BPU) on the Task 1 Questions posed by the BPU EV Stakeholder Group.

As background, AFM is a distributed power generation company located within the Historic Mill One Complex in Hamilton, NJ. AFM uses proprietary battery storage systems and control software to improve the economics of distributed solar power generation to enhance the reliability of the electric grid. AFM designs, deploys & operates distributed Solar-Storage systems at Utility, Commercial, and Residential Scales.

Question 1: Do EVs fall under the definition of demand side management and energy efficiency as set forth under N.J.S.A. 48:3-51 and/or N.J.S.A. 48:3-98.1.d.?

Electric Vehicles (EV's) represent a new electric load to the grid. Both N.J.S.A. 48:3-51 and/or N.J.S.A. 48:3-98.1.d. seem to mainly be geared towards existing electrical equipment already installed within a customer's facility. It is somewhat silent to what occurs to equipment that represent a new electric new load to the grid. EV charging can be managed which then could fall under the demand side management rules. Additionally, EV's do provide an efficient use of energy by using electricity as its primary source of fuel, especially if the vehicles are being charged during off peak hours or using renewables.

So as the laws are currently written now, it's unclear if EV's fall under the definition of demand side management or energy efficiency under N.J.S.A. 48:3-51 and/or N.J.S.A. 48:3-98.1.d. AFM feels that EV's should fall under the current definitions and that those rules should be modified to include language specific to EV's.

Question 2: Should owners and operators of EVSE that provide electric vehicle charging service be regulated as electric utilities? Are operators of EVSE reselling electricity or providing a charging service?

AFM feels that a company who provides public EV charging services should not be considered a regulated electric utility within the state of New Jersey based on the following example. The entities providing an EV charging service to their customers should be allowed to charge a reasonable fee for that service. An analogy to this would be for a Bank ATM to charge a user fee to a customer to withdraw money from their checking account or credit card. So, if the EV charging service company wants to charge an EV owner a fee to fuel their car with electricity then they should have the right to do so under laws that govern such transactions within the state of New Jersey as long as that fee is added separately to the cost of electricity purchased by the EV charging service company.

Concluding Comments by AFM

In conclusion, AFM supports the efforts of the BPU EV Stakeholder Group. Please feel free to contact me with any comments or questions on our testimony.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Wayne Wittman".

Wayne Wittman, Head of Gov. Affairs

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