

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on March 19, 2020

COMMISSIONERS PRESENT:

John B. Rhodes, Chair
Diane X. Burman
James S. Alesi
Tracey A. Edwards
John B. Howard

CASE 18-E-0138 - Proceeding on Motion of the Commission
Regarding Electric Vehicle Supply Equipment and
Infrastructure.

ORDER PROVIDING CLARIFICATION AND MODIFYING
DIRECT CURRENT FAST CHARGING INCENTIVE PROGRAM

(Issued and Effective March 19, 2020)

BY THE COMMISSION:

INTRODUCTION

On November 25, 2019 Tesla, Inc. (Tesla) filed a Petition for Clarification and Modification (Petition) of the Public Service Commission's (Commission) Direct Current Fast Charging (DCFC) Program Order,¹ and Order Modifying DCFC Program.² Tesla requests two clarifications of these orders, which established a DCFC per-plug incentive program, and seeks three discreet program modifications.

¹ Case 18-E-0138, Order Establishing Framework for Direct Current Fast Charging Infrastructure Program (issued February 7, 2019) (DCFC Program Order).

² Case 18-E-0138, Order Modifying Incentive Program and Granting, In Part, Petition for Rehearing (issued July 12, 2019) (Order Modifying DCFC Program).

The DCFC Program Order adopted, with modification, a proposal filed by the Joint Utilities and various state agencies and authorities to implement a DCFC per-plug incentive program for up to 1,074 new plugs.³ The Commission's subsequent Order Modifying DCFC Program responded to a Petition for Rehearing filed by Tesla on February 28, 2019, alleging that the DCFC Program Order contained various errors of law and fact.⁴

By this order, the Commission clarifies certain elements of the DCFC per-plug incentive program and directs modifications to other program rules. These clarifications and modifications seek to provide developer certainty and encourage public DCFC station deployment and promote the public interest by reducing greenhouse gas emissions from the vehicle transportation sector.

NOTICE OF PROPOSED RULE MAKING

Pursuant to the State Administrative Procedure Act (SAPA) §202(1), a Notice of Proposed Rulemaking (Notice) was published in the State Register on December 11, 2019 [SAPA No. 18-E-0138SP3]. The time for submission of comments pursuant to the Notice expired on February 10, 2020. Three comments were received and are addressed below.

LEGAL AUTHORITY

Pursuant to Public Service Law (PSL) §§5, 65, and 66, the Commission has the legal authority to take the actions

³ The Joint Utilities are: Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., 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.

⁴ Case 18-E-0138, Tesla, Inc. Petition for Rehearing (filed February 28, 2019).

prescribed in this order. The Commission has authority to direct utilities to formulate and carry out long-range programs, individually or cooperatively, with economy, efficiency, and care for the public safety, the preservation of environmental values and the conservation of natural resources. Furthermore, the Commission has broad discretion and judgment in choosing the means of achieving statutory mandates, and has the authority to adopt different methodologies or combinations of methodologies in balancing ratepayer and investor interests.⁵

THE PETITION

Tesla explains that it is a leading developer and manufacturer of electric vehicles (or EVs), and that Tesla funds, builds, and operates a network of charging stations as a service to its EV customers. Tesla asserts that it does not intend to operate its charging network as a profit center. By this Petition, Tesla requests that the Commission issue an order clarifying and modifying five aspects of the DCFC per-plug incentive program.

Tesla requests that the Commission: (1) declare that Tesla Supercharger payment technology meets the DCFC per-plug incentive program requirements; (2) declare that station-specific and session-level data should not be disseminated publicly or used for any commercial purpose; (3) extend the first year incentive amounts to be available through December 31, 2020; (4) modify the program to include "mixed tiers" so that incentives at co-located sites are tied to the capability of each individual plug; and, (5) direct that no station developer or operator may seek incentives for installation of greater than 50 percent of the plugs per utility.

⁵ Multiple Intervenors v. Public Service Commission of the State of New York, 154 A.D.2d 76 (3d Dept. 1991).

Tesla recognizes that the Commission's DCFC Program Order payment method directs that "[n]etworked stations that offer single per-use charging fees payable through a commonly accepted payment method such as cash, credit, or debit will satisfy this criterion." As Tesla has explored participating in the DCFC per-plug incentive program, there has been uncertainty about whether Tesla Superchargers are eligible because Tesla's payment process is seamlessly integrated into the charging experience. Tesla explains that Superchargers automatically identify the customer when their vehicle is plugged in to a Tesla charger. Tesla then bills the debit or credit card associated with the Tesla account holder. If a credit or debit card is not on file or has expired, Tesla explains that the customer will be prompted to input new payment information via the vehicle user interface, the Tesla mobile app, or by calling Tesla's customer service number. Tesla requests that the Commission confirm that this payment method conforms to the DCFC incentive program requirements.

Next, Tesla requests clarification of the DCFC Program Order's data sharing requirements. Specifically, Tesla seeks clarification regarding how data will be handled by utilities and third parties to ensure that customer privacy and trade secret information will be protected.

Third, Tesla requests that the Commission modify the per-plug incentive program by extending the first year DCFC per-plug incentive amounts to be available through December 31, 2020.⁶ Tesla observes that the program websites of the Joint

⁶ The Commission interprets Tesla's request to modify the program so that the full per-plug incentive amounts are available for applications received between January 1, 2020 and "December 1, 2020," as a request for an extension through December 31, 2020, consistent with the dates used elsewhere in the Petition. The commenters share this understanding.

Utilities indicate that no incentives have been approved for 2019, meaning that the entire program budget is still available. According to Tesla's proposal, the per-plug incentives should not decline in 2020, and the program should still end in 2025. Tesla continues that, given the long lead time of fast charging developments and the novel design of the program, a one-year extension of the full incentive amount will provide the charging industry with additional flexibility and certainty to develop new fast charging stations across New York.

Fourth, Tesla explains that previously, the Commission partially granted its February 28, 2019 Petition for Rehearing of the DCFC Program Order. By the subsequent Order Modifying DCFC Program, Tesla states that the Commission removed prescriptive language that identified eligible plug type by technology and also expanded eligibility to include proprietary plugs at stations with co-located commonly accepted standardized plug types of the same or greater kilowatt (kW) level as the other plugs being installed.

Tesla goes on to explain that the Order Modifying DCFC Program envisioned two separate "tiers" of charging plugs such that plugs capable of simultaneous charging at or above 50 kW, but less than 75 kW, would be eligible for a 60 percent incentive, while plugs capable of simultaneous charging at or above 75 kW will be eligible for a full incentive payment. Tesla requests that the Commission modify these program rules and adopt a "mixed tier" incentive.

Tesla asserts that modifying the program so that the full per-plug incentive amounts are available for plugs rated 75 kW and above plugs that are co-located with plugs rated between 50-74 kW better represents the variety of DCFC equipment and power level capabilities currently being deployed in the market. Tesla explains that a popular technical function for charging

equipment is to "power share" across charging stalls and spaces to enable simultaneous charging and limit the total power requirements for a site. According to Tesla, power sharing may lead to some stalls having a maximum output above 75 kW while others are below 75 kW during simultaneous charging. Tesla's petition provides information about two equipment examples, the Tritium Veefil and Chargepoint CPE-250, where if two stalls power share anything less than 150 kW, only one plug would be able to operate above 75 kW of simultaneous output. Tesla requests that the per-plug incentive program be modified such that the incentive level be tied to the charging capability of each individual plug located at the station.

Finally, Tesla explains that it understands there may be questions about Tesla's participation in the program and whether it will account for the majority of the allocations given the size of the Supercharger network and the Tesla vehicle fleet. To mitigate these questions and concerns, Tesla proposes that the Commission adopt a cap such that no single charging operator or developer is allocated a disproportionate amount of the funds. According to Tesla, a program cap that limits charging operators or developers to no more than 50 percent of the plugs in each utility service territory is an appropriate way to encourage and provide an opportunity for more original equipment manufacturers (OEM) to enroll in the per-plug incentive program.

COMMENTS

The City of New York

According to the City of New York (the City), on-road transportation electrification will play a critical role in reaching full carbon neutrality by 2050 as set forth in the City's strategic plan. Furthermore, Mayor de Blasio signed an

executive order on February 6, 2020, requiring that the City's fleet be all-electric by 2040.

Given these policy considerations, the City supports Tesla's recommendation that the maximum incentive amount be provided to participants that enroll in the 2020 calendar year. The City explains that limited enrollment in the 2019 DCFC incentive program year may not indicate lack of interest, or programmatic issues. The City cites its own experience and anecdotal third-party developer experience in installing fast charging infrastructure to suggest that permitting, meter and building design, construction, and other steps can easily take a year or longer and are exacerbated in New York City where additional challenges exist.

The City concludes that it is reasonable to extend the maximum incentive level to 2020 so that developers have the opportunity and flexibility to further develop their projects, without penalizing them for delays in the station development process. Finally, the City argues that extending the availability of the maximum incentives will ensure that the authorized budgets are actually committed and spent.

The Joint Utilities of New York

The Joint Utilities urge the Commission to deny Tesla's requested "mixed-tier" approach and to deny Tesla's proposed cap to limit charging operators to no more than 50 percent of participating plugs. According to the Joint Utilities, Tesla's request for a mixed-tier approach represents a departure from the Commission's rationale for co-located, non-proprietary plug types setting the incentive level for the proprietary plugs. Since Tesla's approach provides an opportunity for plugs to receive the maximum incentive for charging capabilities that cannot be provided simultaneously to two vehicles, the Joint Utilities argue that it is contrary to

the Commission's decision to base incentives on simultaneous charging so as to increase charging availability and encourage EV use. The Joint Utilities contend that granting this request will result in spending more customer funds on incentives without commensurate increases in EV charging ability.

Similarly, the Joint Utilities urge the Commission to reject Tesla's proposal to limit charging operators to no more than 50 percent of participating plugs as premature. According to the Joint Utilities, it would be better to defer such a programmatic change until the mid-term review when more program implementation experience is available.

The Joint Utilities support Tesla's recommendation to extend the 2019 incentive levels, but suggest that the first year's incentive level be available through 2021. According to the Joint Utilities, many developers are likely to wait for the Commission to adopt a statewide Make-Ready Program that would provide incentives to both Level 2 and DCFC stations. The Joint Utilities propose utility-specific budgets in Attachment A to their comments. According to the Joint Utilities' proposal, the 2019 incentive levels should be available in 2020 and 2021, with all incentives ending in 2025 regardless of what year a participant entered the DCFC per-plug incentive program.

Finally, the Joint Utilities confirm their commitment to the protection of customer data privacy, and they state that they agree that Tesla's available methods of payment conform to the DCFC per-plug incentive program requirements and are qualifying payment options.

The New York Power Authority

The New York Power Authority (NYPA) explains that it is committed to helping New York State reach decarbonization and EV-related goals through the EVolveNY Program. NYPA supports Tesla's request to extend the full incentive payment for one

year for all developers. According to NYPA, "range anxiety" remains a significant concern for potential EV buyers, and the availability of public charging stations can build consumer confidence. By extending the 2019 incentive level through December 2020, NYPA states that developers will be encouraged to invest in DCFC infrastructure within the original maximum budget. NYPA concludes by citing Department of Public Service Staff's (Staff) support for holding the 2020 incentive steady at the 2019 level as an additional reason why the Commission should adopt Tesla's request.

DISCUSSION

Tesla Supercharger Payment Technology

The Commission agrees with both Tesla and the Joint Utilities, and clarifies that Tesla's available methods of payment conform to the DCFC per-plug incentive program requirements and are qualifying payment options.

As a threshold matter, proprietary plugs such as Tesla's Superchargers may only become eligible for the per-plug incentive where the charging station also makes available commonly accepted standardized plug types. Once a proprietary plug is made available with a standardized plug, it may be eligible to receive a per-plug incentive if it is usable without a paid membership and if the fees are "... payable through a commonly accepted payment method such as cash, credit, or debit."⁷ Additionally, payment through a smartphone application may not be the only form of payment a DCFC station accepts in order to qualify for this program. Since Tesla has an in-vehicle customer interface and a customer service telephone

⁷ DCFC Program Order, p. 45.

number⁸ in addition to a smartphone application, the Supercharger network conforms to the DCFC per-plug incentive program requirements.

Data Collection and Reporting

The Commission affirms and directs that station-specific and session-level data should not be disseminated publicly or used for any commercial purpose. As the Commission stated in the DCFC Program Order, detailed data review by the Commission is prudent and necessary to evaluate the success of the program and inform any changes.⁹ The Commission therefore directed all developers participating in the DCFC per-plug incentive program to collect and report specific detailed data to the relevant utility in order to inform annual utility reports that will be provided to the Commission.¹⁰

The Commission has addressed the need for utilities to protect customer privacy in other proceedings. In the Order Adopting Distribution System Implementation Plan (DSIP) Guidance,¹¹ the Commission recognized that access to customer usage data and system data was necessary to enable markets, and required the utilities to provide specific details in the DSIP filings regarding current data availability and future plans.

⁸ The Commission further clarifies that this customer service telephone number must be clearly posted to the charging unit and must permit payment to be made via telephone call through automation and/or a customer service representative 24 hours per day, 365 days per year.

⁹ DCFC Program Order, p. 42.

¹⁰ Each utility recently filed their first annual DCFC per-plug incentive program report in this case and appropriately treated trade secret information by filing such portions of each report confidentially.

¹¹ Case 14-M-0101, Reforming the Energy Vision, Order Adopting Distribution System Implementation Plan Guidance (issued April 20, 2016) (DSIP Order).

The Commission also noted that cybersecurity of both customer and system data is a critical concern; emphasizing maintaining customer data privacy, keeping platform operations safe and secure, and requiring that data security measures be entrenched in standards and protocols.

The Commission recognizes the customer privacy and trade secret concerns that Tesla raises and that other competitive developers likely share, and affirms the need for prudent confidential data management and protection of confidential commercial information. It is the Commission's understanding that the Joint Utilities have all engaged a third-party consultant to collect, anonymize, and aggregate collected DCFC per-plug incentive station data to inform the publicly filed annual reports. Such a third-party vendor is subject to cybersecurity and data security agreements, and the Commission reiterates that no station-level, customer specific usage data shall be publicly filed. The publicly filed annual reports shall contain aggregated, anonymized data only. Confidential, station- or customer-specific granular data shall be available to Staff and the Commission.

Accordingly, the Commission directs that DCFC per-plug incentive program data collection shall only be used to inform publicly filed anonymized, aggregated annual reports and to provide Staff and the Commission with more granular program data. The Commission notes that it appears that, to date, all data collection and management has been consistent with this directive and the aforementioned principles regarding the protection of customer privacy and trade secrets.

Maximum Incentive Level Extension

The Commission agrees with Tesla's observation that both the roll out of the new incentive program and the long-lead time needed to develop DCFC stations has resulted in lower than

desired enrollment in 2019. The Commission also agrees with NYPA that since the maximum program budget will remain fixed, even after modifying the yearly incentive amounts, it is appropriate to extend the maximum per-plug incentive level.

Staff recently released the Whitepaper Regarding Electric Vehicle Supply Equipment & Infrastructure Deployment (Whitepaper),¹² which proposes a "Make-Ready" Program that recommends, among other things, an incentive payment to cover a percentage of the costs of make-ready infrastructure for new publicly accessible Level 2 and DCFC stations, and a lower percentage incentive payment for new Level 2 and DCFC stations that are not publicly accessible, among other recommendations. As NYPA notes, in the Whitepaper, Staff stated support for the Commission holding the 2020 DCFC per-plug incentive level steady at the 2019 level instead of stepping down the annual incentive payment, as must happen under the current program design.¹³ Staff explained that it is reasonable to expect much more developer interest in building New York's EV charging infrastructure with the proposed Make-Ready Program. The Joint Utilities' suggestion to extend the first-year incentives through 2021 anticipates that many developers may wait for Commission adoption of the Whitepaper's recommended Make-Ready Program.

The Commission agrees with the rationale behind Tesla's proposal, which is echoed in the City, NYPA, and the Joint Utilities' comments. Upon review, the Commission agrees with the Joint Utilities' proposal to hold the 2020 and 2021 DCFC per-plug incentive level steady at the 2019 level instead

¹² Case 18-E-0138, Whitepaper Regarding Electric Vehicle Supply Equipment and Infrastructure Deployment (filed January 13, 2020).

¹³ Id., p. 16.

of stepping down the annual incentive payment. Thus, the Commission approves a two-year extension of the 2019 incentive level, i.e., until December 31, 2021. Accordingly, the Commission directs each utility to update their DCFC per-plug incentive program in accordance with the budgets and step-downs set forth in Attachment A. While there is no reason for developers to delay construction of economic stations, the Commission acknowledges that some developers might not submit applications under the per-plug incentive program prior to Commission action on Staff's proposed Make-Ready Program.

Mixed Tier

The DCFC Program Order and the Order Modifying DCFC Program contemplate two tiers of incentives as a reasonable method to provide a greater incentive to install plugs with faster charging capabilities. As the Commission noted in the DCFC Program Order, 50 kW is typical of Level 3 charging, though higher demand charging capabilities will become commercially available in the future and charging infrastructure will need to follow.¹⁴ Furthermore, as stated in the Order Modifying DCFC Program, the tiered incentive program and ability for proprietary plugs to qualify by co-locating standardized plugs seeks to encourage dual compatibility at all new public DCFC stations.¹⁵

Tesla's proposal for a mixed tier incentive is, in general, a reasonable approach to incentivize EV charging, given the present market conditions, equipment availability, and the rate of developer participation during the program's first year. However, as discussed herein, important minimum criteria are necessary to ensure that program funding is effectively spent.

¹⁴ DCFC Program Order, p. 43.

¹⁵ Order Modifying DCFC Program, p. 3.

As a general matter, more complex power sharing systems and charging systems with higher output capacities tend to be more expensive than systems that have lower capacities. Commonly accepted, standardized plug equipment capable of simultaneously charging two vehicles at greater than 75 kW is more expensive and not yet as readily available in comparison to a 125 kW charger with two plugs capable of simultaneously charging each of two electric vehicles at equal to or greater than 62.5 kW. Accordingly, for the mixed tier option, the minimum criteria shall require that a participating standardized plug must be capable of simultaneous charging two vehicles at 62.5 kW to 74 kW to receive the 60 percent incentive. Plugs that fall below these minimum criteria are not eligible for the mixed tier option provided for in this order.

The Commission directs the Joint Utilities to modify the DCFC per-plug incentive program rules so that at co-located stations, any plug type capable of simultaneously charging two vehicles at 75 kW or greater receives a full per-plug incentive, and commonly accepted, standardized plug equipment at the site capable of simultaneous charging two vehicles at 62.5 kW to 74 kW receives 60 percent of the full incentive. To be clear, at least two, simultaneously accessible standardized plugs that can simultaneously provide 62.5 kW - 74 kW speeds must be present to establish eligibility for the aforementioned program incentives. In addition, recognizing that the market is moving towards higher charging capabilities, the opportunity to seek incentives under the mixed tier option will cease after three years from the date of this order.

Developer Cap

To mitigate concerns that a single developer or operator could obtain a disproportionate amount of incentive funds, Tesla proposed adding a cap that would limit charging

operators or developers to no more than 50 percent of the eligible DCFC incentive program plugs in a given service territory. While the Joint Utilities' would prefer to defer consideration of a participating developer or operator cap, this single company cap provides a simple and effective solution that will, among other things, ensure against the risk of a disproportionate amount of program funding being devoted to any one proprietary plug type. It is appropriate to adopt this developer cap; the Commission directs the Joint Utilities to update the DCFC per-plug incentive program rules so that no single station developer or operator may seek incentives for installation of greater than 50 percent of the plugs per utility service area.

CONCLUSION

As stated in the Order Modifying DCFC Program, the purpose of the DCFC per-plug incentive is to provide an economic incentive to build out the infrastructure needed to meet the fast charging demands of the State's zero emissions vehicle deployment goals.¹⁶ Leveraging third-party contributions to meet public policy goals is a core objective of the Commission's Reforming the Energy Vision initiative, and the program changes directed by this order will result in deploying more private capital in the State's DCFC network.

The Commission orders:

1. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and

¹⁶ Order Modifying DCFC Program, p. 25.

Rochester Gas and Electric Corporation are directed to modify their direct current fast charger per-plug incentive programs consistent with the discussion in the body of this order and Attachment A, to be effective upon issuance of this order.

2. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., 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 are directed to update the direct current fast charger per-plug incentive program sections on the electric vehicle charging station information websites with the program changes directed in the body of this order within 60 days of the date this order is issued.

3. In the Secretary's sole discretion, the deadlines set forth in this order may be extended. Any request for an extension must be in writing, must include a justification for the extension, and must be filed at least one day prior to the affected deadline.

4. This proceeding is continued.

By the Commission,

(SIGNED)

MICHELLE L. PHILLIPS
Secretary

	2019	2020	2021	2022	2023	2024	2025	
<i>Central Hudson Gas & Electric</i>								total incentive
Fixed annual incentive (First year: 2019)	\$ 11,000	\$ 9,429	\$ 7,857	\$ 6,286	\$ 4,714	\$ 3,143	\$ 1,571	\$ 44,000
Fixed annual incentive (First year: 2020)		\$ 11,000	\$ 9,429	\$ 7,857	\$ 6,286	\$ 4,714	\$ 3,143	\$ 42,429
Fixed annual incentive (First year: 2021)			\$ 11,000	\$ 9,429	\$ 7,857	\$ 6,286	\$ 4,714	\$ 39,286
Fixed annual incentive (First year: 2022)				\$ 9,429	\$ 7,857	\$ 6,286	\$ 4,714	\$ 28,286
Fixed annual incentive (First year: 2023)					\$ 7,857	\$ 6,286	\$ 4,714	\$ 18,857
Fixed annual incentive (First year: 2024)						\$ 6,286	\$ 4,714	\$ 11,000
Fixed annual incentive (First year: 2025)							\$ 4,714	\$ 4,714
<i>Con Edison</i>								total incentive
Fixed annual incentive (First year: 2019)	\$ 4,000	\$ 3,429	\$ 2,857	\$ 2,286	\$ 1,714	\$ 1,143	\$ 571	\$ 16,000
Fixed annual incentive (First year: 2020)		\$ 4,000	\$ 3,429	\$ 2,857	\$ 2,286	\$ 1,714	\$ 1,143	\$ 15,429
Fixed annual incentive (First year: 2021)			\$ 4,000	\$ 3,429	\$ 2,857	\$ 2,286	\$ 1,714	\$ 14,286
Fixed annual incentive (First year: 2022)				\$ 3,429	\$ 2,857	\$ 2,286	\$ 1,714	\$ 10,286
Fixed annual incentive (First year: 2023)					\$ 2,857	\$ 2,286	\$ 1,714	\$ 6,857
Fixed annual incentive (First year: 2024)						\$ 2,286	\$ 1,714	\$ 4,000
Fixed annual incentive (First year: 2025)							\$ 1,714	\$ 1,714
<i>National Grid</i>								total incentive
Fixed annual incentive (First year: 2019)	\$ 7,500	\$ 6,428.57	\$ 5,357.14	\$ 4,286	\$ 3,214.29	\$ 2,142.86	\$ 1,071	\$ 30,000
Fixed annual incentive (First year: 2020)		\$ 7,500	\$ 6,429	\$ 5,357	\$ 4,286	\$ 3,214	\$ 2,143	\$ 28,929
Fixed annual incentive (First year: 2021)			\$ 7,500	\$ 6,429	\$ 5,357	\$ 4,286	\$ 3,214	\$ 26,786
Fixed annual incentive (First year: 2022)				\$ 6,429	\$ 5,357	\$ 4,286	\$ 3,214	\$ 19,286
Fixed annual incentive (First year: 2023)					\$ 5,357	\$ 4,286	\$ 3,214	\$ 12,857
Fixed annual incentive (First year: 2024)						\$ 4,286	\$ 3,214	\$ 7,500
Fixed annual incentive (First year: 2025)							\$ 3,214	\$ 3,214
<i>New York State Electric and Gas</i>								total incentive
Fixed annual incentive (First year: 2019)	\$ 8,000	\$ 6,857	\$ 5,714	\$ 4,571	\$ 3,429	\$ 2,286	\$ 1,143	\$ 32,000
Fixed annual incentive (First year: 2020)		\$ 8,000	\$ 6,857	\$ 5,714	\$ 4,571	\$ 3,429	\$ 2,286	\$ 30,857
Fixed annual incentive (First year: 2021)			\$ 8,000	\$ 6,857	\$ 5,714	\$ 4,571	\$ 3,429	\$ 28,571
Fixed annual incentive (First year: 2022)				\$ 6,857	\$ 5,714	\$ 4,571	\$ 3,429	\$ 20,571
Fixed annual incentive (First year: 2023)					\$ 5,714	\$ 4,571	\$ 3,429	\$ 13,714
Fixed annual incentive (First year: 2024)						\$ 4,571	\$ 3,429	\$ 8,000
Fixed annual incentive (First year: 2025)							\$ 3,429	\$ 3,429
<i>Orange & Rockland Utilities</i>								total incentive
Fixed annual incentive (First year: 2019)	\$ 11,000	\$ 9,429	\$ 7,857	\$ 6,286	\$ 4,714	\$ 3,143	\$ 1,571	\$ 44,000
Fixed annual incentive (First year: 2020)		\$ 9,429	\$ 7,857	\$ 6,286	\$ 4,714	\$ 3,143	\$ 1,571	\$ 31,429
Fixed annual incentive (First year: 2021)			\$ 9,429	\$ 7,857	\$ 6,286	\$ 4,714	\$ 3,143	\$ 28,286
Fixed annual incentive (First year: 2022)				\$ 9,429	\$ 7,857	\$ 6,286	\$ 4,714	\$ 28,286
Fixed annual incentive (First year: 2023)					\$ 7,857	\$ 6,286	\$ 4,714	\$ 18,857
Fixed annual incentive (First year: 2024)						\$ 6,286	\$ 4,714	\$ 11,000
Fixed annual incentive (First year: 2025)							\$ 4,714	\$ 4,714
<i>Rochester Gas & Electric</i>								total incentive
Fixed annual incentive (First year: 2019)	\$ 17,000	\$ 14,571	\$ 12,143	\$ 9,714	\$ 7,286	\$ 4,857	\$ 2,429	\$ 68,000
Fixed annual incentive (First year: 2020)		\$ 17,000	\$ 14,571	\$ 12,143	\$ 9,714	\$ 7,286	\$ 4,857	\$ 65,571
Fixed annual incentive (First year: 2021)			\$ 17,000	\$ 14,571	\$ 12,143	\$ 9,714	\$ 7,286	\$ 60,714
Fixed annual incentive (First year: 2022)				\$ 14,571	\$ 12,143	\$ 9,714	\$ 7,286	\$ 43,714
Fixed annual incentive (First year: 2023)					\$ 12,143	\$ 9,714	\$ 7,286	\$ 29,143
Fixed annual incentive (First year: 2024)						\$ 9,714	\$ 7,286	\$ 17,000
Fixed annual incentive (First year: 2025)							\$ 7,286	\$ 7,286