



May 5, 2025

Hon. Michelle L. Phillips, Secretary  
New York State Public Service Commission  
3 Empire State Plaza  
Albany, New York 12223-1350  
[secretary@dps.ny.gov](mailto:secretary@dps.ny.gov)

**Re: Proceeding On Motion Of The Commission Regarding Electric Vehicle Supply Equipment And Infrastructure - Make-Ready Program Review (Case 18-E-0138)**

Dear Secretary Phillips:

Advanced Energy United and The Alliance for Clean Energy New York submits for filing the attached Joint Comments supporting the Joint Utilities' Petition to Continue Make-Ready Program During the Program Review Period filed on February 24, 2025.

Respectfully submitted,

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# Advanced Energy United and Alliance for Clean Energy New York Supporting Comments

## **Re: Proceeding On Motion Of The Commission Regarding Electric Vehicle Supply Equipment And Infrastructure - Make-Ready Program Review (Case 18-E-0138)**

Advanced Energy United (“United”) and the Alliance for Clean Energy New York (“ACE NY”) support the Joint Utilities’ (“JU”) Petition to Continue Make-Ready Program (“MRP”) During the Program Review Period filed on February 24, 2025.

United is a national association of businesses that works to accelerate the move to 100% clean energy and electrified transportation in the U.S. The term advanced energy encompasses a broad range of products and services that constitute the best available technologies for meeting our energy needs today and tomorrow. These include electric vehicles (“EVs”), energy efficiency, demand response, energy storage, solar, wind, hydro, nuclear, heat pumps (air- and ground-sourced), and smart grid technologies. United represents more than 100 companies in the \$374 billion U.S. advanced energy industry, which employs 4.1 million U.S. workers and over 231,600 in the state of New York.

ACE NY is a member-based organization with a mission of promoting the use of clean, renewable electricity technologies, transportation electrification, and energy efficiency in New York State to increase energy diversity and security, boost economic development, improve public health, and reduce air pollution. ACE NY’s diverse membership includes companies engaged in the full range of clean energy technologies as well as consultants, academic and financial institutions, and not-for-profit organizations interested in their mission.

The MRP has been instrumental in driving the expansion of EV charging infrastructure in New York State, and its continuation is crucial to maintaining the momentum of EV adoption and market stability.



The Joint Utilities have stated that their programs are on track to meet plug targets, and in some cases, they are even positioned to exceed them. Allowing the MRP to continue using already authorized funds will ensure that the progress made thus far is not disrupted by unnecessary program pauses. Such pauses can lead to project delays, loss of momentum, and negative impacts on the local workforce and supply chain.

The continued implementation of the MRP aligns with the Commission's objectives to promote EV adoption and achieve the State's clean transportation goals. By providing incentives for EV charging infrastructure, the MRP removes barriers to EV ownership and supports the development of a robust charging network.

United and ACE NY support Commission approval of authorization of the continuation of the MRP during the program review period. This decision will provide certainty to the market, maintain program momentum, and facilitate the continued growth of EV adoption in New York State.

Thank you for your consideration.

