



April 1, 2025

Hon Michelle L. Phillips
New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 22-E-0236 - Proceeding to Establish Alternatives to Traditional Demand Based Rate Structures for Commercial Electric Vehicle Charging.

Dear Secretary Michelle L. Phillips,

The Alliance for Clean Energy 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.

We are writing to share our comments on the biennial review of the programs implemented in accordance with the Demand Charge Alternatives Order. ACE NY has found that the upstate utilities and downstate utilities’ Demand Charge Rebate programs and the downstate utilities Commercial Managed Charging programs have been very successful in offering significant financial savings that enabled infrastructure manufacturers to build out chargers while waiting for the permanent EV phase-in rate to take effect. Ultimately, the benefits of these programs will advance the adoption of electric vehicles in New York state, which will reduce carbon emissions and bring New York closer to the goals set out in the 2019 Climate Leadership and Community Protection Act. We encourage the utilities to continue developing these programs and offer several recommendations on areas for improvement.

We encourage all utilities to replicate Con Ed’s willingness to use its own metering data in the enrollment process for operators of electric vehicle charging infrastructure. Rather than requiring all interested parties to submit their own interval data, such a procedure will streamline the process for all applicants, as they will not need to internally manage data,

adding extra administrative burden. Simplifying the process will encourage more operators to take part in the program.

Similarly, the enrollment process can be simplified by standardizing the program requirements across utilities. Each utility's different application procedure complicates the process for applicants that operate across multiple service territories. For instance, Orange and Rockland's requirements of site visit and technical inspections were added obstacles that were not asked of by other utilities. Given that the sites are already operational, and that the utility has site-level interval data, this procedure may be a strong candidate for elimination so as to standardize the process across the state. Complications also arose from the fact that several utilities do not have a portal to track application status to match that of Con Ed. We encourage the utilities to collaborate in future operations of these programs so as to standardize the procedures. Reducing the variables between service territories will encourage site operators to enroll in the programs and allow for an improved charging rate model for all of New York state.

ACE NY would again like to express our appreciation of the utilities' operation of these demand charge alternative programs. Perfecting the operation of electric vehicle charging is an essential step towards significant decarbonization in the transportation sector. ACE NY encourages proliferation of these programs, accompanied by standardization, to increase transportation electrification in New York state. Thank you for the opportunity to provide our input on this review. ACE NY looks forward to continuing to work with the utilities and the Department of Public Service to create a cleaner and more equitable future for all New Yorkers.

Sincerely,
Jed Prickett
Clean Energy Analyst
Alliance for Clean Energy New York