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October 23, 2026

Hon. Michelle L. Phillips, Secretary
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

Dear Secretary Phillips:

The Joint Utilities¹ submit the attached slides that were presented at the October 14, 2026, EV Make-Ready Program Technical Conference: EV Charging Data Reporting Standardization and Operational Compliance. This technical conference was convened pursuant to ordering clause 15 of the Public Service Commission's March 23, 2026, Order Denying Petition and Making Other Findings. The technical conference provided a forum for stakeholders to receive information and offer input on EV charging infrastructure data standardization within the Make-Ready Program, and to review the results of the Joint Utilities' onsite operational verification of Make-Ready-funded charging stations.²

In addition, on October 1, 2026, the Joint Utilities filed the following questions for public comment in the above-referenced proceeding. Stakeholders may continue to provide comments on the questions below through DMM in Case 18-E-0138. Comments are requested by November 16, 2026.

¹ The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

² Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, Order Denying Petition and Making Other Findings (issued March 23, 2026).

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Questions for Public Comment

Best Practices

1. For all stakeholders: What are best practices for EV data collection within utility programs across the country? What recommendations do you have for the future to limit challenges related to data-reporting, considering what you have done across different states/utilities and examples of what's worked well?
2. For all stakeholders: What information is most important for enabling good governance and continuous improvement of the Make Ready Program?
3. For site operators: When considering data reporting requirements, what procurement considerations are important in selecting a network service provider or making site design decisions?

Meeting Reporting Requirements

For all stakeholders:

4. What does it specifically take to fulfill the New York State make-ready data reporting requirements (e.g., what specific technology, human resource capabilities, upfront costs and what level of ongoing cost)? What kind of partnership is required across stakeholders to meet the requirements?
5. For all stakeholders: How do site-specific and hardware-specific decisions impact site hosts' abilities to successfully meet data-reporting requirements?

Data Usage Outside of the Make Ready Program

6. For Network Service Providers: Does your business or do your customers measure utilization and outages for purposes other than compliance with the Make Ready Program? If so, how is this data measured and stored and used? To what extent could a future program use the data in the form it's already collected and tracked? What are the likely or observed inconsistencies across Network Service Providers?
7. For all stakeholders: Outside of compliance reporting to the utilities, how does your company (or do your customers) use and process data at the EV-charger level for business operations?

Streamlining and Standardization

For all stakeholders:

8. From a national perspective, what role does EV charging data play in program review and management, and what other data is typically considered or prioritized?
9. When designing EV program data requirements, what considerations related to site hosts, installers, network service providers, or other industry stakeholders should be taken into account to support complete and standardized data reporting?
10. For all stakeholders: Are there opportunities to streamline reporting across different programs (e.g., NY MRP vs. NEVI)?

Protocols, such as Open Charge Point Interface (OCPI)

11. For all stakeholders: What are the options for data collection and reporting standardization for a future program through established protocols like the Open Charge Point Interface (OCPI)?
12. For all stakeholders: What are the advantages of OCPI as a data-sharing standard and protocol for a utility Make-Ready Program? What are the disadvantages?
13. For all stakeholders: How does OCPI promote interoperability, generally (e.g., if a site host wants to change hardware, software, or NSP in the future)? In what ways does it fall short?
14. For all stakeholders: What are the biggest challenges or points of friction in adopting OCPI in the initial implementation (e.g., data loss, impact of switching of NSPs or replacement of EVSE, etc.)?
15. For all stakeholders: Are there certain segments of customers where adopting OCPI is not feasible for statewide utility Make-Ready program reporting? Why?

Questions about the technical conference should be directed to
info@jointutilitiesofny.org.

Respectfully submitted,

/s/Marina W. Chu

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