



Mary Krayeske
Associate Counsel

March 1, 2018

Honorable Kathleen H. Burgess
Secretary
NYS Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

RE: Case 16-E-0060 – Con Edison Electric Rates
Proposed Expansion of the SmartCharge New York Program

Dear Secretary Burgess:

Consolidated Edison Company of New York, Inc. (“Con Edison” or the “Company”) requests that the New York State Public Service Commission (“Commission”) approve this proposal to expand the eligibility criteria for the SmartCharge New York program for light-duty vehicles to include medium- and heavy-duty vehicles, including buses. It is expected that an increasing number of vehicles will use electricity, not gasoline, for fuel and the Company is committed to assisting electric vehicle market growth. Con Edison’s proposal to expand the SmartCharge New York program eligibility criteria to include these additional vehicle categories also aligns with New York State and City public policy objectives to encourage electric vehicle adoption.

BACKGROUND

As required by the Case 16-E-0060 Rate Plan,¹ the Company implemented an EV Program to provide incentives to existing light-duty electric vehicles, with incentives to charge during off-peak hours. The Company currently provides program participation rewards and equipment for vehicles that do not have charging communications capability, at no cost to the customer, to measure and verify charging times for light-duty vehicles. The Company also provides cash incentives to customers, from the Company’s available Rate Plan energy efficiency funds, for charging during off-peak seasons and times. The Company has and will continue to adjust these incentives as necessary to provide incentives for electric vehicle off-peak

¹ Case 16-E-0060, *et al.*, *Proceeding as to the Motion as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric Service* (“Con Edison Electric Rate Proceeding”), Order Approving Electric and Gas Rate Plans (issued January 25, 2017) (“Case 16-E-0060 Rate Plan” or “rate Plan”).

charging, subject to other EV Program priorities and the overall cap on EV Program funding contained in the Rate Plan.²

This program started in April 2017 and has approximately 900 participating light-duty vehicles, comprised of approximately 450 private vehicles and 450 fleet vehicles. Between April and December 2017, the Program reduced peak electric load by 0.6 MW and provided \$63,818 in incentive rewards payments to participants.

The Case 16-E-0060 Rate Plan contemplated expansion of the SmartCharge New York program to other vehicle categories. The Rate Plan provides that the Company would “commence discussions with interested parties on the possible development of a new service classification, new rates within existing service classifications, incentives and/or pilot programs for electric vehicles, including but not limited to cars, light trucks, heavy trucks and buses.”³ Con Edison discussed this proposed expansion with interested stakeholders, including interested participants from recent rate cases, on February 28, 2018.

EXPANSION OF SMARTCHARGE NEW YORK PROGRAM

As anticipated by the Rate Plan, additional electric vehicles are being introduced in the Company’s service territory. For example, the Metropolitan Transportation Authority (“MTA”) is starting a pilot program using 10 electric buses on routes in Manhattan and Brooklyn. Also, the Company understands that medium-duty electric trucks are being produced and will soon be on New York City’s roads. The Company seeks approval of this proposed program expansion to incentivize off-peak charging for these vehicles as soon as possible. The intent is to incentivize off-peak charging for these electric vehicle classes in a manner that reflects the environmental and other societal benefits of vehicles operating on electricity rather than fossil fuels.

The Company proposes the inclusion of medium- and heavy-duty electric vehicles (including buses) in the existing EV Program, which is funded under the Rate Plan. The Company does not anticipate that this expansion would result in the EV Program exceeding the funding included in the Rate Plan.⁴

² The current incentives and awards are described on the Company’s web site: www.coned.com/smartchargenewyork.

³ Con Edison Electric Rate Proceeding, Joint Proposal (filed September 19, 2016), p. 75.

⁴ As discussed above, the Company may adjust the incentives and awards for various reasons, including, among others, to (a) achieve program goals, (b) improve the participation rate, or (c) address a funding concern. In addition, because this program would merely expand eligibility criteria for the EV Program approved in the Case 16-E-0060 Rate Plan, no tariff changes are required.

CONCLUSION

As contemplated in the Case 16-E-0060 Rate Plan, the Company requests Commission permission to expand the eligibility for the SmartCharge New York Program to include medium- and heavy-duty vehicles because allowing their program participation will provide environmental and system efficiency benefits.

Very truly yours,

/s/ Mary Krayske

Mary Krayske

cc: Active Parties