

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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

**CONSOLIDATED EDISON COMPANY OF NEW YORK MAKE-READY PROGRAM
End of Program Report**

Filed September 15, 2026

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I. Introduction

In accordance with the New York Public Service Commission’s (Commission) *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other* (“2020 Order”), *Order Approving Midpoint Review Whitepaper’s Recommendations with Modifications* (“2023 Midpoint Order”), and the *Order Denying Petition and Making Other Findings* (“2026 Order”), Consolidated Edison Company of New York (Con Edison or the Company) provides this End of Program Report summarizing program evolution, lessons learned, and early recommendations for a future program.¹ This report also includes data on electric vehicle (EV) charging stations incentivized through the program from the start of the program through June 30, 2026.

The 2020 Order established a first of its kind program in New York State to support at-scale statewide development of EV Level 2 (L2) and direct current fast charging (DCFC) infrastructure. The Make-Ready Program engages the market through educational and advisory efforts and provides cost-efficient incentives to offset utility and customer capital costs of eligible EV charging infrastructure, with the end goal of encouraging customers and businesses to purchase and use EVs as a result of having access to charging. The 2023 Order further modified the Make-Ready Program based on market conditions and the program experience at the time. The 2023 Order also directed the Joint Utilities to file End-of-Program Reports “when either the utility is within 80 days of either the L2 or DCFC port goals being met or the program budget is depleted, whichever occurs first.”² Due to the permanent pause of the L2 Program and temporary pause of the DCFC Program required by the 2026 Order, the utilities were instructed to submit the L2 and DCFC End-of-Program Reports by June 30, 2026. The Order Providing Clarification on Make-Ready Program issued on June 12, 2026 adjusted the submission deadline to September 1, 2026, which was extended on August 27, 2026 to September 15, 2026.³

The report describes:

- I. Overall program outcomes, including port deployment and corresponding EV adoption levels in the service area
- II. Program evolution and lessons learned across four phases of growth: 1) initial program launch, 2) scaling market capacity and program engagement, 3) scaled L2 installation and DCFC ramp-up, and 4) maturity and post-installation excellence

¹ Case 18-E-0138, *Electric Vehicle Supply and Equipment and Infrastructure Proceeding (EVSE & I Proceeding)*, Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs (July 16, 2020) (2020 Order). Case 18-E-0138, *EVSE & I Proceeding*, Order Approving Midpoint Review Whitepaper’s Recommendations with Modifications (November 16, 2023). (2023 Midpoint Order). Case 18-E-0138, *EVSE and I Proceeding*, Order Denying Petition and Making Other Findings (March 23, 2026) (2026 Order).

² Case 18-E-0138, *EVSE & I Proceeding*, 2023 Order at Ordering Clause 5.

³ Case 18-E-0138, *EVSE & I Proceeding*, Order Providing Clarification on Make-Ready Program at 23 (June 12, 2026) (2026 Clarification Order); Ruling on Extension Request (August 27, 2026).

- III. Early recommendations for a potential future program that supports diverse charging settings, informed by reliable data and ongoing evaluation, to continue to advance EV adoption, equitable access, geographic coverage, and cost containment

II. Overall Program Outcomes

A. EV infrastructure buildout

Since the Make-Ready Program launched, Con Edison has committed incentives to 20,919 L2 ports and 1,612 DCFC ports. Of those committed, 17,030 L2 ports and 716 DCFC ports have been constructed and acquired as of June 30, 2026.⁴ As of mid-August 2026, the Company maintains a waitlist of approximately 18,000 L2 ports and 1,930 DCFC ports, in addition to a substantial pipeline of projects progressing through engineering review.⁵

Figure 1. Acquired L2 Ports by Acquisition Year

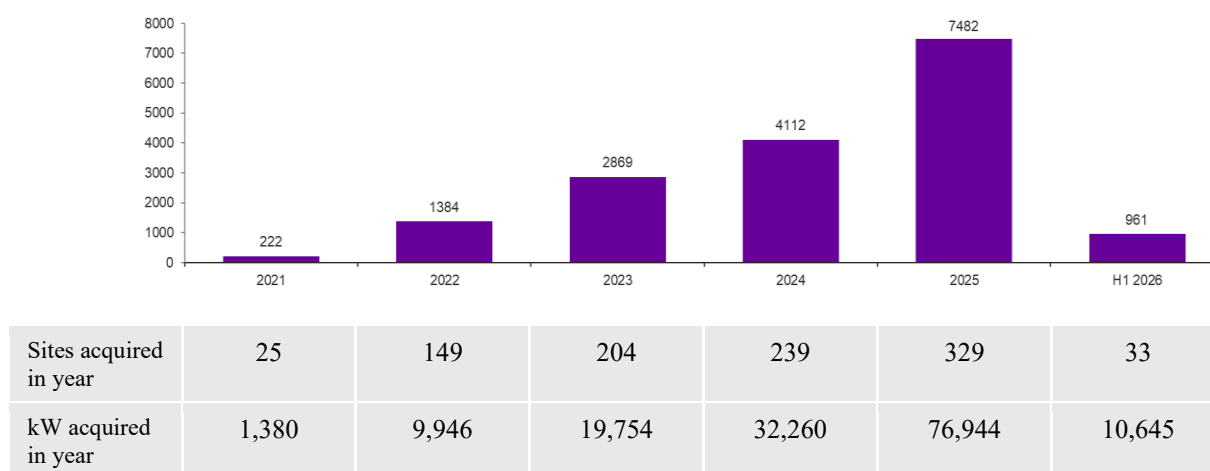
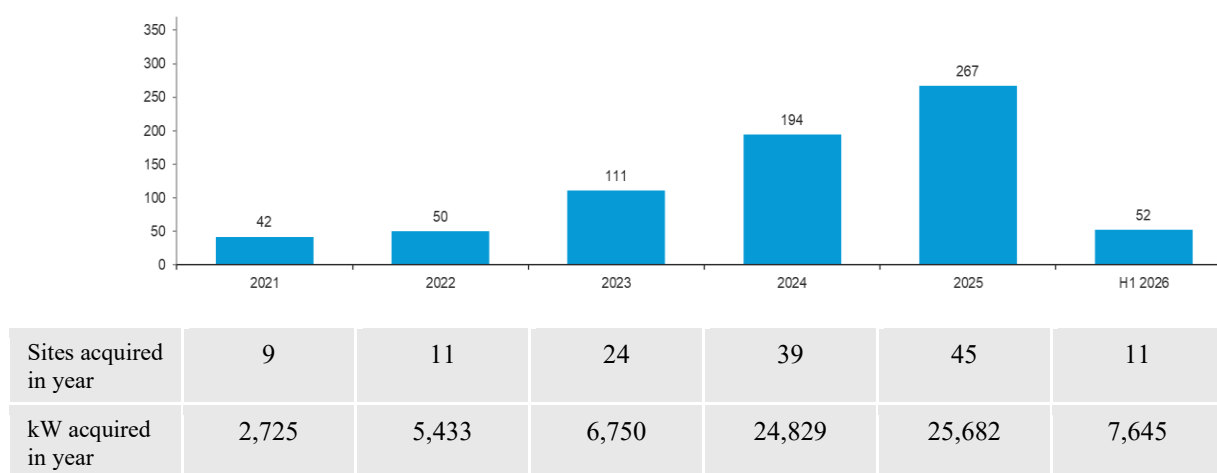


Figure 2. Acquired DCFC Ports by Acquisition Year



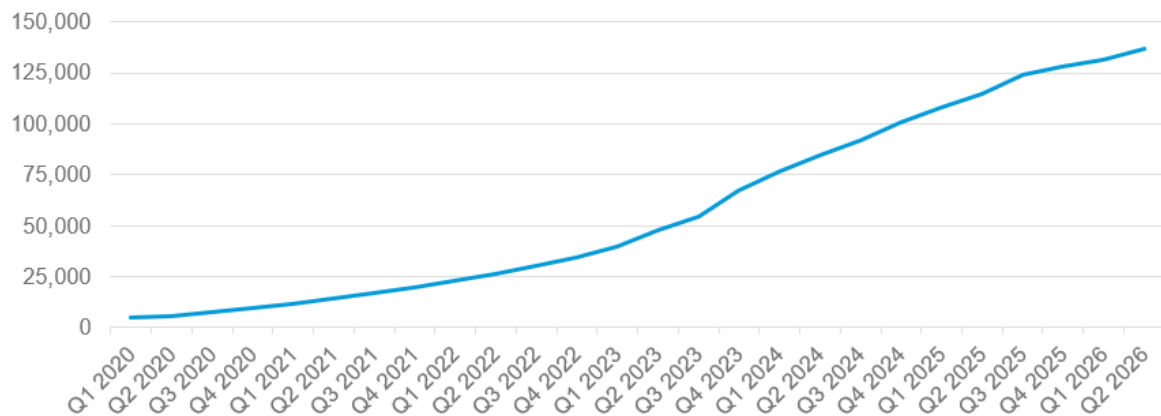
⁴ *Acquired* and *committed* are defined in Appendix A.

⁵ Nearly 1,300 DCFC ports are completing their engineering review to support finalizing an incentive commitment and an additional 1,630 DCFC ports are on-hold waiting for attrition to create space under the port target so that they can receive incentive commitments with total commitments reaching but not exceeding the target 3,157 ports.

B. Continued EV adoption

Deployment of EV charging infrastructure has occurred with continued growth in EV adoption in the Company's service area. Although the pace of new EV registrations has moderated since the expiration of the federal EV tax credit, new EV registrations continue each quarter, demonstrating ongoing demand for electric vehicles.

Figure 3. Cumulative New EV Registrations Since 2020 in Con Edison Service Area



Con Edison observes that high visibility and accessibility of a diverse mix of EV charging stations can increase awareness of vehicle electrification opportunities and can promote EV adoption.⁶ Consistent with customer survey results shared in previous filings in this proceeding, no single charging use case is sufficient to support EV adoption across its diverse service territory.⁷

C. Deployment under budget

Program deployment is on track to achieve port targets while remaining below authorized budgets, demonstrating that the Make-Ready Program's cost containment strategies have been effective while enabling flexible incentive management and targeted deployment.

Con Edison achieved cost containment through active management of incentive levels within the Commission-authorized program structure. As discussed in later sections, throughout the duration of the program, the Company reduced average incentive amounts paid per L2 port while continuing to support targeted incentives for projects that advanced specific program objectives

⁶ Over the course of the PlugNYC demonstration project, awareness of curbside chargers measured through consumer surveys has more than tripled from 7% to 29%. Case 14-M-0101, *Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision*, REV Demonstration Project: Curbside Electric Vehicle Charging Q2 2025 Quarterly Progress Report (July 30, 2025).

⁷ Case 18-E-0138, *EVSE & I Proceeding*, New York Joint Utilities' Comments on the Petition to Continue Make-Ready Program During the Program Review Period and Responses to Questions and Key Issues (Oct 6, 2025) at Appendix 5.

(e.g., rapid deployment) or required complex upgrades.⁸ As discussed in prior filings, Make-Ready projects exhibit variation in cost based on site conditions, electrical infrastructure requirements, location characteristics, and charging use case.⁹ The existing structure allowed the Company to accommodate this variability while managing to an overall budget.

⁸ A comparable L2 make-ready program, Southern California Edison's Charge Ready Light Duty Program, reports per plug incentives that are approximately 20% higher than those observed for Con Edison's L2 program over the same time period (2021 through 2024). SCE Charge Ready Light Duty Program: 2024 Evaluation Report (June 30, 2025), p. 47.

⁹ Case 18-E-0138. *EVSE & I Proceeding*, New York Joint Utilities' Comments on the Petition to Continue Make-Ready Program During the Program Review Period and Responses to Questions and Key Issues (Oct 6, 2025) at Appendix 6: Upstate and Downstate L2 Make-Ready Eligible Project Costs.

III. Program Evolution and Lessons Learned

The Make-Ready Program has undergone both substantial growth and evolution since it began in July 2020. This section describes the different phases of the program, along with lessons learned and controls implemented in each.

A. Initial Program Launch (2020-2021)

Description

After the initial Make-Ready Program Order in 2020, Con Edison and the other Joint Utilities developed and established a program structure, including an Implementation Plan, Participant Guide, and program website, and opened the new program. Early program resourcing focused on program management and business development teams. Across 2020 and 2021, the Company gathered data and insights about prospective participants and site settings interested in installing electric vehicle chargers, educated participants about the program offerings and value propositions, and acquired the first charging port in May 2021.

Lessons Learned – Market Development & Growth

- **Market engagement is critical for establishing trust and catalyzing initial project acquisitions:** With the launch of a new program, an early focus on business development, outreach, and communications strategies was essential to build awareness and trust among potential Participants, and to develop an early program pipeline. Activities focused on market education and stakeholder ecosystem development prompted a high number of initial project applications to be submitted (23 L2 and 22 DCFC applications were submitted in 2020, and 1,368 L2 and 98 DCFC submitted in 2021). The Company:
 - Focused immediate attention on building relationships with EVSE developers and contractors from other markets (e.g., energy efficiency) to quickly build a diverse and scalable portfolio of Make-Ready participants who would have a low-friction experience moving through the program.
 - Published the Participant Guide (with the Joint Utilities) and the Con Edison Implementation Plan in August and September 2020 respectively:
 - The Participant Guide provides current and potential program participants with cross-territory information on program eligibility, the application process, operational requirements, reporting requirements, and utility-specific contacts.
 - The Con Edison Implementation Plan provides utility-specific guidance on project and incentive level eligibility, the participation process, program outreach and education efforts, and budget allocation.
 - Published the program website with frequently updated information and resources as program processes were developed and refined.

- Launched monthly “Trade Ally” calls to educate the market on program updates, procedures, and requirements, gathering 50+ stakeholders each month.

Lessons Learned – Program Oversight & Controls

- **Core project management processes are critical to implement quickly from the start:** Before the first port could proceed to incentive commitment and construction, the Company put project management tools in place to track the information and progress of projects that had applied. Validation of project characteristics, eligibility, and anticipated costs were necessary before committing incentives to any applied sites. The Company developed and implemented core processes addressing the first step through the conclusion of a project and, as the first projects moved through their lifecycle, the Company continually identified and acted on opportunities to further improve controls. The Company:
 - Developed application requirements and an early online application portal.
 - Engaged its electric operations organization from the beginning to integrate service connection processes for a seamless customer experience and strong internal oversight on submitted projects.
 - Created initial program management tools for tracking projects, calculating incentives and issuing contracts, and reporting.
 - Implemented an early control to prevent participant fraud by designing a framework for project cost containment, including a structure for comparing cost line items. This also included a process to remove risk of program exposure to customer cost overruns.
 - As the first projects reached completion of construction, launched a work verification process to confirm and document installation of 100% of incentivized ports, and implemented an invoice review process for project information and eligibility accuracy for all projects prior to payment.
- **Early program application volumes can react significantly to incentive adjustments:** Within regulatory and budgetary caps, incentive levels needed to be tested in a new market to determine the optimal level for both timely and cost-effective achievement of goals. In doing so, the Company learned that it is important to communicate clearly to the market any upfront constraints on the application volume or duration of certain incentive rates.
 - The Company adjusted L2 incentive program cost caps to spur slow-to-start application growth and learn about impact on market demand. When application volume exceeded forecasts, cost caps had to be quickly reduced, causing temporary market confusion and constraints on program resources.

B. Scaling Market Capacity and Program Engagement (2022-2023)

Description

In 2022 and 2023, as application volume began to rise, the program focused on supporting scale with enabling technology, improving developer education and customer experience, increasing the quality and cost effectiveness of the program pipeline, and refining adjustments to incentive caps to respond to market conditions and cost containment goals. Program-specific resourcing grew to include technical roles focused on reducing project lifecycle times and maturing program IT applications and tools.

In the same period, EV adoption began to rise rapidly, with registrations in Con Edison's service area reaching a quarterly peak above 12,000 in Q4 2023.

Lessons Learned – Market Development & Growth

- **Participant-facing tools that streamline and deliver key information are important enablers of program scaling:** While internal program and project management tools enabled the rapid launch of the program, new market-facing tools were developed as the program entered into the phase of rapidly scaling up. With these, Participants no longer needed to request ad hoc project information or liaise with a Company representative to understand costs – online tools readily provided this information, improving application submission speed and reducing program costs.
 - In March of 2022, the Company launched its Salesforce application portal, which gave Participants a portfolio-level view of all of their projects, integrated the program application portal with the service connection management system for a “one-stop-shop” experience and reduced time needed to review and process applications, calculate and approve incentives, sign contracts, and track work verification and final payment reviews and payment processing. The platform also provided a central location for all project information.
 - The Company launched its online EV Charging Rate calculator to support customer understanding of how to manage operational costs of EVSE equipment.
- **Stakeholders share valuable insights with each other that motivate market momentum, if provided opportunities to engage with one another:** In this phase of the program, the Company recognized its unique role in the New York City and Westchester regions as a convener with the EVSE project development ecosystem. Stakeholders across the industry had valuable experience, knowledge, and ideas to share that would efficiently and effectively spur market education and program participation.

- The Company hosted a day-long event to educate developers about best practices and resources for connecting EVSE projects.
- The Company hosted its first “E-Mobility Awards” ceremony for program participants in 2023, creating an opportunity for in-person networking, recognition of best practices, and information sharing.
- **Early advisory services and strong in-flight technical support can improve efficiency and clarity with respect to project costs and timelines:** Developers new to the EVSE technology and/or the Company’s service connection process were able to submit higher quality applications and move faster up technical learning curves to get projects done more efficiently with this type of support and customer service.
 - In 2022, the Company created an enterprise-wide initiative to reduce service connection timelines for electric vehicle projects, after observing that 1) many EVSE developers were new to the territory and unfamiliar with Con Edison-specific processes and grid design and 2) EVSE construction timelines can be mismatched with Company service connection timelines when larger grid upgrades are needed. Subsequently, in 2023, the Company identified and began implementing 17 recommendations to reduce service connection timelines.
 - The Company also added dedicated resources for Advisory Services, creating a more efficient and seamless experience for customers needing early site assessments to gauge project feasibility. This gave developers more education and support to design projects with lower utility-side costs for further cost containment.
- **Budget baselines support effective port target deployment while maintaining flexibility as a program scales:** The existing baseline-budget-target framework allowed the Company to innovate with targeted incentive adders for specific use cases while preserving discipline over average program expenditures. The framework created a clear reference point from which to adjust incentives up and down, in response to market needs, and to direct funds where most necessary.
 - For example, the incentive cost cap was adjusted downward for L2 ports, lowering the 100% tier incentive cap from \$11,257 to \$8,000 per port in March 2023, in response to high program demand. These lowered cost caps were paired with incentive adders that signaled the program’s additional goals of scale and speed to market.
- **Formal queue management processes are needed with increasing project application volume:** The rapid influx of L2 applications in 2021 caused a strain on internal resources and initiated a waitlist environment. An active management process was necessary to reduce attrition from quality projects.
 - The program developed several strategies to manage the queue and move through a backlog of approximately 20,000 ports throughout 2022, clearing

the waitlist by Q1 of 2023. The queue management process was later documented and refined for use by other utilities.¹⁰

- **Future-proofing can reduce cost and disruption of later site expansion, but developers need stronger signals to prioritize longer-term expansion:** Developer feedback indicated that available future-proofing incentives, which were capped at ten percent of eligible costs per site, often did not cover sufficient future-proofing costs and complexity and that customers, in turn, prioritized their capital investments in immediately operational ports.

Lessons Learned – Program Oversight & Controls

- **Program scale and benchmarks enable more effective cost containment:** As the program gained momentum and scale, the Company learned more about project costs and timelines. These insights were translated into operational controls through the formalization of project cost management tools and processes. During the midpoint review, the Company also sought to contain costs through narrower and more restrictive definition of areas or projects eligible for the up-to-100% incentive tier to direct the enhanced incentive only to low-and-moderate income residents in the service area.
 - Having completed many projects, the Company utilized this project data to refine its cost benchmarking tools, creating a model that better compared submitted costs of new projects to comparable historical projects, considering size and other site characteristics. In 2023, the Company also standardized its review process for cost justifications from participants.
 - The Company supported elimination of the disadvantaged community “plus one mile” radius for DACs (which was too broad a geographic area in CECONY’s dense urban service territory) while also suggesting building-specific¹¹ qualification metrics for low-income multifamily housing, which were adopted in the Midpoint Order.

C. Scaled L2 Installation and DCFC Ramp-Up (2024-2025)

Description

The market development and incentive structures put in place in 2022-2023 resulted in successful growth of L2 application volume and a large uptick in installation of new L2 chargers

¹⁰ Case 18-E-0138, *EVSE & I Proceeding*, New York State Electric Vehicle Application Queue Management Utility Manual (December 18, 2025).

¹¹ Case 18-E-0138, *EVSE & I Proceeding*, Joint Utilities’ Comments on the Department of Public Service Staff Electric Vehicle Make-Ready Program Midpoint Review and Recommendations Whitepaper p. 19 (May 15, 2023).

in 2024 and 2025. As a result, the Company was able to almost fully commit incentives up to the program's regulatory L2 port target while continuing to be under program budget.

During this time, and in response to the 2023 Midpoint Order's increased targets, budget, and incentives to meet market need, the Company focused on expanding the DCFC deployment application pipeline and installations, which had been slow to scale until this point in time. This focus was driven by a clear market need for larger public sites to serve a growing rideshare market segment¹², and because of EVSE technology shifting towards higher capacity ports. The Midpoint Order also instituted updated EVSE communication standards and requirements related to data collection. As a result, the Company and program participants worked together toward compliance with the updated requirements. The Company also worked with the Joint Utilities to onboard a new vendor to support educating participants and their Network Service Providers (NSPs) on data submission requirements and to gather and store the submitted data.

As the market matured, the Company observed participation from site host types with wide-ranging motivations for installing EVSE. At MUDs and fleet sites, EV charging installations compete with other capital expenditure opportunities and incentives help EVSE deployment compete against other projects. Additionally, developers of these sites report customers' desire to minimize both disruption and cost of construction while preparing for future EV adoption. In particular, in New York City, many developers working with MUDs must navigate co-op and condo board priorities for building construction projects. In contrast, many public DCFC site hosts aim to drive profit over time and incentives defray the upfront costs, helping to improve the operating economics of the site and attract investors to raise the remaining upfront capital.

The Company also learned from its deployment of public curbside L2 chargers during this time under its REV Demonstration Project, which was implemented in close coordination with the Make-Ready program. The project's charger utilization was six times what was expected, demonstrating a strong demand from drivers (in particular, rideshare drivers and drivers without dedicated parking) for easily accessible, long-dwell time charging.¹³

Lessons Learned – Market Development & Growth

- **End users expect a diverse mix of EV charging infrastructure, and incentives are an effective lever to enable development across a portfolio of use cases:** In Con Edison's January 2025 survey on charging access and availability, respondents identified access at a variety of charging settings as critical to EV adoption: overnight charging near their residences, fast charging near their residences, and long-distance travel charging ranked

¹² In October 2023, the City of New York and the New York City Taxi and Limousine Commission (TLC) adopted the Green Rides Initiative, requiring high-volume rideshare companies (e.g., Uber and Lyft) to dispatch all trip to either zero-emission vehicles or wheelchair accessible vehicles by 2030. As of June 2026, there are 82,106 for-hire high-volume vehicles in New York City (13,544 of these vehicles are EVs). TLC Factbook, available at: <https://www.nyc.gov/site/tlc/about/data-and-research.page>.

¹³ Case 14-M-0101, *Proceeding on the Motion of the Commission in Regard to Reforming the Energy Vision*, Curbside EV Charging Q3 2025 (October 31, 2025).

the highest in influencing EV adoption decisions.¹⁴ To encourage market development across this mix of use cases, incentives needed to be adjusted and tested further, in alignment with increasing prioritization of DCFC.

- Con Edison updated its incentive caps in January 2024 in response to the new incentive baselines established by the 2023 Midpoint Order. Con Edison set its utility-specific baseline incentive cap at \$800 per kW with discretionary adders in line with program priorities (e.g., for timely project completion, use of load management technology, and project size and interconnection complexity). Using the flexibility available under the program structure, Con Edison modified its DCFC strategy in November 2024 by increasing the incentive cap for qualifying large public sites with six or more ports, which spurred higher rates of public port applications.
- The Company launched an online eligibility calculator to assist participants with understanding how different factors influence incentive amounts, such as number of ports, port capacity, geography, and setting of a project.
- **Partnership with municipal governments is critical to expand curbside charging and meet strong unmet demand.** The Company partnered with NYC Department of Transportation on the curbside pilot, which required both funding and innovation around design permitting. The resulting utilization showed that there was existing unmet demand as well as likely queuing and wait times for curbside charging availability. Expansion of curbside charging at scale will require make-ready funding and continued collaboration with New York City.¹⁵ The Company has also partnered with multiple developers since 2023 to deploy curbside charging infrastructure in several major Westchester municipalities.

Lessons Learned – Program Oversight & Controls

- **Market participants are willing to align to standards, but changes take time to implement when they have meaningful supply chain impacts:** The Midpoint Order instituted updates to communications standards for eligible charging equipment. The market needed enough time to understand and adjust equipment procurement and supply chain planning for a smooth transition and to avoid market disruption.
 - The Company focused efforts on internal and JU-wide education on these standards, bringing in subject matter experts from organizations such as the Electric Power Research Institute (EPRI).

¹⁴ Con Edison EV Charging Access and Availability Survey, January 2025; Base: Total survey, n=1,009. Con Edison customers responded that the following types of EV charging access would most encourage EV adoption (customers could rank up to three selections): overnight charging at or near their residence (64%), fast charging near their residence (51%), charging on long-distance road trips (51%), and charging at their workplace (19%).

¹⁵ The curbside demonstration project led to an RFP from NYC DOT for future curbside expansion. NYC DOT has applied to Con Edison's make-ready program and is on the waitlist for L2 incentives.

- The Company developed market education for program participants on compliance timelines for meeting these standards and enforcing these standards for new applications or program contracts once they were in place.
- **Improving data collection requires coordination with NSPs and Participants, with all parties aware of and acting on requirements:** While required data points are communicated to the participant and mandated during contracting in the project development process, ultimately it is often NSPs who store and provide the data. NSPs have contractual relationships with program participants or site hosts who are acting as owner/operators. As a result, it is typically the larger developers who have the most leverage over NSPs, while other entities can face more challenges in pushing their NSPs to action. The Company also observed challenges when three NSPs in the service area exited the business, leading to at least 13 sites needing to implement new solutions for collecting and providing data.
 - After the 2023 Midpoint Order, the Company continued to collect data via a third-party data aggregator and report all data collected. In 2024, the Joint Utilities updated required datapoints for reporting from Participants in Implementation Plans and other market materials and onboarded a new third-party aggregator.
 - In collaboration with the third-party aggregator, the Joint Utilities implemented the Preferred Network List in April 2025. This list benefited program participants by providing them insight into the most effective NSPs but it did not require them to use them. The Commission's subsequent 2026 Order restricting the use of NSPs to those meeting data reporting requirements will be a more effective tool in supporting data compliance.
 - In 2025, the Company began direct outreach to NSPs on top of the JU's data vendor's efforts as it became evident that this was a more effective route to engage participants on their data reporting obligations.
- **Continued improvement in customer support and advisory services enabled further efficiencies in program administration:** Site assessments, rate analyses, fleet advisory services, customer education, and technical consultations helped customers evaluate project feasibility before committing substantial resources. These services conserve customer and utility resources by allowing engineering to focus on projects likely to proceed. For example, in 2024 and 2025, approximately 80% of projects that received a site assessment did not proceed to a full application and engineering review, meaning that the desk-review site assessment gave customers the information they needed to determine the project was not viable which in turn preserved customer and Company engineering resources for viable projects. The Company also observed lower attrition among submitted projects that completed a site assessment and moved forward to engineering review.
 - Building on the early success of the advisory services offering, site assessments were refined to incorporate information frequently requested by customers, such

as protected street paving restrictions and existing electric service locations. In 2025, Con Edison conducted a customer survey to gather feedback on the offering, with results indicating strong overall satisfaction. The feedback informed additional improvements to the site assessment process, including the development of an Interconnection Guide that provides customers with a high-level overview of project types, expected timelines, roles, and key considerations associated with each.

- As the updated DCFC incentive levels successfully led to larger public sites, which also led to more projects with larger service upgrades and construction timelines, the Company refreshed its internal initiative to identify opportunities for time savings during the service connection process. This refresh was completed in 2025, leading to several initiatives launching in 2026.

D. Maturity and Post-Installation Excellence (2026)

Description

From the end of 2025 through early 2026 as the program's installed base of chargers reached critical mass, the Company has used its lessons learned to improve activities focused on overseeing Participants' post-installation performance and charging customer experience. The Company also continued its focus on obtaining and enforcing Participants' timely and complete provision of charging data to inform program oversight and design.

Based on the most robust set of data on the program's chargers and sites to date, the Company has assembled a dataset that will contribute to New York State's understanding of electric vehicle charging trends: refer to the appendices for participant information and port and charging session data.¹⁶ Additionally, Appendix G includes the Company's data-reporting score, as defined by the 2026 Clarification Order, and Appendix C includes the underlying data that contributed to the scores.

Lessons Learned – Market Development & Growth

- **Active engagement and management of participants preserves market engagement and momentum even during program queue management:** In the first half of 2026, the DCFC pipeline reached a point where applied ports, even with attrition, were set to exceed the regulatory port cap of 3,157. The program implemented a DCFC project waitlist, but the Company recognized that continued engagement was key to ensuring market interest in EVSE development would remain high, whether or not projects would ultimately be able to proceed through the program.

¹⁶ For data requirements for the end-of-program report, see Case 18-E-0138, *EVSE&I Proceeding*, 2023 Midpoint Order (November 16, 2023), p. 24.

- In May 2026, the Company launched a queue management process, using the L2 framework developed earlier in the program as a guide. The Company communicated extensively to participants through individual conversations as well as Trade Ally call presentations and follow up emails.
 - In order to prevent high-quality projects from getting “stuck” in the queue, the Company is providing equal opportunity to all Participants to “swap” projects within their submitted portfolios. This means that more feasible or cost effective projects can be switched for their projects that are ahead of them in line but face barriers that could delay, cancel, or increase project costs. The Company is closely monitoring attrition and releasing ports on a monthly basis, building on queue management strategies established earlier in the program.

Lessons Learned – Program Oversight & Controls

- **Changes to initial project verification can enable downstream improvements in operational performance and compliance:** After several stages in the program evolution and clarifications regarding communication standards, data needs, and setting-specific operating requirements, the program now uses more sophisticated controls that assess project quality and compliance early on.
 - In adherence to Commission requirements, the Company refined work verification requirements by integrating checks for data availability and transmission before work verifications can be passed and projects receive payment.
 - Upon observing a trend of new applications proposing public DCFC stations in environments not optimized for vehicle access, the Company rolled out more detailed public site criteria to enhance charger visibility, accessibility, and the overall driver experience. This included a number of new requirements such as directional signage, clear instructions to enter the site, and ease and speed for driver access and use of chargers for a more efficient and lower friction driver experience. For example, public DCFC sites must be truly “self-serve” and not rely on valet or attendants for access to chargers. As of July 2026, the Company had reviewed over 2,700 public DCFC ports, with over 60% deemed eligible for program contracts and the remainder still going through review and/or modification. Applied projects that are unable to make the necessary site modifications and are consequently ineligible for public incentives have the option to withdraw or receive a lower tier incentive as a private site.
- **A more complete set of data allows for deeper understanding of market behavior, but is only possible through deep NSP engagement.** With more direct engagement with NSPs, the Company has gained more familiarity with the range of measurements, metrics, and data structures used to reflect EV charging activity. By bringing data

collection directly in-house, and building out internal capabilities for data storage and analysis, the Company is well-positioned to continue to gather insights from session and outage data to inform any future program.

- In 2026, the Company shifted to a direct data collection, intake, and validation approach. The Company is now working directly with NSPs to collect data on a monthly basis. This approach led to the Company's data completeness score improvement as demonstrated in the Company's 2025 Annual Report and 2026 Semi-Annual Report. The data completeness score as of June 30, 2026 is 95.3% for DCFC and 85.0% for L2 stations, calculated based on the methodology documented in the Data Compliance Plan.¹⁷
- The Company has also been able to expand data collection efforts to additional data points to supplement outage data. In keeping with the 2026 Clarification Order, the Joint Utilities are now using uptime as a substitute (i.e., the inverse) of outage data where outage data is not available. This data will provide a more complete picture of charger availability and operations.
- With a more complete dataset, the Company is conducting assessments of project behavior and compliance across the program, leading to follow-ups with participants, NSPs, and sites as needed.
- The Company is designing new program requirements to further facilitate long-term site access to audit EVSE operations and driver experience. While Participants have a five-year obligation to provide Company access to all incentivized sites, the Company learned through the operational site visits it conducted in compliance with the March 2026 Order¹⁸ that some Participants had trouble coordinating these visits with site hosts, especially in instances where building ownership or management had changed since project installation. Post-installation site host obligations for access (e.g., through program contracts) should be integrated into the program design and persist through changes in building management or ownership.

E. Lessons Learned throughout Program Administration

Description

While the Con Edison Make-Ready Program has evolved over the course of several distinct periods or stages, several cross-cutting lessons emerge when taking stock of the program as a whole. This section highlights these overarching lessons that have proven relevant throughout the years.

¹⁷ Case 18-E-0138, EVSE&I Proceeding, Data Compliance Plan (July 13, 2026).

¹⁸ Case 18-E-0138, *EVSE and I Proceeding*, 2026 Order (March 23, 2026) at p.14 and ordering clauses 13 and 14.

Lessons Learned

- **Clear and consistent goals guide a program:** Clearly identified deployment goals were instrumental in guiding the Make-Ready Program. The Commission updated technical standards and data-reporting-completeness measurement guidelines during the course of the Make-Ready Program, which led to periods of refreshing program information and controls, but overall targets kept the program on course and maintained momentum even as participants adjusted to these changes. If the program continues, carrying consistent standards and guidelines forward will support the original program vision and support market stability.
- **A flexible design allows program administrators to respond to market conditions and contain costs:** Flexible program design enabled the Company to respond to changing market conditions, support policy priorities, and accelerate deployment across a range of charging use cases. The Company followed the Commission's framework of baselines, budgets, port targets, and incentive tiers, ultimately adjusting program-specific incentive caps throughout the course of the program. This approach supported cost containment and deployment across diverse customer segments and charging applications as market conditions evolved.
- **Budget carve-outs preserve equity-focused deployment:** The incentive structure of the Make-Ready Program supported deployment of EVSE in DACs and low-and-moderate-income MUDs. Observations from the program to date indicate that future carve-outs can be specific to use case, with public DCFC costs typically being consistent across geographies. When used strategically, targeted program strategies can improve geographic outcomes. For example, the Bronx's share of Con Edison's cumulative committed and completed DCFC ports increased from 3% in Q1 2022 to 10% in Q1 2026 following targeted incentive adders, marketing, and developer engagement.¹⁹

¹⁹ The total number of vehicles registered for the Bronx borough is about 12.5% of total ~2.1M registered vehicles in counties served by Con Edison Company of New York: <https://nacmiasauto.com/nyc/methodology>.

IV. Early Recommendations for a Potential Future Program

As discussed in Section III, the program's consistent incentive structures helped customers plan while giving utilities flexibility to make targeted incentive adjustments to address market gaps. Within the structure described above, Con Edison recommends considering the following adjustments in potential future programs:

1. **The program design must address multiple objectives and metrics in selecting segments eligible for incentives and developing site eligibility rules.** Initial utilization is a useful and critical datapoint, but other considerations like the rate at which utilization in the segment ramps up, ratepayer cost, staying appropriately ahead of EV adoption to spur new EV purchases and avoid customer queuing, and equity also need to be factored in to program scoping. The Company's experience shows that more granular site characteristics such as site configuration, site size, number of ports to be installed, operator business model, and local availability or lack of other charging options all give important context to what is needed in an EVSE network to meet existing charging needs and to spur future EV adoption.
2. **Set the expectation that incentive eligibility can be adjusted over time, depending on market needs and performance by segment.** With ongoing shifts in market needs and in the pace of adoption as it responds to changing policy drivers, annual reviews of incented use cases and incentive levels would be useful, while maintaining flexibility to address any major unforeseen market developments. With regular reviews of use cases and their future requirements across charging speed, setting (e.g., public vs. private), use case (e.g., residential vs. commercial), and other factors, eligibility of different segments for incentives can be adjusted (with sufficient lead times to communicate to the market along with controls to moderate application / queue volume).
3. **Maintain support for public L2 charging use cases such as curbside.** Con Edison's experience with curbside utilization demonstrates pent-up demand and driver need for charging that is accessible to those who do not have a dedicated parking space. In dense urban markets like Con Edison's, curbside charging is an essential part of the EVSE network.
4. **Direct light-duty Class 2B fleets to the Medium- and Heavy-Duty ("MHD") charging program.** Class 2B fleets occupy a middle ground between traditional light-duty vehicle use cases and larger commercial fleet applications. Moving this segment into the MHD program, once it moves beyond the MHD Pilot to a full program in the MHD

proceeding,²⁰ would better align customer needs, vehicle operations, and infrastructure requirements within a fleet-focused framework while preserving continuity of support for electrification.

5. **Re-evaluate funding for new construction MUD projects.**²¹ Con Edison's analysis found that a majority of projects proceeding to service requests without Make-Ready incentives are new building construction projects, indicating that EV charging infrastructure is increasingly becoming part of standard development practices for certain building types and is cost-effective to include in new-construction service requests. Make-Ready support could be re-balanced between near-term and future-proofing charging buildout to achieve cost effective outcomes for ratepayers.
6. **Provide lowest level of incentives that still allow the MUD segment the ability to build EVSE projects aligned with their site restrictions, capital planning and budget cycles.** Many MUDs in the Company's urban environment have indicated a preference to build charging to not only meet existing tenant demand but be prepared for demand multiple years in the future as existing or new tenants make decisions about buying their next vehicle after charging is available. Stated reasons include management of disruption to tenant parking in tight indoor garages during construction; minimization of repeat costs such as permitting, engineering, and design; and alignment with capital planning and investment cycles or co-op / condo board engagement. A potential future program should develop options with which the MUD segment can navigate these needs and challenges while minimizing program and electric system costs.
7. **When the site host is not the participant, require site host agreements in addition to program agreements.** This provides all parties with clarity with respect to site maintenance and access.
8. **Design future-proofing incentives that provide enough support for future EVSE by use case.** For example, in certain use cases, future-proofing is useful when directly tied to additional EVSE parking spots, while in others, it may be better to support higher powered chargers to accommodate future faster charging as EVSE and vehicle battery technology improves.

²⁰ Case 23-E-0070, Proceeding on Motion of the Commission to Address Barriers to Medium- and Heavy-Duty Electric Vehicle Charging Infrastructure.

²¹ In Con Edison's service area, to qualify for incentives, LMI buildings must demonstrate that they serve a LMI population through the steps outlined in the Company's Implementation Plan.

V. Conclusion

The combination of clear objectives and accountability with sufficient flexibility to respond to a changing market served as an important foundation for the Make-Ready Program from 2020 through 2026. A stable program supporting diverse charging settings, informed by reliable data and ongoing evaluation, can advance EV adoption, equitable access, geographic coverage, and cost containment. Con Edison recommends that design for a potential future program preserve those core features while prioritizing ongoing evaluation of program data in context of charging use cases, refining future-proofing treatment, continuing customer advisory services, and adjusting some of the incentive requirements as discussed above.

Appendix A: Definitions

Please also refer to the Data Compliance Plan, including the Plan's Appendix A. Data Specification for JU Reporting, which was filed on July 13, 2026.²²

Please note that some of these Definitions are obtained from ICF's Annual Data Collection Report to Con Edison; others are provided by Con Edison and O&R directly.

- **Acquired Site/Port/Plug/Station:** EV charger installations which were operational and paid incentives from one of the Companies as of **June 30, 2026**.
- **Charger:** Synonymous with Station or Charging Station, defined below.
- **Committed Budget:** Refer to funds designated for participants who have executed a program agreement, representing a financial commitment by Con Edison or O&R, pending disbursement.
- **Data Contractor:** A third-party consultant that may be contracted by the Joint Utilities to assist with activities like data collection from NSPs, data ingestion, and data aggregation across Companies.
- **Data Remediation:** Controlled methods for resolving anomalies across datasets before scoring data against the data reporting threshold.
- **Excluded Outage:** Fully Excluded Outage Duration (Minutes), which represents the portion of an outage event, expressed in minutes, that is excluded from uptime. As defined by National Vehicle Electric Infrastructure ("NEVI"), excluded outages include electricity service interruptions, power interruptions due to the fault of the vehicle, scheduled maintenance, vandalism, or natural disasters. Note that excluded outages are assumed to be zero if an NSP provides outage data and does not ascribe any time to excluded outages.²³
- **Network Service Provider ("NSP"):** Business entity that provides centralized networking, communications, and data services for charging equipment connected across an Internet-enabled network
- **Outage:** Record of an interruption to the availability of a charging station. For the purposes of calculating the percentage of downtime or uptime, excluded outages and the corresponding duration may be identified.
- **Participant:** An entity, including its subsidiary or affiliate, that applies for and/or receives the incentives available through the Make-Ready Program. This entity signs the Program Agreement.

²² Case 18-E-0138, EVSE&I Proceeding, Data Compliance Plan (July 13, 2026).

²³ National Electric Vehicle Infrastructure (NEVI) Formula Program Final Rule, 23 C.F.R. § 680.116 (2022).

- **Plug:** The connector at the end of an electric vehicle supply equipment (EVSE) cable that inserts into an electric vehicle to transfer electricity.
- **Port:** Part of the electric vehicle supply equipment (or charging station) that supplies power to fill one electric vehicle's battery at a time. A charging station's port may have multiple connectors, but each port represents a single dedicated connection capable of powering only one vehicle. In the L2 program, a port corresponds to the number of plugs eligible for incentives such that each plug is capable of simultaneously charging an EV. In the DCFC program, a port corresponds to the number of plugs eligible for incentives such that each plug is capable of simultaneously charging an EV at minimum power rating of 50 kW.
- **Program Agreement:** A required contract that a Participant must sign before construction, confirming the approved service connection layout, incentive offering, and program terms.
- **Session:** Record of a charging event.
- **Site:** A location where one or more EV charger(s) have been installed. In the context of the Make-Ready Program, where one or more station(s) have been installed or have applied to be installed with the assistance of Make-Ready incentives.
- **Site Owner or Operator:** Owner of the property where a Make-Ready Program EV station is located or operator of the site, overseeing the EV charging equipment at a site.
- **Station or Charging Station:** Electric vehicle charging equipment with a serial number ascribed by the manufacturer. Stations may have one or more ports that charge vehicles.
- **Uptime:**
This calculation is mentioned in the 2023 Midpoint Order; the NEVI calculation is as follows below.²⁴ Note that excluded outages (T_{excluded}) will be set equal to zero if an NSP provides outage data and does not ascribe any time to excluded outages.²⁵

$$\text{Uptime}_{\text{port}}(\%) = \left(\frac{525,600 - (T_{\text{outage}} - T_{\text{excluded}})}{525,600} \right) \times 100$$

²⁴ Case 18-E-0138, *EVSE&I Proceeding*, 2023 Midpoint Order (November 16, 2023), p. 73.

²⁵ See Appendix A of the Data Compliance Plan (Data Specification for JU Reporting) for information on outage reporting.

Appendix B: EV Make-Ready Program Annual Report Data Methodology Addendum

Appendix B includes a separately filed PDF and Excel document.

Appendix C: Con Edison Program Participation and Plug and Session Charging Data

Appendix C is a separately filed series of confidential Excel workbooks. Unless otherwise noted, data represents data collected across the full program history through June 30, 2026.

Note: “Plug and session charging data” is interpreted to refer to data received for eligible ports.

Appendix C (1)	- Infrastructure costs (broken out by customer and company infrastructure, allocated by make-ready costs and new business costs; new business costs are reported from start of the program through June 30, 2026) - Incentive levels received by each site - Total make-ready incentives paid per site
Appendix C (2)	Number of daily charging sessions by station
Appendix C (3)	- Daily aggregation of charging session count for Con Edison MRP stations - Daily aggregation of session and charging durations for Con Edison MRP stations - Daily aggregation of energy delivered (kWh) for Con Edison MRP stations
Appendix C (4)	Historical session data available through June 30, 2026; files provided for each NSP <i>Includes: Start and stop times of each session, session duration, charging duration, energy delivered during session (kWh), peak kW of the session</i> <i>Note: Sessions containing values that need to be cured are retained in the dataset as-is, until they are addressed through the cure process.</i>
Appendix C (5)	- Annual aggregated kWh per charging site with energy consumption data - Annual aggregated hours charging - Aggregated kW nameplate capacity - Annual site-level utilization percentage (energy-based)
Appendix C (6)	- Site-level aggregation of monthly maximum peak kW for each station at site with energy consumption data - Aggregated site kW nameplate capacity
Appendix C (7)	Outage records for Con Edison MRP stations from program start through June 2026 <i>Includes: Start and stop times of each outage and duration of each outage</i>
Appendix C (8)	See Appendix C4 for historical session data available through June 30, 2026
Appendix C (9)	Uptime information for Con Edison MRP stations from program start through June 2026 <i>Includes: Uptime measurement period start and end date, uptime percentage for station during measurement period</i>

Appendix D: Con Edison Participant Site information for Operational Sites

Appendix D is a separately filed confidential Excel workbook. The Semi-Annual Report equivalent is Appendix E.

Appendix E: Con Edison Station Information for Operational Sites

Appendix E is a separately filed confidential Excel workbook. The Semi-Annual Report equivalent is Appendix G.

Appendix F: Con Edison Station Confirmation (Attestation) Information

Appendix F is a separately filed confidential Excel workbook. The Semi-Annual Report equivalent is Appendix I.

Appendix G: Con Edison Station Scoring in Data-Reporting Score

Appendix G is a separately filed confidential Excel workbook. The Semi-Annual Report equivalent is Appendix K.