



Mary Krayeske
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Law Department

December 4, 2020

Honorable Michelle Phillips
Secretary
State of New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Case No. 18-E-0138 – Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure.

Dear Secretary Phillips:

Pursuant to the Commission’s July 16, 2020 Make Ready Order,¹ Consolidated Edison Company of New York, Inc. (“Con Edison” or “the Company”) submits this filing to describe its current managed charging program, SmartCharge New York (“SCNY” or “the Program”). SCNY influences electric vehicle (“EV”) charging behavior by rewarding EV owners with off-the-bill per vehicle incentives for charging during off-peak hours, as well as for avoiding charging during peak hours. SCNY has matured over the past several years, including increasing enrollment, expanding marketing efforts, incorporating new technologies to manage charging behavior, and expanding eligibility to include medium-duty and heavy-duty (“MDHD”) EVs. As the Program evolves and as the EV market develops further, Con Edison will continue to consider new technologies and approaches to managed charging.

Introduction

SCNY was initially authorized in January 2017² and launched in April 2017. The initial program focused on light-duty EVs and was expanded in 2018 to include MDHD EVs.³

¹ 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) (“Make Ready Order”).

² Case 16-E-0060, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric Service*, Order Approving Electric and Gas Rate Plans (issued January 25, 2017).

³ SCNY was continued in the Company’s most recent rate case as a \$13.3 million program for an additional three years. Case-19-E-0065, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric Service*, Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plan (issued January 16, 2020).

Any light-duty or MDHD EV charged in the Con Edison service territory is eligible to participate in the Program. Different incentives can be earned depending on if the vehicle is light-duty, MDHD, or if the EV owner is an SC1 Rate III customer. SCNY uses a variety of technology for monitoring charging behavior including:

- 1) A FleetCarma connected car device (“device”)
- 2) Onboard vehicle telematics
- 3) Smart charging stations
- 4) Submetering

Con Edison uses a variety of marketing channels to recruit EV owners to participate in the Program, including digital methods (emails and websites), print materials (postcards and stickers), referral programs, and in-person events and conferences.

Light-Duty EV Participation

Most light-duty vehicles participating in the program enroll in SCNY with the FleetCarma device, which supports 37 EV models.⁴ The Program has grown significantly since 2017. In 2017, a total of nearly \$65,000 were paid out to EV owners enrolled through the FleetCarma device. From January 1, 2020 to October 30, 2020, EV owners using the FleetCarma device earned a total of \$631,000. In 2017, 416 light-duty EV owners enrolled in SCNY with the FleetCarma device.⁵ As of this Filing date, 2,342 light-duty EV owners are enrolled with the FleetCarma device.

The device plugs into the onboard diagnostics (OBD II) port of the vehicle either directly or via an adapter cable. This device collects charging data, including the location, start time, duration, charging rate, and total energy consumed during each charging session. EV owners receive cash incentives via PayPal based on their charging behavior, which are discussed in more detail below. There is a mobile-friendly online dashboard for EV owners that displays their charging and driving data and tracks the rewards they earn each month.

Light-duty EV owners using the device may earn the following rewards:

- \$150 enrollment bonus for installing and activating the device upon the first charge event⁶ in the Con Edison service territory.
- \$25 for installing the device within seven days after delivery.

⁴ The FleetCarma device does not support the Honda Clarity vehicle model. In 2019, Con Edison collaborated with the American Honda Motor Company (“Honda”) to run a three-month SCNY Pilot Program using the onboard telematics of the Honda Clarity to monitor charging behavior. In July 2020, Con Edison and Honda rolled out the full scale SCNY Honda Clarity Program, in which Honda Clarity owners register with the HondaLink application and activate “Remote Features” to earn rewards in the form of Amazon promotional codes. The rewards are similar to the rewards in the FleetCarma program, except the \$150 enrollment bonus is earned upon the first charge event in the Con Edison service territory. Honda Clarity owners who participated in the Pilot Program also earn a \$100 enrollment bonus.

⁵ A vehicle is considered enrolled if it has the device installed and activated and has charged in the Con Edison service territory at least once.

⁶ A charge event is defined as charging >1 kWh.

- \$5 per month for at least one charging event in the Con Edison service territory.
- \$20 per month for avoiding summer peak charging, which is defined as weekdays 2:00 PM to 6:00 PM, June 1 to September 30.
- \$0.10 per kWh for off-peak charging (except for SC1 Rate III customers, who earn \$0.0166 per kWh for off-peak charging), which is defined as 12:00 AM to 8:00 AM year-round.

EV owners on the residential time-of-use rate (“TOU”) (SC1 Rate III customers) can also earn an additional \$10 per month for avoiding non-summer peak charging, which is defined as weekdays 2:00 PM to 6:00 PM, October 1 to May 31.

Instead of installing the device, light-duty EV fleet owners can earn rewards and participate in SCNY by charging at networked smart charging stations and providing Con Edison access to their charging data. For example, Con Edison works with ChargePoint to receive customer-consented data from their smart charging stations. These participants earn similar rewards as those enrolled through the FleetCarma device, except for the \$150 enrollment reward and the \$25 reward for installing the device. These rewards are paid by check or electronic transfer.

Medium-Duty and Heavy-Duty EV Participation

MDHD vehicles may earn the following rewards as part of SCNY:

- \$0.0221 per kWh for off-peak charging, which is defined as 12:00 AM to 8:00 AM year-round.
- \$250 per vehicle per month for avoiding charging during the months of June through September during a Con Edison four-hour weekday Commercial System Relief Program (“CSRP”) event period⁷ applicable to the Con Edison network where the vehicle is charged (whether or not a CSRP event is called).

Con Edison pays the rewards by check or electronic transfer to the owners of the MDHD vehicles enrolled in the Program. To monitor charging behavior, MDHD vehicles enrolled in SCNY use onboard vehicle telematics, smart charging stations, and submetering. In 2018, 16 MDHD vehicles participated in the Program. As of this Filing date, 25 transit buses and three eCanter trucks are enrolled in the Program.

Lessons Learned

By offering flexibility, Con Edison has seen increased enrollment in SCNY. For example, the Program does not require the EV owner to install additional electrical equipment (such as a panel or meter) to participate in the program. SCNY participation is also not restricted to Con Edison account holders or home charging. Many Con Edison customers charge their vehicles at locations that are not associated with their Con Edison account and the person making the charging decision may be different from the one

⁷ Information for Con Edison’s CSRP and event periods can be found here: <https://www.coned.com/-/media/files/coned/documents/save-energy-money/rebates-incentives-tax-credits/smart-usage-rewards/networks-and-tiers.pdf>

responsible for the electric bill. By allowing this flexibility, SCNY allows the Company to manage EV load of any EV owner who charges in Con Edison's service territory.

As SCNY continues to grow, the Company is considering new ways to enroll additional EV owners and lower per vehicle acquisition costs, as well as new technologies for monitoring charging behavior. As lessons are learned from the current Program and other statewide initiatives, and as technologies evolve, Con Edison will consider new approaches or changes to SCNY to further support system optimization.

If there are any questions, please contact me.

Sincerely,

/s/ Mary Krayeske

Mary Krayeske