New York Electric Vehicle Infrastructure Make-Ready Program

IMPLEMENTATION PLAN

Submitted by: New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation

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EXECUTIVE SUMMARY AND PROGRAM DESCRIPTION

NYSEG and RG&E EV Make-Ready Program Implementation Plan

1.1 EXECUTIVE SUMMARY

New York State Electric & Gas Corporation ("NYSEG") and Rochester Gas and Electric Corporation ("RG&E") (hereinafter "the Companies") will deliver an electric vehicle ("EV") make-ready infrastructure program ("EV Make-Ready Program") to their commercial, industrial, municipal, and multi-unit dwelling[1] ("MUD") customers. The Companies hereby submit this EV Make-Ready Implementation Plan ("Implementation Plan") for program years 2020 through 2025. The Companies are filing this Implementation Plan in compliance with the New York State Public Service Commission's ("Commission") July 16, 2020 "*Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs"* ("Order"[2]).

On August 17, 2020, the Joint Utilities of New York ("JU") filed their joint New York EV Make-Ready Infrastructure Program Participant Guide[3] ("Participant Guide"). The Companies continue to work collaboratively with the JU and Department of Public Service ("DPS") Staff (hereinafter "Staff") on the framework for this Implementation Plan, additional EV Make-Ready Program requirements identified in the Implementation Plan, and other programs stipulated in the Commissions' Order.

Additional EV Make-Ready Program requirements defined in the Order include the Phase I and II Application Portal, Approved Contractor Application, Fleet Assessment Services, and Load Capacity Maps.

[1] Multi-unit dwellings are defined as multi-unit residential buildings with five or more dwelling units.
[2] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure.* Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs, Jul. 16, 2020.
[3] New York EV Make-Ready Infrastructure Program Participant Guide, Joint Utilities of New York, Aug. 17, 2020.

Other programs stipulated in the Order include a Medium and Heavy-Duty Fleet Infrastructure Make-Ready Pilot and a proposal for an Active Managed Charging Program. EV Make-Ready Program requirements and other programs stipulated in the Order are summarized in Table 1A.

Table 1A: EV Make-Ready Program Requirements and Other Programs

EV Make-Ready Program Requirements and Other Programs Timeline	
Requirement/ Program	**Requirement/ Program Date**
EV Program Requirements	
Approved Contractor Application	September 14, 2020 (assumed)
Phase I Application Portal	October 14, 2020
Phase II Application Portal	January 16, 2021
Fleet Assessment Service Application	September 14, 2020 (assumed)
Load Serving Maps	December 31, 2020
Other Programs	
Medium/ Heavy-Duty Implementation Plan	October 14, 2020
Active Managed Charging Proposals	November 13, 2020

The Companies will offer the EV Make-Ready Program through accelerated program design and process implementation to ensure all program participants[4] who develop Electric Vehicle Supply Equipment ("EVSE") projects, that have not begun construction as of the date of the Order, have access to eligible EV Make-Ready Infrastructure Program incentives. In addition to contributing to the development of EVSE in the Companies service areas, the EV Make-Ready Program will contribute to the achievement of state Zero Emissions Vehicle ("ZEV") Memorandum of Understanding[5] ("MOU") goals and provide positive environmental benefits including reductions in greenhouse gas ("GHG") emissions across the NYSEG and RG&E service territories.

These reductions in GHG emissions are critical in helping the Companies meet New York State Energy Plan targets and the more recent Climate Leadership and Community Protection Act ("CLCPA") mandates. The CLCPA put into law New York State's goal to reduce GHG emissions 40 percent below 1990 levels by 2030, and 85 percent by 2050.[6] [7]

[4] The Implementation Plan refers to program participants throughout as defined by the Participant Guide.
[5] Multi-State Zero-Emission Vehicle Programs Memorandum of Understanding, Oct.24, 2013
[6] The Energy to Lead: 2015 New York State Energy Plan. Available at: https://energyplan.ny.gov/Plans/2015.aspx.

1.2 PROGRAM DESCRIPTION

The Companies' EV Make-Ready Program will provide incentives to program participants for eligible EV make-ready infrastructure as described in this Implementation Plan up to the target number of plugs and/or the authorized budget shown in Table 1B. Incentive levels may cover up to 100% of eligible make-ready costs dependent upon the Eligibility Criteria, the Companies Project Approval Process, and the available program budget. Incentive levels are limited by other criteria described in the Implementation Plan, including the quantity, type and capacity of EVSE plugs, and a cap on the maximum incentive a single program participant may receive in each of the Companies' Service areas. Additionally, to be eligible to receive make-ready incentives, all make-ready work must be completed by an approved contractor chosen from a list of approved contractors located and maintained on the JU website. Finally, by accepting make-ready incentives, program participants must adhere to operational requirements defined in this Implementation Plan.

Table 1B: Target Plugs and Authorized Incentive Budgets

Target Plugs and Authorized Incentive Budgets by Operating Company	
NYSEG	RG&E
Target L2 Plugs: 9,279	*Target L2 Plugs: 4,178*
Authorized L2 Budget: $51,126,000	Authorized L2 Budget: $23,020,200
Target DCFC Plugs: 250	*Target DCFC Plugs: 149*
Authorized DCFC Budget: $12,628,000	Authorized DCFC Budget: $7,529,500

[7] Chapter 106 of the Laws of 2019. Available at https://legislation.nysenate.gov/pdf/bills/2019/S6599
See also, the Climate Act Fact Sheet, available at: https://climate.ny.gov/-/media/CLCPA/Files/CLCPA-Fact-Sheet.pdf

EV MAKE-READY PROGRAM ELIGIBILITY CRITERIA

2.1 ELIGIBLE EQUIPMENT

Two categories of equipment or infrastructure are eligible for incentives under the EV Make-Ready Program:

1. Utility-side Make-Ready Infrastructure: Utility electric infrastructure needed to connect and serve a new EV charger. This may include traditional distribution infrastructure such as step-down transformers, overhead service lines, and utility meters that will continue to be owned and operated by the utility.
2. Customer-side Make-Ready Infrastructure: EV equipment or infrastructure necessary to make a site ready to accept an EV charger that is owned by the charging station Developer, Equipment Owner, or Site Host. This electric infrastructure may include conductors, trenching, and panels needed for the EV charging station.
   Eligible future proofing to the site and equipment may also be approved as part of this infrastructure.

All EV supply equipment must be installed by utility-approved contractors to be eligible for the incentives available through this EV Make-Ready Program. Equipment associated with the EV charger itself, such as the actual EV chargers, power blocks, modules, mounting hardware, co-located distributed generation, or energy storage material, are ineligible for incentives under the EV Make-Ready Program.

2.2 ELIGIBLITY CRITERIA & INCENTIVES

To receive incentives through the EV Make-Ready Program, a program participant must satisfy the following criteria:

1. Approved Application: An application for a proposed EV charging station within either of the Companies' service areas must be submitted by the program participant and accepted into the EV Make-Ready Program. The Companies will review, evaluate, and, if appropriate, approve applications. See Application Approval Process Section 3.2.

2. Station Maturity: Construction of the EV charging station must have commenced no earlier than July 16, 2020.

3. Location Capacity: EV charging stations must conform to capacity guidelines including:

- EV charging stations must have a minimum of two plugs. A DCFC is considered a two-plug charging station if the charger provides two plugs (either SAE CCS or CHAdeMO types) capable of simultaneously charging at 50 kW or greater.
    - The number of two-plug stations that can receive incentives through the Program is limited to no more than 25 percent of the target number of plugs in the Companies' Service areas as shown in Table 2A.

Table 2A: Number of Allowed Two-Plug Stations

Maximum Number of Two Plug Stations by Operating Company	
NYSEG	RG&E
Target L2 Plugs: 9,279	*Target L2 Plugs: 4,178*
Maximum L2 Two Port Chargers: 2,320	Maximum L2 Two Port Chargers: 1,045
Target DCFC Plugs: 250	*Target DCFC Plugs: 149*
Maximum DCFC Two Port Chargers: 63	Maximum DCFC Two Port Chargers: 37

- DCFC sites with more than ten plugs and/or demand more than 2MW will be allowed to participate in the EV Make-Ready Program under the condition that developing the site does not cause the utility to incur new business costs greater than those that would have been incurred to develop a site with a maximum demand of 2MW.
    - The number of plugs at locations with greater than ten plugs is limited to no more than 50 percent of the target number of plugs in the Companies' Service areas as shown in Table 2B.

Table 2B: Number of Allowed Plugs at Locations with Greater than 10 Plugs

Maximum Number of Plugs Allowed at Sites with Greater than 10 Plugs	
NYSEG	RG&E
Target L2 Plugs: 9,279	*Target L2 Plugs: 4,178*
Maximum L2 Two Port Chargers: 4,640	Maximum L2 Two Port Chargers: 2,089
Target DCFC Plugs: 250	*Target DCFC Plugs: 149*
Maximum DCFC Two Port Chargers: 125	Maximum DCFC Two Port Chargers: 75

Participants in the EV Make-Ready Program are eligible to receive incentives covering up to the given cost of Make-Ready infrastructure based upon the criteria listed in Tables 2C and 2D.

Table 2C: NYSEG Incentive Eligibility Criteria

NYSEG	Up to 50%	Up to 90%	Up to 100%
Accessibility	Non-public locations, including workplace and privately-owned pay-to-park lots	Public locations, including municipal paid parking	
Plug Type	Locations where a station with proprietary plug types are not co-located with an equal number of commonly accepted standardized plug types	Locations where all plugs are standardized or where a proprietary plug type is co-located at a station with an equal number of commonly accepted standardized plug types	
Disadvantaged Communities			Publicly accessible non-proprietary DCFC and/or Level 2 sites located in multi-unit dwellings sites which are also located within 2 miles of a Disadvantaged Community

Table 2D: RG&E Incentive Eligibility Criteria

RG&E	Up to 50%	Up to 90%	Up to 100%
Accessibility	Non-public locations, including workplace and privately-owned pay-to-park lots	Public locations, including municipal paid parking	
Plug Type	Locations where a station with proprietary plug types are not co-located with an equal number of commonly accepted standardized plug types	Locations where all plugs are standardized or where a proprietary plug type is co-located at a station with an equal number of commonly accepted standardized plug types	
Disadvantaged Communities			Publicly accessible non-proprietary DCFC and/or Level 2 sites located in multi-unit dwellings sites which are also located within **1 mile** of a Disadvantaged Community

Up to 100 percent eligibility for Disadvantages Communities is available until expenditures reach 20 percent of the authorized incentive budget, and 90 percent for the remainder of the EV Make-Ready Program budget as shown in Table 2E.

Table 2E: Up to 100% Eligibility Maximum Budget

Maximum Budget for Up to 100% Eligibility by Operating Company	
NYSEG	RG&E
Authorized L2 Budget: $51,126,000	*Authorized L2 Budget: $23,020,200*
Maximum Budget: $10,231,200	Maximum Budget: $4,604,040
Authorized DCFC Budget: $12,628,000	*Authorized DCFC Budget: $7,529,500*
Maximum Budget: $2,525,600	Maximum Budget: $1,505,900

No single program participant may receive incentives greater than 50 percent of any utility-specific Make-Ready Incentive budget as shown in Table 2F.

Table 2F: Maximum Incentive Eligibility for a Single Program Participant

Maximum Incentive for a Single Program Participant by Operating Company	
NYSEG	RG&E
Authorized L2 Budget: $51,126,000	*Authorized L2 Budget: $23,020,200*
Maximum Budget: $25,563,000	Maximum Budget: $11,510,100
Authorized DCFC Budget: $12,628,000	*Authorized DCFC Budget: $7,529,500*
Maximum Budget: $6,314,000	Maximum Budget: $3,764,750

2.3.1 Definition of Disadvantaged Communities

Disadvantaged Communities: Per the CLCPA, disadvantaged communities ("DAC") are defined as 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. DAC's include environmental justice[8] ("EJ") and low- and moderate-income communities[9] ("LMI") as defined by the Order. The Companies, in consultation Staff, will publish an updated definition for DAC in October 2020.

Mapping of Disadvantaged Communities: The Companies are collaborating with the JU and working in consultation with Staff to develop interactive maps of DAC's and the associated 1 mile or 2-mile radius areas surrounding these communities. The maps will allow developers to identify areas within disadvantaged communities or the radii around them by entering a location and placing a marker on the map to indicate the potential development site. The Companies expect to publish these maps in October 2020.

[8] See Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure. Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs, Jul. 16, 2020 page 134

[9] See Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure. Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs, Jul. 16, 2020 page 133

PROGRAM IMPLEMENTATION

3.1 APPLICATION PROCESS

To facilitate immediate application to the EV Make-Ready Program the Companies have made a temporary application form available to program participants. A fillable PDF form may be completed at each Companies' web site located on their EV Make-Ready Program landing page. The Companies will comply with requirements of the Phase I Application Portal through modification to its existing DER Interconnection Portal by October 14, 2020. Once the Application Portal is live, the temporary application form on the Companies' web sites will be removed and program participants will navigate to the Application Portal through links located on the EV Make-Ready Program landing page.

3.2 APPLICATION APPROVAL PROCESS

Beyond supporting state climate goals and encouraging greater EV adoption, the Companies believe that one of the most important aspects of the Program is to provide maximum value to ratepayers. Therefore, the primary evaluation metric for project approval is project cost. In addition to project cost, the Companies will also evaluate projects for location suitability and accessibility.

Cost Evaluation Metrics: The cost evaluation metric is categorized by three cost levels:

- Baseline: Defined by the expected average cost per plug as stipulated in the Order. For Upstate NY the expected average cost per plug for L2 chargers is $6,000. For DCFC the expected average cost is $55,000 per plug.
- Threshold Baseline: Defined by those projects that have final costs per plug that are at a minimum of 85% or less of the L2 and/or DCFC Baseline cost.
- Over Baseline: defined by those projects that exceed the Baseline cost per plug.

Projects submitted to the Companies that meet or are below the Threshold Baseline cost criteria will be reviewed, approved, and incentives accrued with priority, followed by those projects submitted to the Companies that exceed Threshold Baseline but do not exceed the Baseline cost criteria. Projects submitted to the Companies that are Over Baseline will be reviewed, approved and incentives accrued on a project by project basis.

Over Baseline Project Approval

1. Projects submitted to the Companies that are Over Baseline will be reviewed and may be approved if, at the time of project submission, the entire portfolio of projects received by the Companies to date is sufficiently below Baseline to support funding of the project.
2. Projects submitted to the Companies that are Over Baseline must provide justification of all project costs. Such justification should include support for other evaluation criteria described in this Section.
3. Projects submitted to the Companies that are Over Baseline will be placed on hold or denied if, at the time of project submission, the entire portfolio of projects received by the Companies to date is insufficiently below Baseline to support funding of the project, or if insufficient justification is provided.
4. Over Baseline projects placed on hold or denied will be reconsidered or may be resubmitted if the entire portfolio of projects received by the Companies to date becomes sufficient to support funding of the project, or if additional justification is provided.

Cost Reduction Strategies

In all cases, the Companies will work collaboratively with Program Participants to identify cost reductions strategies to ensure the best opportunity for project success.

Cost Evaluation Metric Review: The Companies will regularly track and analyze actual costs of all approved projects and will use that information to evaluate and, if necessary, revise the Cost Evaluation Metric on an annual basis.

Project Suitability Evaluation Criteria: Projects submitted to the Companies will be evaluated for alignment with the suitability criteria that the Companies have identified to be favorable for EVSE development. These criteria include:

- Available upstream capacity in the proposed project location.
- Local capacity availability in the proposed project location.
- Project location in relation to existing local infrastructure (i.e. no additional line extensions required).
- Distance of the proposed EVSE from the planned point of service.
- Ability to optimize the use of all available existing utility infrastructure.

Project Suitability Enhancement Strategies

In all cases, the Companies will work collaboratively with Program Participants to identify project suitability strategies to ensure the best opportunity for project success.

Project Accessibility Evaluation Criteria: Projects proposed in locations that expand EV charging access to areas within the Companies' service area beyond those with high EV adoption rates or areas with high levels of existing EVSE saturation will be given priority. This includes locations that fall under the definition of Disadvantaged Communities.

Project Accessibility Strategies

In all cases, the Companies will work collaboratively with Program Participants to identify project accessibility strategies to ensure the best opportunity for project success.

3.3 APPROVED CONTRACTOR LIST

To receive incentives for eligible make-ready infrastructure, work must be performed by an approved contractor. The JU have developed a common application which must be submitted by contractors who will provide make-ready work services, and approved by the JU, prior to being added to the approved contractor list.

The contractor application is accessible from the JU website or from links on the NYSEG or RG&E websites. Contractors seeking to be added to the approved contractor list must certify:

- They are registered to do business within New York State; and
- They have all appropriate licenses and certifications that are needed for all jobs in the area(s) where they do work.

Contractors will be asked to indicate areas within New York State in which they plan to do make-ready work.

Utilities, in consultation with Staff, shall have the ability to remove contractors from the qualifying list for either (1) falling out of standing with qualification criterion/criteria established by the Joint Utilities or (2) performance concerns and/or customer complaints.

1. Contractors who fall out of standing on one or more of the qualifying criterion/criteria and subsequently correct any deficiencies shall be reinstated upon demonstration of compliance.
2. A utility, in consultation with Staff, may place any contractor who receives consistent customer complaints on probation and require that contractor to file a corrective action plan within 30 days of the start of the probationary period. Failure to provide the corrective action plan and/or the continuance of customer complaints will result in the suspension of the contractor's ability to provide work for Make-Ready Program Participants in that utility's service territory. Contractors may be reinstated upon a reasonable demonstration of their capabilities.

3.4 FLEET ASSESSMENT SERVICE

The Companies will offer a fleet assessment service consistent with the Order. The fleet assessment service will use a common JU application for inquiries to the service and will be available to light, medium, and heavy-duty fleet operators. The application will be posted to the JU website and be included on a new fleet assessment service landing page to be created on the Companies' web sites.

Customers interested in electrification of their commercial fleets will be provided with an analysis of site feasibility for anticipated load increases and rate analysis to determine appropriate rates and estimated billing impact for increases in energy consumption. The site feasibility analysis would include the load serving capacity of existing utility infrastructure at the proposed site and an estimate of additional local and potential upstream utility infrastructure that would be required to serve the proposed load resulting from new charging infrastructure. Based on the results of the site feasibility analysis, further rate analysis will be performed to include "what-if" billing scenarios based on anticipated load and kWh consumption of the proposed charging load, duration, and schedules.

The JU will develop a common fleet assessment services satisfaction survey to understand customer's perceptions of the fleet assessment service, what the likelihood of fleet electrification is before and after participation, and what additional services should be offered. The Companies will develop lessons learned and gain useful insights into the fleet assessment service and increase services offerings as appropriate.

3.5 FUTUREPROOFING

The Order directs the Companies to establish a futureproofing budget of 8% of the Companies' total EV-Make Ready Program incentive budget. The futureproofing budget does not reduce the Companies' overall make-ready budget but provides additional funding for futureproofing activities specifically related to make-ready infrastructure. Futureproofing costs will not be included in the Companies' Cost Evaluation Metrics described in Section 3.2 when evaluating project costs. However, since futureproofing costs are limited, the Companies will apply the same cost criteria methodology described in Section 3.2 separately to project futureproofing proposals.

The Order caps total futureproofing costs for any site at 10% of the total make-ready costs for that site. Therefore, in the case of futureproofing, the Companies will use 10% of the project's total make-ready cost as the Baseline for futureproofing costs.

Additionally, futureproofing costs for equipment or infrastructure that are ineligible for make-ready incentives will not be eligible for futureproofing incentives.

3.6 OPERATIONAL REQUIREMENTS

The EV Make-Ready Program requires that all sites meet a specific minimum set of performance standards, which will be tracked and reported by the program participant as part of the overall reporting requirements outlined in Section 3.7 below. These operational standards are as follows:

- DCFC plugs must be operational 95 percent of the time (annually);
- DCFC charging stations must be operational 99 percent of the time (annually), with a minimum of 50 percent of the plugs considered to be "up" at all times; All charging stations in the EV Make-Ready Program must operate for a minimum of five years; and
- Ownership of EV charging stations may change or stations may be upgraded during the five-year term, if 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.

Additionally, program participants must report all customer complaints to the Companies and DPS Staff. Details of customer complaints will not be made public and will be used by the Companies to develop best practices for the EV Make-Ready Program.

3.7 REPORTING REQUIREMENTS

Program participants will provide the Companies with the necessary data regarding the installation and use of the EVSE to facilitate necessary tracking of the EV Make-Ready Program's overall operation and effectiveness on a quarterly basis. This data includes:

- Plug and charging session data, including:
    - 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. Plug outage information is to include the number and duration of outages and is to be differentiated by expected outages (for maintenance), and unexpected outages.
- Financial information, including:
    - 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, which should include energy-related costs and non-energy related costs separately identified.

Program participants must also consent to allowing the Companies to share the following information with New York State DPS Staff:

- Utility system and billing information for each EV charging station, including:
    - 15-minute interval data;
    - load profiles for the EV charging stations for the top ten demand days of each year; and
    - utility bills. Utility bills are to be differentiated by delivery service-related costs and energy-related costs.

All data subject to the reporting requirements identified in this section will be provided on a quarterly basis to the JU after a third-party consultant designated by the JU anonymizes and aggregates the data. Consistent with the Order, program participants that fail to provide the required data will not be eligible for new Make-Ready Program incentives and will either be subject to claw back of the make-ready payments received or revocation of service so that the station can be operated by an alternate market participant.

EDUCATION AND OUTREACH PLAN

4.1 OVERVIEW

The Companies will conduct education and outreach to promote the EV Make-Ready Program to developers and potential site hosts throughout their service areas. The Companies will deploy a community-driven approach to EVSE deployment. A key element of this approach is to engage state and local leaders in government, education, medical institutions, private sectors, and community organizations to research, identify, and deploy EVSE in alignment with community needs and forecasts. A desired outcome of this approach is to deploy the appropriate level of EVSE at the county and town level that will scale to reach the overall required level of EVSE that meets state ZEV MOU goals as a percentage relative to the Companies' service areas.

4.2 PRIORITIZATION OF EDUCATION AND OUTREACH EFFORTS

Consistent with the Order, the Companies shall focus their education and outreach efforts in three key areas:

- Strategic Locations
- Other locations identified by the EV Charging Infrastructure Forecast
- Disadvantaged Communities

As directed by the Order, the Companies will develop an EV Charging Infrastructure Forecast in consultation with Staff and present their forecast methodologies and results at the planned 2021 Technical Conference. The EV Charging Infrastructure Forecast will prioritize Strategic Locations. In addition, areas of adequate load service will be identified and compared with areas of existing and projected high EV adoption rates. The Companies will prioritize their education and outreach efforts in favorable areas identified by the forecast.

4.2.1 Disadvantaged Communities

The Companies will work collaboratively with municipal, economic development, community organizations, and developers to form partnerships with the purpose of enabling increased accessibility to EV charging infrastructure. Using the 1-mile and 2-mile radius criteria as a catalyst, potential areas for EVSE development will be identified that provide the best possible business case for developers while also creating opportunities for disadvantaged communities to gain increased access to EV charging.

4.3 LOAD SERVING CAPACITY MAPS

As directed by the Order, the Companies shall publish load serving capacity maps by December 31, 2020. The Companies recognize that load serving capacity maps will provide developers and potential site hosts with an important piece of information regarding the available upstream capacity at any given site which is one component of the Program suitability criteria. Load serving capacity information will be an added feature to the Companies existing hosting capacity maps. For any location the information to be displayed will include substation transformer rating, current loading, and remaining capacity.

CHAPTER FIVE: PROGRAM COSTS

5.1 TOTAL PROGRAM COSTS

The Companies' total EV Make-Ready Program budget is established by the amounts authorized in the Order. The five-year budgets for each of the Companies' service are shown in Table 5A.

Table 5A: 5-Year Program Budget ($M)

Program Budget by Operating Company ($M)	
NYSEG	RG&E
L2 and DCFC Incentives	*L2 and DCFC Incentives*
L2 Incentives: $51.1	L2 Incentive: $23.0
DCFC Incentives: $12.6	DCFC Incentives: $7.5
Futureproofing	*Futureproofing*
8% of Incentives: $5.1	8% of Incentives: $2.4
Implementation and Fleet Assessment Services	*Implementation and Fleet Assessment Services*
Administrative: $9.6	Administrative: $4.6
Total: $78.4	**Total: $37.6**

5.2 INCREMENTAL ADMINISTRATIVE COSTS

The Order directs the Companies to provide estimates of the incremental costs associated with the implementation of the EV Make-Ready Program. For the purposes of estimating incremental costs, the Companies have considered administrative costs for internal and external resources. Internal administrative costs include incremental costs that may occur within and across the Companies' various departments that are directly or indirectly involved in the administration of the EV Make-Ready Program. External administrative costs include external resources the Companies may secure, to assist in program administration. All estimated costs include costs to provide fleet assessment services.

The estimated program costs provided by the Companies are based on initial expectations. As the Companies gain experience and develop lessons learned in the administration of the EV Make-Ready Program, administrative costs will be reviewed and adjusted as appropriate. An estimated schedule of administrative costs is shown in Table 5B.

Table 5B: 5-Year Implementation and Fleet Assessment Service Budget ($M)

Implementation and Fleet Assessment Service Cost Estimates by Operating Company ($M)	
NYSEG	RG&E
Internal and External Administration	*Internal and External Administration*
55% - 65%	55% - 65%
Program Tools	*Program Tools*
10% - 25%	15% - 30%
Education and Outreach	*Education and Outreach*
20% - 25%	15% - 20%
Total: $9.6	**Total: $4.6**

5.2.1 Internal Administrative Costs

The Companies expect to incur minimal incremental internal administrative costs related to implementation of the EV Make-Ready Program including inter-departmental cost allocations. The Companies currently have four Full-Time-Equivalent ("FTE") employees dedicated to the administration of the EV Make-Ready Program and are considering the addition of .5 to 1 FTE. The current positions dedicated to the Companies' EV Make-Ready Program include a full-time manager of electric vehicles, a full-time EV Make-Ready program manager and a full-time project specialist for each operating Company. Inter-departmental cost allocations are not currently anticipated to the extent that activities related to program administration such as accounting, communications, engineering, human resources, marketing, planning, and IT are not overly burdensome and are considered as part of the course of normal business. To the extent activities related to program administration exceed the normal course of business, the Companies may require inter-department cost allocations or secure additional external resources.

5.2.2 External Administrative Costs

The Companies plan to procure third party resources to assist in the administration of the EV Make-Ready Program. These resources will support the Companies' existing EV Make-Ready Program staff and provide other services and program tools to support program implementation such as outreach and education and data collection and reporting.