Janet M. Audunson, P.E., Esq.
Assistant General Counsel

September 14, 2020

VIA ELECTRONIC DELIVERY

Honorable Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza, 19th Floor
Albany, New York 12223-1350

RE: Case 18-E-0138 – Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure

NATIONAL GRID ELECTRIC VEHICLE INFRASTRUCTURE MAKE-READY PROGRAM IMPLEMENTATION PLAN

Dear Secretary Phillips:

In accordance with the requirements of the Commission's July 16, 2020 *Order Establishing Electric Vehicle Infrastructure Made-Ready Program and Other Programs* in the subject proceeding, Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid") hereby submits for filing its Electric Vehicle Infrastructure Make-Ready Program Implementation Plan.

Please direct any questions regarding this filing to:

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Thank you.

Respectfully submitted,

/s/ Janet M. Audunson

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Enc.

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National Grid
EV Infrastructure Make-Ready Program
Implementation Plan

Case 18-E-0138

September 14, 2020

nationalgrid

EV INFRASTRUCTURE MAKE-READY PROGRAM IMPLEMENTATION PLAN

Contents

Glossary: Abbreviations, Acronyms and Definitions:

2018 Rate Case:	Cases 17-E-0238 *et al.,* Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Electric Service, which was resolved as directed by the Commission's March 15, 2018 *Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plans*.
Applicant:	Potential participants who have completed an application for the Make-Ready Program ("MRP") which has not yet been approved by National Grid.
Application Portal:	A customer-facing interface hosted on National Grid's website that will enable Applicants to submit MRP applications online and facilitate various forms of communication with the Company.
Approved Contractor:	A contractor who has met the National Grid's approval criteria to install EV charging infrastructure incentivized through the EV Make-Ready Program.
CLCPA:	Climate Leadership and Community Protection Act
Commission:	New York State Public Service Commission
Company:	Niagara Mohawk Power Corporation d/b/a National Grid
Customer:	An entity taking electric service from the Company or a delivery customer.
Charging Station:	A collection of co-located EV chargers
DAC:	Disadvantaged Communities
DCFC:	Direct Current Fast Charging station
Developer:	An entity responsible for designing, constructing, and commissioning an EV charging station.

Disadvantaged Communities:	Defined in the Make-Ready Program Order to include low- and moderate-income ("LMI") communities and Environmental Justice ("EJ") Communities. The Company will collaborate with Staff to publish an updated definition in October 2020.
Equipment Owner:	The entity that purchases and owns the EV charging equipment once it is installed.
EV:	Electric vehicle
EV Instituting Order:	The Commission's April 24, 2018 *Order Instituting Proceeding*_ in Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure
EVSE:	Electric Vehicle Supply Equipment
Implementation Plan:	Implementation Plan prepared in accordance with the Make-Ready Program Order.
L2:	Level 2 EV charging stations
Make-Ready Program:	The Make-Ready Program authorized by the Make-Ready Program Order that is the subject of this Implementation Plan.
Make-Ready Program Order:	The Commission's July 16, 2020 *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs* in Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure
MRP:	Make-Ready Program
MRP Landing Page:	A customer-facing page hosted on National Grid's website containing basic information regarding the Company's Make-Ready Program with links to other relevant sub-sites, such as the Application Portal.
MUD:	Multi-Unit Dwelling is a building consisting of five (5) or more residential units.

National Grid:	Niagara Mohawk Power Corporation d/b/a National Grid
New Business:	New Business is a sub-category of the Company's "Customer Requests/Public Requirements" category of capital expenditures. New Business describes the costs to serve new customers, conversion to serve new customers or substantial new load, or the addition of new phases to serve new three-phase customers.
OEM	Original Equipment Manufacturer
Participant:	An entity that applies for and receives the incentives available through the MRP. This entity may also be responsible for owning, managing, and/or operating the EV charging equipment and may include the Developer, Site Host, Equipment Owner, Approved Contractor or Customer.
Phase 1 Make-Ready Program:	The Make-Ready Program offered by National Grid between April 2018 and October 1, 2020 as an outcome of the 2018 Rate Case which offers incentives for the installation of EV infrastructure to support the deployment of L2 and DCFC stations in National Grid's electric service territory.
Site Host:	The owner of the site on which the EV charging equipment is installed. The Site Host may or may not be the Equipment Owner.
Staff:	New York State Department of Public Service Staff
ZEV:	Zero Emissions Vehicle
ZEV MOU:	A Multi-state Zero Emissions Vehicle Memorandum of Understanding committed to transportation electrification signed by Governor Cuomo in 2013. New York's share of the multi-state ZEV target is approximately 850,000 ZEVs by 2025.

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EV INFRASTRUCTURE MAKE-READY PROGRAM IMPLEMENTATION PLAN

Executive Summary

Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid" or "the Company") is pleased to provide this Electric Vehicle Infrastructure Make-Ready Implementation Plan to fulfill the requirements of the Commission's Make-Ready Program Order,[1] to advance the goals of the Climate Leadership and Community Protection Act ("CLCPA"),[2] and to support the State's target of 850,000 zero-emission vehicles ("ZEVs") on the road by 2025.

This Implementation Plan sets forth the Company's process to facilitate customer installation of L2 and DCFC chargers in National Grid's electric service territory.

The Make-Ready Program Order – and the Company's corresponding Make-Ready Program ("MRP") - are intended to reduce the upfront costs of deploying Electric Vehicle Supply Equipment ("EVSE") infrastructure, thereby spurring the deployment of EVSE and enabling the accelerated adoption of EVs in order to meet the State's climate goals. The Make-Ready Program Order established incentives for utility-side make-ready infrastructure and customer-side make-ready infrastructure. Certain L2 and DCFC projects in Disadvantaged Communities would be eligible for 100 percent of total Make-Ready costs; certain publicly accessible site locations not in Disadvantaged Communities would be eligible for Make-Ready incentives up to 90 percent of total Make-Ready costs; and certain

[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) ("Make-Ready Program Order").
[2] Chapter 106 of the Laws of 2019. CLCPA is available at https://legislation.nysentate.gov/pdf/bills/2019/S6599

privately-owned parking lots and employee workplace parking would be eligible for incentives that cover up to 50 percent of total Make-Ready costs.

The Make-Ready Program Order sets a target for the Company of 15,728 L2 and 504 DCFC plugs. The MRP will build on the Company's existing Phase 1 Make-Ready Program, which will stop accepting applications on October 1, 2020. Until that time, prospective project developers can submit applications to National Grid's Phase 1 Make-Ready Program or the MRP via EVNationalGridUNY@nationalgrid.com. An on-line Make-Ready Program Application Portal ("Application Portal") will be available on October 16, 2020, after which applicants must submit applications for the MRP online.

The Make-Ready Program Order authorizes National Grid to offer up to $86.658M in L2 make-ready incentives, $25.460M in DCFC make-ready incentives, $16.818M for administration and Fleet Assessment Services, $5.090M for transit authority make-ready programs, and $8.969M for future-proofing of charging stations.

Projects to install chargers will be categorized either as Simple Projects or Complex Projects. Simple Projects will be fast-tracked while Complex Projects will undergo further evaluation to determine whether the projects are an appropriate fit for the site. Upon receiving Company approval, construction on a project may commence using an Approved Contractor. Incentive payments from the Company to Participants will be made after construction has been completed and project documentation has been submitted to the Company via the Application Portal. Those seeking to construct projects in Disadvantaged Communities will be able to choose eligible locations through a map that will be available on the Company's MRP Landing Page. Incentives for approved make-ready projects

authorized in the Make-Ready Program Order will be available between July 16, 2020 and December 31, 2025 or until such time that the Company has fully allocated the authorized funding, whichever occurs first.

I. Introduction and Preliminary Statement

In accordance with the Make-Ready Program Order, National Grid submits this Implementation Plan. The Implementation Plan outlines how National Grid will carry out the directives of the Make-Ready Program Order and will serve as a reference for MRP Participants and other stakeholders and interested parties. The MRP seeks to accelerate the installation of EVSE through financial support for the associated electric infrastructure. The Implementation Plan focuses on the tactics the Company will use to implement the MRP, inclusive of the Fleet Assessment Services and associated administrative costs.

On April 24, 2018, the Commission commenced a proceeding to consider the role electric utilities can play in building cost-effective infrastructure and equipment to accommodate the "needs and electricity demand of EV and EVSE".[3] In issuing the EV Instituting Order, the Commission acknowledged that regulatory attention may be required to remove obstacles to EV adoption and ensure critical infrastructure is in place to enable the emerging EV market.

Subsequently, the CLCPA codified ambitious targets governing economy-wide reductions in greenhouse gas emissions in New York.[4] To support the goals and in alignment with the State's policy goal on light-duty vehicle electrification outlined in the 2013 Multi-state Zero Emissions Vehicle Memorandum of Understanding ("ZEV MOU"), the Make-Ready Program Order provided direction to New York electric utilities to support the installation of EVSE across the State.

[3] EVSE &I Proceeding, Order Instituting Proceeding (issued April 24, 2018) ("EV Instituting Order"), p. 3.
[4] *See* Climate Act Fact Sheet, *available at*: https://climate.ny.gov/-/media/CLCPA/Files/CLCPA-Fact-Sheet.pdf

The Make-Ready Program Order will help New York meet its emissions reduction targets by supporting increased adoption of EVs through statewide deployment of more than 50,000 L2 plugs and 1,500 DCFC plugs by the end of 2025. The Make-Ready Program Order authorizes collective spending by the Joint Utilities[5] not to exceed $701M, with $206M of that amount allocated to directly benefit Disadvantaged Communities (as defined below in Section II). The Commission authorized a total budget of $143M for National Grid. Table 1 and 2 illustrate how the Company's budget is allocated across MRP elements and associated plug targets.

Table 1: National Grid Make-Ready Program Budget by Category

Program Category	Budget ($M)
L2 Make-Ready Incentives	$86.658
DCFC Make-Ready Incentives	$25.460
Total Make-Ready Incentives	$112.118
Future-proofing	$8.969
Implementation and Fleet Assessment	$16.818
Total Make-Ready Program	$137.905
Transit Authority Make-Ready Program	$5.090
Total	$142.995

Table 2: National Grid Make-Ready Program Targets by Plug Type

Type of Plug	Count
L2 Plugs	15,728
DCFC Plugs	504

The MRP will support future-proofing certain sites to allow for subsequent cost-effective expansion. In addition to authorizing the MRP, the Commission also directed each

[5] 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 & Rockland Utilities, Inc., and Rochester Gas & Electric Corporation.

utility to offer a Fleet Assessment Service to assist fleet owners making the transition to EVs. Finally, the Commission authorized a Transit Authority MRP component.

II. Make-Ready Program Eligibility and Incentives

This section details the types of infrastructure, equipment, sites, and potential Participants that will be eligible for inclusion in the Company's MRP.

A. Equipment and Infrastructure Eligibility

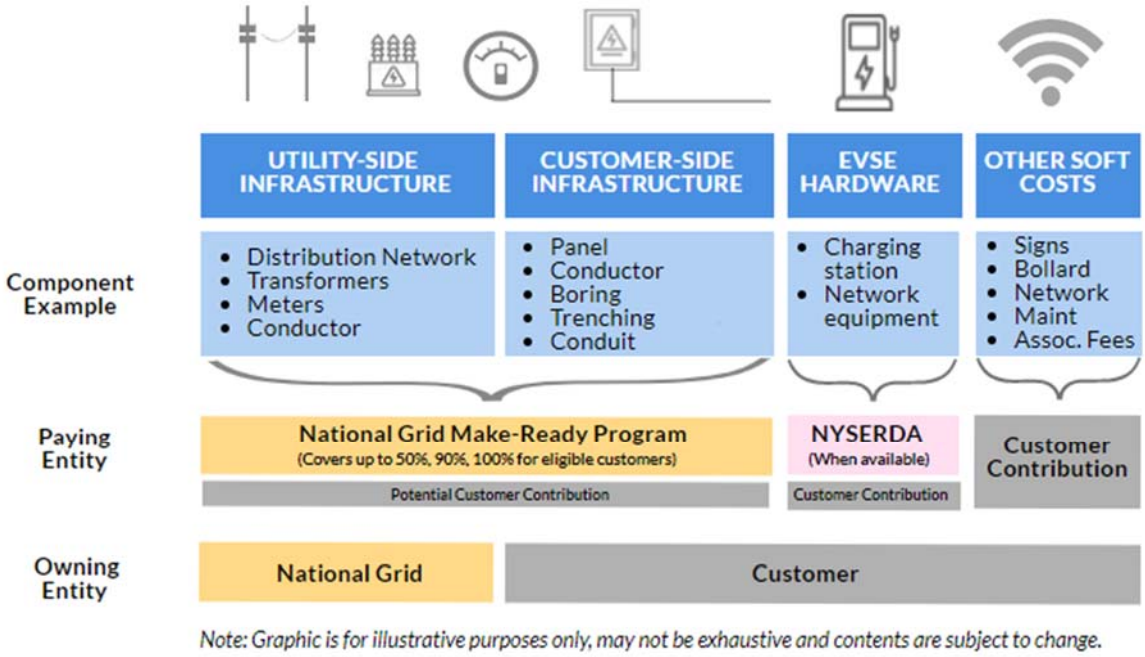
Two categories of equipment or infrastructure are eligible for MRP incentives:

i. **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.

ii. **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 may include electric infrastructure such as conductors, trenching, and panels needed for the EV charging station.

Table 3 below illustrates an example of the components applicable to utility-side and customer-side infrastructure, as well as the entity responsible for funding and owning the components.

Table 3: Make-Ready Program Components



Note: Graphic is for illustrative purposes only, may not be exhaustive and contents are subject to change.

The two categories of Make-Ready Infrastructure vary in several important ways. First, the utility will own, operate and maintain the utility-side infrastructure, while customers will own, operate and maintain the infrastructure on the customer-side.

The MRP incentives apply to both utility-side and customer-side infrastructure, but in different ways. Absent the make-ready incentives, customers would pay for utility-side infrastructure through contribution-in-aid of construction ("CIAC") payments calculated so that National Grid recovers the entire cost to install the relevant infrastructure. Under the MRP, make-ready incentives first will be allocated to cover the cost of the CIAC payment. If the approved amount of make-ready incentive is greater than the CIAC payment, the remaining amount will be applied to customer-side infrastructure. Many projects,

particularly those for L2 plugs that do not require a new service, will have low or no utility-side costs. Many DCFC plug projects that do require new service will incur utility-side costs.

The Company may also approve future-proofing at the host site as described more fully in Section III. All customer-side make-ready work must be conducted by Approved Contactors in order to be eligible for the incentives available through the MRP. Equipment associated with the EV charger itself, such as the actual EV charger, power block, modules, mounting hardware, co-located distributed generation, or energy storage material, are not eligible for incentives under the MRP.

B. Site Eligibility Criteria and Incentives

To be eligible for incentives through the MRP, the Site Host must be a National Grid delivery customer. The Applicant must submit an application meeting the eligibility requirements outlined in Section II of this Implementation Plan. The project application must be approved by National Grid and, per the specification in the Make-Ready Program Order, project construction cannot have started prior to July 16, 2020. Fully completed MRP applications will be required for National Grid to determine incentive level eligibility. The application process is discussed more fully in Section III.

The level of incentive available to Participants in the MRP varies by both project type and the project's actual make-ready costs. Within Disadvantaged Communities, public DCFC projects and L2 projects at multi-unit dwellings are eligible to receive incentives up to 100 percent of the actual cost of make-ready infrastructure. Publicly available L2 and DCFC with standardized plug types that are not within Disadvantaged Communities are eligible for incentives of up to 90 percent of their actual make-ready costs. Stations with

proprietary plugs, where there are at least as many standardized plugs of an equal or greater charging capacity as compared to the proprietary plugs, are also eligible for incentives covering up to 90 percent of their actual make-ready costs. Stations in non-public locations or those consisting only of proprietary plug types or where proprietary plugs are not co-located with a similar number of standardized plugs of equal or greater charging capacity, are eligible for incentives up to 50 percent of their make-ready costs.

Table 4: Overview of Incentive Level Eligibility Criteria by Project and Site Type*

Incentive Level	Eligible Project Example
Up to 100 percent	DCFC with standardized plug types at publicly-available locations located within Disadvantaged Communities.
	L2 projects at multi-unit dwelling sites located within Disadvantaged Communities.
Up to 90%	L2 and DCFC projects with standardized plug types at publicly-available locations (outside of Disadvantaged Communities). Includes municipal pay-to-park and free parking locations.
	L2 and DCFC projects with proprietary plugs with an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs at publicly-available locations (outside of Disadvantaged Communities).
Up to 50%	L2 and DCFC projects in non-public locations, including workplaces with restricted access and privately-owned pay-to-park lots.
	L2 and DCFC projects consisting only of proprietary plugs.
	L2 and DCFC projects where proprietary plugs are not co-located with a similar number of standardized plugs of equal or greater charging capacity.

** Table is provided for illustrative purposes. See additional details in the following sections of this plan. National Grid reserves the right to make determinations regarding incentive-level eligibility based on its best interpretation of the proposed project and available information at the time of review.*

C. Accessibility Eligibility Criteria

To receive an incentive of up to 90 percent, site locations must be both publicly accessible and accept common forms of payment. Publicly-accessible charging includes stations that are:

- Open to the public without fee or access restrictions;
- Municipally-owned parking including both free and pay-to-park;
- In workplaces that are in a public venue (*e.g.*, shopping malls, hospitals, hotels) and available to the public without an access fee; or
- In multi-unit dwellings outside Disadvantaged Communities, if the public has unlimited access without parking fees.

EV charging stations dedicated to a single owner's personal use (*e.g.*, home charging or dedicated rented parking) do not satisfy the publicly-accessible criteria.[6] Sites that do not meet the publicly-accessible criteria will be eligible for an incentive of up to 50 percent. Examples of sites eligible for up to the 50 percent incentive level include:

- Privately owned pay-to-park parking lots;
- Private or employee-only workplace parking.

D. Plug Type Eligibility Criteria

All stations, both L2 and DCFC, must contain at least two (2) plugs. On a programmatic level, stations with only two plugs may not exceed 25 percent of the target number of plugs established in the Make-Ready Program Order for National Grid.

[6] Home charging at an individual residential household for the resident's exclusive use does not qualify for any portion of the Make Ready Program.

Therefore, the number of plugs at two-plug sites is limited to a total of 126 DCFC and 3,932 L2 plugs. For the purpose of counting DCFC plugs, only those which can be in use simultaneously at a rate of at least 50 kW count as unique plugs. For example, a station containing a SAE Combined Charging System (CCS)[7] plug and a CHAdeMO plug type[8] mounted to the same charger (which can only charge either a SAE CCS compatible vehicle or a CHAdeMO compatible vehicle at any given session) will count only as one plug. By contrast, a station containing a SAE CCS plug and a CHAdeMO plug type mounted to the same charger (which are capable of simultaneously charging both a SAE CCS compatible vehicle and a CHAdeMO compatible vehicle at greater than 50 kW) will count as two plugs (*i.e.*, one standardized, one proprietary).

DCFC sites with more than ten (10) plugs and/or demand in excess of 2 MW will be allowed to participate in the MRP under the condition that developing the site does not cause National Grid to incur New Business costs greater than those that would have been incurred to develop a site with a maximum demand of 2 MW. The number of plugs at locations in excess of 10 plugs may not exceed 50 percent of the target number of 504 DCFC plugs. Thus, in the National Grid electric service territory, no more than 252 plugs at stations with greater than 10 plugs will be eligible for make-ready incentives.

[7] CCS stands for "Combined Charging System" and is a charging standard developed by the Society of Automotive Engineers ("SAE") and the European Automobile Manufacturers Association that supports both AC and DC charging, combined in a single plug design. Definition provided by the Electric Power Research Institute, 2019.
[8] CHAdeMo is an abbreviation of "CHArge de MOve", a DC fast-charging standard co-developed by Tokyo Electric Power Company and Japanese automakers. Definition provided by the Electric Power Research Institute, 2019.

In accordance with the Make-Ready Program Order, the Company will limit the number of L2 plugs developed in the first three years of the MRP to no more than 60 percent of the total target, or 9,436.

E. Disadvantaged Communities Eligibility Criteria

To encourage siting of EVSE in Disadvantaged Communities, the MRP offers higher incentive levels (up to 100 percent of the eligible make-ready costs) for chargers sited in such communities. Disadvantaged Communities include low- and moderate-income and environmental justice ("EJ") Communities as defined by the Make-Ready Program Order. The Company will collaborate with Staff to publish an updated definition for Disadvantaged Communities in October 2020.[9] To be eligible for incentives up to 100 percent the following criteria must be met:

- Publicly-accessible DCFC within two miles of a Disadvantaged Community;
- Multi-unit dwellings (MUDs) that are within two miles of a Disadvantaged Community (for L2 or DCFC);
- For public DCFC or MUD projects within the city boundaries of Albany, Buffalo, Schenectady, Syracuse, and Troy the site must be located within one mile of a Disadvantaged Community.

To assist applicants with determining site eligibility, the Company intends to make a map illustrating Disadvantaged Communities available in October 2020. The map will have a search function in which applicants will enter the physical address of the potential project

[9] If the definition of Disadvantaged Communities is subsequently modified through the Climate Action Council authorized by the CLCPA, the MRP eligibility requirements will be modified and updated accordingly.

and determine if it falls within a Disadvantaged Community. The map will be accessible via National Grid's MRP Landing Page.

As determined in the Make-Ready Program Order, 20 percent of the MRP's L2 and DCFC make-ready budget of $112.118M will be allocated to sites that meet the DAC requirements for a total of $22.424M. Once that total cost threshold has been met, eligible sites in DACs will only be eligible for up to 90 percent of the eligible make-ready costs.

III. Program Implementation

The Company anticipates deploying the following implementation practices to deliver on the Make-Ready Program Order, adjusting as necessary to best serve its customers, the market, and the ultimate goals of the MRP. The Company will build upon existing best practices developed while implementing the Phase 1 EV Make-Ready Program approved in its 2018 Rate Case.

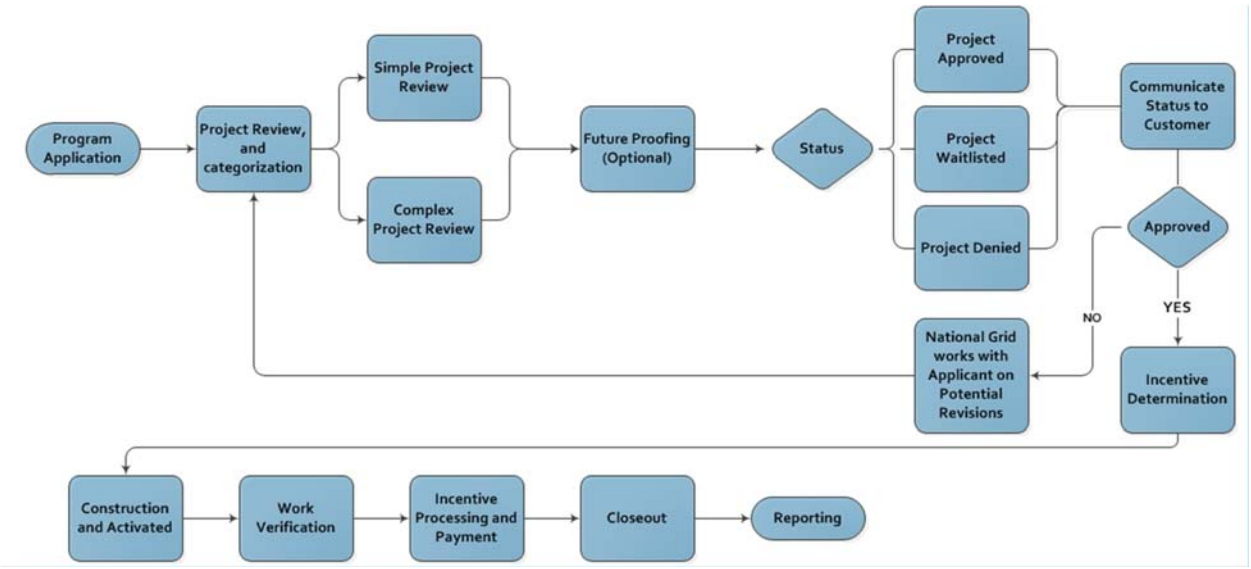
A. Make-Ready Program

The Company's MRP seeks to enable 15,728 L2 and 504 DCFC stations as cost-effectively as possible. The Company endeavors to do so via a user-friendly, customer-centric process.

There are three important steps in the MRP. First, an Applicant submits their application. Second, National Grid will evaluate the application. The Company will either approve the application (with a specified quantity of make-ready incentive), waitlist, or deny the application with an explanation of the rationale to the Applicant. Third, after application approval, the Applicant becomes a Participant and can move forward to construction. The construction phase ends once the EV chargers are activated. Finally, after

providing proof of construction completion and other relevant documentation, the Participant will invoice National Grid who will disburse the incentive payment.

Figure 1: MRP Application Process



a. Application Process

National Grid will develop an online Application Portal, which will be available to Applicants on October 16, 2020. Once the Application Portal is available, Applicants will be required to submit completed applications through the portal. Until such time that the Application Portal is live, applicants may submit applications via the EVNationalGridUNY@nationalgrid.com e-mailbox.

b. Application Evaluation

The Company will deploy a cross-functional team (detailed in Section V) to approve, waitlist, or deny applications based on eligibility criteria as well as cost, load capacity, station type, location, and other details of the project. The Company anticipates that the specific process may adjust over time to better reflect customers' needs and program best

practices. The Company will utilize a two-pronged approach whereby projects will qualify as "Simple Projects" or "Complex Projects."

Simple Projects are anticipated to be those that meet all of the following criteria: average cost is less than or equal to $5K per plug; added load per application (site) is below 200 kW; new or upgraded electric service is not required; components are not technically complex (*e.g.*, including, but not limited to vehicle-to-grid or paired with solar or energy storage) and do not require a detailed engineering review. Applications which propose managed charging solutions to reduce the application (site) load are encouraged and will be reviewed for consideration as Simple Projects. The Company will seek to fast-track Simple Projects, though they will still be subject to necessary National Grid engineering review to ensure the incremental load does not trigger additional complications or considerations (*e.g.*, exceeding a service transformer's nameplate capacity either individually or in combination with other customer applications submitted concurrently).

Complex Projects are those projects that do not meet all of the aforementioned criteria for Simple Projects. Complex projects will be further evaluated on a case-by-case basis. The National Grid team will work closely with the Applicants on these projects to determine if the projects are an appropriate fit for the site and if design changes that affect load or cost containment measures can be implemented to move these projects forward.

National Grid will first notify an Applicant if their project will be considered as a Simple Project or Complex Project. Thereafter, National Grid will notify the Applicant if their project is approved, waitlisted, or denied. Once approved, the Applicant will transition to a Participant and receive an approval package with the designated incentive amount.

The Company will periodically review program participation to ensure that no single Participant exceeds the incentives stipulated in the Make-Ready Program Order.

c. Construction and Make-Ready Incentive Payment

Once approved, the Participant can begin construction using an Approved Contractor. If the Participant intends to make any significant changes to the site design or project scope after National Grid designates the incentive quantity the Participant must consult with National Grid prior to doing so. National Grid will evaluate proposed changes for their impact on project eligibility, incentives and/or construction timeline.

Upon construction completion, the Participant will submit completion documentation to National Grid via the Application Portal.[10] When all documentation is received and verified, National Grid will remit payment to the designated payee.

d. Customer Resources Including Application Portal

The Company will create an MRP Landing Page hosted on the Company's website to serve as the primary communication vehicle with customers for the MRP. Customers will be able to access a program overview, specific program details, the Application Portal with relevant application material, and other relevant information on embedded pages. These subpages may include, but not be limited to:

- **Make-Ready Program Application Portal:** The Application Portal will include all relevant application forms and submittal requirements, and ultimately enable

[10] Required completion documentation may include but not be limited to proof of activated stations, W9s, invoices, letters of compliance stamped by a licensed Professional Engineer in New York State, photos of job site, and as-built drawings.

customers to submit their project applications online.[11] Phase 1 of the Application Portal will include required application information[12] and contact information where applicants can address additional questions directly to the Company's EV team. Phase 1 of the Application Portal will be complete on October 16, 2020. Phase 2 will include additional customer-centric capabilities and be complete by January 16, 2021. Phase 3 will be addressed at a future date. The Company will direct all applicants to the Application Portal and will utilize the information provided by the customer via the portal to determine MRP eligibility.

- **Load Serving Capacity Map** – The MRP Landing Page will include a link to the Company's Load Capacity Maps to assist potential Applicants in selection of strategic locations for EVSE deployment.
- **Disadvantaged Community Map** – The MRP Landing Page will include a link to the Company's DAC Map to assist customers in determining their project eligibility for the DAC incentive level.

[11] Until such time that the Information Portal is active, customers can submit applications to EVNationalGridUNY@nationalgrid.com and find more information regarding the Company's Phase 1 EV Program at https://www.nationalgridus.com/Upstate-NY-Business/Energy-Saving-Programs/Electric-Vehicle-Charging-Station-Program.

[12] The Applicant may be asked to provide the following information regarding the proposed project, in addition to any other information deemed necessary by the Company: Applicant's name and contact information, Site Host name and contact information, EV site location details (address, location type, etc.); EV site details (station manufacturer, type of plugs, number of plugs), incentive payee information, make-ready cost estimates, requested incentive based on eligibility (e.g., up to 50, 90 or 100% of covered costs); future-proofing requests (description, costs, expansion plans), electric power requirements, second service request if applicable, electric infrastructure costs, site map and plans (inclusive of overhead satellite image of site, location of electrical panel proposed to serve the EVSE, proposed location of EVSE, proposed location of electrical infrastructure to EVSE, including distance) and all other notes and information to assist with evaluating the application.

e. Future-proofing

Pursuant to the Make-Ready Program Order, National Grid will authorize up to approximately $9M for future-proofing charging stations in the MRP. Future-proofing refers to the practice of oversizing certain pieces of equipment at sites relative to their current charging station capacity such that increasing station capacity in the future will be less costly. This may include installing oversized or additional conduit, oversized panels to accommodate adequate space associated with expansion, installing additional conduit and connections points (including trenching and conduit to additional parking spaces for future chargers), and oversized service for the station to accommodate the potential load at the site. Such future-proofing may be needed for both L2 and DCFC stations.

The Company will determine which equipment qualifies for future-proofing, track all costs of future-proofing separately from the other make-ready costs, and ensure future-proofing costs do not negatively impact the Company's selection of projects.

Future-proofing is subject to both project specific and program-level cost limits. For individual projects, future-proofing costs covered by the MRP will not exceed ten percent of the site-specific make-ready costs. At a programmatic level, future-proofing costs will not exceed eight percent of the Company's overall MRP incentive budget.

If a Participant opts to future-proof a site, and the cost is greater than ten percent of that site's MRP cost, the Participant will be required to pay for future-proofing costs in excess of the ten percent limit. In those instances, the Company will perform the future-proofing work after securing funding from the Participant if the costs of future-proofing are related to utility-side make-ready infrastructure. Thus, the Developer can choose to future-

proof equipment not eligible for a utility incentive for future-proofing, but that Developer will be responsible for 100 percent of such future-proofing costs.

Participants must apply for future-proofing and specify which costs are related to future-proofing. It is not a requirement to future-proof a site to participate in the MRP and Applicants and Participants are under no obligation to future-proof sites.

f. Contractor Approval Process

The Joint Utilities' combined website will include a list of contractors available for the Make-Ready Program, as well as an application form for those contractors who wish to become an Approved Contractor. Each of the individual utilities will have links on their websites to this information as well.

The information required to be added to the list of contractors will include self-certification that the contractor is registered to do business within NY and that the contractor has all appropriate licenses and certifications that are needed for all jobs in the area(s) where they perform work. The contractor will also be asked to indicate the areas of NYS in which it plans to perform make-ready work.

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

a. Contractors who fall out of standing on one or more of the qualifying criterion/criteria and subsequently correct that deficiency shall be reinstated upon demonstration of compliance.

b. National Grid, 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 Participants in the Company's service territory. Contractors may be reinstated upon a reasonable demonstration of their capabilities.

B. Reporting Requirements

As stipulated in the Make-Ready Program Order, the Company will file an annual report in conjunction with the annual report required for the DCFC Framework Order,[13] beginning March 1, 2021.

The Company will provide four categories of information in the annual report, detailed below. Per the Make-Ready Program Order, the Company will require that categories three and four be provided by Participants (vendors or Site Hosts/owners) to the Company's third-party consultant who will be contracted to aggregate and anonymize the data. The third-party consultant will be expected to update Staff on granular, confidential data outside of the annual report filings and therefore Participants are expected to be able to make the information available on a quarterly basis or as frequently as deemed necessary.

[13] EVSE&I Proceeding, Order Establishing Framework for Direct Current Fast Charging Infrastructure Program (issued February 7, 2019) ("DCFC Framework Order")

1. **Reporting period program participation information:** including the percent of service applications that have matured into operating stations; number of station owners participating; the number of sites for which incentives were issued; the number of plugs installed, and infrastructure costs incurred. Infrastructure costs will be differentiated by equipment and installation costs for customer-owned assets as well as equipment and installation costs for Company-owned assets. The cost details for Company-owned assets will be broken out into costs that are considered make-ready and costs that are considered New Business.
2. **Utility system and billing information for stations:** including interval data, load profiles for certain days, and required utility bill information. The load data includes: 15-minute interval data; load profiles for the stations for the top ten demand days of each year; and utility bills. Utility bills will be differentiated by delivery service-related costs and energy-related costs
3. **Plug and charging session data:** including the number of sessions daily; start and stop times of each charge; amount of time each vehicle is plugged in per session; peak kW per session; kWh per charging session; and plug outage information. Plug outage information is to include the number and duration of outages and to be differentiated by expected outages (for maintenance) and unexpected outages.
4. **Financial information:** including, 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.

C. Program Timelines

The Company anticipates adhering to the following timelines:

Table 5: MRP Timelines

Date	Item	Description
7/16/2020	Make-Ready Program Order	Customers may begin applying for MRP and will still be able to submit applications for the Company's existing Phase 1 Make-Ready Program but can only submit an application for either the Phase 1 Make-Ready Program or the MRP, but not both. Customers submitting applications for the MRP will be reviewed under the current process in place for the Phase 1 Make-Ready Program until the new review and approval processes are in place for MRP.
8/15/2020	Participant Guide filed with Commission	The Joint Utilities filed a comprehensive Participant Guide available on the JU website.
9/14/2020	Implementation Plan filed with Commission	The Company files an Implementation Plan detailing how it envisions deploying the MRP.
10/1/2020	Phase 1 Make-Ready Program application cut-off	The date by which the Company will stop accepting applications for the Phase 1 Make-Ready Program. Only applications for the MRP will be accepted after this date.
10/15/2020	Phase 1 Make-Ready Program approval deadline	The final date by which the Company will review and approve applications for the Phase 1 Make-Ready Program.
10/16/2020	Application Portal Phase 1	The Company will open the Application Portal. All applications must be submitted via portal.
12/31/2020	Capacity Maps	The Company will publish load serving capacity maps for EV charging.
1/16/2021	Application Portal Phase 2	The Company will publish Phase 2 of its Application Portal.
3/1/2021	Annual Report	The Company will file its first annual report.
10/1/2022	MRP Mid-Point Review	The Company will submit required information for mid-point review by this date *or* when applications for 45% of total eligible DCFC plugs are complete.
12/31/2025	MRP Closes	The Company will close the MRP on or before this date, depending on when program goals and funding levels are met.

D. Fleet Assessment Service

The Company will offer a Fleet Assessment Service to light, medium, and heavy-duty vehicle fleet customers. As specified in the Make-Ready Program Order,[14] for interested customers that request the service, the Company will provide a site feasibility analysis to determine if the local distribution system can accommodate their estimated increased load (based on the maximum power draw of the electrified fleet under consideration), and would include analysis of planned utility work nearby to identify potential cost-saving opportunities. If the site feasibility analysis is positive, the Company will perform a rate analysis for each fleet depot location to provide fleet operators with an understanding of the available rate options, potential maximum bill impact of fleet electrification based on the fleet's charging behavior, and potential to mitigate bill impact with managed charging.

To facilitate the process, the Company will post a Fleet Assessment Services intake form on both the Company's website and on the Joint Utilities of New York website. The Company will work with the Joint Utilities to design a common Fleet Assessment Services survey to determine satisfaction with the program, usefulness of the analysis, likelihood of fleet electrification, any additional barriers to fleet electrification, and other offerings the Company could provide to these customers to support electrification.

IV. Education and Outreach Plan

The Company will develop and execute an education and outreach plan to drive awareness of, and participation in, the MRP among commercial customers, especially

[14] EVSE&I Proceeding, Make-Ready Program Order, pp. 127-128.

among municipalities and those located in DACs. The plan will prioritize outreach to Developers and potential Site Hosts that are determined to be in the most beneficial locations identified in the Suitability criteria outlined below.

The Company's communication channels reach throughout its service territory, and the Company communicates with customers monthly through bills and home energy reports, and less regularly through other channels such as email, social media, billboards, digital, print and radio media. The Company will leverage these capabilities, findings from currently offered programs, communication to internal EV/Energy Efficiency sales teams, and external partnerships with an advertising agency as well as developers, contractors and trade allies to execute the Education and Outreach Plan. The Plan will be crafted to empower commercial customers to make informed decisions about the benefits of installing EV charging stations for business or public charging and highlight opportunities to accelerate fleet electrification.

More specifically, the Company will work with the aforementioned teams and partners to execute the plan and an accompanying multi-channel marketing campaign to:

- Identify and prioritize site hosts including workplaces, multi-unit dwellings, and public charging sites and promote the benefits of EV charging accessibility to increase Site Hosts' familiarity with EV charging as an amenity for employees, customers, tenants, and the community.
- Identify and educate corporate parties and commercial customers that may benefit from fleet electrification and on-premise charging.

- Perform dedicated outreach to targeted environmental organizations, non-profits, state agencies, and consumer advocacy groups to ensure the Company is reaching DACs and appropriate stakeholders across the jurisdiction. In coordination with existing stakeholders and contacts through energy efficiency programs, the Company will look to expand outreach and engage new entities in the deployment of EV charging and related programs. This outreach will help to maintain continued engagement with these groups, as well as support coordination to ensure DACs are benefiting from the MRP investments and that stakeholders and representative organizations have the opportunity to provide feedback on community needs, infrastructure gaps, and can provide targeted outreach at the community level to identify potential locations for deployment or interested site hosts.
- Develop messages that highlight the Company's charging infrastructure and fleet offerings and deliver them through multiple channels, listed below, and direct communication to internal teams, external trade allies, contractors, and developers.
- Deliver developed messaging through channels such as:
  - Company channels (website, social media, bill inserts, call centers, sales team);
  - Partner channels (EVSE vendors, NYSERDA, local auto dealers and original equipment manufacturers ("OEMs"), and trade groups).
  - Press coverage (local print, broadcast, and digital media outlets);
  - Purchased media (advertising: digital, print, and radio);
  - EV advocacy groups (Electric Drive Transportation Association, Edison Electric Institute, Plug In America); and

- Trade ally and developer communication and engagement.

The Company anticipates refining the above-mentioned foundational tactics with input from the selected advertising agency and using data derived from research and input from the partners prior to any campaign launch.

A. Suitability Criteria and Tools for Project Developers

National Grid will develop tools for potential applicants to help determine suitable locations for EVSE development and perform targeted outreach in locations deemed favorable for EVSE development. Locations for targeted outreach will be defined by the following Suitability Criteria: 1) available load serving capacity, 2) expected EVSE growth as identified by the Company's EV Charging Infrastructure Forecast, and 3) location specific societal benefits.

Locational load serving capacity data will inform the Suitability Criteria and be made available to developers through load capacity maps on the Company's System Data Portal.[15] The initial release of the load capacity map will provide potential applicants with a simplified analysis of the remaining headroom measured in MW at the feeder head for the purpose of siting EVSE installations. Load serving capacity maps will be available no later than December 31, 2020. Subsequent iterations will offer incremental improvements based on user feedback.

Regarding the second criterion, National Grid currently forecasts EVSE and EV load as part of the net load forecast developed annually for system planning. This forecast

[15] Available at https://www.nationalgridus.com/Business-Partners/NY-System-Portal.

utilizes the POLARIS transportation modeling environment, which takes internal and external inputs (including transportation networks, power grid networks, travel demand census data, and household survey data), simulates individual daily activity and mobility patterns for each forecasted EV owner, and outputs forecasted EVSE locations at the feeder level, including hourly load profiles for each charger. This information will be useful in targeting outreach since the forecasting methodologies consider several elements critical to most developers' business cases.

The third element of the Suitability Criteria will consider societal benefits not captured by the first two criteria. These location specific benefits include consideration of EJ, LMI, rural, or hard-to-reach locations, particularly considering the public health benefits EV adoption produces for these communities.

National Grid intends to make certain elements of the Suitability Criteria available on the Company's System Data Portal, particularly where the data can provide value to prospective EVSE developers.

V. Make-Ready Program Administrative Costs

The Make-Ready Program Order set a maximum budget of $16,817,715 for National Grid's MRP Administration and Fleet Assessment Services. Program administration costs include, but are not limited to, those related to incremental staffing, education and marketing, IT support, data collection and management, and evaluation. The Company's anticipated cost allocation for each category is described in more detail below.

A. Incremental Staffing

The Company plans to add ten full-time employees (full-time equivalents ("FTEs")) to implement the MRP. The Company's current staffing plan includes:

Table 6 – Positions to be added for Make Ready Program

Count	Title	Role Description
1	Manager	Responsible for overall implementation of the MRP, other implementation Staff, and program budget.
3	Program Manager	Responsible for reviewing and approving MRP applications, including L2, DCFC and Transit. May be split by region or technology as program needs require.
1	Technical Specialist	Responsible for technical evaluation of projects across all of the Company's service territory (especially those requiring new service), liaising with the Customer Connections Representatives, and coordinating with area planners to screen for potential system impacts or efficiencies.
1	Customer Connections Representative	Responsible for in-taking MRP-related new electric service work requests and serving as job owner to ensure necessary work is preformed and coordinated among various internal groups, helping to prevent potential backlog from an increase in work requests.
1	Analyst	Responsible for tracking installations, costs, reporting out to customer teams on a regular cadence, and facilitating timely payment to Participants.
2	Channel Sales Representative	Responsible for engaging customers (especially DAC), MRP Participants, contractors, vendors, and others to introduce them to and promote use of the MRP.
1	Marketing Specialist	Responsible for overall communication of the MRP including outreach, education, and all associated marketing efforts, especially to EJ Communities and LMI customers.

B. Education & Outreach

As directed by the Make-Ready Program Order, the Company anticipates deploying a robust education and outreach effort as outlined in Section IV above and informed by the suitability criteria.

C. IT Requirements

The Company will develop an online portal to accept applications for the MRP. The first phase will be deployed on October 16, 2020 with a second phase scheduled for January 16, 2021. Further, to deploy an effective online customer experience the Company anticipates needing to design approaches to align with certain back-end systems.

D. Data Collection & Management

Pursuant to the Make-Ready Program Order, the Company will coordinate with the Joint Utilities to contract a third-party consultant to manage data collection, aggregation, and anonymization.

E. Fleet Assessment Service

The Company will offer a Fleet Assessment Service (detailed in Section III-D) and deploy a small amount of marketing to communicate to relevant customers and survey participants, respectively.

F. Evaluation

The Company anticipates hiring an independent, third-party evaluation expert to implement a comprehensive evaluation of the Company's MRP, assessing the outcomes of the program and, where possible, quantifying its effects.

G. Summary

The Company may need to re-allocate administrative funding between categories based on program, customer, and market needs in order to most effectively implement the MRP. All of the costs included in this Implementation Plan conform to the limits set for

National Grid in the Make-Ready Program Order. The administrative allocations are set forth below.

Table 7: Approximate Administrative Cost Allocation Summary Table

Administrative Component	Budget ($M)
Staffing	$8.2
Education & Outreach	$2.5
IT Requirements	$3.8
Data Collection & Management	$0.20
Fleet Assessment Service	$0.21
Evaluation	$1.90
Total	$16.81

The Company will seek cost recovery in conformance with the Make-Ready Program Order. For utility make-ready work, including future-proofing, costs will be treated as capitalized plant in service with cost recovery under traditional ratemaking methodologies. In accordance with the Make-Ready Program Order, the Company will seek to recover the associated revenue requirements through a surcharge until such times as the investments are reflected in the Company's base rates. Interim recovery will be from all customers in proportion to each class based on a per kilowatt hour for energy-billed customers and on a kilowatt basis for demand-billed customers. The Company will exclude such utility-owned make-ready work from its plant in service reconciliation.

Incentives paid for customer-owned make-ready work, including future-proofing facilities, will be included in base rates as a regulatory asset collected over 15 years in the Company's next rate case. Until such time as the Company's base rates reflect these incentive payments, the Company will begin recovery through the surcharge mechanism allowed in the Make-Ready Program Order.