



VIA ELECTRONIC MAIL

July 7, 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

Re: Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure (18-E-0138)

Dear Secretary Phillips:

Advanced Energy United and Alliance for Clean Energy New York submit for filing the attached Joint Comments supporting the Joint Utilities Petition to Extend Managed Charging Programs During the Program Review Period filed on April 9, 2025.

Respectfully submitted,

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Advanced Energy United and Alliance for Clean Energy New York Comments

Re: Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure (18-E-0138)

Advanced Energy United (“United”) and Alliance for Clean Energy New York (“ACE NY”) support the Joint Utilities’ (“JU”) Petition to Extend Managed Charging Programs During the Program Review Period.

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 231,600 in 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 managed charging programs support integration of electric vehicles into the power grid. The programs in this petition help mitigate the strain on the grid by encouraging charging during off peak hours, which lowers peak demand and improves grid efficiency.



The reauthorization of managed charging programs will ensure continued success and prevent setbacks. As the JU noted, any pause in the programs can cause customer and market uncertainty and lead to decreased enrollment. Extending the programs will allow the JU the necessary time to develop effective strategies for improvement and expansion, while continuing to promote charging during off peak hours.

Orange and Rockland Utilities (“O&R”) has had much success with their managed charging programs, including higher-than-expected enrollment and satisfaction rates attributed to education and outreach. To build on this success, O&R is requesting \$600,000 be reallocated from their incentive budget to the implementation and enrollment budget. We support this request and appreciate the work O&R has done to advance the EV market.

United and ACE NY request that the Commission authorizes the extension of the residential managed charging programs until new reauthorization occurs. Doing so ensures program effectiveness, avoids program gaps, grows customer participation and satisfaction, and facilitates the continued growth of EV adoption in New York State.

Thank you for your consideration.

