

CONSOLIDATED EDISON COMPANY  
OF NEW YORK, INC.

&

ORANGE AND ROCKLAND UTILITIES,  
INC.

IMMEDIATE SOLUTIONS  
IMPLEMENTATION PLAN

Filed February 27, 2025

Case 22-E-0236

Pursuant to New York Public Service Commission's January 19, 2023  
*Order Establishing Framework for Alternatives to Traditional Demand-  
Based Rate Structures*

INTERNAL

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## 0. Version Control

Revision Effective Date	Changes
3/20/23	Initial filing
10/21/24	Version 2
3/1/25	Version 3 – Annual Filing

### Program Modification and Clarification

- Updates throughout to reflect changes to program timelines, implementation, and regulatory developments since program launch

## 1. Introduction

### 1.0 Background and Summary of Order

The New York Public Service Commission’s (“PSC”) January 19, 2023 *Order Establishing Framework for Alternatives to the Traditional Demand-Based Rate Structure* (“Order”)<sup>1</sup> adopted a suite of operating cost relief solutions for commercial electric vehicle (EV) charging customers. The Order directed the Joint Utilities (JU)<sup>2</sup> to file an Immediate Solution implementation plan on March 20, 2023 (60 days after issuance of the Order) and a Near-term Solution proposal on July 18, 2023 (180 days after issuance of the Order).<sup>3</sup> The Immediate Solution included, for the Upstate Utilities,<sup>4</sup> a Demand Charge Rebate (DCR) for all commercial EV charging use cases; for the Downstate Utilities,<sup>5</sup> a Commercial Managed Charging Program (CMCP) with use-case specific adders for transit and public Level 2 (L2) charging, and a 50 percent DCR for public Direct Current Fast Charging (DCFC) sites; and for all utilities, terminating the existing Per-Plug Incentive (PPI) program for new applicants and redeploying those funds for demand management technology incentives.<sup>6</sup> The PSC’s subsequent November 20, 2023 *Order Implementing Immediate Solutions Programs* (“Order Implementing Immediate Solutions”)

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<sup>1</sup> Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Charging, *Order Establishing Framework for Alternatives to Traditional Demand-Based Rate Structures* (Issued January 19, 2023).

<sup>2</sup> The Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation (RG&E).

<sup>3</sup> For a Near-term Solution, the Order directed the JU to develop and implement an electric vehicle (EV) Phase-in Rate, including a CMCP for the Upstate Utilities. The Order specifies that the DCR and use-case-specific adders will be offered to customers until an EV Phase-In Rate is available to customers, while the Commercial Managed Charging Program (CMCP) will continue to be offered after the EV Phase-In Rate Solution is available.

<sup>4</sup> The Upstate Utilities are Central Hudson, NYSEG, National Grid, and RG&E.

<sup>5</sup> The Downstate Utilities are Con Edison and O&R.

<sup>6</sup> Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Vehicle Charging, *Order Establishing Load Management Technology Incentive Programs* (Issued August 19, 2024).

approved the implementation plans filed by the JU and directed the JU to open the programs for customer participation within 60 days.<sup>7</sup>

The immediate solution offerings provide operating cost relief to commercial EV charging customers while incenting cost-efficient grid-beneficial electric vehicle charging. The design of the Immediate Solution programs outlined above is provided in a separate filing submitted by the JU in this proceeding called the Immediate Solutions Program Design (Program Design Document).<sup>8</sup> That filing includes the design, eligibility, incentive levels, and reporting requirements for the Immediate Solutions. This Immediate Solutions Implementation Plan (Implementation Plan) provides key implementation elements of the Downstate Utilities' CMCP, adder incentives, DCR, PPI Transition, and Business Incentive Rate (BIR) termination for EV charging stations, including eligibility, use cases, incentives, participation requirements, technologies, marketing, and program costs.

### 1.1 Con Edison and O&R's Role in Driving Transportation Electrification

Consolidated Edison Company of New York, Inc. (Con Edison) and Orange and Rockland Utilities, Inc. (O&R), jointly "the Companies", are committed to delivering a clean energy future to its customers. The electrification of the transportation sector is a key element of advancing the State's ambitious clean energy goals, and the Companies support this transition to electric vehicles. The critically important transportation sector accounts for 19% of New York's statewide greenhouse gas emissions<sup>9</sup> and is a key policy target for reductions under New York's Climate Leadership and Community Protection Act.

The Companies currently support the buildout of a widespread and visible EV charging network through their PowerReady Make-Ready Program (MRP), authorized in 2020,<sup>10</sup> to bring over 24,000 new EV charging plugs to Con Edison's service area and over 1,800 plugs to O&R's territory by 2025. Operating cost support, such as the residential managed charging program, SmartCharge New York (SCNY), and the programs authorized under the Order and described in this Implementation Plan, can provide critical operating cost relief to further help to spur EV charging station development, and in turn, EV adoption by drivers in the Companies' service areas, and electrification of key transportation segments like fleets. Additionally, managed charging based cost programs can help meaningfully lower the cost of this transition for its customers by mitigating growth in demand at peak times. Satisfying peak demand growth requires the installation of new grid infrastructure which can increase costs for all customers, and the Companies' CMCPs will promote behavior that reduces new EV demand at network peak times by encouraging charging during off-peak times.

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<sup>7</sup> Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Charging, *Order Implementing Immediate Solutions Programs* (Issued November 20, 2023).

<sup>8</sup> Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Charging, *Joint Utilities Immediate Solutions Program Design* (Filed March 20, 2023).

<sup>9</sup> "2024 Statewide GHG Emissions Report," New York State Department of Environmental Conservation, published January 15, 2025.

<sup>10</sup> Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, *Order Establishing Electric Vehicle Infrastructure Make Ready Program and Other Programs* (Issued July 16, 2020).

## 2. Immediate Solutions

### 2.1 Commercial Managed Charging Program Implementation

#### 2.1.1 Eligibility

Charging Sites where customers receive service under Service Classification (SC) 8 Rate I, II or III, SC 9 Rate I, II or III, SC 12 Rate I, II or III billed for both energy and demand, SC 13 Rate I, or otherwise applicable customers served under Rate I or II of the PASNY Rate Schedule for Con Edison and SC 2 – Secondary Demand Billed, SC 2 – Primary, SC 3, SC 9, SC 20, and SC 21 rates (commercial customer) for O&R are eligible to participate in the CMCP. Eligible Sites must be able to provide the required program data through a technology that is compatible with the downstate utilities' platforms to track and verify performance.

##### *2.1.1.1 Adder Eligibility*

In addition to the criteria described above, a Charging Site must also meet the criteria below to be eligible for the use case specific adder described in this Implementation Plan:

- i. *Transit Use Case:* All of the participating EV chargers at these Charging Sites must be used for public transit.
- ii. *Publicly Accessible DCFC and L2 Use Cases:* All of the participating EV chargers at these Charging Sites must be publicly accessible.

##### *2.1.1.2 Eligibility for Participants in the Companies' SmartCharge New York Program*

The Companies operate SCNY<sup>11</sup> programs that focus on drivers charging their vehicles outside the electric system peak period from 2pm to 6pm. These vehicle-based programs monitor the vehicles' charging using mainly on-board telematics to determine drivers' incentives. The SCNY program complements the CMCP which instead is charger-based and focuses on grid beneficial charging behavior during the local peak windows which, as specified in the Program Design Document, can range from 11 am to 11 pm. The two programs work together at different levels in the system since the SCNY program helps mitigate buildout of infrastructure at the system level, while the CMCP mitigates buildout of infrastructure on the distribution system. Because of these two distinct benefits, cars participating in the SCNY program are permitted to charge at CMCP participating stations. This is critically important for providing grid beneficial price signals to those without access to at-home charging including the many apartment dwellers in Con Edison's service area. Additionally, light-duty fleets are eligible to participate in both Con Edison's SCNY program and its CMCP since these fleets may charge on-the-go as well as at a depot. Medium- and heavy-duty fleets are eligible for the CMCP only since their energy costs typically include price signals that encourage charging away from the system peak period.

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<sup>11</sup> <https://www.coned.com/en/save-money/rebates-incentives-tax-credits/rebates-incentives-tax-credits-for-residential-customers/electric-vehicle-rewards> for Con Edison and <https://www.oru.com/en/our-energy-future/technology-innovation/electric-vehicles/new-york/electric-vehicle-charging-rewards> for O&R.

### 2.1.1.3 Eligibility for Demand Response Customers

Customers enrolled in the Companies' Demand Response programs are eligible to participate in the CMCP assuming they meet all other CMCP eligibility requirements.

### 2.1.2 Incentive Structure

The CMCP has two core incentives that provide operating cost relief while entrenching grid beneficial behavior for EV charging stations. The kilowatt (kW) based Peak Avoidance Incentive encourages participants to reduce their peak load during a network 4-hour peak period in Con Edison's service territory and the substation 4-hour peak period in O&R's service territory. Con Edison network peak hours and associated areas are included in Appendix 1 and O&R's substation peak hours are included in Appendix 2. The Off-Peak Charging kilowatt-hour (kWh) based incentive further incentivizes Participants to explicitly charge their vehicle during the overnight off-peak period, when system resources are more likely to have available capacity. Use-case specific adders are available to some use cases to provide additional operating cost relief. The incentive levels and eligibility for each charging use case are outlined in the Program Design Document submitted in this proceeding.

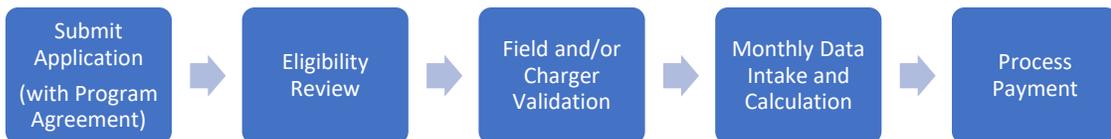
### 2.1.3 Program Process

Figure 1 and Figure 2 below show a high-level overview of the various stages a commercial EV Charging Site can expect to go through when enrolling and participating in the Con Edison and O&R CMCPs, respectively. Each of these high-level stages can have significant levels of complex sub-processes. The Companies have developed detailed processes and workflows to identify, prioritize, and build the functionality required for each of the high-level stages below. The steps for each stage have been developed so eligible Charging Sites entering the stage can progress efficiently to the next step, and the Companies will continue to build on the many lessons learned and best practices from implementing their other EV programs. The Companies will continually refine the Program mechanics and structure as the market matures and learnings are gained. The CMCP Team has communicated with potential and current Participants to encourage their feedback on Program design and experience.

Figure 1: Con Edison CMCP Process



Figure 2: O&R CMCP Process



Program participants will be required to submit data during onboarding as well as on a monthly cadence for incentive determination. The monthly consumption data for the Charging

Site must be reflective of charging activity for all participating chargers and include sufficient detail to support the calculation of incentive payments. If available, participants will provide and continue to provide 15-minute interval data. If interval data is not available, participants will submit session data. Data requirements may include, but may not be limited to, the following:

**Onboarding Data:**

- Financial and other information for providing payment
- Make and model of charger(s) at the Charging Site
- Charging Site type (public, transit, fleet, etc.)

**Monthly Consumption Data:**

*Interval Data*

- 15-minute interval kWh usage
- Session start and stop times

*Session Data*

- Session kWh usage
- Session start and stop times
- Charging start and stop times and/or charging duration

For participants that provide session data, Con Edison and O&R will apply an adjustment factor in the Peak Avoidance Incentive calculation, and will calculate the Overnight Off-Peak Charging Incentive, as described below:

- *Peak Avoidance Incentive:* the average demand derived from session data<sup>12</sup> will be converted to an approximation of session peak demand using an adjustment factor of 21 percent for DCF and 22 percent for L2.<sup>13</sup> The adjustment factor is applied as follows:  
$$Peak\ Demand_{Adjusted} = Session\ Average\ Demand\ (kW) \times (1 + Adjustment\ Factor)$$
- Overnight Off-Peak Charging Incentive: where a charging session occurs partially during the off-peak period and partially outside of the off-peak period, the

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<sup>12</sup> Session average demand is calculated as the session kWh usage divided by the charging duration in hours.

<sup>13</sup> The Adjustment Factors were developed based on a Con Edison analysis of approximately 300 months of charging data. For each month of data, the session peak demand calculated from 15-minute interval data was compared to the session average demand calculated from session data. These adjustment factors were set equal to the average demand discrepancy plus one standard deviation. Con Edison and O&R will continue to analyze available charging data and based on available data, may propose a change to the incentive determination methodology and/or the Adjustment Factors.

session kWh may be prorated based on the percentage of session duration that occurred during the off-peak period.

Participants that fail to provide the required data for a given month in a reasonable timeframe for the Companies to validate the data and calculate the incentive will not be eligible for the monthly incentives that month. Participants may be required to return previously earned incentives or have future incentives reduced if the data is determined to be distorted, falsified, or altered.

The CMCP and adder incentives will be paid out, at a minimum, on a quarterly basis through a bank Automated Clearing House (ACH) transfer or a check via the Companies payment system. On a billing cycle basis, CMCP and adder incentives may be assessed against the delivery portion of the customer bill. Incentive payouts may be adjusted if incentive payout exceeds monthly delivery charges.

#### 2.1.4 Technology Tools

##### 2.1.4.1 Con Edison

Con Edison will leverage and expand its existing tools for the CMCP Program Portal, such as the Con Edison's existing E-Mobility Enterprise System (EMES), a Salesforce-based program operations platform, application portal, and system of record that currently supports operations for Con Edison's PowerReady infrastructure incentive program for light-duty EV charging stations. Using the existing tools provides an efficient and seamless transition for Participants to apply to the Program, track applications, and manage their incentives. The Program Portal is customized to meet the program requirements outlined in the Order and allows:

- Participants to apply, track application milestones, view incentive payments, and track charging behaviors while in the program;
- Con Edison program managers to review applications, determine eligibility, and progress applications and incentives through the program lifecycle;
- Con Edison to calculate incentives and track payments; and
- Con Edison to track and report data for program compliance.

##### 2.1.4.2 O&R

O&R engages with vendors to manage elements of the program, including the application portal and data aggregation. A publicly accessible online webpage provides information needed to confirm eligibility and allow for enrollment in the Program.

O&R works with a vendor to manage a portal to meet the program requirements. This provides a seamless transition for EV charging operators and owners to apply to the Program, track applications, and manage their projects. The portal, is customized to meet the program requirements outlined in the Order and, allows:

- Customers to apply, track application milestones, view incentive payments, and track charging behaviors while in the program;
- O&R program managers to review applications, determine eligibility, and progress projects through the program lifecycle;
- O&R program managers to calculate incentives and track payments; and

- O&R program managers to track and report data for program compliance.

### 2.1.5 Program Timeline

Table 1 below lays out the major pre- and post-launch milestones of the program.  
Table 1. Estimated Program Timeline.

Program Launch Timeline <sup>14</sup>	
Milestone	Date
CMCP Implementation Plan Filed	March 2023
Launch Outreach & Marketing Activities	May 2023
Con Edison IT Platform Vendor Selection	July 2023
Order Approving CMCP	November 2023
Launch Program	January 2024
O&R Launch: Participant Portal / Outreach & Marketing Activities	January 2024
Launch Participant Portal	February 2024
Expand Data Eligibility Requirements	October 2024
Adder phases out, CMCP continues	October 2025 <sup>15</sup>

## 2.2 Demand Charge Rebate Implementation

### 2.2.1 Eligibility

The eligibility criteria for the DCR are laid out in the Program Design Document Section 1.1, including eligibility for Customers with non-EV load co-mingled with EV load. These customers will require a Charging Ratio (CR) computation to participate, which relies on availability of an up-to-date load letter specifying the customer loads for the account. If the customer load letter is outdated or there is no record of a load letter for the account, they will be required to provide an updated load letter during the Eligibility Review program process step to establish eligibility as described below in Section 2.2.3.

Charging Sites where customers receive service under SC 8 Rate I, II or III, SC 9 Rate I, II or III, SC 12 Rate I, II or III billed for both energy and demand, SC 13 Rate I, or otherwise applicable customers served under Rate I or II of the PASNY Rate Schedule for Con Edison and SC 2 – Secondary Demand Billed, SC 2 – Primary, SC 3, SC 9, SC 20, and SC 21 rates (commercial customer) for O&R will be eligible to participate in the DCR. A site will be ineligible to

<sup>14</sup> Timeline for marketing activities and program start may be adjusted based on when Order following the Immediate Solutions Implementation Plan is filed

<sup>15</sup> Use case specific adders will be offered until the EV Phase-in Rate becomes available

participate if it: (1) receives a discount under the Rider H - Economic Development Rider (for O&R); (2) participates in the Excelsior Jobs Program; or (3) participates under Recharge-NY.

### 2.2.2 Incentive Structure

As per Ordering Clause 7, the DCR for eligible customers will be calculated as the product of: (1) the actual kW demand for the billing period, (2) the CR, (3) the 50% rebate level, and (4) the applicable base delivery demand rate, which may be a prorated rate in months where there is a rate change. There will be no DCR on surcharges or supply charges that are billed on a per kW basis.

### 2.2.3 Program Process

The DCR program will follow the same high-level process shown for the CMCP above in Figure 1 and Figure 2. As part of the Eligibility Review step in the process, customers who choose to participate into the DCR program will be required to provide the maximum potential connected load of the site in the form of a load letter to determine their CR. For sites with existing load letters that meet the needs of the program, a customer will not be required to provide a new load letter; however, to the extent a new load letter is needed, the customer will be required to provide one to establish eligibility for the program. The CR shall be determined at the time of application and shall remain the CR until such time that the customer provides a new load letter with changes to the site's electrical needs or otherwise updates the loads for an account. Additionally, the Companies may re-evaluate the CR at any time during the program offer period as needed. In some cases, the Companies may complete a visual inspection to confirm accuracy of load letter data; if inspection shows that the information on the load letter is inaccurate, corrective action will be taken by the associated company.

Incentives will be determined based on data collected at the utility account level so no EV charger data will be required to determine the monthly incentive amount.

#### 2.2.3.1 Con Ed Rebate Mechanism

The EMES program management platform is integrated with Con Edison's vendor payment system. Rebates will be paid directly to the Participant through checks or ACH payments. The integrated system allows rebate to be tracked throughout the entire process for each Participant.

#### 2.2.3.2 O&R Rebate Mechanism

O&R works with a vendor to calculate and make incentive payments to participants by check. Incentive payments are calculated on a quarterly basis and paid directly to the Participant.

### 2.2.4 Technology Tools

Con Edison will build on the EMES platform for all required program management, applicant portal, financial tracking and payments as described in Section 2.1.4 above for the CMCP.

O&R's customized portal allows EV charging operators and owners to apply to the Program, track applications, and manage their projects. . The portal is customized to meet the program requirements outline in the Order as described in section 2.1.4 above.

### 2.2.5 Program Timeline

The DCR program development follows the same timeline as the timeline laid out in Table 1 above for the CMCP development in Section 2.1.5. The DCR program will be phased out beginning once the EV Phase-In Rate becomes available, pursuant to the PSC *Order Implementing Electric Vehicle Charging Rates for Commercial Customers*.<sup>16</sup>

## 2.3 Program Budget

### 2.3.1 Con Edison Estimated Budget

Con Edison determined the estimated CMCP, adder, and DCR budgets by estimating (1) rates for charger buildout of each use case<sup>17</sup> in the utility territory, (2) program enrollment rates by use case, and (3) expected charging behavior by use case. To account for uncertainty in station buildout rates and enrollment rates by use case, the Companies developed low and high estimated budgets. For the low budget case, input assumptions included (1) charger forecasts based on supporting the light-duty vehicle fleet projections in Con Edison’s territory-specific market-based vehicle forecast model, and (2) standard projected enrollment rates for each charging use case. At the higher end of the incentive range, input assumptions included (1) charger forecasts based on supporting vehicle adoption levels that meet aggressive policy targets, such as those under Advanced Clean Cars II, and (2) aggressive enrollment rates ranging from 75% to 95%, depending on charging use case. For both the low and high cases, the use case specific assumptions for charging behavior at each Charging Site were based on the load profiles provided in the New York State Energy Research & Development (NYSERDA) EV Rate Summary Report<sup>18</sup> which were found to be consistent with Con Edison’s estimated profiles and a small sample of EV charging data.

Table 2 below outlines Con Edison's budget estimate for the CMCP with use case specific adders and DCR.

Table 2. Con Edison Estimated Budget.

	CMCP	Adder	DCR
<b>Use Cases</b>	<ul style="list-style-type: none"> <li>Public DCFC</li> <li>Fleet DCFC</li> <li>All L2</li> </ul>	<ul style="list-style-type: none"> <li>Transit</li> <li>Public L2</li> </ul>	<ul style="list-style-type: none"> <li>Public DCFC</li> </ul>
<b>Timeline</b>	2024-2026	Q1 2024 – Q4 2025	Q1 2024 – Q4 2025
<b>Incentives<sup>19</sup></b>	\$90M - \$180M	\$7M - \$14M	\$130M - \$193M

<sup>16</sup> Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Charging, *Order Implementing Electric Vehicle Charging Rates for Commercial Customers* (Issued October 17, 2024).

<sup>17</sup> Use cases considered for budget development include public DCFC, public L2, transit, and commercial fleet.

<sup>18</sup> <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={C2BFD595-D1A7-4DCF-B992-623957FBBAFF}>

<sup>19</sup> Ranges in CMCP implementation budgets vary depending on charger forecasts for the service territory and enrollment rates. For the lower end of the range, charger forecasts follow market-based projections

<b>Implementation</b>	\$45M
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Con Edison’s \$45 million (M) budget will support implementation and administration of the programs. This budget estimate is based on assuming robust program participation across the available programs but does not double count across overlapping programs (e.g., does not assume for a given enrollment rate the same public DCFC station would participate in both DCR and CMCP). Standing up this new first-of-kind program with significant technology needs on the program operations side as well as ongoing management of significant volumes of charging data while maintaining data completeness, quality, and fidelity will require development of sophisticated technology tools from scratch as well as close program management and evaluation, measurement and verification. Table 3 below outlines the categories associated with the expenditure needed for implementation of the program and expected distribution of the budget across those categories which are described further below:

Table 3. Con Edison Implementation Budget Components.

<b>Implementation Budget Components</b>	<b>Budget</b>
Program Implementation and Administration	50% - 60%
Third-Party Support and Program Tools	15% - 25%
Marketing & Outreach	20% - 25%

The implementation cost categories in Table 3 are described below:

- I. ***Program Implementation and Administration:*** To effectively manage this new Program, Con Edison will add personnel to its Managed Charging Team. Con Edison expects additional personnel will be needed across functional areas including program administration, measurement and evaluation, reporting, and data quality assurance.
- II. ***Third Party Support and Program Tools:*** Technology vendors will support the buildout of tools to facilitate Program activities as described above in Section 2.1.4. Examples of these tools include the expansion of the EMES program platform to accommodate this new program and IT infrastructure to bring in, store, validate, and integrate the EV charger data.
- III. ***Marketing & Outreach:*** Con Edison will develop materials for the marketing, outreach and other communications efforts laid out in Section 2.5.1 across print, digital, and in-person channels. This will include fact sheets and brochures for mail and email campaigns to Customers and Developers and digital advertising and social media campaigns. This budget will also support fees for outreach activities.

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and program enrollment begins in the first year at 10%, and depending on charging use case increases to 25% over the three year period. At the higher end of the range, charger forecasts are based on levels to meet policy goals and program enrollment depending on use case ranges from 75% to 95%.

### 2.3.2 O&R Estimated Budget

O&R determined the estimated CMCP, adder, and DCR budgets by building off of Con Ed’s analysis and estimating (1) rates for charger buildout of each use case<sup>20</sup> in the utility territory, (2) program enrollment rates by use case, and (3) expected charging behavior by use case. In addition, the DCR budget is estimated by enrollment rates in the DCR program. Input assumptions included (1) charger forecasts based on supporting vehicle adoption levels that meet aggressive policy targets and (2) aggressive enrollment rates ranging from 75% to 95%, depending on charging use case. The use case specific assumptions for charging behavior at each Charging Site were based on the load profiles provided in the New York State Energy Research & Development (NYSERDA) EV Rate Summary Report<sup>21</sup> which were found to be consistent with O&R’s estimated profiles and a small sample of EV charging data.

Table 4 below outlines O&R’s budget estimate for the CMCP with use case specific adders and DCR from the launch of the programs and the subsequent three years.

Table 4. O&R Estimated Budget.

	CMCP	Adder	DCR
<b>Use Cases</b>	<ul style="list-style-type: none"> <li>Public DCFC</li> <li>Fleet DCFC</li> <li>All L2</li> </ul>	<ul style="list-style-type: none"> <li>Transit</li> <li>Public L2</li> </ul>	<ul style="list-style-type: none"> <li>Public DCFC</li> </ul>
<b>Timeline</b>	2024-2026	Q1 2024 - Q4 2025	Q1 2024 - Q4 2025
<b>Incentives</b>	\$12.4M	\$ 0.5M	\$0.9M
<b>Implementation</b>	\$4.3M		

O&R’s \$4.3M budget is needed to facilitate program implementation and administration. Implementing this new, first-of-its-kind program will necessitate significant fixed upfront technology costs. O&R continues to develop sophisticated technology tools and systems to manage significant volumes of charging data while maintaining data completeness, ensuring data quality and fidelity. Because O&R must develop these stand-alone systems and cannot leverage existing platforms, O&R anticipates its administration needs to be greater than other utilities. O&R notes that these upfront technology implementation costs, once incurred, may not be required after the initial three-year life of the program and ongoing administration and operation costs may flatten.

Table 5. O&R Implementation Budget Components.

Implementation Budget Components	Budget
Program Implementation and Administration	50%
Third-Party Support and Program Tools	40%
Marketing & Outreach	10%

<sup>20</sup> Use cases considered for budget development include public DCFC, public L2, transit, and commercial fleet.

<sup>21</sup> <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={C2BFD595-D1A7-4DCF-B992-623957FBBAFF}>

The implementation cost categories in Table 5 above are described below:

- I. *Program Implementation and Administration*: To effectively manage this new Program, O&R will add personnel to its Managed Charging Team. O&R expects additional personnel will be needed across functional areas including program administration, measurement and evaluation, reporting, and data quality assurance.
- II. *Third Party Support and Program Tools*: Technology vendors will support the buildout of tools to facilitate Program activities as described above. The scope of work will include building a platform to accommodate this new program and IT infrastructure to bring in, store, calculate incentives over, validate, and make payments for O&R as well as have a customer facing portal.
- III. *Marketing & Outreach*: O&R will develop materials for the marketing, outreach and other communications efforts across print, digital, and in-person channels. This will include fact sheets and brochures for mail and email campaigns to customers and developers and digital advertising and social media campaigns. This budget will also support fees for outreach activities.

## 2.4 Cost Recovery

Costs for the DCR and CMCP will be (1) recovered on a one-year lag basis with carrying costs at the weighted average cost of capital set at the Company's regulated rate of return accruing during the year's lag, (2) allocated among service classes using the transmission and distribution revenues allocator, (3) recovered on a per-kW basis for demand-billed customers and on a per-kWh basis for non-demand billed customers, and (4) through the existing Electric Vehicle Make Ready (EVMR) Surcharge for each Company, which is assessed on a per kWh basis from non-demand billed classes and on a per kW basis from demand billed classes. Costs will be allocated to each class in proportion to each class's delivery revenues. The EVMR Surcharge recovers the prior calendar year costs for the 12-month period commencing February 1 of every year.

However, we note that all expenses for the program will be evaluated for cost categorization in line with Generally Accepted Accounting Principles (GAAP). While the significant majority of program costs will be recovered as stated above, in limited cases, costs may be determined to be capital, such as certain IT development expenses. In these cases, any charges that are determined to be capital will be amortized as appropriate to the asset in concert with the depreciation/amortization schedule in each company's Joint Proposal<sup>22</sup> (For Con Edison: Appendix 14, schedule A; For O&R: Appendix 11). These expenses will be recovered

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<sup>22</sup> For Con Edison, see <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={070F9CB3-17F6-4FAD-B030-1139B47545B5}>. For O&R, see <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={72F442B0-A71B-4382-B210-44261199D871}>.

through either surcharge or in base rates in line with guidance for make-ready program recovery provided in the *Order Approving Managed Charging Programs with Modifications*.<sup>23</sup>

## 2.5 Program Marketing and Outreach

### 2.5.1 Marketing, Outreach and Education

#### 2.5.1.1 Con Edison

Con Edison's CMCP and DCR outreach strategy is based on a coordinated and multifaceted approach that aims to engage potential customers across a variety of channels. Program outreach leads will attend events, advocate for the program, and be available to assist participants in signing up for the CMCP and DCR. These leads will also work with other EV program teams to identify participants who would benefit from signing up for the respective programs.

Program information, including FAQs, instructional videos, and program guides, will be posted on the Con Edison EV web portal as well as the application website, similar to the Con Edison PowerReady Contractor Resources page<sup>24</sup> for the Con Edison make-ready program. Con Edison will engage in program marketing through targeted advertising to funnel prospective participants to the website.

Con Edison will partner with various industry groups, non-governmental organizations, developers, building management companies, and other businesses to help educate their members and customers about CMCP and DCR.

#### 2.5.1.2 O&R

O&R's CMCP and DCR outreach strategy is a multifaceted approach that aims to engage potential customers across a variety of channels. O&R markets the CMCP and DCR and builds on its prior and proven success of utilizing a variety of media channels, as well as in-person engagement, to acquire new participants. These media channels may include traditional print collateral, social media, and targeted digital engagement. O&R will review opportunities for in-person engagement (*e.g.*, through ride-and-drive events, auto enthusiast meetups, fleet shows) on a rolling basis and seek to focus on events with high impact returns to program enrollment. O&R will be developing methods of gathering participant insights into the respective programs and assessing satisfaction. These will be detailed and implemented throughout the year as participants are enrolled.

## 2.6 Per-Plug Incentive Transition

### 2.6.1 Implementation

As discussed in the Program Design Document and as mandated by the Order Implementing Immediate Solutions, the Companies terminated the PPI program effective January 19, 2024. The unspent program funds have been redeployed to fund the new Load

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<sup>23</sup> <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={A1E3F84E-0710-4073-865F-FE7D4816B76B}>

<sup>24</sup> <https://www.coned.com/en/our-energy-future/technology-innovation/electric-vehicles/power-ready-program/contractor-resources>

Management Technology Incentive Programs to incentivize EV charging demand management technologies.<sup>25</sup>

Per the Order, existing PPI Participants were given 60 days to decide whether to stay in the PPI Program or switch to an Immediate Solution. The Companies made up to three attempts to reach existing Participants during the 60-day window, twice by email and once by phone; each attempt was made at least one week apart.

## 2.7 EV Business Incentive Rate Termination

### 2.7.1 Implementation

As discussed in the Program Design Document and as approved by the Order Implementing Immediate Solutions, Con Edison proposed to terminate the EV Quick Charging Station Program component of the BIR to avoid market distortionary effects. The EV BIR was terminated effective January 19, 2024. Con Edison made up to three attempts to reach existing Participants, twice by email and once by phone, to inform them of the BIR termination and provide details of the Immediate Solution options; each attempt was made at least one week apart.

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<sup>25</sup> Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Charging, *Order Establishing Load Management Technology Incentive Programs* (Issued August 19, 2024).

### 3. Glossary: Abbreviations, Acronyms and Definitions

Applicant	Any entity who has submitted program application details to Con Edison but has not yet been accepted
Program Portal	Customer facing portal to be used for application and program details
Charging Site	One or more EV chargers at a single location
Commission	New York Public Service Commission
CMCP	Commercial Managed Charging Program
The Companies	Consolidated Edison Company, of New York, Inc. ("Con Edison") and Orange and Rockland Utilities, Inc. ("O&R")
Customer	A person or organization that is billed for Con Edison or O&R electric service
CR	The ratio of a customer's EV charging capacity (sum of nameplate or actual maximum charging capability if less) to the customer's maximum potential connected load, including EV charging
DCFC	Direct Current Fast Charger
DCR	Demand Charge Rebate
EMES	E-Mobility Enterprise System; Salesforce program operations platform that support's Con Edison's PowerReady infrastructure incentive program
EV	Electric vehicle
EVMR	Electric Vehicle Make Ready
BIR	Con Edison's Business Incentive Rate
Implementation Plan	Outlined proposal to facilitate the execution of a managed charging program, Demand Charge Rebate program, Per Plug Incentive Transition and Business Incentives Rate Transition
JU	The Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation (RG&E)
L2	Level two EV charger
Participant	Any accepted applicant enrolled in the program
PPI	Per-Plug Incentive program
PSC	New York State Public Service Commission
Service Classification (SC)	Service class; electric service delivered under one of Con Edison's or O&R's tariffs, as filed with the PSC
SCNY	Smart Charge New York

## 4. Appendices

### Appendix 1: Con Edison Networks Peak Hours at the Time of Filing

11:00 AM – 3:00 PM	2:00 PM – 6:00 PM	4:00 PM – 8:00 PM	7:00 PM – 11:00 PM
Beekman	Battery Park City	Buchanan	
Bowling Green	Bay Ridge	Cedar Street	
Canal	Borden	Central Bronx	
Chelsea	Borough Hall	Central Park	
City Hall	Brighton Beach	Crown Heights	
Cortlandt	Columbus Circle	Elmsford No. 2	
Fashion	Cooper Square	Flatbush	
Freedom	Empire	Flushing	
Fulton	Grasslands	Fordham	
Grand Central	Greenwich	Fox Hills	
Greeley Square	Harlem	Fresh Kills	
Herald Square	Harrison	Granite Hill	
Hudson	Lenox Hill	Jackson Heights	
Hunter	Long Island City	Jamaica	
Kips Bay	Madison Square	Maspeth	
Lincoln Square	Park Place	Millwood West	
Midtown West	Pleasantville	Mohansic	
Pennsylvania	Roosevelt	Northeast Bronx	
Plaza	Sheridan Square	Ocean Parkway	
Rockefeller Center	Triboro	Ossining West	
Sutton	White Plains	Park Slope	
Times Square	Yorkville	Prospect Park	
Turtle Bay		Rego Park	
		Richmond Hill	
		Ridgewood	
		Riverdale	

		Rockview	
		Sheepshead Bay	
		Southeast Bronx	
		Sunnyside	
		Wainright	
		Washington Heights	
		Washington Street	
		West Bronx	
		Williamsburg	
		Willowbrook	
		Woodrow	

Appendix 2: O&R Substation Peak Hours

<b>O&amp;R 51 Substations Peak Windows</b>			
<b>Substation</b>		<b>Begin</b>	<b>End</b>
<b>Western (NY)</b>	Western #1	18:00	22:00
	Western #2	15:00	19:00
	Western #3	15:00	19:00
	Western #4	17:00	21:00
	Western #5	18:00	22:00
	Western #6	15:30	19:30
	Western #7	9:00	13:00
	Western #8	17:00	21:00
	Western #9	18:00	22:00
	Western #10	16:00	20:00
	Western #11	18:00	22:00
	Western #12	19:00	23:00
	Western #13	16:00	20:00
	Western #14	16:00	20:00
	Western #15	18:00	22:00
	Western #16	18:00	22:00
<b>Central (NY)</b>	Central #1	18:00	22:00
	Central #2	15:00	19:00
	Central #3	17:00	21:00
	Central #4	15:00	19:00
	Central #5	13:00	17:00
	Central #6	17:00	21:00
	Central #7	15:30	19:30
	Central #8	17:00	21:00
	Central #9	16:00	20:00
	Central #10	17:00	21:00
	Central #11	17:00	21:00
	Central #12	15:30	19:30
	Central #13	12:00	16:00
<b>Eastern (NY)</b>	Eastern #1	17:00	21:00
	Eastern #2	15:30	19:30
	Eastern #3	16:00	20:00
	Eastern #4	11:00	15:00
	Eastern #5	19:00	23:00
	Eastern #6	15:00	19:00
	Eastern #7	16:00	20:00
	Eastern #8	16:00	20:00

	Eastern #9	15:00	19:00
	Eastern #10	16:00	20:00
	Eastern #11	15:30	19:30
	Eastern #12	14:00	18:00
	Eastern #13	15:00	19:00
	Eastern #14	11:00	15:00
	Eastern #15	16:00	20:00
	Eastern #16	16:00	20:00
	Eastern #17	13:00	17:00
	Eastern #18	16:00	20:00
	Eastern #19	15:00	19:00
	Eastern #20	17:00	21:00
	Eastern #21	15:00	19:00
	Eastern #22	10:00	14:00