NEW YORK STATE | Department of Public Service

KATHY HOCHUL
Governor

RORY M. CHRISTIAN
Chief Executive Officer

April 14, 2025

Via Electronic Mail
Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, NY 12223-1350

Re: Case 18-E-0138 – Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure.

Matter 24-00339 - In the Matter of EV Infrastructure Interconnection Working Group.

Dear Secretary Phillips,

The Public Service Commission (Commission) directed Department of Public Service Staff (Staff) to initiate an electric vehicle (EV) infrastructure interconnection working group (EVIIWG) in the Order Approving Midpoint Review Whitepaper's Recommendations with Modifications (Midpoint Review Order), issued on November 16, 2023 in this proceeding. The EVIIWG was formed to identify, discuss, and resolve the technical barriers and challenges associated with the electric vehicle (EV) interconnection application process, including queue management and to identify other EV-specific standardized interconnection requirements (SIR) in a collaborative, efficient and effective manner. The goal of the EVIIWG is to streamline identified difficulties and barriers that affect the application process for the interconnection of EVs, building electrification, and any other associated processes that may result in a backlog in the interconnection application queue, review, and approval process. Staff initiated the EVIIWG on March 15, 2024.

In addition to directing the formation of the EVIIWG, the Midpoint Review Order directed Consolidated Edison Company of New York, Inc. (Con Edison) to "submit a straw proposal describing the efforts put forth in streamlining their queue management system for consideration and further development by the EVIIWG." As part of its ongoing work, the EVIIWG has been reviewing, discussing and modifying the submitted straw proposal.

Attached, for filing in the above-referenced case, is the Department of Public Service Staff Modified Proposal for Streamlined Vehicle to Grid Queue Management in Electric Vehicle Make-Ready Program and Other Programs. Staff anticipates that this final draft will be submitted for public notice and comment.

Please feel free to contact me at (518) 408-1441 or Stephanie.McDermott@dps.ny.gov should you have any questions.

Sincerely,
/s/ Stephanie S. McDermott

CASE 18-E-0138 – Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure

MODIFIED PROPOSAL FOR STREAMLINED VEHICLE TO GRID QUEUE MANAGEMENT IN ELECTRIC VEHICLE MAKE-READY PROGRAM AND OTHER PROGRAMS

April 11, 2025

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1. Definitions

Committed Project: A project where a utility and a Participant have signed a program agreement.

Disadvantaged Community: Disadvantaged Communities are "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 areas that meet the CJWG's final definition of Disadvantaged Community is available online.[1]

Downstate Utilities: Consolidated Edison Company of New York, Inc. (Con Edison) and Orange and Rockland Utilities, Inc. (O&R)

Fleet advisory services: Established in the Make-Ready Order, fleet advisory services are provided by the Joint Utilities to light-, medium-, and heavy-duty fleet operators. Fleet advisory services include site-specific feasibility assessments and Participant rate analysis.[2]

High-volume application period: To be determined by each utility, based on factors including overall active application count, relative increase in application count month-over-month, and applications per staffing resource.

Joint Utilities: The collective group of investor-owned utilities in New York State, Central Hudson Gas & Electric Corporation (Central Hudson), Con Edison, Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), New York State Electric & Gas Corporation (NYSEG), O&R, and Rochester Gas & Electric Corporation (RG&E).

"On-Hold" Status: Refers to known delays or barriers on the Participant side. Any potential delays due to queues or bandwidth constraints on the utility-side would not result in a project being placed "on hold."

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[1] New York State, Final Disadvantaged Communities (DAC) 2023 Map, available at https://data.ny.gov/Energy-Environment/Final-Disadvantaged-Communities-DAC-2023/2e6c-s6fp/about_data

[2] Case 18-E-0138, Electric Vehicle Make-Ready Proceeding, Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs (issued July 16, 2020) (Make-Ready Order), pp. 127-129.

Participant: An entity, including its subsidiary or affiliate, which applies for and/or receives the incentives and all associated program legal requirements available through the Make-Ready Program. This includes:

> **Developer**: An entity responsible for designing, constructing, and commissioning an electric vehicle (EV) charger site. This entity may also be responsible for owning, managing, and operating the chargers.
>
> **Equipment Owner**: The entity that purchases and owns or controls the EV charging equipment after installation.
>
> **Site Host:** The electric account owner of the site on which the EV charging equipment is installed. The Site Host may or may not be the Equipment Owner.

Pre-engagement Services: Refers to services that potential Participants receive before requesting service for an EV charging site or before submitting a Make-Ready Program application (e.g., fleet advisory services and self-serve tools like a rate calculator and capacity hosting map).

Program Agreement: A contract in the Make-Ready Program where the Participant agrees to the service connection layout, the initial incentive offer, and other terms provided by the utility.

Program Team: Utility employees involved in managing the administration of Make-Ready Program incentives, including prospective Participant outreach, project eligibility evaluation, shepherding the project from application to incentive payout, and education on data reporting requirements.

Service Determination Teams: The technical utility teams that conduct the analysis to determine whether the existing service to a Site Host is sufficient to serve the Participant's requested load expansion; if insufficient, the Service Determination Team outlines the scope of work for utility grid upgrades to serve the new load.

Shovel-Ready: The term "shovel-ready" refers to the Participant's assessment of project shovel-readiness before service determination (e.g., project financing, site host negotiations).

Upstate Utility: Central Hudson, NYSEG, National Grid, and RG&E.

V1G: Unidirectional operation of EV charging; power flows in one direction from the grid to the charger.

V2G: Bidirectional operation of EV charging; power can flow in two directions – from the grid to the charger, or from the charger to the grid.

V2X: Bidirectional operation of EV charging; power can flow in two directions – from the grid to the charger, or from the charger to another application (e.g., grid, home, commercial building, etc.).

2. Abbreviations and Acronyms

Central Hudson	Central Hudson Gas & Electric Corporation
CJWG	Climate Justice Working Group
CIAC	Contributions in Aid of Construction
Con Edison	Consolidated Edison Company of New York, Inc.
DAC	Disadvantaged Community
DCFC	Direct Current Fast Charger
DER	Distributed Energy Resources
EV	Electric Vehicle
EVIIWG	Electric Vehicle Infrastructure Interconnection Working Group
EVSE	Electric Vehicle Supply Equipment
L2	Level 2 Charger
LMTIP	Load Management Technology Incentive Program
National Grid	Niagara Mohawk Power Corporation d/b/a National Grid
NYCSBUS	New York City School Bus Umbrella Services
NYSEG	New York State Electric & Gas Corporation
O&R	Orange and Rockland Utilities, Inc.
PSC	Public Service Commission
RG&E	Rochester Gas and Electric Corporation
V1G	Vehicle-to-Grid – unidirectional (see definitions)
V2G	Vehicle-to-Grid – bidirectional (see definitions)
V2X	Vehicle-to-Everything – bidirectional (see definitions)

3. Introduction

In the Midpoint Review Order,[3] the Commission recommended "establishing a Stakeholder group whose goal is to develop an EV interconnection framework that addresses Utilities' application backlog issues effectively and sufficiently."[4] Additionally, the Midpoint Review Order states "the Stakeholder process shall address and advance, among other issues, transparency, the queue backlog, wait times, and application development. Establishing a standard process for the interconnection applications may shorten, and ideally streamline, the intake of applications that are driven by electrification and the CLCPA."[5] Furthermore, the Midpoint Review Order directed Staff to initiate an Electric Vehicle Infrastructure Interconnection Working Group (EVIIWG) and for Con Edison to "submit a straw proposal describing the efforts put forth in streamlining their queue management system for consideration and further development."[6]

On March 15, 2024, Consolidated Edison Company of New York, Inc. (Con Edison) submitted the straw proposal (Straw Proposal) in accordance with the New York Public Service Commission's (Commission) recent orders related to programs that provide incentives to electric vehicle (EV) charging stations to offset the cost of bringing power from the grid to the EV chargers.[7]

The initial Straw Proposal outlined best practices for effective queue management based on Con Edison's experience serving Participants developing unidirectional, non-exporting (

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3 Case 18-E-0138, Order Approving Midpoint Review Whitepaper's Recommendation with Modifications (issued November 16, 2023) (Midpoint Review Order).

4 Midpoint Review Order, p. 28.

5 Midpoint Review Order, p. 28

6 Midpoint Review Order, p. 29

7 Case 18-E-0138, Make-Ready Order; Order Approving Modifications to Make-Ready Program (issued July 14, 2022) (2022 Make-Ready Modification Order); and Midpoint Review Order.

V1G) EV charging projects.[8] In developing the Straw Proposal, Con Edison drew on its experience during the first three-and-a-half years of the Make-Ready Program.[9] The Straw Proposal also reflected the queue management strategies Con Edison developed after Con Edison received a high volume of Make-Ready Program applications in a short period in late 2021, leading to a waitlist.[10] Con Edison also incorporated feedback from Make-Ready Program Participants and other Stakeholders gathered since 2021. This Best Practices to Streamline V1G Application Queue Management in Electric Vehicle Make-Ready Programs and Other Programs (Application Queue Management document) now reflects not only the experience of Con Edison but also that of the Joint Utilities and EVIIWG stakeholders.[11]

Through the EVIIWG, stakeholders shared feedback regarding this document as well as future topics for discussions that may require the creation of other stakeholder groups; additional topics for discussion are summarized in Appendix C. The Joint Utilities, in consultation with Department of Public Service Staff (Staff) and other EVIIWG participants, has amended the original Queue Management Straw Proposal to reflect stakeholders' comments, resulting in a framework of best practices for Utilities to follow application queue management. This Application Queue Management document adopts best practices and lessons learned to support the Joint Utilities' process for Make-Ready Program applications - from first contact with the

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[8] This Proposal and the EVIIWG are specifically focused on queue management for V1G EV charging projects. Best practices for managing V2G EV charging *or* V1G EV charging combined with a distributed energy resource (DER) will be considered in the Interconnection Technical Working Group (ITWG), as clarified in the June 21, 2024 EVIIWG meeting, available at https://dps.ny.gov/electric-vehicle-infrastructure-and-interconnection-working-group-eviiwg. V1G refers to unidirectional EV charging, where power flows in one direction from the grid to the charger. The scope of this Application Queue Management proposal does not include V1G EV charging projects that are co-located with other DERs (e.g., solar, battery energy storage).

[9] As of March 15, 2025, the Make-Ready Program has supported the installation of 18,250 Level 2 (L2) charging plugs and 1,252 DC Fast Charging (DCFC) plugs, along with a queue of 10,254 L2 and 1,145 DCFC plugs under construction. Data provided for the Con Edison service area, where data includes some plugs that are operational but are not considered "completed," meaning they have not completed the full program closeout process.

[10] At that time, project application volume increased by over 10 times within a few weeks, from 17 applications per week to 172 applications per week. This increase strained internal resources and led to a waitlist for enhanced incentives for L2 plugs benefitting disadvantaged communities. After assessing its pipeline and listening to Participant feedback, Con Edison developed several strategies to manage its queue and moved through a backlog of approximately 20,000 plugs throughout 2022, clearing the waitlist by Q1 of 2023.

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

utility to EV station energization.[12] The Application Queue Management document has the potential to facilitate meeting the more ambitious Make-Ready Program targets outlined in the Midpoint Review Order on time and, if necessary, managing application surges or waitlist situations that may arise as incentives become exhausted. Although these best practices were developed with the Make-Ready Program in mind, they could be adapted and applied to service requests from EV project developers who are not receiving Make-Ready Program incentives.

This Application Queue Management document includes an application queue management approach consisting of four methods informed by four guiding principles, outlined in Table 1:

[12] Downstate and Upstate utility program flows are outlined in Appendices A and B.

Table 1. Queue Management Methods Underpinned by Cross-cutting Principles for Continuous Improvement

Methods for Streamlining Queue Management: **1. Operational Measures** **2. Participant Informational Tools for Pre-Engagement, Planning, and Project Management** **3. Participant Communication Strategies** **4. Utility-Enterprise Alignment**			
Guiding Principle #1: Speed to Goal	**Guiding Principle #2: Flexibility and Innovation**	**Guiding Principle #3: Participant Experience**	**Guiding Principle #4: Transparency**
The importance of moving projects through the program process expeditiously to reach Make-Ready Program targets and help achieve New York's clean transportation goals.	Deploying innovative, flexible solutions is often in Parties' best interests and can avoid lower performance.	A fair process and positive experience with the Make-Ready Program can support the Participant's current projects while encouraging the Participant to develop additional projects through the Make-Ready Program.	Providing Participants and other stakeholders information to understand the Make-Ready Program processes and allowing Participants to plan their business decisions accordingly.

The methods and guiding principles in Table 1 are a framework for Make-Ready Program application queue management of V1G EV charging station projects across New York State. Utilities may vary application of the best practices herein described in accordance with the volume of applications that are received. Currently, the Upstate Utilities have not received a high influx of Make-Ready Program applications leading to such a high backlog as Con Edison, therefore the application queue management framework has not needed to be fully implemented.

Other variations occurring between utilities may be caused by differences in staffing resources, V1G Make-Ready Program application volume, service territory demographics, or utility-specific engineering standards, among other reasons. Therefore, examples cited in this Application Queue Management document illustrate how one utility has implemented a particular practice, and other utilities should begin to implement the same practices within their specific parameters and when applicable triggers are met, to avoid any application backlog. Examples of differences occurring between utilities' queue management practices can include but may not be limited to an "on-hold" policy, and the medium for communicating "on-hold" status to Participants. It should be noted that any "on-hold" status due to delays to queues or bandwidth constraints on the utility-side would not result in a project being placed "on hold" (nor would Utility-side delays trigger any potential cancellations).

4. Operational Measures

The strategies in this section promote fairness and transparency, thus fostering a predictable Participant experience.

4.1. General Make-Ready Program Management

This sub-section outlines the standard operational best practices the Joint Utilities have adopted for managing V1G Make-Ready Program applications. After a Participant submits a Make-Ready Program application, utility teams should first review the application for completeness. The Participant will be given the opportunity to supplement or modify their application at this time. Once the Make-Ready Program application is complete, the utility teams should utilize the following best practices to efficiently advance the application throughout the Make-Ready Program incentive process.[13] Appendices A and B describe the Make-Ready Program application flow for the Downstate and Upstate Utilities, respectively.

[13] After the initial MRP application, the Downstate Utilities review the application's eligibility for MRP incentives, before advancing the project to service determination review. The Upstate Utilities first initiate the service determination process for a project, and then generally complete the Make-Ready Program incentive eligibility review in parallel with the service determination.

4.1.1. Include a Cancellation Policy to Underscore Fairness

Cancellation may apply when either: (a) a committed project has not completed construction within a time period defined in the Program Agreement and no mutual agreement has been reached by the Participant and the Utility to extend that timeline,[14] (b) a Participant cannot be reached by phone or email past a timeframe defined in program resources; or (c) when the Participant decides to not move forward. As an illustrative example, if Participant-side construction is not completed within one year following the full signing and acceptance of Con Edison's Program Agreement, and if the Participant and Con Edison cannot come to a mutually agreeable revised completion date, then Con Edison may cancel the project.[15] Each Utility's Program Agreement should define what would trigger the cancellation of a project. The Program Agreement should contain details including a defined cancellation policy (i.e., the circumstances under which a utility would cancel a project). After a Program Agreement is signed, the project may be referred to as "committed." Each Utility's Program Agreement should define the maximum amount of time that can pass before a cancellation is triggered. The Program Agreement should also provide guidance on what communication is expected from the Participant to avoid project termination.

4.1.2. Use Participant-initiated Pauses to put Projects On-hold

Rather than cancelling a project where the Participant is not ready to move forward, develop procedures that will allow for a project to be put "on-hold" until the Participant is ready to proceed. This flexible approach allows projects to pause temporarily if they cannot move forward due to situations like the Participant needing to secure financing or permitting or to finalize an agreement with the site host.[16] The "on-hold" status allows the utility to allocate resources to projects ready to move forward. This approach avoids canceling the project, which can create work for both the Participant and the utility to reinitiate the application process

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[14] Each utility's Program Agreement should define the maximum amount of time that can pass before a cancellation is triggered. The Program Agreement should also provide guidance on what communication is expected from the Participant to avoid project termination.

[15] The Program Team should communicate any upcoming cancellation deadlines in writing or as agreed-upon in the Program Agreement.

[16] Additional examples of situations that could lead to an "on hold" status include, but are not limited to, project delays from policy changes, equipment lead time delays, extreme weather conditions.

if/when the project resumes.[17] Note that an "on-hold" status is temporary, and the temporary status should be defined. Utility cancellation policies set the time that a project can be "on-hold" for prior to cancellation; these policies would be documented in the Program Agreement.

4.1.3. Robust and Transparent Records and Project Data Platforms

Standardize and save the documentation of Participant's correspondence and share changes in project status. Good record-keeping supports program review and assists the Program Team with clear communication strategies (via email, meetings, and/or the Participant portal) that supports the Participant in determining what stage their project is in and whether a project is waiting on Participant-provided, additional materials. Transparent record-keeping also allows utility teams and Participants to work from the same information in managing the project.

4.1.4. Participants with Questions about Results May Contact the Utility

For example, Participants may inquire about the analysis performed and the rationale for upgrades if they are needed. Participants with disputes should use the provided form or contact information.[18]

4.2. High-Volume Application Periods

This sub-section details practices that can be utilized to manage the Make-Ready Program application queue during high-volume application periods. Utilities should identify the threshold that triggers a high-volume application period including utility-specific factors such as overall active application count, relative increases in applications month-over-month, and applications per staffing resource. The practices described below have been identified by Con Edison to manage waitlists and high-volume application periods that may occur during the Make-Ready Program.

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[17] Once a project has been removed from an "on-hold" status, the project continues the process from where it left off unless the project comes off hold with a major change (e.g., change in equipment or number of chargers), in which case a new engineering study may be required. Note: a cancellation would require a project to "restart" if Participant decides to pursue again.

[18] Utilities provide contact information for disputes on their websites. For example, see Con Edison's Energy Services page at https://www.coned.com/en/small-medium-size-businesses/building-project-center/contact-us.

4.2.1. Determine Sequencing of Eligibility Review Before High Volume Periods

This practice ensures that the Program Team is prepared to follow the proper review process before experiencing a waitlist environment.[19] For example, Con Edison reviews completed and submitted Make-Ready Program applications for incentive eligibility on a first-come, first-served basis both when the program is experiencing normal application volumes and at volumes that could result in a waitlist environment.[20] As a result, no one type of application (e.g., curbside) is given preferred treatment over another. Therefore, in a waitlist environment where funds are exhausted, the later application must wait for review until the incentive budget is expanded or until a project ahead in line is cancelled, thereby releasing its commitment of incentive funds. At Con Edison, regardless of waitlist environment, after the review is completed, applicants receive an incentive eligibility letter and decide whether to initiate the service determination process (note that incentive eligibility does not determine incentive estimates, which only occur after service determination).

4.2.2. Determine Prioritization Strategy if Receiving Multiple Projects from the Same Participants

As an illustrative example, if the utility needs to prioritize speed of installations during high-volume application periods, such as when a utility is facing programmatic restrictions, then, among projects from the same Participants, the utility may prioritize initiating Service Determination for projects from Participants that are "shovel-ready" before initiating service determination for the Participant's projects that are not "shovel-ready."

4.3. Innovations

This sub-section details operational innovations that have been identified and implemented by some or all of the members of the Joint Utilities – as specified below. Each

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[19] A waitlist environment could occur when category-specific budget caps have been committed or program-wide budget caps have been committed, among other reasons.

[20] MRP application requirements for each utility can be found on their Make-Ready Program specific websites; links available at https://jointutilitiesofny.org/ev/make-ready.

For Con Edison, completed incentive applications have submitted the mandatory documentation through the PowerReady Portal. Con Edison's requirements are found at Con Edison Make-Ready Program Contractor Program Documents and Tools, available at https://www.coned.com/en/our-energy-future/electric-vehicles/power-ready-program/contractor-resources/program-documents-tools.

utility may consider these for implementation on an as-needed basis. These innovations are focused on improving application management throughout the Make-Ready Program incentive and V1G interconnection processes while offering Participants flexibility to manage their project portfolios.

4.3.1. Utilities with High Application Volume Should Identify Areas of Flexibility Across a Participants Portfolio

All utilities help Participants evaluate their portfolio of projects submitted within a few months of each other, should a single developer submit multiple projects within a several-month timeframe. For example, Con Edison – a utility that sometimes receives 10-20 applications from a single developer over the course of a few months – will help Participants evaluate their portfolio of projects on similar timelines to offer flexibility in project prioritization based on Participant-communicated "shovel-readiness." This flexible approach improves the Participant experience and promotes speed with no detriment to fairness, as this prioritization is contained within a single Participant's portfolio. An overly prescriptive statewide process would limit this flexibility.

4.3.2. Establish a Pace that Matches Participant Needs

Participants receive an estimated timeframe for service determination and may request more specific timeline estimates and information.[21] Matching Participants' pace can promote innovation for a positive Participant experience. This practice has been implemented by all Utilities.

As an example of innovation, Con Edison uses an internal tool to expedite service determinations for all load requests that meet certain criteria. This tool, known as an auto-rule, allows simpler projects to go through an automated service determination (for Con Edison's and O&R's EV projects, this would happen after the project application and incentive eligibility review; for Upstate Utilities, service determination occurs during incentive eligibility review).[22] Projects that are auto-ruled as service adequate can immediately progress to the next step without

[21] Estimates indicate which parts of the process are subject to variability, based on weather events, permitting delays, supply chain, and Participant-side delays.

[22] Note that auto-rule is separate from and unrelated to the optional site assessment discussed in section 2.

a full engineering review, giving engineering groups more time to work on complex projects. If a project does not meet the auto-rule criteria, then it would go through the full-service review process. Con Edison is exploring how auto-rule can be expanded to include a wider breadth of project types.

4.3.3. Support Participant Strategies to Deploy V1G Chargers at Sites with Limited Hosting Capacity or Other Development Challenges

For example, the Joint Utilities will post information about phased connections as an option for discussion with utility fleet advisory teams. When sufficiently resourced, utility fleet advisory services can help Participants understand the benefit of phased connection, load management software, and hardware solutions at grid-constrained sites.[23] Con Edison has implemented this practice, which is especially helpful during high-volume application periods when the time savings associated with minimizing the need for utility-side upgrades are amplified; avoiding utility-side upgrade during high-volume application periods reduces stress on the queue. Additionally, interested Participants may request information, including a site assessment, on phasing the deployment of V1G chargers at a given site (i.e., install a first tranche of chargers with minimal upgrades required, then install a second tranche of chargers after grid upgrades have been completed).

[23] Load management hardware and software solutions may be eligible for additional incentives through the Load Management Technology Incentive Program (LMTIP). The LMTIP program allows all Joint Utilities to discuss load management solutions with Participants. More information is available in each utility's implementation plan for LMTIP. Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Charging, Order Establishing Load Management Technology Incentive Program*s* (issued August 19, 2024).

Successful implementation of load management technology can enable V1G EV charging projects to proceed at grid-constrained sites, where upgrades would otherwise be required to service project nameplate capacity specifications. For instance, NYCSBUS recently completed a V1G electric school bus charging project with Mobility House in Con Edison's service territory. By integrating load management software and hardware solutions, NYCSBUS can charge up to 17 electric buses at this site (up to 268 kW of charger nameplate capacity), while staying under the site's 80 kW capacity limit. A press release with more details on the project is hosted on the Mobility House website, available at https://www.mobilityhouse.com/usa_en/our-company/newsroom/article/nycsbus-mobility-house-expansion-alm.

5. Participant Informational Tools for Pre-Engagement, Planning, and Management

The strategies in this section emphasize the guiding principles of speed to goal, transparency, and a positive Participant experience. How each of these best practices is implemented may vary by utility, depending on factors like progress toward program plug targets, Participants' needs, and staffing resources. It should be noted that the Joint Utilities have not yet analyzed the costs of uniformly implementing the practices discussed in Section 2. Should the Commission determine that program process changes are needed (particularly those that require increases in staffing or information technology expenditure), the Joint Utilities requests the opportunity to discuss the associated cost and how to recover those costs. To uniformly adopt each of these best practices in full across the Joint Utilities to their full extent, additional administration budget could be required for most of the Joint Utilities.

5.1. Expand Advisory Services to Improve Pre-Application

Pending available Program Team resource and budget availability, the Joint Utilities would expand advisory services from only fleet Participants to other types of Make-Ready Program Participants, thereby improving pre-application preparation and, in turn, reducing churn and timelines. The Make-Ready Order directed utilities to provide fleet advisory services, which all members of the Joint Utilities now offer. Con Edison expanded these services by developing several pre-application services to support site identification and application preparation. First, the Program Team supports Participants as they prepare the required documents for their service determination application. Second, the Program Team offers optional site assessments to Participants, which provide a preliminary review of the grid capacity at the site before application documents are prepared and the full-service determination process is completed.

The site assessments – and the review with the Participant – are offered at no cost to the Participant and are valuable for 1) helping Participants determine site viability before significant investment of the Participant and Utility resources; and 2) educating the Participant on the service determination process to improve the Participant experience and speed to goal. The Joint Utilities also aim to cross-publicize programs, helping Participants that are pursuing EV charging infrastructure projects learn about complementary programs (e.g., managed charging and other cost relief offerings).

5.2. Build Self-Service Tools to Help Prepare Participants

The Joint Utilities have built self-service tools that help prepare the Participant for productive conversations with Program Team or advisory services, thereby increasing the speed and transparency of the incentive application and interconnection process. Each member of the Joint Utilities has implemented self-service tools. For instance, hosting capacity maps help the Participant plan for their projects; they are most effective if reviewed with a member of the Program Team. Additionally, a publicly available list of required documents, with clear guidance on what constitutes an acceptable document, helps the Participant prepare to move efficiently through the Make-Ready Program application process. The Joint Utilities also collectively host several self-service resources.

5.3. Develop a Make-Ready Program Participant Portal for Transparency

Each member of the Joint Utilities offers a Participant Portal. For example, at Con Edison, the Participant portal shows project history, status, open items, and next steps. A platform can help make transparent to the Participant on whether the utility or Participant is the "owner" of each stage, and what is required to move projects forward to the next step.

5.4. Publish a Flow Diagram Indicating Which Steps are Owned by the Participant and Which Are Owned by the Utility

A flow diagram promotes transparency and Participant experience; process illustrations for both Upstate and Downstate Utilities are available for Participants. See a flow diagram for the Downstate Utilities in Appendix A and a flow diagram for the Upstate Utilities in Appendix B.

6. Participant Communication Strategies

The strategies in this section typically deliver a positive Participant experience and provide transparency. These practices have been implemented by all of the Joint Utilities; utility-specific examples are cited below and in footnotes.

6.1. Publish Remaining Incentive Funds

The Joint Utilities collectively publish a refreshed budget and plug tracker on an informational website, giving Participants a transparent view into the remaining incentive budget

so they can make business decisions accordingly.[24] This budget and plug tracker shows data for completed and committed plugs in each utility's service territory as well as by incentive tier (e.g., Public, Private, and Disadvantaged Community-benefitting).

6.2. Provide Participants with Education Opportunities for Program Updates

The Joint Utilities already provide participants with educational opportunities via webinars, and share Make-Ready Program updates, including eligibility requirements, process improvements, and the status of remaining incentive funds. Participants are also interested in policy and regulatory updates. Webinars can be especially helpful for Participants new to the Make-Ready Program and provide scheduled time for Participants to ask questions. Webinar slides and other information can also be sent to the market through automated e-mail blasts.

6.3. Communicate a Timeline Range for Estimated Completion of Utility Side Upgrades after the Participant Receives a Service Determination

Emphasize that the timeline estimate is specific to the individual project and the scope studied in the service determination, as construction timelines vary based on project complexity and Participant timelines. Any modifications made by the Participant throughout the process may also extend the utility-side timeline.

6.4. Highlight and Explain Participant Dependent Deadlines with the Participant

See appendix A and B for an illustration of some Participant dependencies. Participants missing Participant-side deadlines (not utility-side deadlines) divert resources away from projects that are ready to meet deadlines. To mitigate resource allocation concerns, a project delayed by a Participant missing deadline(s) may be placed on-hold (see section 1.1.2). The deadlines should also include a defined, unpublished grace period for Participant deadlines known among Program Team members; utilities may consider removing the grace period in waitlist scenarios.[25]

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[24] Joint Utilities of New York. "EV Make-Ready Program: Plug and Budget Tracker," available at https://jointutilitiesofny.org/ev/make-ready.

[25] Not publishing the grace period allows for more flexibility and effective queue management. The utility may want to consider removing the grace period in waitlist scenarios to trigger more efficient throughput. Waitlist scenarios could include situations where there are more limited pools of funding (e.g., the limitation of L2 funding for projects in Disadvantaged Communities experienced in the Con Edison service territory, or the end of the Make-Ready Program).

7. Utility Enterprise Alignment

The strategies in this section focus on speed to reaching the plug goal and flexibility. Enterprise alignment supports efficient program process and service determination innovation.

7.1. A Change in Project Scope Requested by the Participant Requires the Project to be Submitted for a New Engineering Analysis

Utilities should provide an estimated, updated timeline that a modification will require; timeline impact varies widely according to degree of scope change. All utilities have determined policies that inform Participants of what they are required to do if the Participant changes the scope of the project, impacting the service determination process.[26] Policies with a flexible approach to queue management are essential for accommodating changes midstream, while keeping fairness top of mind and projects moving. These policies are communicated to Participants at multiple points in the application process via education materials and conversations with the utility; for example, the Con Edison Program Team communicates this message in webinars, in conversations with the Participant, and in the Program Agreement.

8. Conclusion

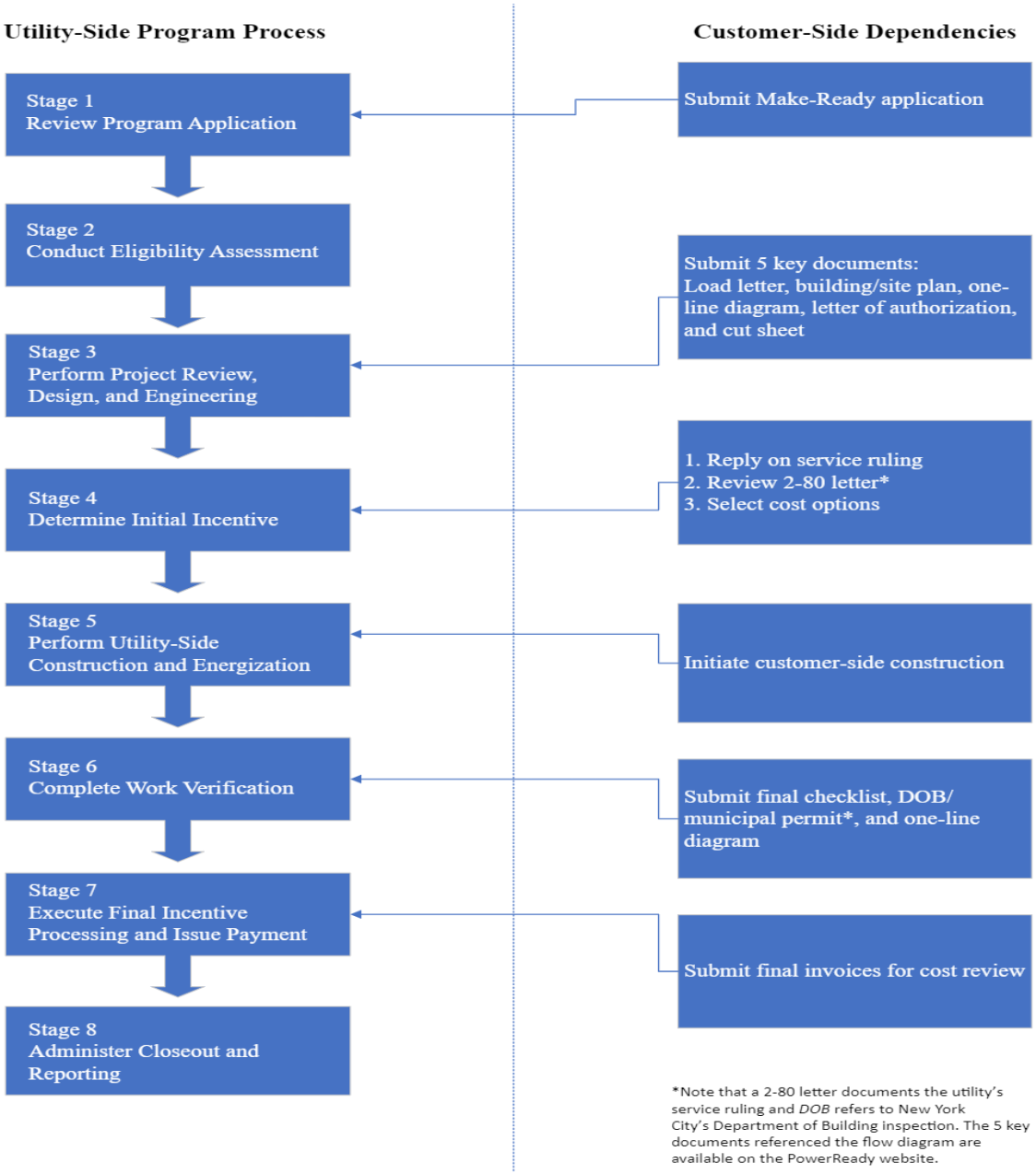
This Application Queue Management document includes a wide range of best practices compiled by the Joint Utilities and discussed in the EVIIWG. Effective application queue management stems from implementing best practices and ensuring transparency across stakeholders.

[26] For example, currently Con Edison permits a Participant to request a project scope change once per project without submitting a new incentive application and Participants must submit revised documents for a new service determination within 30 days of requesting a service change.

9. Appendices

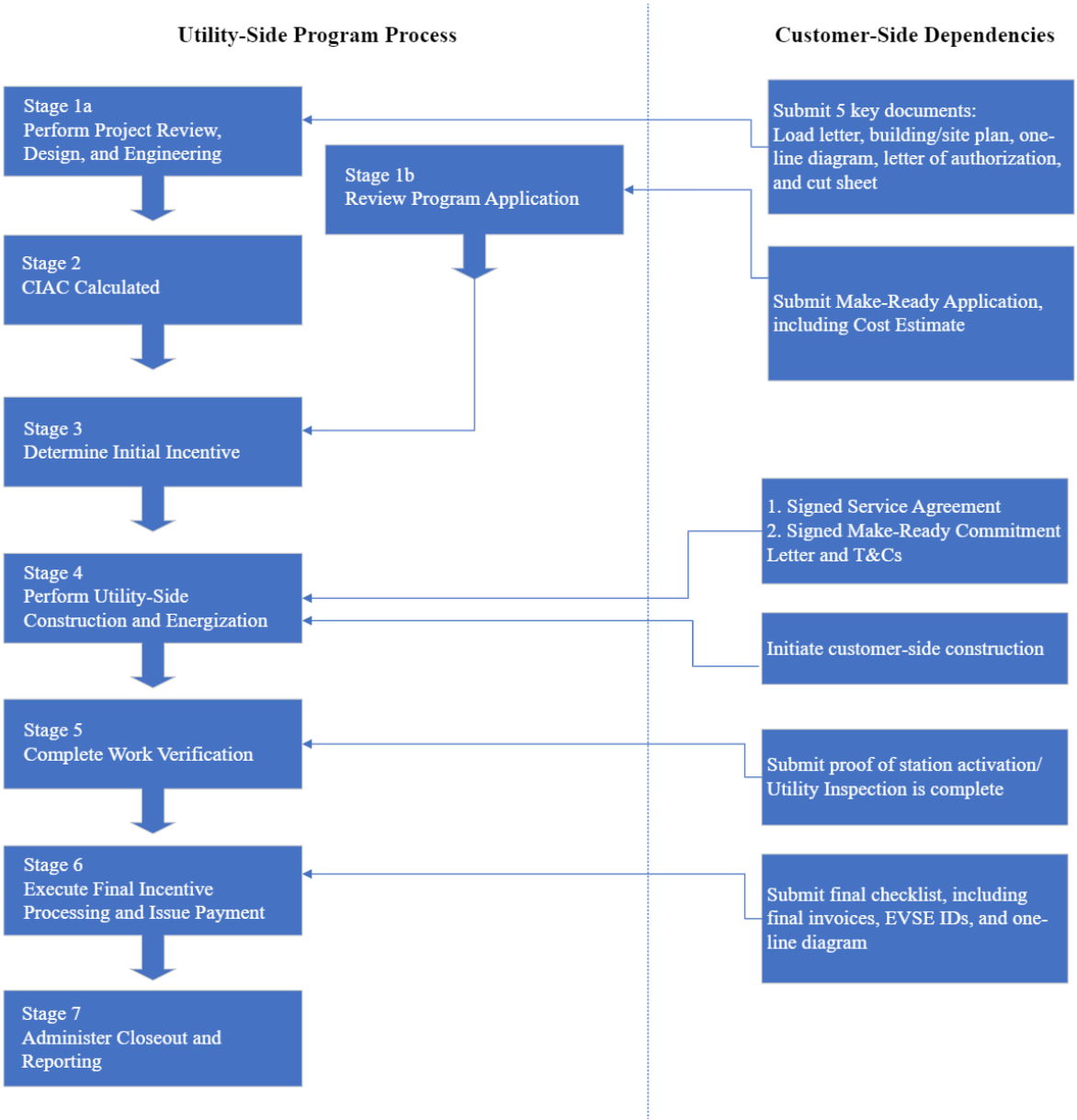
9.1. Appendix A – Make-Ready Program Flow Diagram, Downstate Utilities

Appendix A depicts the Make-Ready Program flow for Participants active in the Downstate Utilities' service territories. For V1G projects that do not apply for the Make-Ready Program, several steps would no longer be relevant. The program application stages 1 and 2 would not occur, and the project would start with stage 3. For stage 4, the Participant-side dependencies would still apply, but the Utility would not provide an incentive estimate. Finally, Stages 7 and 8 (incentive payment and closeout) would also be removed from the process.



9.2. Appendix B – Make-Ready Program Flow Diagram, Upstate Utilities

Appendix B depicts the Make-Ready Program flow for Participants active in the Upstate Utilities' service territories. For V1G projects that do not apply for the Make-Ready Program, the flow chart would be simplified to Stages 1a, 2, and 4. Stage 4 still requires the Participant dependency to sign the Service Agreement but does not require the dependency to sign the Make-Ready Commitment Letter and terms and conditions. The Upstate standard connection process does include post-construction steps around verification, closeout, and reporting, but for standard connection requests, these stages do not require further Participant-side dependencies.



9.3. Appendix C – Suggested Topics by Working Group for Future Discussion

The members of the working group suggest the following for a reconvening of the EVIIWG or for a different forum, at Commission discretion and direction:

- Connection timeline measurement and reporting;
- Bridging solutions, including flexible connection;
- Harmonizing the application for bidirectional resources, such as V2X EV chargers and EVSE paired with storage;
- Website and informational resource enhancements; and
- Participant guide updates including dispute resolution.