**STATE OF NEW YORK**
**PUBLIC SERVICE COMMISSION**

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| In the Matter of Electric Vehicle Supply Equipment and Infrastructure Proceeding | ) ) | Case 18-E-0138 |

# IMPLEMENTATION PLAN OF ORANGE AND ROCKLAND UTILITIES, INC. FOR A LIGHT-DUTY ELECTRIC VEHICLE CHARGING INFRASTRUCTURE MAKE-READY PROGRAM

February 20, 2025
Pearl River, New York

Contents

## I. Introduction and Summary

On July 16, 2020, the New York State Public Service Commission (the "Commission") issued the *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs* ("Make-Ready Order" or "Order").[1] On November 16, 2023, the Commission issued revisions to the Order.[2] Orange and Rockland Utilities, Inc. ("O&R" or the "Company") submits this Implementation Plan in accordance with the revised Make-Ready Order. The Order authorizes a budget of $48 million to facilitate the make-ready of 1,546 Level 2 ("L2") and 340 Direct Current Fast Charger ("DCFC") charging plugs in the O&R service territory through 2025.[3]

The Company is committed to facilitating clean transportation in its service territory as part of its Clean Energy Commitment[4] and looks forward to expanding the availability of charging infrastructure to electric vehicle ("EV") drivers in the O&R service territory. The electrification of transportation is a key tenant of New York State's clean energy goals, including the Climate Leadership and Community Protection Act's ("CLCPA") target to reduce greenhouse gas emissions by 85 percent of 1990 levels by 2050.[5] Making more charging infrastructure available to drivers supports this goal by reducing range anxiety and removing barriers to EV adoption.

This filing details O&R's initial Company-specific plans, processes and procedures to implement the revised Make-Ready Program within its service territory including plans, eligibility criteria, incentive levels, outreach and education and anticipated program costs. In addition, details of the Company's implementation of a Fleet Assessment Service for light-, medium- and heavy-duty fleets are included.

This Implementation Plan is divided into the following sections:

- Section II presents a program overview and general eligibility criteria;
- Section III addresses the implementation of O&R's Make-Ready Program;
- Section IV describes the Company's planned outreach and education activities;
- Section V reviews the fleet assessment service;
- Section VI provides implementation timelines; and

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- Section VII describes anticipated program costs, third-party support and administrative needs.

While this Implementation Plan provides details regarding O&R's Make-Ready Program, additional detail for program participants and interested parties is available through the Company's outreach and education efforts as well as through updated information on the

Company's Make-Ready Program website[6] during the course of program implementation.

## II. Make-Ready Program Overview and Eligibility Criteria

The objective of the Make-Ready Program is to "support the development of electric infrastructure and equipment necessary to accommodate an increased deployment of EVs within New York State by reducing the upfront costs of building charging stations for light-duty EVs." This program will offset certain infrastructure costs associated with preparing a site for EV charger installation for light-duty EVs in the O&R service territory by providing an incentive to qualifying projects.

### A. Definitions

The following definitions are applicable to the Make-Ready Program:

- Approved Contractor – A contractor who has met the Joint Utilities'[7] approval criteria, as described further in Section II. E of this Implementation Plan.

- Curbside Charging – On-street public parking that is associated with a designated EV charging parking space, and that a framework is in place to prevent non-charging vehicles from blocking access to charger.

- Disadvantaged Community ("DACs") - 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, ECL § 75-0101(5). The Climate Justice Working Group ("CJWG") adopted final criteria to identify DACs in New York State on March 27, 2023. The DAC map can be accessed at: https://climate.ny.gov/Resources/Disadvantaged-Communities-Criteria.

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

- Publicly Accessible – An EV charging station that is accessible to public EV drivers without an access fee during charging.
- Participant – An entity that applies for and receives incentives through the Make-Ready Program. This includes:

    - Developer – An entity for designing, constructing, and commissioning an EV charger site. This entity may also be responsible for owning, managing and operating the chargers.

- Equipment owner – The entity that purchases and owns the EV charging equipment once it is installed.

- 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.

- Customer – An entity taking utility service from O&R.

## B. Eligible Equipment or Infrastructure

There are two categories of make-ready infrastructure eligible for incentives under the 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 that will be owned by O&R, such as step-down transformers, overhead service lines, and utility meters.

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, panels, and advanced technologies including energy storage and Automated Load Management Systems needed for the EV charging station.

All Customer-side make-ready infrastructure must be installed by Approved Contractors in order to be eligible for incentives under this Make-Ready Program. Additional infrastructure may be eligible for incentive as part of futureproofing (*see* Section III. B. of this Implementation Plan for details).

Additional costs to future proof a site may also be approved as part of this eligible infrastructure. All EV supply equipment must be installed by utility-approved contractors in order 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 (including bidirectional chargers), power blocks, modules, mounting hardware, co-located distributed generation, or networking fees, are ineligible for incentives under the EV Make-Ready Program.

## C. Eligibility Criteria and Incentives

A project must satisfy the following criteria in order to receive an incentive through the Make-Ready Program:

1. **Approved Application:** Prospective participants must submit an application on the O&R website[8] detailing the proposed EV charging project. O&R will review, evaluate, and as appropriate, approve applications.

2. **Station Maturity:** Construction of the EV charging station must have commenced after July 16, 2020.

3. **Locational Capacity:** EV charging stations must follow capacity guidelines which include:

    a. Charging stations must have a minimum of two plugs. The number of two-plug stations that can receive incentive through the Make-Ready Program is limited to no more than 50 percent of the target number of plugs within the O&R service territory.

    b. DCFC stations with more than ten plugs and/or demand in excess of 3MW will only be allowed to participate in the Make-Ready Program if development of the site does not cause O&R to incur new business costs greater than the cost that would be incurred to develop a site with a maximum demand of 3MW.

    c. The number of plugs at locations in excess of ten plugs cannot exceed 50 percent of O&R's target number of plugs established in the EV Make-Ready Order.

4. **Contact Information:** All chargers in the EV Make-Ready Program must display easily identifiable and up-to-date contact information for the EV service provider on each charger.

## D. Make-Ready Incentive Levels

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 detailed in Tables 1 and 2. No single Participant may receive incentives for greater than 50 percent of any utility-specific Make-Ready Program incentive budget.

**Table 1.** O&R Make-Ready Eligibility Criteria

| Incentive Level | Eligible Project Criteria |
|---|---|
| **Up to 100%** | 1. Publicly available DCFC projects with standardized plug types located within DAC +1. Projects with proprietary plug types must have an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs.<br>2. L2 projects located at eligible multi-unit dwellings (MUD) (see Table 2).<br>3. L2 projects located at MUDs in a DAC + 0. |

| | |
|---|---|
| | 4. L2 curbside projects within or adjacent to a DAC + 0.<br>*Enhanced incentive eligibility is described below and detailed in Table 2.* |
| **Up to 90%** | • Publicly available L2 and DCFC projects with standardized plug types. Includes municipal pay-to-park locations and free parking offered while charging.<br>• Publicly available L2 and DCFC projects including proprietary plugs must have an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs. |
| **Up to 50%** | • Non-public L2 projects, such as workplaces or MUDs with restricted access and privately owned pay-to-park lots and not located in a DAC + 0 for MUDs.<br>• Non-public or proprietary plug DCFC projects, such as workplaces or MUDs with restricted access and privately owned pay-to-park lots.<br>• Public and non-public DCFC projects where proprietary plugs are not co-located with an equal number or greater number of standardized plugs of equal or greater charging capacity. |
| *Table 1 is provided for illustrative purposes. Individual utilities reserve the right to make determinations regarding incentive level eligibility based on their best interpretation of the proposed project and available information at the time of review. Customers are responsible for all costs not eligible for incentives including the cost of chargers, maintenance, electricity, networking fees, and other operational costs.* | |
| | |

Participants in the Make-Ready Program are eligible for an enhanced incentive tier, up-to 100% of eligible costs, if they meet the following criteria: (eligibility varies by utility service territory, as shown in Table 2 below.):

1. Publicly available DCFC projects with standardized plug types located within DAC +1. Projects with proprietary plug types must have an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs.
   L2 projects located at eligible MUDs.

2. Statewide, MUDs that have an affordable housing regulatory agreement in place with a state, federal or city entity that requires at least 25% of units to be affordable to households at or below 80% of Area or State Median Income; or, alternatively, MUDs that can demonstrate via rent roll that at least 25% of the units have a calculated household income no more than 80% of the greater of the Area or State Median Income.

3. MUDs located in a DAC census tract.

4. Statewide, curbside L2 chargers located in or directly adjacent to DACs. Participants must demonstrate that each curbside charger is associated with a designated EV charging parking space, and that a framework is in place to prevent non-charging vehicles from blocking access to charger.

Table 2: Enhanced Incentive Eligibility Criteria

| | **Affordable MUD L2** | **Market Rate MUD L2** | **Public Curbside L2** | **Public DCFC** |
|---|---|---|---|---|
| **Inside of DAC census tract** | Up-to 100% | Up-to 100% | Up-to 100% | Up-to 100% |
| **Outside of DAC census tract*** | Up-to 100% | Up-to 50% | Up-to 90% | Up-to 100% within a 1-mile radius of a DAC census tract. Up-to 90% outside of 1-mile radius of a DAC census tract. |

*Please refer to the DAC discussion in Section II F of this Implementation Plan for more information on the 100% tier.

The Commission has authorized O&R to continue to incentivize Level 2 plugs beyond the plug target until the remaining Level 2 budget is fully expended.[1] Moving forward, the Company will implement the following declining cost cap until the Level 2 budget is fully expended:

- The first 450 plugs receive the lesser of either $5,000 per plug or the applicable percentage tier; and
- Subsequent plugs receive the lesser of either $3,000 per plug or the applicable percentage tier.

**Equipment Eligibility:**

**Electric Vehicle Supply Equipment ("EVSE") Communication Standards Requirements:** Sites that receive PowerReady incentives must meet specific technical communication standards, including the International Organization for Standardization's ("ISO") ISO 15118 and Open Charge Point Protocol's ("OCPP") OCPP 2.0.1. ISO 15118 -2 and -20 address network and application protocol

[1] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Order Modifying Make-Ready Program (issued January 24, 2025).

requirements and -3 addresses the physical and data link layer.[2] ISO 15118-capable hardware provides enough processing power for ISO 15118-conformant software to operate. OCPP 2.0.1 requires chargers to operate an open-source application protocol for communication between EV charging stations and centrally managed charging station networks. The effective dates that govern whether projects must use equipment conforming to these standards are below. The compliance requirements updated in this version of the Implementation Plan reflect the Public Service Commission's ruling[3] on a petition the Joint Utilities filed recommending changes to the communications standards requirements.[4]

**Summary of Requirements**

1. ISO 15118 hardware conformance must meet the definition specified in the Commission's petition ruling:
    a. Hardware conformance with ISO 15118-3; and
    b. Hardware capable of enabling ISO 15118 -2 or -20.
2. ISO 15118 software conformance must meet the definition specified in the Commission' petition ruling:
    a. Software conformance with ISO 15118 -2 or -20.
3. EVSE must also comply with OCPP 2.0.1 or later.

**Summary of Compliance Timelines for L2 Chargers**

1. EVSE installed at sites committed before June 1, 2025, are not required to comply with any communication technical standards.
2. EVSE installed at sites committed on or after June 1, 2025, must achieve conformance to all requirements described above in the section titled "Summary of Requirements."[5]

**Summary of Compliance Timelines for DCFC Chargers**

1. As of the filing date of this Implementation Plan, all new commitments for EVSE installed at sites must have equipment that can achieve ISO 15118 hardware conformance (equipment satisfies ISO 15118-3 and ISO 15118 -2 or -20).
2. Projects committed on or after December 16, 2023, must have equipment that can achieve ISO 15118-2 or -20 software conformance by November 16, 2024. If the project is committed after November 16, 2024, then the project must have equipment that can achieve ISO 15118-2 or -20 software conformance immediately upon project completion.
3. Beginning on November 16, 2024, all projects must also achieve OCCP hardware conformance (equipment satisfies OCPP 2.0.1 or later).

The following table summarizes modifications to the communication standards requirements.

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[2] ISO 15118 includes technical specification of the Vehicle-to-Grid Communication Interface that enable electric road vehicles to "recharge in the most economic or most energy efficient way" and allow for a convenient billing systems. Available at https://www.iso.org/obp/ui/en/#iso:std:iso:15118:-4:ed-1:v1:en

[3] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, ("EVSE&I Proceeding"), Order Approving Modification to Make-Ready Program. (issued September 20, 2024) ("Commission's Petition Ruling").

[4] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, ("EVSE&I Proceeding"), Joint Utilities' Petition Requesting Changes to Make-Ready Order Requirements Regarding Equipment Communications Standards and Medium-and Heavy-Duty Pilot Eligibility (filed March 15, 2024)

[5] Originally, the effective date for ISO 15118 hardware and software conformance & OCPP hardware conformance were December 16, 2023, and November 16, 2024, respectively. These compliance dates for L2 projects are superseded by the currently effective dates listed in the Order Approving Modification to Make-Ready Program (issued September 20, 2024).

| | L2 | | DCFC | | |
|---|---|---|---|---|---|
| | *Committed before Jun 1, 2025* | *Committed on or after Jun 1, 2025* | *Committed before Dec 16, 2023* | *Committed between Dec 16, 2023 and Nov 15, 2024* | *Committed on or after Nov 16, 2024* |
| ISO 15118 hardware conformance | No requirement | 15118-3, capable of enabling 15118-2 or 15118-20 | No requirement | 15118-3, capable of enabling 15118-2 or 15118-20 | 15118-3, capable of enabling 15118-2 or 15118-20 |
| ISO 15118 software conformance | No requirement | 15118-2 or 15118-20 | No requirement | 15118-2 or 15118-20 by Nov 16, 2024 | 15118-2 or 15118-20 |
| OCPP hardware conformance | No requirement | OCPP 2.0.1 or later | No requirement | No requirement | OCPP 2.0.1 or later |

The Joint Utilities ("JU") website (https://jointutilitiesofny.org/ev/make-ready) contains information on how Participants can request that their preferred EVSE supplier attest to the EVSE meeting the requirements described above. The JU will collect attestations for the requirements specified in the table above as of the filing date of this Implementation Plan. In addition, as of the date of this Implementation Plan's publication, O&R will only issue Program Agreements that reflect equipment whose supplier OEM is able to provide said attestations.

Starting on March 1, 2025, the JU-managed eligible equipment list will be replaced with the Electric Power Research Institute ("EPRI")[6] Vetted Product List ("VPL")[7]. To be eligible for O&R's PowerReady Program, equipment must be listed on EPRI's VPL.

## E. Approved Contractors

As specified in the Make-Ready Order, to be eligible for the program, Participants are required to use JU -approved contractors. Contractors self-certifying to meeting certain criteria will be noted as approved by the JU for use in the Make-Ready Program, which will be posted to the JU website[9] and linked to the O&R landing page. Participants may choose from among the approved contractors for inclusion in their program application.

[6] The Electric Power Research Institute (EPRI) is a research organization that conducts research related to the electric power industry. More information available at https://www.epri.com/about

[7] The VPL can be access at https://www.epri.com/vpl by selecting "Joint Utilities of NY – EPRI Vetted Product List"

Contractor Approval Process

Contractors wishing to be approved for participation in the program must provide self-certification that they:

- are registered to do business in New York State;
- indicate the area(s) in New York State where they plan to do make-ready work; and
- have all the appropriate licenses and certifications needed to do work in those area(s).

A common New York State application for use by contractors to become approved for the Make-Ready Program will be available on the JU website. Contractor applications shall be approved or denied within one month of the application submittal.

The JU, in consultation with New York State Department of Public Service ("DPS") Staff, can suspend or remove a contractor from the posted list of Approved Contractors if the JU or Staff becomes aware of non-compliance with any of the criteria or if there are performance or other concerns raised. Contractors falling out of standing can be reinstated upon demonstration of renewed criteria compliance or successfully completing the reinstatement process.

### F. Disadvantaged Communities

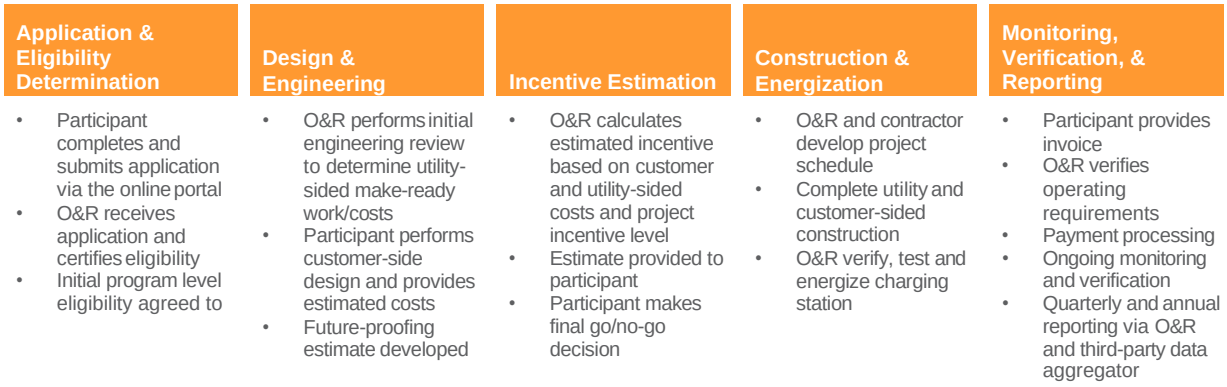
Incentives of up to 100 percent of make-ready infrastructure costs may be available for EV L2 charging sites within a DAC and DCFC charging sites located within one mile of DACs. As of January 29, 2025, O&R calculates expenditures on projects subject to the DAC budget cap as the sum of the total incentive amount for those projects, including future-proofing costs. The sum of all L2 DAC total incentive amounts has reached the cap of 20 percent of the authorized incentive budget. As such, O&R will provide this 100 percent incentive only for DCFC projects, until the sum of all DAC total incentive amounts reaches the cap of 25 percent of the authorized incentive budget for DCFC projects. After this point, the Company will continue to support development within Disadvantaged Communities at the standard applicable 90 or 50 percent incentive levels. Sites eligible for the 100 percent incentive include:

1. Publicly accessible DCFC sites utilizing non-proprietary plugs, located within one mile of Disadvantaged Communities.

## III. Make-Ready Program Implementation

In order to stand up and implement the revised Make-Ready Program quickly, O&R will leverage existing business processes and systems to the degree possible. Generally, these processes fall into five project phases: 1) Application & Eligibility Determination, 2) Design & Engineering, 3) Incentive Estimation, 4) Construction & Energization, and 5) Monitoring, Verification & Reporting.

**Figure 1.** O&R Make-Ready Program




## A. Application Review and Incentive Level

Entities wishing to participate in the Make-Ready Program will be required to apply for the program via the Company's online application portal. Information regarding the portal, the application process, program eligibility and incentives, and other program information may be found on O&R's Make-Ready Program landing page. To apply for the program, Participants will be required to submit the following information via the online portal:

- The Participant's name, and contact information;
- A description of the project, including the number of plugs, charging output and plug type of each, location (and if located in an environmental justice community), whether demand management software or hardware will be used, whether the EVSE will be bi-directional (at present or in the future) or exclusively load, and any co-located distributed generation or energy storage;
- Site plan, proof of site control, one-line diagram and anticipated project load;
- Future-proofing needs and site expansion plans (see below); and
- Name of Approved Contractor for Customer-side work (see Section 1.D. of this Implementation Plan).

Once an application is received, O&R will assign a project identification number and confirm the required information is provided. O&R will review the application to determine program eligibility, including requesting and receiving from the Participant, as required, additional information or answers to any questions. Once O&R completes the initial review, the Company will engage with the Participant to align expectations. If the eligibility criteria are met, O&R will notify the Participant of the appropriate incentive level which will be applied to the project and update the status in the application portal accordingly.

In the event that an application is incomplete, or an application is determined ineligible, the Company will explain the deficiency or deficiencies to the Participant and allow the Participant to resubmit.

### B. Design and Engineering

Once the Company receives an application for new service, O&R will perform an initial analysis leveraging its existing business processes for new service interconnections. The Company's New Business team will schedule and conduct a site review for internal stakeholders and the Participant to discussion the Point of Interconnection ("POI"). Once the POI is finalized, the New Business team will document the POI and a design job will be initiated in the Company's Work Management System ("WMS") and transmitted to the Design Engineering organization.

Design Engineering will analyze the application to determine whether service upgrades will be necessary to support the station. If service upgrades will be required, a cost estimate will be developed and provided to the Participant for review. If the Participant has chosen to futureproof the project, Design Engineering will provide a cost estimate for the futureproofing work in addition to the baseline cost.

During this time, the Participant will work with the Approved Contractor to develop an estimate of customer-side project costs. The estimate for the customer-side costs will be provided to the New Business team when ready. If the total estimated costs of the project exceed the average per-plug installed cost across the Company's service territory, the Company will work with the Participant to evaluate alternative project designs that may reduce estimated project costs. If unable to reduce project costs below 10% of the average per-plug installed cost, O&R may approve the project at a lower incentive level or decline the project.

<u>Futureproofing</u>

In accordance with the Make-Ready Order, O&R will offer participants the opportunity to futureproof sites in order to accommodate future growth at a site at minimal incremental cost. Participants will be required to determine whether they wish to request futureproofing of their site during the application process. Participants will not be allowed to request futureproofing after an application has been accepted. Participants that request future-proofing work must specify their plans for future expansion of the site, including additional plugs, additional power needs, additional parking spots on-site, additional land, and any other relevant information that may be used to assess the feasibility and cost of futureproofing the site.

As part of the Design and Construction stage discussed above, the Company will work with the Participant to determine the feasibility of the future-proofing plans from a grid and site perspective. During the review, O&R will determine whether the site can accommodate additional Make-Ready infrastructure. The evaluation of the proposed future-proofing work may include various factors such as:

- **Plans for expansion**: Is futureproofing needed based on the Developer's plans to install

additional plugs or upgrades to a higher kW unit in the future?

- **Expansion feasibility**: Can the site accommodate the identified additional make-ready infrastructure and, if relevant, additional parking spots or higher kW charging equipment?

For each site, futureproofing costs covered by the Program will be limited to no more than 10 percent of the project's make-ready costs. For costs not covered by the O&R incentive, the Participant will be required to pay the excess costs. In this instance, the Company will only conduct any utility-side future-proofing work after securing funding from the Participant.

### C. Incentive Estimation

Once a project's design engineering and cost estimates are complete and accepted by all parties, O&R will calculate the estimated incentive taking into account estimated customer and utility-sided costs and the project's incentive level based on its location, plug-type and accessibility. The future-proofing estimate will be included in the overall incentive estimate calculation up to the limits described above. The estimated incentive will be provided to the Participant who will be required to make a final decision whether to proceed with the project. If the Participant elects to proceed with the project, the Participant will be required to sign a Program Agreement, agreeing to the site design, service connection layout, incentive offering, and other terms before the Approved Contractor is released to begin construction.

### D. Construction & Energization

Once the Program Agreement is signed, the Participant and O&R will coordinate the development of a construction schedule that accommodates both customer-sided and utility-sided work. Once customer-sided work is complete, the Participant will notify O&R. O&R will commission the system.

Following commissioning, the Participant shall provide all invoices itemizing costs incurred by the Approved Contractor as part of the customer-sided construction. O&R will validate the invoices. Program Participants and Approved Contractors are responsible for keeping customer-sided costs within budget. O&R will not be responsible for costs in excess of agreed budgets. Once costs are validated, vendors will be paid directly via check. The Participant shall be responsible for all costs that exceed those estimated by the Participant's contractor.

### E. Monitoring, Verification & Reporting

The Make-Ready Order requires each project to meet minimum operating requirements and to be monitored and reported on to inform the Commission on the effectiveness of the program. The following operational and reporting requirements are required of program participants.

Operating Requirements

Participants in O&R's Make-Ready Program will be required to adhere to operational requirements as specified in the Make-Ready Order. Operational requirements include:

- 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 half of the plugs considered to be "up" at all times;
- All charging stations in the EV 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, as long as the number of plugs and the capacity of the station does not decrease, and the site continues to meet all performance and reporting obligations of the Program.
- All chargers in the EV Make-Ready Program must display easily identifiable, up-to-date contact information for the EV charging service provider.

Reporting Requirements

Participants agree to provide O&R with the necessary data regarding the installation and use of the EV charging equipment to facilitate necessary tracking of the Program's overall operation and effectiveness via a third-party consultant on a quarterly basis. This data includes:

- Program Participation: (Provided by O&R)
  - Reporting year;
  - Site ID;
  - Census Tract;
  - Is the site located in a geographic Disadvantaged Community;
  - Percent of service applications that have matured into operating stations;
  - Number of station owners participating;
  - Number of sites for which incentives were issued;
  - Number of plugs installed;
  - Aggregated kW Nameplate Capacity;
  - Infrastructure costs (broken out by customer and company infrastructure, allocated by make-ready costs and new business costs);
  - Incentive levels a site received (up-to-50, 90, or 100 percent);
  - Total incentives paid per site;
  - Whether the site received funding from the MHD Pilot;
  - Whether the site received funding from the Transit Authority Make-Ready Program' and
  - Whether the site received Operating Cost Relief from a Demand Charge Alternative Program.

- Plug and charging session data, including: (Provided by Participant)
  - Number of sessions daily;
  - Start and stop times of each charge;
  - Amount of time each vehicle is plugged in per session;
  - Peak kW per charging site (aggregated monthly per site; including site capacity, charger nameplate capacity, and peak kW load management adjustment);

- Annual aggregated kWh per charging site;
- Annual aggregated percent utilization per site;
- Annual aggregated hours charging; and
- Plug outage information (the number and duration of outages, differentiated by expected outage and unexpected outages).

All data subject to the reporting requirements identified in this section will be provided, at minimum, on a quarterly basis to the JU after a third-party consultant designated by the Joint Utilities anonymizes and aggregates the data.

Consistent with the Orders, 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. Additionally, the JU will develop a preferred network list as part of a Data Reporting Compliance Plan by March 1, 2024. After March 1, 2024, networks will be given more information about how they can be added to the preferred network list, and how to maintain their status on the list. The JU will provide participants with the preferred network list and educational materials about data collection and the consequences for failing to provide the data.

The JU will publish a publicly accessible tracker that monitors both the committed and completed L2 and DCFC plug installations, as well as committed and completed L2 and DCFC budgets reported as separate dollar figures and by service territory and will designate, at a minimum, incentives and plug totals committed and installed to benefit Disadvantaged Communities. The tracker will be updated monthly and made available at https://jointutilitiesofny.org/ev/make-ready.

### F. Micromobility

The Micromobility Program has a separate Implementation Plan in effect as of February 2, 2024. It reviews key elements of the Micromobility Program, including eligibility criteria, incentive levels, program implementation processes, education and outreach plans, and program budget. The plan can be found on the O&R website at oru.com/micromobility.

## IV. Outreach and Education

O&R will expand its outreach and education efforts to move beyond increasing customer adoption of EVs to informing potential site hosts, developers, dealers and other potential stakeholders on the opportunity offered by the Make-Ready Program. To maximize participation in the program, the Company's outreach and education plan will focus on identifying potential participants and priority sites for EVSE development. Efforts will then be concentrated on developing and delivering outreach and education using methods and tactics targeted to those opportunities.

### A. Target Participants

A primary component of the Company's outreach and education plan will be to identify key stakeholders and participants for targeted outreach. Some types of participants the Company

anticipates targeting may include:

- EVSE Developers – O&R will establish and expand relationships with EVSE developers in the O&R service territory in order to collaborate on identifying key areas and plans for development, understanding site development needs and to inform developers of program requirements.
- EV Dealers – O&R will expand its outreach efforts to include the Make-Ready Program in its dealer outreach efforts. Beyond participating in the program themselves, EV dealers are a key piece of the Company's outreach efforts as a source of knowledge for potential EV customers.
- Fleet Customers – O&R will identify and conduct outreach to customers in its service territory that maintain light-duty vehicle fleets to make them aware of the opportunity to participate in the Make-Ready Program. In addition, for fleet owners and operators for all vehicle classes (light, medium- and heavy-duty), O&R will educate them on the Company's Fleet Assessment Service.
- Commercial Customers – Commercial customers represent an opportunity as likely site hosts for EVSE developers and as stakeholders in the development of EV chargers which may attract business. O&R will work with its commercial customers to educate them on the benefits of hosting EV chargers and the opportunity to take advantage of the Make- Ready Program.
- Real Estate Developers – Real estate development firms in the Company's service territory serve as a large opportunity to develop EV charging infrastructure as part of their development plans. The Company will conduct outreach to developers in order to make them aware of the opportunity to take advantage of the program incentive to install EVSE as part of their projects.

**B. Prioritization**

The Company's outreach and education efforts will be focused to promote the development of charging infrastructure where it is most cost-effective and provides the most benefit to O&R's customers. O&R will execute targeted outreach efforts by leveraging the suitability criteria developed in the Order as follows:

**i.** **Load Serving Capacity:** One of the strongest predictors of low-cost EV charging infrastructure is the capacity of the electric distribution system to accommodate the additional charging load without significant upgrades. The Company will continually update its Load Serving Capacity maps, part of its Electrification Maps, to provide developers with areas of the system which have the most available load serving capacity and will result in lower cost to develop.

**ii.** **EV Charging Infrastructure Forecast:** The purpose of the Charging Infrastructure Forecast will be to assist in identifying areas in the O&R service territory where the

need for EV charging infrastructure is anticipated. The forecast will be developed internally and will consider inputs such as customer type and existing and anticipated EV ownership to identify areas of potential EV-driven load growth. The forecast will be used to inform the Company's Capital Planning process and to target and prioritize outreach and education efforts to developers and site hosts, with a focus on smaller businesses which may otherwise be unfamiliar with the details of the Make-Ready Program. The Forecast will inform O&R's outreach and education activities to increase EV and EV infrastructure awareness, and ultimately drive EV adoption through the availability of public charging infrastructure development.

iii. **Strategic Locations:** Strategic Locations are those that account for sites that may contain societal benefits and may not otherwise be identified by analysis of load serving capacity or charging infrastructure forecasts. Strategic locations may include environmental justice ("EJ"), LMI, or disadvantaged communities or areas with unique "public health benefits or network attributes that expand access to rural and hard-to-reach communities."[10] Once identified, O&R anticipates adding strategic location information to the Company's hosting capacity maps. Prior to submitting a program application. Participants will be able to reference the maps to determine whether the site in question falls into strategic location and may be eligible for a higher incentive.

O&R will continue to coordinate with the JU, DPS Staff and other stakeholders to define EJ, LMI and DAC for inclusion as strategic locations. O&R will then apply that criteria to the O&R service territory to identify eligible locations and will leverage the existing hosting capacity maps to advise potential program Participants with information on where these areas exist.

### C. Marketing and Communications Tools and Mechanisms

Based on the potential participant type, the Company will develop targeted marketing materials and tools to inform and engage stakeholders. In addition to the Company's Make-Ready Program website, the Company will promote the use of its load serving capacity maps and EV webpages to educate potential customers and program participants about the benefits of hosting EV charging stations and areas with lower cost of development. The Company will continue to develop marketing and communications materials for use across multiple communications channels tailored to each type of target participant or potential customer.

## V. Fleet Assessment Service

As part of the Make-Ready Program, O&R will offer a Fleet Assessment Service to light, medium- and heavy-duty vehicle fleets in its service territory to assist them in their transition to EVs. Initially the service will concentrate on providing site feasibility and rate analyses to

assist fleets in understanding the transition and operating costs of switching to electric vehicles. A description of these services is below.

Site Assessment

The site feasibility analysis will be based on the maximum power draw of an electrified fleet to determine if the local distribution system can accommodate that increased load. The site feasibility analysis will include all planned utility work on the distribution system both nearby and on the infrastructure serving the existing depot, to find cost-saving synergies that may exist. If the site feasibility analysis is positive, the utility will offer the customer a rate analysis, working to understand the maximum costs fleet electrification may incur and how to implement best practices and managed charging to mitigate these costs.

Rate Analysis

The rate analysis will be tailored to each depot location, and the fleet manager would understand all rate options available, as well as a reasonably certain range of costs they may expect based on their charging behavior.

As the Company begins to provide fleet assessment services, it is anticipated that significant learnings will be gained from working with customers to understand fleet electrification needs and that services may be identified that utilities could provide to fleet customers. As part of its Fleet Assessment Service, O&R will conduct customer satisfaction survey to gather input from participating fleets. The survey will ask questions such as whether the participants found the analysis useful, how likely they are to electrify their fleets in the near- and long-term, what the biggest barriers to fleet electrification are, and what additional services may be provided by the Company to support fleet electrification, among others. The results of the survey will be used to inform the development of future Fleet Assessment Services.

Application

The Company is directed to develop a standardized web-based form for Fleet Assessment Services, as directed by this Order.

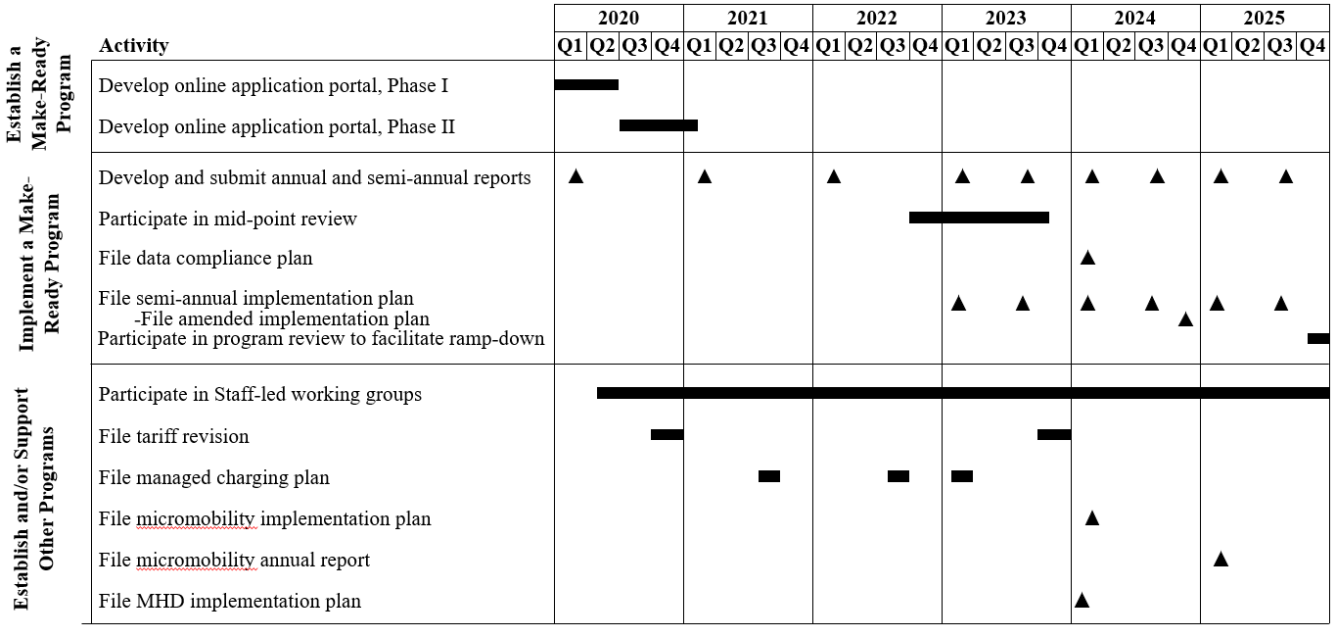
## VI. Implementation Timeline

The Company's primary focus in implementing the revised Make-Ready Program will be the development of the processes and tools needed to begin accepting and vetting program applications to facilitate participants wishing to participate in the program as soon as possible. Subsequent Company efforts will focus on streamlining Company processes to continue to improve the customer experience and further expedite the administration of program incentives.

The August 2024 report will be filed at the same time as the March 1, 2025 report as a result of

an approved extension request the Joint Utilities requested with the Public Service Commission. See Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, ("EVSE&I Proceeding"), Ruling on Extension Request (issued August 5, 2024).

**Figure 2. O&R Make-Ready Program Implementation Timeline**



## VII. Program Costs, Third-Party Support and Administrative Needs

O&R's overall Make-Ready budget is established at $48 million set by the Make-Ready Order, including incentive and implementation costs. Table 3 below outlines the Company's budget allocation for the duration of the Make-Ready Program.

**Table 3.** O&R Make-Ready Program Budget ($000's)

| Program | O&R |
|---|---|
| **DCFC Make-Ready** | $22,514,669 |
| **L2 Make-Ready** | $17,708,845 |
| **Future Proofing (8% of DCFC MR)** | $3,217,881 |
| **Admin & Fleet Assessment Services** | $6,033,527 |
| **Total** | $49,474,922 |

Table 4 below lists budget categories and their definitions as directed by the Midpoint Review Order for the expenditure of the $6.03 million budget authorized for administration and implementation of the Program and the Fleet Assessment Service. Table 5 below includes actual and forecasted costs for the eight categories for calendar year 2024.

**Table 4. Budget Category Definitions**

| Category | Definition |
|---|---|
| Education and Outreach | All program marketing costs associated with outreach to site hosts, developers, and other stakeholders through methods such as educational video content, bill inserts, giveaways, newsletters, social media, events, press releases, informational websites, direct mail, and advertisements for possible site hosts, and FAQs, webinars, and other resources about the application process for developers. |
| Information Technology Requirements | Costs associated with technology tools needed to support the program's operation, including maintaining online resources such as the application portals for incentives. |
| Data Collection and Management | Costs associated with collection and analysis of required program data, such as contracting with a consultant to manage data collection, aggregation, and anonymization to meet the requirements of the annual and bi-annual reports. |
| Fleet Assessment | Costs associated with fleet assessment services administered by the utility, excluding service staff as that is under service staffing. Examples of costs included technology and data management tools and vendors supporting fleet assessment. |
| Service Staffing | Costs of staffing for the program, including all employee costs and including cost of some employee contractors (i.e., those who are hired for multiple functions of the program and thus do not clearly fall into other expense categories). |
| Vendor Costs | Third-party vendor services retained for functions that do not fall into other expense categories. |
| General Implementation | All other non-vendor costs that do not fall into other expense categories. |

| | |
|---|---|
| Costs | |
| Evaluation | Costs associated with completing required program evaluation, including contracting with a third-party evaluation service, creating, distributing, and analyzing participant surveys and producing an end-of-program report. |

Of O&R's total program budget, $6.03 million is allocated to administration and fleet assessment services. O&R's implementation budget is allocated as set forth in Table 5 below.

**Table 5** O&R Make-Ready Implementation Budget ($000's)

| **Budget Components** | **Forecasted** |
|---|---|
| Education and Outreach | ~ 7% - ~ 9% |
| Information Technology Requirements | ~ 7% - ~ 12% |
| Data Collection and Management | ~ 1% - ~ 2% |
| Fleet Assessment | ~ 5% - ~ 7% |
| Service Staffing | ~ 70% - ~ 80% |
| Vendor Costs | ~ 1% |
| General Implementation Costs | ~ 1% |
| Evaluation | ~ 1% |

As discussed in the original Order, utilities' existing processes and procedures for providing service to the EVSE sector will not be sufficient to meet the goals of the Make-Ready Program. In order to meet the increased needs of the revised Make-Ready Program, O&R anticipates adding additional full- time staff to the Company's E-Mobility team.

O&R also anticipates Information Technology costs associated with the Company's front-end portal which will be used to process Make-Ready Program applications and, over time, integrate with other internal platforms to automate back-end activities required to streamline application processing. Costs include configuration, ongoing subscription payments, future integration costs, set-up costs and monthly fees associated with a third-party platform which the Company will use to pay incentives and track program performance.

## Appendix – Implementation Plan Revision Tracker

| Version | Filing Date | Change Description | Change Location | Reasoning |
|---|---|---|---|---|
| MRP IP Revision April 12, 2024 | 4/12/2024 | Added wording explaining contractor approval or denial within one month of application submittal | Contractor Approval Process, pg. 8 | DPS Staff request |
| MRP IP Revision April 12, 2024 | 4/12/2024 | Add link to online plug and budget tracker | Reporting Requirements, pg. 14 | DPS Staff request |
| MRP IP Revision April 12, 2024 | 4/12/2024 | Develop more robust implementation timeline | Implementation Timeline, pg. 18 | DPS Staff request |
| MRP IP Revision April 12, 2024 | 4/12/2024 | Revised future-proofing budget from $1,801,174 to $3,217,881 along with total budget | Program Costs, Third-Party Support and Administrative Needs, pg. 19 | MRP Errata Notice, Issued February 15, 2024. |
| MRP IP Revision July 12, 2024 | 7/12/2024 | Add a note explaining the November 16, 2024 enforcement date for ISO 15118 software and OCCP 2.0.1 hardware requirement is canceled until the Public Service Commission rules on the formal petition the Joint Utilities filed in March 2024. | Equipment Eligibility, pg. 7 | To reflect the latest change affecting program implementation |
| MRP IP Revision July 12, 2024 | 7/12/2024 | Added a footnote referencing the Data Reporting Compliance Plan filed with the Commission | Reporting Requirements, pg. 14 | To reflect the latest update to the PowerReady program |
| MRP IP Revision July 12, 2024 | 7/12/2024 | Added a table that lists the eight administrative budget reporting categories and their definitions. In addition, added a separate table that lists the actual and forecasted costs for calendar year 2024. | Program Costs, Third-Party Support and Administrative Needs, pg. 21-22 | 2023 Midpoint Order Directive |
| MRP IP Revision October 18, 2024 | 10/18/2024 | Added new language regarding the updated communication standards. | Equipment Eligibility, pg. 7-9 | 2024 JU MRP Petition Order Regarding Electric Vehicle Supply Equipment and Infrastructure |
| MRP IP Revision January 10, 2025 | 1/10/2025 | Provided information on the eligible equipment list transition from the JU website to EPRI's VPL | Equipment Eligibility, pg. 9 | To reflect the latest change affecting program implementation and eligibility criteria |

| | | | | |
|---|---|---|---|---|
| MRP IP Revision January 10, 2025 | 1/10/2025 | Clarified the filing timeline for the August 2024 semi-annual report | Implementation Timeline, pg. 19-20 | To reflect the latest update to the PowerReady program |
| MRP IP Revision 2/24/2025 | 2/24/2025 | Provided information on declining cost cap incentives for Level 2 side of the program in excess of plug target | Make-Ready Incentive Levels pg. 7 | Order Modifying Make-Ready Program, January 24, 2025 |
| MRP IP Revision 2/24/2025 | 2/24/2025 | Clarified information regarding the DAC carve out calculation after coordination with Staff | Disadvantaged Communities "DAC" pg. 10 | To reflect clarification made by Staff regarding DAC carve out budget calculation |