

CONSOLIDATED EDISON COMPANY OF
NEW YORK, INC. AND ORANGE AND
ROCKLAND UTILITIES, INC.

MICROMOBILITY PROGRAM
IMPLEMENTATION PLAN

Filed February 1, 2024

CASE 18-E-0138

Pursuant to New York Public Service Commission's November 16, 2023
*Order Approving Midpoint Review Whitepaper's Recommendations with
Modifications*

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Introduction

Consolidated Edison Company of New York, Inc. ("Con Edison") and Orange & Rockland Utilities, Inc. ("O&R") (collectively, the "Companies") submit this Micromobility Implementation Plan in accordance with the New York Public Service Commission's (the "Commission") November 16, 2023 *Order Approving Midpoint Review Whitepaper's Recommendations with Modifications* ("Midpoint Order").¹ This Micromobility Implementation Plan outlines the Companies' plans for the implementation of a new Micromobility Make-Ready Program ("Micromobility Program" or "Program") to provide incentives to support micromobility charging infrastructure. The Midpoint Order authorized a total Program budget of \$20M to be administered jointly by the Companies.

The Companies are committed to advancing New York State's clean transportation goals in their service territories. Micromobility devices, such as electrified bikes and scooters, are an efficient mode of clean transportation, particularly in dense urban areas, and more affordable than electric cars, making them more accessible to residents in Disadvantaged Communities. Despite the benefits of electric micromobility, over the last few years, in-home micromobility charging has also been the source of increasingly common fire safety incidents. Therefore, access to safe and reliable charging infrastructure for micromobility is an important component in advancing clean energy goals and increasing access to electric mobility for Disadvantaged Communities.

Given the nascency of the micromobility market, the Companies will establish a Program design that allows for continuous improvement and incorporation of learnings to match evolving market conditions, such as providing flexibility to support new changing technologies and business models, and expand as the market grows.

This Micromobility Implementation Plan explains key elements of the Micromobility Program, including eligibility criteria, incentive levels, Program implementation processes, education and outreach plans, and Program budget.

Definitions

Curbside Charging: Charging sites that are located at the curb or on the sidewalk.

Disadvantaged Communities: 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). This definition was adopted by the Climate Justice Working Group (CJWG) on March 27, 2023. An updated map reflecting the CJWG's final definition of *Disadvantaged Community* is available online.²

¹ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Order Approving Midpoint Review Whitepaper's Recommendations with Modifications (issued November 16, 2023) (Midpoint Order).

² https://data.ny.gov/Energy-Environment/Final-Disadvantaged-Communities-DAC-2023/2e6c-s6fp/about_data

Micromobility: Micromobility encompasses lightweight, low-speed transportation devices, including electric bikes and electric scooters.

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

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

- **Developer:** An entity responsible for designing, constructing, and commissioning a micromobility charging site. This entity may also be responsible for owning, managing, and operating the charging site.
- **Equipment Owner:** The entity that purchases and owns or controls the micromobility charging equipment once it is installed.
- **Site Host:** The owner or operator of the site on which the micromobility charging equipment is installed. The Site Host may or may not be the Equipment Owner.
- **Customer:** An entity taking service from Con Edison or O&R.

Publicly Accessible: A micromobility charging site that is accessible to any user of micromobility who wants to access the site and has compatible equipment.

Shared-use Sites: Charging sites serving (i) multiple users enrolled in subscription-based micromobility, and/or (ii) micromobility charging co-located with charging for other types of electric mobility, such as electric cars, trucks or buses.

Program Eligibility Criteria

Micromobility Program Participants must meet certain eligibility criteria to qualify for incentive payments.

This section discusses the (i) eligible make-ready infrastructure or equipment that the Micromobility Program can incentivize, (ii) criteria a project must meet to qualify for the incentive, and (iii) incentive levels that a project can qualify for.

Eligible Infrastructure or Equipment

The Micromobility Program will provide incentives for make-ready infrastructure and equipment necessary for safe charging of micromobility devices, including curbside and shared-use sites. Eligible infrastructure includes:

- **Utility-side make-ready infrastructure:** Utility electric infrastructure needed to connect and serve the load associated with the charging of micromobility devices that would have otherwise been paid by the Participant as Excess Distribution Facilities ("EDF"),³ contributions in aid of construction ("CIAC")⁴ and/or accommodation charges. This may

³ Excess Distribution Facilities are those constructed when the Companies provide distribution facilities in excess of or in place of those normally provided or otherwise designated by the Companies.

⁴ Contributions paid by customers for reimbursement of electric assets that O&R constructs to serve those specific customers using the assets.

include traditional distribution infrastructure that will be installed, owned, and operated by the Companies, such as step-down transformers, overhead or underground service lines and utility meters.

- **Customer-side make-ready infrastructure:** Customer equipment or infrastructure necessary to make a Customer site ready to connect charging for micromobility devices to the electric grid, including conductors, trenching, and panels needed, and other costs, such as project management and site scoping and design. Customer-side make-ready infrastructure also includes any equipment supporting fire suppression and safety of the micromobility charging site. Customer-side make-ready infrastructure is developed, owned, and maintained by the charging Developer, Equipment Owner, or Site Host.

In the case of a shared-use site, where there is the potential for eligible make-ready infrastructure to support more than one type of charging (e.g., both micromobility devices and electric vehicles), Participants may stack incentives from another program (e.g., PowerReady) if permitted by Program rules, but will not receive incentives covering more than 100% of eligible make-ready costs.

Eligibility Criteria

A project must satisfy the following criteria to be considered for an incentive through the Micromobility Program:

- **Approved application:** Prospective Participants must apply for the Micromobility Program. The application can be found on the Program Websites. The Companies will review, evaluate, and provide eligibility letters.
- **Station installation commencement:** Construction or installation of the micromobility charging site must commence on or after November 16, 2023.
- **Site location:** The micromobility charging site must be publicly accessible and located in a Disadvantaged Community; *OR* located in or adjacent to a multi-unit dwelling meeting premise-specific criteria: at least 25% of units have a calculated household income no more than 80% of the greater of the Area or State Median Income. Premise-specific eligibility can be demonstrated via qualifying housing contracts with a local, state or federal agency or via rent roll.

Eligible Incentives

The Companies will provide incentives to Participants covering:

- *Up to* 100% of utility-side make-ready infrastructure
- *Up to* 50% of customer-side make-ready infrastructure

The Companies will have full discretion in accepting applications and deciding final incentives based on the specific characteristics of the project. The Companies may use mechanisms, such as incentive caps and cost comparisons, to minimize overall make-ready costs and optimize the program budget. The Companies also reserve the right to limit the amount of incentives given to a single Participant or charging solution type.

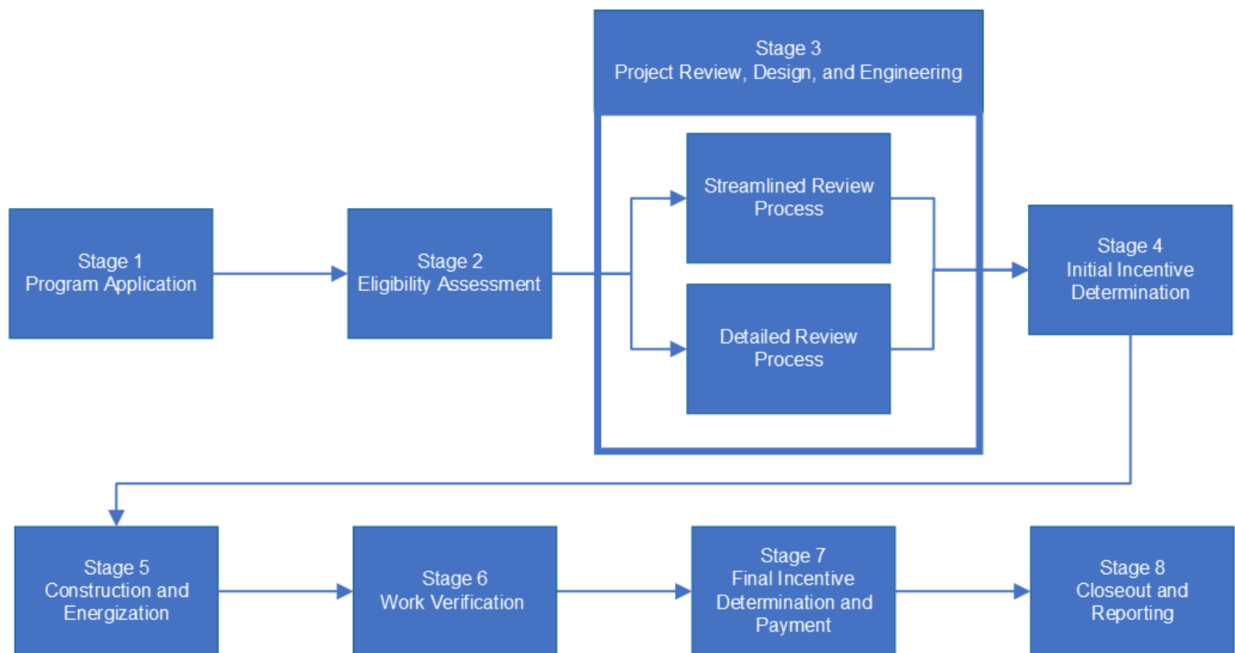
Program Implementation

Given the nascency of the micromobility market, the Companies are first developing the core structure of the Micromobility Program to support early projects. As the Program and market mature, the Companies plan to track trends and monitor projects in the Program pipeline to evolve Program implementation and implement refinements to the Program to maximize Program achievement.

The Companies will launch the Program in the first quarter of 2024 and will accept Program applications until the Program funds have been exhausted.

Program Process

The figure below shows an overview of a project’s process in the Micromobility Program. The Program has been designed to allow the Companies to continue to refine the Program mechanics and structure as the Companies learn about the market, project costs, and best practices. Each stage is described in greater detail in the following subsections.



Stage 1: Program Application

Each of the Companies' Program Websites⁵ will contain a link to the Program application, application instructions, and relevant Program information, such as Program eligibility, incentives, and Participant requirements.

To manage and track Program applications, Con Edison will use a Salesforce-based web portal and O&R will use an online application form. For electric service requests, each of the Companies will use its respective Energy Services Project Center platform. The Program application will request the below information needed for the Companies to process and evaluate the application:

- Applicant's name and contact information
- Description of the project, including the type of charging technology, number of charging resources and micromobility devices supported, charging output and charging plug type, accessibility, location, proof of eligibility (for those not located in a Disadvantaged Community), demand management software and hardware (if applicable), and any co-location with other technologies (e.g., distributed energy resources or other electric vehicle charging).

The Companies will continue to make enhancements to the Program application and management systems as necessary.

Stage 2: Eligibility Assessment

The Companies will each have their own Program teams to manage their respective Program application intake process. Upon receipt of the application, the teams will evaluate the information provided compared to the eligibility criteria outlined previously, which may include requesting additional information or documents from the Participant. The Companies will communicate to the Participant whether the project qualifies for the Program. If the project is eligible, the application will proceed to the next stage detailed below.

Stage 3: Project Review, Design, and Engineering

All projects in the Con Edison Program are required to complete an initial engineering ruling to determine if the existing electric service at the site is adequate. In this stage, the project will go through one of the following pathways:

- **Streamlined Review Process:** If the existing electric service at the site is ruled adequate to supply the additional requested load, the project will not require company reinforcement work and be able to move to the Initial Incentive Determination phase once the Participant has finalized the customer-side engineering and cost estimates.
- **Detailed Review Process:** If the engineering analysis shows that utility-side upgrades are required or if the Participant requests a new design, new electric service, or point of entry for their electric service, the Companies will provide the Participant a Company-preferred

⁵ The Companies' Program Websites will go live in the first quarter of 2024.

electric service option at the location where the utility-side costs are the lowest. If the Participant requests a different design or point of entry for electric service, the Companies will evaluate the customer-proposed locations for electric service and provide the amount of associated utility-side costs to the Customer. The Companies and the Participant will work together on the service design and seek to moderate total project costs. Once the Participant has accepted a service design and point of entry and finalized their customer-side costs, the Companies will complete the final design and engineering for the utility-side work.

The Participant is responsible for designing the make-ready infrastructure on the customer-side of the meter and providing the design and estimated cost to the Companies.

Stage 4: Initial Incentive Determination

The Companies will provide the Participant with an Initial Incentive Determination with an incentive amount based on the Participant-provided estimates of utility-side and customer-side make-ready costs.

Initially, the Companies will implement a simple incentive calculation using eligible utility-side and customer-side costs, including a review for cost reasonableness, the incentive level (e.g., up to 50%, 100%), and the incentive amount requested by the Participant.

The incentive determination will be designed to minimize overall make-ready costs. The Companies will accept applications for projects of all types and magnitude of make-ready costs and the Companies will review any supporting information the Participant wishes to provide for such projects, but the Companies reserve the right to reject the project or to work with the Participant if they agree to accept a smaller incentive and bear more of the make-ready costs. The Companies expect to gain additional information and experience related to customer-side costs during the initial implementation process, allowing for modifications and refinements of the incentive determination, if needed, to encourage more efficient spend of Program funding, respond to changes in the marketplace, and advance the goals of the Program.

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

Stage 5: Construction and Energization

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

Stage 6: Work Verification

Once the project is complete, the Participant will submit the required project cost documentation and provide support for any required inspections by the Companies. This could include

photographs, equipment specifications, contractor and subcontractor records, and final site plans. The Companies will verify that the make-ready installation and the charging station facilities (e.g., number of plugs, public accessibility, etc.) match the project submittals and approved incentive parameters.

Stage 7: Final Incentive Determination and Payment

After project validation, the Participant will submit invoices supporting the actual costs incurred for the customer-side make-ready infrastructure for review and approval by the Companies. The authorized incentive amount will be recalculated if actual incurred costs are lower than estimated costs established during the Initial Incentive Determination phase. If actual incurred costs are higher than estimated costs established during the Initial Incentive Determination phase, the Participant should expect the incentive to be the amount agreed to in the Program Agreement. The final incentive will then be approved for distribution to the Participant and the Companies will disburse the funds to the Participant.

Stage 8: Closeout and Reporting

After incentives are paid, the Companies will close out the project with proper documentation and update the project status in internal project tracking and reporting tools. The Companies will also receive Participant feedback to continually improve the Program.

Reporting Requirements

The Companies will file a report to the Commission on an annual basis by March 1 of each year, starting in 2025 for Program year 2024. The reports will include information regarding Program spending, commitments, and remaining budget by utility service territory, along with a description of the Program accomplishments for the prior calendar year.

Education and Outreach Plan

To maximize participation in the Micromobility Program, the Companies' outreach and education plan will focus on identifying potential Participants and priority sites for micromobility charging development. Stakeholders for engagement include Developers, Equipment Owners, Site Hosts, equipment providers, and Micromobility network providers, as well as community organizations. Efforts will then be concentrated on developing and delivering outreach and education using methods and tactics targeted to those potential Participants and stakeholders. These various engagement efforts are planned as follows:

- **Potential Participants:** The Companies plan to engage with potential Participants of the Micromobility Program, including Developers, Equipment Owners, Site Hosts, and Micromobility network providers through direct outreach and industry events to better understand their unique business models and needs, and provide guidance on Program participation. The Companies also plan to conduct marketing and provide various resources for reference, which are detailed in the following section.
- **Community Organizations:** The Companies plan to engage directly with community organizations and stakeholders that represent or serve members of Disadvantaged

Communities and users of micromobility to receive input on their needs or to disseminate information on the Micromobility Program and educate their constituencies.

Tools and Marketing

The Companies plan to use various print, digital, and in-person marketing channels and tools to inform and engage stakeholders. The primary resources for the Micromobility Program will be the Companies' websites, which will outline details such as Program rules, eligibility requirements, and information to submit an application. In addition, the Companies will promote the use of their load serving capacity maps⁶ to educate Program Participants about where there is likely to be capacity available to serve the load of a micromobility charging installation.

The Companies plan to develop marketing and communications materials for use across multiple communications channels, which can be diverse and based on the target audience. Potential channels may include, but are not limited to:

- **Print:** Print materials such as factsheets and brochures.
- **Social Media:** Social media platforms can be used to reach a wide and diverse audience.
- **Webinars and Meetings:** Regularly occurring meetings to provide Program information to current and future participants.
- **Email Campaigns:** These can be used to send targeted messages to individuals or organizations who have expressed interest in micromobility.
- **Public Outreach and Engagement:** This can include community meetings, public forums, and other industry events where the Companies can engage directly with the community and market participants.

Program Budget

The Midpoint Order authorized a total Program incentive budget of \$20M to be split between the Companies and an additional \$3M Program administrative budget (15% of the total Program incentive budget). Tables 1 and 2 below outline the Companies' expected Program incentive and administrative budgets, respectively.

Table 1: Con Edison and O&R Program Incentive Budget

Company	Program Budget
Con Edison	\$18M
O&R	\$2M
Total Program Budget	\$20M

⁶ <https://www.coned.com/en/business-partners/hosting-capacity>

Table 2: Con Edison and O&R Program Administrative Budget

Company	Administrative Budget
Con Edison	\$2.7M
O&R	\$0.3M
Total Administrative Budget	\$3M