

**From:** [Graham, Karriemah \[BPU\]](#)  
**To:** [Reed, AlJawann \[BPU\]](#)  
**Subject:** FW: [EXTERNAL] NJBPU CRA EV Comments For Docket No. QO25040206  
**Date:** Monday, June 9, 2025 10:14:41 AM

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**From:** Doug O'Malley <[domalley@environmentnewjersey.org](mailto:domalley@environmentnewjersey.org)>  
**Sent:** Friday, June 6, 2025 4:55 PM  
**To:** Secretary, BPUBoard [BPU] <[Board.Secretary@bpu.nj.gov](mailto:Board.Secretary@bpu.nj.gov)>  
**Subject:** [EXTERNAL] NJBPU CRA EV Comments For Docket No. QO25040206

Please see these attached comments below for Docket No. QO25040206 which is also submitted online via the docket.... Thanks! --- Doug

Sherri L. Lewis  
Secretary of the Board  
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Email: [board.secretary@bpu.nj.gov](mailto:board.secretary@bpu.nj.gov)

Comments on Docket No. QO25040206

Dear Secretary Lewis,

Please include these comments on Docket No. QO25040206. These are in addition to previously filed comments on the broader docket including our organizations. These comments solely focus on the ChargeUp Program for EV rebates, and we appreciate the opportunity to provide comments on this matter, both for the docket and the opportunity for the separate public hearing which our organizations were not able to join.

I want to begin our comment on behalf of Environment New Jersey, the NJ Work Environment Council and Jersey Renews, a broad diverse coalition representing more than 70 faith, labor, community and environmental organizations by saying that we are appreciative of the work that NJBPU has done to maximize the sales of light duty electric vehicles through the ChargeUp program over the last five years. The program has now passed infancy and toddlerhood and there are many lessons that we can learn from its experience over the last five years.

The most important lesson – and shared by many of the stakeholders commenting on the docket – is the critical nature of the ChargeUp program in expanding the sales of light duty Electric Vehicles. We especially appreciate the work of the Board to ensure that the program continues to be successful and sustainable for this program year and runs in a

manner that maximizes the sales of light duty EVs. We sincerely appreciate t

Our core ask for the Board at this moment is that the modeling that has provided the basis for these decisions continues to be under wraps by the Board. It is difficult to have a measured dialogue and even debate on the future of the program based on the assumptions of stakeholders that can't be measured against the data analytics of the contractors and consultants that the Board has hired.

The central questions and debate on the ChargeUP program are a multitude: the size of the EV rebate, the tiered basis on income (the LMI adder which is quite significant and tiered to both low and middle income based on the AMI threshold), the importance of the continuity of the program, and the central question on how to maximize sales by avoiding the free loader problem (which can be seen through both rebates that would be too high or too low) and ensuring that the advertising for EV rebates up to \$4,000 leads to sales for both car buyers that fit within the AMI threshold for LMI and car buyers that could only qualify for the \$1,500 rebate. There are also essential questions on the customer experience with rebates and the experience of dealers in translating the rebate program into actual EV sales.

There is no way to resolve these questions within the weeks leading up to the FY26 budget year and the need to start up the new Charge Up program in early July 2025. That being said, there should be a desire for the Board to show its work to stakeholders and allow stakeholder questions and concerns to be addressed through the data that the Board has so assiduously collected.

We would propose a stakeholder session in Quarter 1 of FY26 to address these exact questions with the incredibly important caveat of sharing the modeling data that is provided to the Board through its contractors and consultants with stakeholders to provide additional input to the Board. We certainly don't expect unanimity of opinion on the best structure of the program, but we do believe firmly that sharing this information would be in the best interest of the Board to back up the assumptions that guide these recommendations for the ChargeUp program for FY26.

We are deeply invested in the success of this program both for this coming program year and for future years, knowing that this program will help to lead to higher adoption of electric vehicles that we won't need the same levels of incentives. That being said, it is critical to ensure the success for this program this current program year to ensure the Board is able to provide a bridge to a future gubernatorial administration. As an adjustment to the famous saying goes, the question is what the program has done for EV sales lately.

Thank you again for this opportunity to provide these comments to the Board and we are thankful and grateful for the work of Board staff to ensure the success of the program – and to make sure that more Garden State drivers can get behind the wheel of an EV because of this program.

Sincerely,

Doug O'Malley  
Director

Environment New Jersey

Debra Coyle  
Executive Director  
NJ Work Environment Council

Drew Tompkins  
Campaign Director  
Jersey Renews

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