

CONSOLIDATED EDISON COMPANY OF
NEW YORK, INC.

ELECTRIC VEHICLE INFRASTRUCTURE
MAKE-READY PROGRAM
IMPLEMENTATION PLAN

Filed September 14, 2020

CASE 18-E-0138

Pursuant to New York Public Service Commission's July 16, 2020
*Order Establishing Electric Vehicle Infrastructure Make-Ready
Program and Other Programs*

Table of Contents

1.0	Introduction.....	3
1.1	Definitions.....	4
2.0	Program Eligibility Criteria	5
2.1	General Eligibility Criteria.....	5
2.1.1	Eligible Equipment or Infrastructure	5
2.1.2	Eligibility Criteria	6
2.1.3	Make-Ready Incentive Levels	7
3.0	Program Implementation.....	8
3.1	Light-Duty Make-Ready Program	8
3.1.1	Program Development Timeline	9
3.1.2	Program Process.....	9
3.1.3	Contractor Approval	14
3.1.4	Future-Proofing.....	14
3.1.5	Reporting Requirements	15
3.2	Fleet Assessment Service.....	17
4.0	Education and Outreach Plan.....	18
4.1	Customer/Site Host/Developer Outreach.....	18
4.1.1	Tools and Marketing	19
4.1.2	Prioritization Strategy	19
5.0	Make-Ready Program and Other Costs.....	20

1.0 Introduction

Consolidated Edison Company of New York, Inc. ("Con Edison" or the "Company") submits this Electric Vehicle Make-Ready Program Implementation Plan ("EV MRP Implementation Plan" or "Plan") in accordance with the New York Public Service Commission's July 16 *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs* ("Order").¹ This EV MRP Implementation Plan outlines the Company's initial plans for the implementation of a new Electric Vehicle Infrastructure Make-Ready Program ("Make-Ready Program" or "Program") that will seek to incent make-ready infrastructure for new Level 2 ("L2") and Direct Current Fast Charging ("DCFC") electric vehicle ("EV") charging stations for light-duty vehicles in the Company's service territory. The Order authorized an approximately \$290 million budget to install 18,539 L2 and 457 DCFC charging plugs in Con Edison's service territory over the five-year Make-Ready Program. The Order also authorized other activities supporting the electrification of transportation, including the development of a Fleet Assessment Service.

The Company is committed to facilitating clean transportation in its service area as part of its Clean Energy Commitment² and looks forward to expanding the availability of charging infrastructure to EV drivers within New York City and Westchester County. The electrification of the transportation sector is a key element of advancing the State's ambitious clean energy goals and as the sector responsible for over a third of statewide carbon emissions,³ will be critical to enable achievement of Climate Leadership and Community Protection Act's ("CLCPA") target to reduce greenhouse gas emissions by 85 percent of 1990 levels by 2050.⁴ Making more charging infrastructure widespread, visible and readily available to drivers supports this goal by reducing range anxiety and making the experience of EV ownership superior to owning a diesel or gasoline-fueled vehicle.

This EV MRP Implementation Plan reviews key elements of the Company's Make-Ready Program, including eligibility criteria, incentive levels, Program implementation processes, education and outreach plans, and Program costs, as well as the Fleet Assessment Service. This document is intended to provide Program Participants and stakeholders with guidelines for Program operation.⁵

¹ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure* ("EVSE&I Proceeding"), Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs (issued July 16, 2020) ("EV MRP Order").

² Con Edison's Clean Energy Commitment is available at <https://www.coned.com/en/our-energy-future/our-energy-vision/our-energy-future-commitment>

³ Reducing Greenhouse Gas Emissions, New York Department of Environmental Conservation, available at <https://www.dec.ny.gov/energy/99223.html>

⁴ Chapter 106 of the Laws of 2019. CLCPA is available at <https://legislation.nysenate.gov/pdf/bills/2019/S6599>

⁵ As more experience with the Program and specific projects is gained, the Company anticipates that Program guidelines will be updated.

1.1 Definitions

Approved Contractor: A contractor who has met the Joint Utilities⁶ approval criteria, described in Section 3.13.

Disadvantaged Communities: Under the CLCPA, Disadvantaged Communities are communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high concentrations of low- and moderate-income households.

In the short term, Con Edison will use the definition for Disadvantaged Communities as defined by the Order. The Joint Utilities will publish an updated definition and corresponding maps after a statewide definition is developed, which is expected in early October 2020.

EV Team: Personnel supporting the implementation of Con Edison's Make-Ready Program.

Initial Incentive Determination: The incentive determination that is provided after design and engineering are finalized but before construction begins.

Final Incentive Determination: The incentive determination that occurs at the end of the project once construction is complete and the Participant invoice has been submitted for the customer-side work.

Multi-Unit Dwelling: A multi-unit residential building with five or more dwelling units.

Participant: An entity, including its subsidiary or affiliate, that applies for and/or receives the incentives available through the EV Make-Ready Program. This includes:

- **Developer:** An entity responsible for designing, constructing, and commissioning an EV charger site. This entity may also be responsible for owning, managing, and operating the chargers.
- **Equipment Owner:** The entity that purchases and owns or controls the EV charging equipment once it is installed.
- **Site Host:** The owner or operator of the site on which the EV charging equipment is installed. The Site Host may or may not be the Equipment Owner.
- **Customer:** An entity taking service from Con Edison.
- **Approved Contractor:** As defined above.

Program Website: Con Edison's website that provides information on the Company's Make-Ready Program and resources for Participants. <https://www.coned.com/en/our-energy-future/technology-innovation/electric-vehicles/make-ready-program>

⁶ The Joint Utilities are Central Hudson Gas & Electric Corporation, Con Edison, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

2.0 Program Eligibility Criteria

2.1 General Eligibility Criteria

Participants in Con Edison's Make-Ready Program must meet certain eligibility criteria in order to qualify for, and aid in the determination of, incentive payments.

This section discusses the (i) eligible equipment or make-ready infrastructure that the Program can incentivize, (ii) criteria a project must meet in order to qualify for the incentive, and (iii) range of incentive levels that a project can qualify for based on its attributes.

2.1.1 Eligible Equipment or Infrastructure

Figure 1: Make-Ready Infrastructure Components

	System Reinforcement	New Business	Utility side Make-Ready		Meter	Customer side Make-Ready			Developer Costs ²⁾
	Substation	Distribution above/under-ground	Distribution transformer & pad	EDF, CIAC & Accommodation ¹⁾		Customer transformer & pad ¹⁾	Trenching	Panel & pre-EVSE wiring	Charger, pedestal installation
Make-Ready Incentive				✓		✓	✓	✓	
Who pays	Utility	Utility	Utility	Customer with support of incentive	Utility	Customer with support of incentive	Customer with support of incentive	Customer with support of incentive	Customer
Budget	System Reinforcement	New business	New business	Make-Ready Program	New business	Make-Ready Program	Make-Ready Program	Make-ready Program	n.a.
Who owns	Utility	Utility	Utility	Utility ¹⁾	Utility	Customer	Customer	Customer	Customer

Point of entry

New business
 Make-Ready ("MR") components
 Developer costs

1) EDF and similar or associated costs are treated as utility-side Make-Ready
 2) Developer costs are not within the Make-Ready program scope and are not paid by utility customers

There are two categories of make-ready infrastructure that are eligible for incentives under Con Edison's Make-Ready Program, as shown in Figure 2:

1. **Utility-side Make-Ready Infrastructure:** Utility electric infrastructure needed to connect and serve the load associated with new EV charger(s) that would have otherwise been paid by the Participant as Excess Distribution Facilities ("EDF"), contributions in aid of construction ("CIAC") and/or accommodation charges. This may include traditional distribution infrastructure that will be installed, owned and operated by Con Edison, such as step-down transformers, overhead or underground service lines, and utility meters.
2. **Customer-side Make-Ready Infrastructure:** EV equipment or infrastructure necessary to make a Customer site ready to connect an EV charger to the electric grid. This electric infrastructure may include conductors, trenching, and panels needed for the EV charging station. Customer-side make-ready infrastructure is developed, owned, and maintained by

the charging station Developer, Equipment Owner, or Site Host. All customer-side make-ready infrastructure must be installed by an Approved Contractor (see Section 3.1.3 for details) to be eligible for incentives under this Make-Ready Program.

Additional infrastructure may be eligible for incentive as part of future-proofing (see Section 3.1.4 for details).

2.1.2 Eligibility Criteria

A project must satisfy the following criteria to be considered for an incentive through Con Edison's Make-Ready Program:

1. **Approved Application:** Prospective Participants must apply for the Program and the application can be found on the Program Website. Con Edison will review, evaluate, and as appropriate, approve applications.
2. **Station Construction Commencement:** Construction of the EV charging station must commence on or after July 16, 2020.
3. **Location Capacity:** EV charging stations must follow guidelines to be eligible for incentive.
 - a. Participant Requirements:
 - i. All stations (L2 and DCFC) must have a minimum of two plugs and serve light-duty vehicles.
 - ii. DCFC stations with more than ten plugs and/or demand over 2 MW will only be allowed to participate in Con Edison's Make-Ready Program if development of the site does not cause Con Edison to incur new business⁷ costs greater than the cost that would be incurred to develop a site with a maximum demand of 2 MW. This analysis and determination will occur during the Project Review, Design, and Engineering phase of the process as described in Section 3.1.2 on a site-specific basis.
 - b. Con Edison Portfolio Level Requirements:
 - i. Within New York City, the Company will limit the number of two-plug stations that can receive an incentive to no more than 50 percent of Con Edison's target number of plugs, *i.e.*, no more than 9,270 L2 charger plugs and 229 DCFC plugs.
 - ii. The number of plugs at locations in excess of ten plugs cannot exceed 50 percent of Con Edison's target number of plugs, *i.e.*, no more than 9,270 L2 charger plugs and 229 DCFC plugs.

⁷ "New business" generally refers to utility-side costs associated with connecting new Customers and load to the distribution system.

4. **Operational Requirements:** Participants are required to meet operational requirements contained in the Order. Relevant metrics will be tracked and reported as part of the reporting requirements in Section 3.1.5 of this Plan. Participants that fail to provide the required data will not be eligible for new Program incentives and may be required to return the make-ready payments received or revocation of service so that the station can be operated by an alternate market Participant. These operational requirements include:
 - a. DCFC plugs must be operational 95 percent of the time annually;
 - b. DCFC charging stations must be operational 99 percent of the time annually, with a minimum of half of the plugs considered to be "up" at all times;
 - c. All charging stations in the Program must operate for a minimum of five years; and
 - d. Ownership of EV charging stations may change, or stations may be upgraded during the five-year term, as long as the number of plugs and the capacity of the station does not decrease, and the site continues to meet all performance and reporting obligations of the Program.

2.1.3 Make-Ready Incentive Levels

Con Edison will provide make-ready incentives to Participants based on the criteria and ceiling levels described in Table 1. No single Participant shall receive incentives equal to or greater than 50 percent of Con Edison's total make-ready incentive budget, *i.e.*, no more than \$117 million through 2025.

The actual incentive dollar amount to be provided to a Participant project is described in the Program Process Section 3.1.2 below.

Table 2: Incentive Levels and Criteria

Criteria Component		Up to 50%	Up to 90%	Up to 100%
Accessibility		Non-publicly accessible sites, including workplace and privately-owned pay-to-park lots	Publicly accessible sites, including municipal paid parking, that accept common forms of payment ⁸	
Plug Type ⁹	L2	Sites utilizing proprietary plugs	Sites utilizing non-proprietary plugs, such as SAE J1772 plugs	
	DCFC	Sites utilizing proprietary plugs	Sites utilizing non-proprietary plugs, such as CCS plugs, or at sites where a proprietary plug type is collocated with an equal number of non-proprietary plug types of equal or greater capacity where both plugs can simultaneously charge at 50 kW or above	
Disadvantaged Communities ¹⁰	L2			Sites located at Multi-Unit Dwellings within one mile of Disadvantaged Communities
	DCFC			Publicly accessible sites located within one mile of Disadvantaged Communities

3.0 Program Implementation

3.1 Light-Duty Make-Ready Program

The Company provides (below) the timeline for Program development and implementation, process steps for Program Participants, and some specific elements of the Program. The Company

⁸ Sites at workplaces (e.g., shopping malls, hospitals, hotels, etc.) and Multi-Unit Dwellings can be considered publicly accessible if they are open and available to the public without an access fee.

⁹ Plug types and technologies will be examined at the midpoint review and this eligibility criteria may be subject to change.

¹⁰ Con Edison will provide this up to 100 percent incentive until expenditures reach 20 percent of its authorized incentive budget, after which Con Edison will continue to support development within Disadvantaged Communities at the standard applicable up to 90 or 50 percent incentive levels.

has developed key Program principles, listed immediately below, that have guided Program design and implementation to support achievement of the state policy goals.

- **Simplicity:** Establish a program that is clear, concise, and provides straightforward information to charging station Developers, Equipment Owners, and Site Hosts
- **Scalability:** Launch a program that is effective and can expand as the market grows
- **Speed:** Deploy a program that can meet EV charging development needs
- **Flexibility:** Allow for continuous improvement through adjustment of Program parameters to match evolving market conditions
- **Fairness:** Provide fair and equitable opportunity for all Program Participants

As the Program guidelines and rules evolve, the Company is first developing simple functional elements and the core structure of the Make-Ready Program to support early projects. As the Program and market mature, the Company will focus on implementing refinements to the Program so that projects move through the Program successfully to maximize Program achievement.

3.1.1 Program Development Timeline

The timeline in Figure 2 shows the high level tasks the Company will undertake over the next five years in implementing the Program along with other activities in the Order.

Figure 2: Con Edison Make-Ready Program Timeline

Make-Ready Program Tasks	2020	2021	2022	2023	2024	2025
Establish Make-Ready Program						
Develop online application portal Phase I	■					
Develop online application portal Phase II		■				
Implement Make-Ready Program						
Develop and submit annual reports		■	■	■	■	■
Participate in midpoint review				■		
Establish and/or Support Other Programs						
Participate in Staff-led working groups	■					
File tariff revision	■					
File the managed charging plan		■				

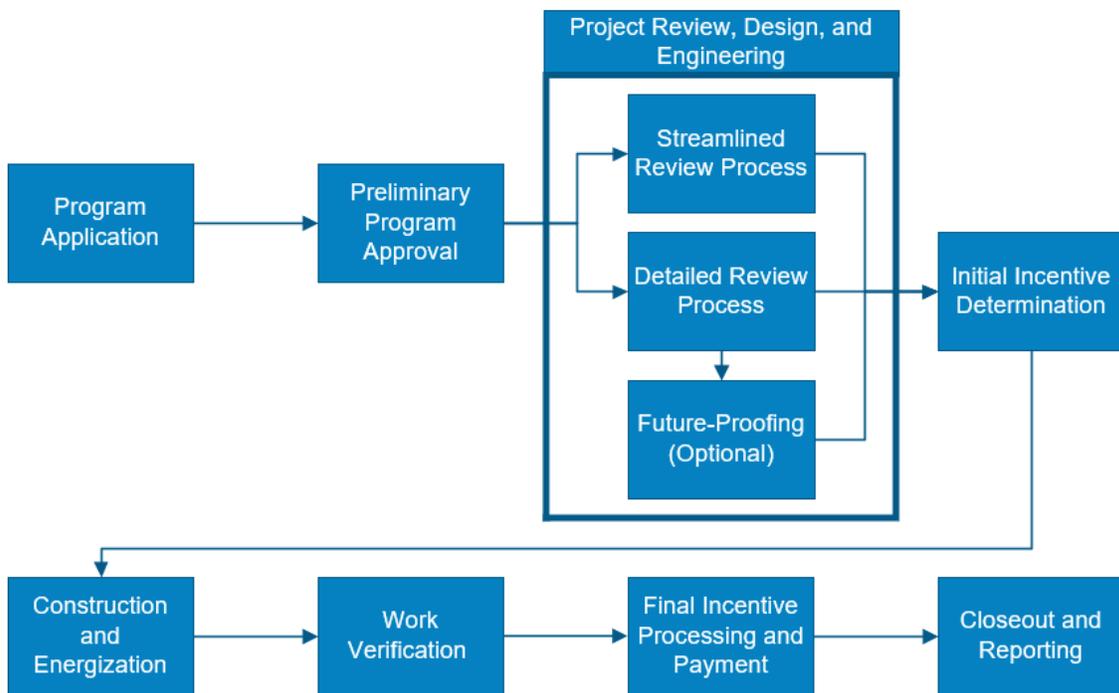
3.1.2 Program Process

Figure 3 below shows a high-level overview of the various stages of development an EV charging station is expected to go through when participating in the Con Edison Make-Ready Program. Each of these high-level stages has significant levels of complex sub-processes and Con Edison is creating detailed processes and workflows to identify, prioritize, and create the

functionality required for each of the high-level stages below. The basic functionality for each stage will be created quickly so projects entering the process can progress through to execution, thereby allowing Con Edison to learn about the market, project costs, and best practices. The Company will continually refine the Program mechanics and structure as the market matures and the EV Team is already communicating with potential Participants to encourage their feedback on Program design and experience. Each of the elements is described in greater detail in the paragraphs that follow.

As described in Section 4.1, Con Edison will conduct education and outreach to encourage applications from different market segments (e.g., Developers and Customers).

Figure 3: Con Edison Make-Ready Program Process



Program Application

The Program Website will contain a link to the Program application, application instructions, the Program Participant Guide¹¹ (which includes Program eligibility, incentives and Participant requirements), Approved Contractors list, and other pertinent Program information.

To support early Program activities and meet the Phase One application portal requirements by October 15, 2020, Con Edison will leverage existing tools, such as the Company's existing PowerClerk web portal and Energy Services Project Center platform, to manage and track Program

¹¹ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, (“EVSE&I Proceeding”), Joint Utilities EV Infrastructure Make-Ready Program Participant Guide (filed August 18, 2020).

applications. During Phase One, Participants will use a PowerClerk form to apply for Program eligibility and Project Center to submit service requests. During the first several months, the back-end management will combine manual and automated processes and communications on Program status. Con Edison will implement a process for evaluating co-located storage projects in Phase Two.

The application will request that Participants provide the information below for the Company to process and evaluate the application.

- The applicant's name and contact information
- A description of the project, including the number of plugs, charging output and plug type of each, location (and if in a Disadvantaged Community), demand management software or hardware, whether the EV supply equipment will be bi-directional at present or in the future or exclusively load, and any collocated distributed generation or energy storage
- If available, order-of-magnitude estimated costs of customer-side make ready infrastructure and make-ready incentive requested
- Future proofing needs and expansion plans

As part of the application, the Participant can also identify their Approved Contractor that they can modify later.

In parallel, to support the Program through 2025, Con Edison is developing the requirements needed for a Program platform that will allow for a seamlessly integrated application, Program portal, and connection to back-end systems.

Preliminary Program Approval

Con Edison's EV Team will manage the Program application intake process. Upon receipt of the application, the EV Team will evaluate the information provided compared to the eligibility criteria outlined in Section 2.1, including requesting and receiving from the Participant, as required, additional information or answers to any questions. Once Program eligibility is established, the EV Team will confirm eligibility and communicate to the Participant the level of incentive (e.g., up to 50%, 90%, or 100%) that will be available to the project for both utility-side and customer-side expenditures.¹² The Company will also review the order-of-magnitude estimate of customer-side costs and requested incentive. The customer-side costs will be refined during the engineering analysis, if required, and during the Initial Incentive Determination phase.

¹² The tier of incentive (e.g., up to 50%, 90% or 100%) considered by the Company will be based on the eligibility criteria described in Section 2.1.3. For example, for a publicly accessible L2 site utilizing non-proprietary plugs, the Company would offer an incentive for up to 90 percent of make-ready costs, and, for a non-publicly accessible DCFC site, the Company would offer an incentive for up to 50 percent of make-ready costs. Projects meeting a mix of the eligibility criteria at different incentive tiers will be evaluated on a case-by-case basis.

Project Review, Design, and Engineering

After confirming Program eligibility, the Company will determine the utility-side work required for interconnection. Con Edison's Energy Services group will review the Participant's application to determine if an engineering analysis is required. Depending on that review, the project will go through one of the two following pathways:

- **Streamlined Review Process:** Some sites will have low enough capacity requirements to move through the process in an expedited fashion because existing service at the site is adequate to supply the additional requested load. These projects requiring primarily customer-side work will move to the Initial Incentive Determination phase once the Participant has finalized the customer-side engineering and cost estimates.
- **Detailed Review Process:** For larger projects that may require more extensive utility-side work, Con Edison will complete an initial engineering ruling to determine if the existing service at the site is adequate. If the engineering analysis shows that utility-side upgrades are required or if the Participant requests a new design or point of entry for their service, Con Edison will provide the Participant a Company-preferred service option at the location where the utility-side costs are the lowest. If the Participant requests a different design or point of entry for service, the Company will evaluate the customer-proposed locations for service and provide the amount of associated utility-side costs to the Customer. Con Edison and the Participant will work together on the service design and seek to moderate total project costs. Once the Participant has accepted a service design and point of entry and finalized their customer-side costs, Con Edison will complete the final design and engineering for the utility-side work.
 - **Future-Proofing:** If the Participant proposes to future-proof their site, they will provide information on their proposed additional plugs, parking spaces, or higher capacity equipment in the Program Application. Con Edison will evaluate the necessary upgrades and related costs required to provide this future-proofed service during the engineering analysis described above. Future proofing criteria are described in Section 3.1.4.

The Participant is responsible for designing the make-ready infrastructure on the customer-side of the meter and providing the design and estimated cost to Con Edison. Con Edison will review all submittals to check that they are reasonable and accurate prior to final approval and Initial Incentive Determination. At this stage, Con Edison will have visibility into estimated customer- and utility-side make-ready costs and will work with the Participant on the design to minimize the overall make-ready cost.

Initial Incentive Determination

Con Edison will provide the Participant with an Initial Incentive Determination with a not-to-exceed incentive amount based primarily on (i) the finalized utility-side costs, (ii) Participant-

provided and Company vetted (for reasonableness) estimates of customer-side make-ready costs, and (iii) the make-ready incentive requested by the Participant.

Initially, the Company will implement a simple incentive calculation that allows for some cost containment and is based on utility- and customer-side costs, the incentive eligibility level of the project (e.g., up to 50%, 90%, or 100%), and the incentive amount requested by the Participant. The incentive determination will be designed to minimize overall make-ready costs, with a preference for projects requesting incentive amounts below the Order's baseline cost. Participants will be allowed to apply for projects with higher make-ready costs and the Company will review any supporting information the Participant wishes to provide for such projects, but Con Edison reserves the right to reject the project or to work with the Participant if they agree to accept a smaller incentive and bear more of the make-ready costs. Con Edison expects to gain additional information and experience related to customer-side costs during the initial implementation process, allowing for modifications and refinements of the incentive determination, if needed.

Con Edison plans to evolve the incentive determination framework to encourage more efficient spend of Program funding, respond to changes in the marketplace, and advance the goals of the Program. The Company's improvements to the framework will result, in part, from the Company gaining more experience and information related to project costs. These frameworks will encourage cost containment while supporting projects that are publicly accessible, with standard non-proprietary equipment, and near Disadvantaged Communities.

The Participant must sign a Program Agreement, agreeing to the service connection layout, the incentive offering, and other terms, before the Approved Contractor can start construction.

Construction and Energization

Once approved for construction, the Approved Contractor will secure necessary permits and complete the customer-side construction. If utility-side upgrades are also required, the Participant will coordinate with Con Edison so that construction of the utility-side work can be scheduled once the Customer demarcation point (e.g., manhole, service end box) and any required infrastructure is installed. Once the customer-side construction is complete, any utility-side work is completed for connection and energization.

Work Verification

Once the project is complete, the Participant will submit the required project documentation and provide support for any required inspections by Con Edison before incentive payments are approved and dispersed. This could include photographs, equipment specifications, contractor and subcontractor records, and final site plans. Con Edison will verify that the make-ready installation and the charging station facilities (e.g., number of plugs, public accessibility, etc.) match the project submittals and approved incentive parameters.

Final Incentive Determination and Payment

After project validation, the Participant will submit an invoice for the actual costs incurred for the customer-side make ready infrastructure for review and approval by the Company. The authorized

incentive amount will be adjusted proportionally downward if approved actual incurred costs are lower than estimated costs established during the Initial Incentive Determination phase. The final incentive will then be approved for distribution to the Participant and Con Edison will disburse funds to the Participant.

Closeout and Reporting

After incentives are paid, the EV Team will close out the project with proper documentation and update the project status in all internal project tracking and reporting tools. Con Edison will use this tracking to report on the utility-side information. Ongoing monitoring begins once the Participant's project is complete and in service. See Section 3.1.5. for reporting details. Con Edison will also receive Participant feedback to continually improve the Program.

3.1.3 Contractor Approval

Participants are required to use Approved Contractors for the installation of make-ready infrastructure to be eligible for Program incentives. The Company's EV Make-Ready Program Website will maintain a regularly updated list of Approved Contractors.

To become an Approved Contractor, entities must provide self-certification that they are registered to do business in the State of New York, indicate the area(s) in the State where they plan to do make-ready work, and have all the appropriate licenses and certifications needed to do work in those area(s). After receiving the contractor self-certification, the Approved Contractor will be placed on Con Edison's as well as the Joint Utilities' website listing Approved Contractors.

While the Joint Utilities seek to remain inclusive by minimizing barriers to participating as Approved Contractors, the Joint Utilities, in consultation with New York Department of Public Service ("DPS") Staff, maintain the ability to suspend or remove a contractor from the posted list of Approved Contractors if the Joint Utilities and/or the Company becomes aware of non-compliance with any of the criteria or if there are performance or other concerns raised. Contractors falling out of standing can be reinstated upon demonstration of renewed criteria compliance or successfully completing the reinstatement process.

3.1.4 Future-Proofing

Con Edison will limit future-proofing costs to no more than eight percent of Con Edison's overall Make-Ready Program budget, approximately \$19 million. The Company will track the costs associated specifically with future-proofing work.

Future-Proofing Eligibility Criteria

Con Edison will implement and provide incentives towards future-proofing activities under the Program rules; all future-proofing costs not covered by the Program or otherwise provided as a

utility service are the responsibility of the Participant. Approved examples of future-proofing for L2 chargers and DCFC include:

- Oversized or additional conduit;
- Oversized panels;
- Additional conduit and connections points (including trenching and conduit to additional parking spaces for future chargers);
- Service for the station; and
- Larger transformers or additional transformers and transformer pads.

Future-Proofing Process

Participants must include a request for future-proofing work in their application, including explaining future expansion plans for the site, such as additional plugs, power needs, parking spots on-site, land, and any other relevant information. After the application is received, Con Edison will evaluate the future-proofing request, and as part of the Project Review, Design, and Engineering stage discussed above, the Company will work with the Participant to determine the feasibility of the future-proofing plans from grid and site perspectives. The evaluation of the proposed future-proofing work may include various factors such as:

- **Plans for expansion:** Is future-proofing needed based on the Developer's plans to install additional plugs or upgrades to a higher kW unit in the future?
- **Expansion feasibility:** Can the site accommodate the identified additional make-ready infrastructure and, if relevant, additional parking spots or higher kW charging equipment?

For each site, the future-proofing costs covered by the Program will be determined based on the evaluation described above and will be limited to no more than ten percent of the project's make-ready costs. For costs not covered by the Con Edison incentive, the Participant will be required to pay the excess costs. In this instance, the Company will only conduct any utility-side future-proofing work after securing funding from the Participant.

3.1.5 Reporting Requirements

Participant Requirements

Every quarter, Participants must provide data regarding the installation and use of the EV charging equipment installed through this Program to a statewide third-party consultant. The reporting requirement facilitates tracking of the station's operations, effectiveness, and compliance with station operational requirements (discussed in Section 2.1.2). The information required includes:

- Plug and charging session data such as:
 - The number of sessions daily;
 - Start and stop times of each charge;
 - The amount of time each vehicle is plugged in per session;

- Peak kW per charging session;
- kWh per charging session; and
- Plug outage information including the number and duration of outages, which must be differentiated by expected outages (for maintenance) and unexpected outages.
- Financial information such as:
 - Infrastructure and equipment costs;
 - Fee structure (structure of fee to the end-use customer, i.e., cost per minute, cost per kWh, cost per session and whether the station owner is providing charging for free);
 - Charging revenues derived; and
 - Operating costs, including energy-related costs and non-energy-related costs separately identified.

The third-party consultant will anonymize and aggregate the Participant EV charging equipment data before sending the data to Con Edison for incorporation into an annual report. Con Edison and the third-party consultant will not disseminate station-specific and session-level data publicly or use it for any commercial purposes. Data must be provided to the third-party consultant in a format or through a data transfer mechanism that the third-party consultant can accept.

Participants must permit the Company to share the following utility system and billing information for each EV charging station with DPS Staff:

- 15-minute interval data;
- Load profiles for the EV charging stations for the top ten demand days of each year; and
- Utility bills differentiated by delivery service-related costs and energy-related costs.

As noted in Section 2.1 on General Eligibility Criteria, Participants that fail to provide the required data will not be eligible for new Program incentives and, upon direction of DPS Staff, may be subject to return of the make-ready payments already received or revocation of service so that the station can be operated by an alternate market Participant.

Con Edison Requirements

Con Edison will file a report to the Commission on a calendar year basis by March 1 of each year. The report will be aligned with the reporting for the DCFC Per Plug Incentive Program required by the DC Fast Charger Framework Order.¹³ The report will include the anonymized and aggregated data provided by the Participants consolidated by the statewide third-party consultant and additional data provided by Con Edison. Con Edison is responsible for reporting the following data:

- Reporting period Program participation information:

¹³ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure* (“EVSE&I Proceeding”), Order Establishing Framework for Direct Current Fast Charging Infrastructure Program (issued February 7, 2019) (“DC Fast Charger Framework Order”).

- The percent of service applications that have matured into operating stations;
- Number of station owners participating;
- Number of sites for which incentives were issued;
- Number of plugs installed; and
- Infrastructure costs incurred differentiated by equipment and installation costs for customer-owned assets as well as equipment and installation costs for Company-owned assets with the latter costs broken into make-ready costs and new business costs.
- Utility system and billing information for each station:
 - 15-minute interval data;
 - Load profiles for the stations for the top ten demand days of each year; and
 - Utility bills differentiated by delivery service-related costs and energy-related costs.

3.2 Fleet Assessment Service

Con Edison will offer a Fleet Assessment Service for light-, medium-, and heavy-duty fleet operators interested in electrifying their fleet. The Fleet Assessment Service will help fleet operators evaluate certain costs and benefits associated with fleet electrification, including an analysis of infrastructure needs for installing EV charging and projected charging costs. The Fleet Assessment Service will include site feasibility and rate analyses.

The site feasibility analysis will be based on the maximum power draw of supplying the proposed electrified fleet to determine if the local distribution system can accommodate the increased load, including an engineering analysis of the impact of the increased transformer and cable loading. This analysis will include an assessment of planned utility work on the distribution system both nearby and on the infrastructure serving the existing depot, to find cost-saving synergies that may be leveraged to meet the new fleet electrification load.

If the site feasibility analysis is positive, Con Edison will then provide a rate analysis, examining the estimated operating costs the fleet operator may incur under electrification and implementing best practices, including managed charging, to mitigate these costs. Con Edison will tailor the rate analysis to each depot location and anticipated load curve and will inform the fleet manager of rate options available, as well as a range of costs they may likely expect based on the fleet's charging behavior. This rate analysis is for illustrative purposes only and does not guarantee the exact cost a fleet operator may incur.

Initially, the Fleet Assessment Service will be provided by Company personnel. Some analytics tools may be developed to support the assessment analyses. The Company will consider additional assessment activities and other services for fleet operators as the Program progresses. Con Edison, along with the Joint Utilities, will develop and post a common application form for the Fleet Assessment Service. The application will be on Con Edison's Program Website as well as the Joint Utilities website. The Joint Utilities will also develop a Customer satisfaction survey to gather

information from Participants, such as the usefulness of the analyses, likelihood they will electrify their fleet in the near- and long-term, biggest barriers they have identified to fleet electrification, their interest in additional services a utility may provide to support their electrification, and other questions.

4.0 Education and Outreach Plan

4.1 Customer/Site Host/Developer Outreach

Con Edison's education and outreach plan consists of a segmented approach based on Customer or Developer size. The different pathways into the Program will be approached as follows:

- **Large Customers:** The EV Team's internal business development manager ("BDM") will conduct direct outreach and engagement to large Customers (i.e., potential Site Hosts) and provide site or business guidance. The BDM will actively build relationships with Customers and connect them with Developers.
- **Large Developers:** The EV Team will conduct direct outreach and engagement to large Developers to understand their market preferences, business models, and Customer acquisition strategies and provide guidance on Program eligibility. Outreach from the EV Team has begun and will continue throughout the Program.
- **Smaller Developers and Customers:** Con Edison will conduct marketing, which is described in the following section. Smaller Customer interest in the Program will also be supplemented by the Developers' own marketing efforts. Relevant Program information, including the list of Approved Contractors, will be located on the Company's Program Website. Marketing to smaller Customers and Developers will continue to scale beyond 2020.
- **Specialized Customers:** Con Edison will continue established relationships with specialized Customers, such as municipalities and governmental agencies, to determine how they can participate in the Program.

Con Edison's BDM will also conduct direct outreach to special interest organizations, such as municipal entities, and consider engagement with community-based organizations ("CBO"). Con Edison may engage with CBOs, particularly in Disadvantaged Communities, to better understand the unique needs and interests of these communities or to disseminate information about the Program and educate their constituencies.

Finally, the Company will work with call center representatives to respond to any inquiries regarding the Program and direct Customers and Developers to relevant Program resources and appropriate contacts in the EV Team.

4.1.1 Tools and Marketing

Con Edison will use several tools to inform and engage with Customers and Developers. The primary resource for Program information will be the Company's Program Website, which will outline details such as Program rules, eligibility requirements, and the list of Approved Contractors. Maps showing Con Edison's load serving capacity and areas within one mile of Disadvantaged Communities, which are discussed in the following section, will inform outreach to Customers and Developers. In future years, the Company may develop more sophisticated digital tools for connecting Developers with Customers.

Con Edison's marketing strategy will include a variety of print, digital, and in-person channels. The EV Team will consider developing printed educational materials, such as Program fact sheets and brochures, for mail campaigns to Customers with parking locations. The EV Team will also engage Customers through email, digital, and social media campaigns to educate them on the Program and promote incentive amounts. Finally, the EV Team will participate and speak at various industry events, including conferences, webinars, or other community events to promote the Program.

4.1.2 Prioritization Strategy

Con Edison's prioritization strategy is designed to guide developers to areas of sufficient load capacity and to promote the development of EV charging stations in locations that might be overlooked by Developers or Site Hosts who are unfamiliar with the benefits of EV charging. Con Edison will act as a trusted advisor and provide useful information and tools to interested Participants. Con Edison's education and outreach efforts will be guided by three suitability criteria: the EV charging infrastructure forecast, load serving capacity maps, and strategic locations.

- The **EV charging infrastructure forecast** will identify locations where growth in EV load is expected and thus, areas of potentially high EV charging utilization. The Company anticipates that forecast methodologies and results will be developed during 2021.
- The Company also maintains active **load serving capacity maps** that Developers can use to identify areas of adequate load service capacity for EV charging.¹⁴ The maps will help Developers identify potential sites that might have lower interconnection costs, but they

¹⁴ Information on Con Edison's load serving capacity maps can be found here: <https://www.coned.com/en/business-partners/hosting-capacity>

are not a substitute for locational specific utility engineering studies. The maps will also indicate areas within a mile radius of Disadvantaged Communities.

- The Company may use information provided by the EV charging infrastructure forecast and the load serving capacity maps to identify **strategic locations**, which will be prioritized by the marketing team and the BDMs as they conduct targeted outreach and build relationships with Developers and Customers. Strategic locations may also include areas not considered in the EV charging infrastructure forecast and the load serving capacity maps, such as areas within one mile of Disadvantaged Communities.

5.0 Make-Ready Program and Other Costs

Con Edison will implement the Make-Ready Program within the budget included in the Order. Table 2 outlines Con Edison's five-year budget for the Make-Ready Program and other activities authorized in the Order.

Table 2: Con Edison Make-Ready Five-Year Budget (\$M)

Program Area	Budget (\$M)
Incentive Budget	\$233.7
<i>L2 Budget</i>	<i>\$191.6</i>
<i>DCFC Budget</i>	<i>\$42.0</i>
Future-Proofing	\$18.7
Program Implementation & Fleet Assessment Service	\$35.0
Transit Authority Make-Ready Program	\$3.0
Total	\$290.4

While Con Edison is still designing certain aspects of the Program and defining the Program support tools, Table 3 lists categories for the expenditure of the \$35 million budget authorized for administration and implementation of the Program and the Fleet Assessment Service and estimates of the budget allocation across these categories. The Company does not anticipate spending more than 60 percent of the budget for Program administration and implementation and Fleet Assessment Service before the midpoint review.

Table 3: Con Edison's Program Implementation & Fleet Assessment Service Five-Year Budget by Category (\$M)

Budget Components	Budget
Program Implementation and Administration	55% - 65%
Third-Party Support and Program Tools	10% - 15%
Marketing	25% - 30%
Total	\$35M

The expenses anticipated in the three budget categories are described below:

Program Implementation and Administration:

To effectively manage this new Program, Con Edison will add full-time employees to the internal EV Team. Con Edison expects additional personnel will be needed across functional areas, such as Program management, and Program operations, including work verification, permitting support, reporting, and business development. As the Fleet Assessment Service develops, additional personnel may be required to support these activities.

Third-Party Support and Program Tools:

The Company expects to supplement in-house staff with third-party support to manage implementation of the Program and provide tools to support Program activities. Examples of third-party support and Program tools include the third-party reporting consultant supporting reporting activities described in Section 3.1.5, development of the Program platform, and an analytics tool to support the Fleet Assessment Service activities.

Marketing:

The Company will develop materials for the marketing and communications efforts laid out in Section 4 across print, digital, and in-person channels. This will include fact sheets and brochures for mail and email campaigns to Customers and Developers and digital and social media campaigns.