National Grid
EV Infrastructure Make-Ready Program
Implementation Plan

Case 18-E-0138

Revised January 11, 2024

nationalgrid

EV INFRASTRUCTURE MAKE-READY PROGRAM IMPLEMENTATION PLAN

Contents

Glossary: Abbreviations, Acronyms and Definitions:

2018 Rate Case:	*Cases* 17-E-0238 *et al.,* Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Electric Service, which was resolved as directed by the Commission's March 15, 2018 *Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plans*.
Applicant:	Potential participants who have completed an application *for* the Make-Ready Program ("MRP") which has not yet been approved by National Grid.
Application Portal:	A customer-facing interface hosted on National Grid's website that enables Applicants to submit MRP applications online and facilitate various forms of communication with the Company.
Approved Contractor:	A contractor who has met the National Grid's approval criteria to install EV charging infrastructure incentivized through the EV Make-Ready Program.
CLCPA:	Climate Leadership and Community Protection Act
Commission:	New York State Public Service Commission
Company:	Niagara Mohawk Power Corp. d/b/a National Grid
CIAC	Contribution In Aid of Construction
Customer:	An entity taking electric service from the Company or a delivery customer.
Charging Station:	A collection of co-located EV chargers
DAC:	Disadvantaged Communities
DCFC:	Direct Current Fast Charging station
Developer:	An entity responsible for designing, constructing, and commissioning an EV charging station.

Disadvantaged Communities:	Communities that bear burdens of negative public-health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high concentrations of low- and moderate-income households. Envt'l Conservation Law § 75-0101(5).
Equipment Owner:	The entity that purchases and owns the EV charging equipment once it is installed.
EV:	Electric vehicle
EV Instituting Order:	The Commission's April 24, 2018 *Order Instituting Proceeding* in Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure
EVSE:	Electric Vehicle Supply Equipment
Implementation Plan:	Implementation Plan prepared in accordance with the Make-Ready Program Order.
L2:	Level 2 EV charging stations
Make-Ready Program:	The Make-Ready Program that is the subject of this Implementation Plan.
Make-Ready Program Order:	The Commission's July 16, 2020 *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs* in Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure
Make-Ready Midpoint Order:	The Commission's November 16, 2023 *Order Approving Midpoint Review Whitepaper's Recommendations with* Modifications, in Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure
MRP:	Make-Ready Program
MRP Landing Page:	A customer-facing page hosted on National Grid's website containing basic information regarding the Company's

	Make-Ready Program with links to other relevant sub-sites, such as the Application Portal.
MUD:	Multi-Unit Dwelling is a building consisting of five (5) or more residential units.
National Grid:	Niagara Mohawk Power Corp. d/b/a National Grid
New Business:	New Business is a sub-category of the Company's "Customer Requests/Public Requirements" category of capital expenditures. New Business describes the costs to serve new customers, conversion to serve new customers or substantial new load, or the addition of new phases to serve new three-phase customers.
NYSERDA	New York State Energy Research & Development Authority
OEM:	Original Equipment Manufacturer
Participant:	An entity that applies for and receives the incentives available through the MRP. This entity may also be responsible for owning, managing, and/or operating the EV charging equipment and may include the Developer, Site Host, Equipment Owner, Approved Contractor or Customer.
Phase 1 Make-Ready Program:	The Make-Ready Program offered by National Grid between April 2018 and October 1, 2020 as an outcome of the 2018 Rate Case which offers incentives for installation of EV infrastructure to support the deployment of L2 and DCFC stations in National Grid's electric service territory.
Site Host:	The owner of the site on which the EV charging equipment is installed. The Site Host may or may not be the Equipment Owner.
Staff:	New York State Department of Public Service Staff
ZEV:	Zero Emissions Vehicle
ZEV MOU:	A Multi-state Zero Emissions Vehicle Memorandum of Understanding committed to transportation electrification signed by Governor Cuomo in 2013. New York's share of the multi-state ZEV target is approximately 850,000 ZEVs by 2025.

Executive Summary

Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid" or "the Company") presents this Electric Vehicle Infrastructure Make-Ready Implementation Plan in accordance with the Commission's Make-Ready Program Order,[1] to advance the goals of the Climate Leadership and Community Protection Act ("CLCPA"),[2] and to support the State's target of 850,000 zero-emission vehicles ("ZEVs") on the road by 2025. This third revision of the Implementation Plan sets forth the process to facilitate customer installation of L2 and DCFC chargers in National Grid's electric service territory, and has been updated to reflect the Midpoint Order[3] of the Make-Ready Program.

The Make-Ready Program ("MRP") is intended to reduce the upfront costs of deploying Electric Vehicle Supply Equipment ("EVSE") infrastructure, thereby spurring the deployment of EVSE and enabling the accelerated adoption of electric vehicles ("EVs") to meet the State's climate goals. The Make-Ready Program Order established incentives for utility-side make-ready infrastructure and customer-side make-ready infrastructure. Certain Level 2 ("L2") and Direct Current Fast Charger ("DCFC") projects in Disadvantaged Communities or locations with low income designation would be eligible for up to 100 percent of total Make-Ready costs; certain publicly accessible site locations would be eligible for incentives up to 90 percent of total Make-Ready costs; and certain non-public

[1] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure* ("EVSE&I Proceeding"), Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs (issued July 16, 2020) ("Make-Ready Program Order" or "Program Order").
[2] Chapter 106 of the Laws of 2019. CLCPA is available at https://legislation.nysentate.gov/pdf/bills/2019/S6599
[3] Case 18-E-0138, *Order Approving Midpoint Review Whitepaper's Recommendations with Modifications*, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure (issued November 16, 2023) ("Make-Ready Midpoint Order" or "Midpoint Order").

and employee workplace parking would be eligible for incentives covering up to 50 percent of total Make-Ready costs.

The Program Order set targets for the Company to support 15,728 L2 and 504 DCFC plugs through 2025; and the Midpoint Order adjusted these targets to 7,439 L2 and 1,329 DCFC plugs. An on-line Make-Ready Program Application Portal ("Application Portal") was implemented in 2020, and a revised Application Portal was released in October 2023.

The Make-Ready Midpoint Order adjusted National Grid's authorization to offer up to $40.801M in L2 make-ready incentives, $67.665M in DCFC make-ready incentives, $16.270M for administration and Fleet Assessment Services, $5.090M for transit authority make-ready programs, and $5.413M for future-proofing of charging stations. Additionally, the Midpoint Order authorized the New York State Energy Research and Development Authority ("NYSERDA") to offer $5M in Micromobility incentives on behalf of the upstate utilities.[4]

Participants work with an Approved Contractor to submit applications via an on-line Application Portal. If the Application is approved by National Grid, Participants may commence project construction using an Approved Contractor. Incentive payments from the Company to Participants are made after construction has been completed and appropriate project documentation has been submitted to the Company via the Application Portal. Those seeking to construct projects in Disadvantaged Communities are able to choose eligible locations through a map on the Company's MRP Landing Page. Incentives

[4] The upstate utilities are are Central Hudson Gas & Electric Corporation, New York State Electric & Gas Corporation, National Grid, and Rochester Gas & Electric Corporation.

for approved make-ready projects will be available between July 16, 2020 and December 31, 2025 or until such time that the Company has fully allocated the authorized funding. If plug goals are not met by this date, the Make-Ready Program may remain in effect until the plug goals are met or budgets are depleted.

I. Introduction and Preliminary Statement

This Implementation Plan outlines how National Grid carries out the directives of the Make-Ready Program and Midpoint Orders and serves as a reference for MRP Participants, other stakeholders, and interested parties. The MRP seeks to accelerate the installation of EVSE through financial support for the associated electric infrastructure. The Implemenreptation Plan describes the tactics the Company uses to implement the MRP, inclusive of the associated administrative costs and the Fleet Assessment Services.

On April 24, 2018, the Commission commenced a proceeding to consider the role electric utilities can play in building cost-effective infrastructure and equipment to accommodate the "needs and electricity demand of EV and EVSE."[5] In issuing the EV Instituting Order, the Commission acknowledged that regulatory attention was needed to reduce obstacles to EV adoption and ensure critical infrastructure is in place to enable the emerging EV market.

Subsequently, the CLCPA codified ambitious targets governing economy-wide reductions in greenhouse gas emissions in New York.[6] To support the goals and in

[5] EVSE &I Proceeding, Order Instituting Proceeding (issued April 24, 2018) ("EV Instituting Order"), p. 3.
[6] *See* Climate Act Fact Sheet, *available at*: https://climate.ny.gov/-/media/CLCPA/Files/CLCPA-Fact-Sheet.pdf

alignment with the State's policy on light-duty vehicle electrification outlined in the 2013 Multi-state Zero Emissions Vehicle Memorandum of Understanding ("ZEV MOU"), the Make-Ready Program Order and Midpoint Order provided direction to New York electric utilities to support the installation of EVSE across the State.

The initiatives authorized in the Program Order and Midpoint Order will help New York meet its emissions reduction targets by supporting increased adoption of EVs through statewide deployment of more than 38,000 L2 plugs and 6,300 DCFC plugs by the end of 2025. The Program and Midpoint Orders authorize collective spending by the Joint Utilities[7] up to $1.243B, with $372M of that amount allocated to directly benefit Disadvantaged Communities (as defined in Section II). The Commission authorized a total budget of $135M for National Grid. Tables 1 and 2 illustrate how the Company's budget is allocated across MRP elements and associated plug targets.

Table 1: National Grid Make-Ready Program Budget by Category

Program Category	Budget ($)
L2 Make-Ready Incentives	$40,800,534
DCFC Make-Ready Incentives	$67,664,610
Total Make-Ready Incentives	$108,465,144
Future-proofing	$5,413,169
Implementation and Fleet Assessment	$16,269,772
Total Make-Ready Program	$130,148,085
Transit Authority Make-Ready Program	$5,090,000
Total	$135,238,085

Table 2: National Grid Make-Ready Program Targets by Plug Type

Type of Plug	Count
L2 Plugs	7,439
DCFC Plugs	1,329

[7] The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, National Grid, Orange & Rockland Utilities, Inc., and Rochester Gas & Electric Corporation.

The MRP supports future-proofing certain sites to allow for subsequent cost-effective expansion. In addition to authorizing the MRP, the Commission also directed each utility to offer a Fleet Assessment Service to assist fleet owners making the transition to EVs. The Commission also authorized a Transit Authority MRP component. Finally, in the Midpoint Order, the Commission authorized NYSERDA to implement a Micromobility program on behalf of the upstate utilities.

II. Make-Ready Program Eligibility and Incentives

This section details the types of infrastructure, equipment, sites, and potential Participants that are eligible for the Company's MRP.

A. Equipment and Infrastructure Eligibility

Two categories of equipment or infrastructure are eligible for MRP incentives:

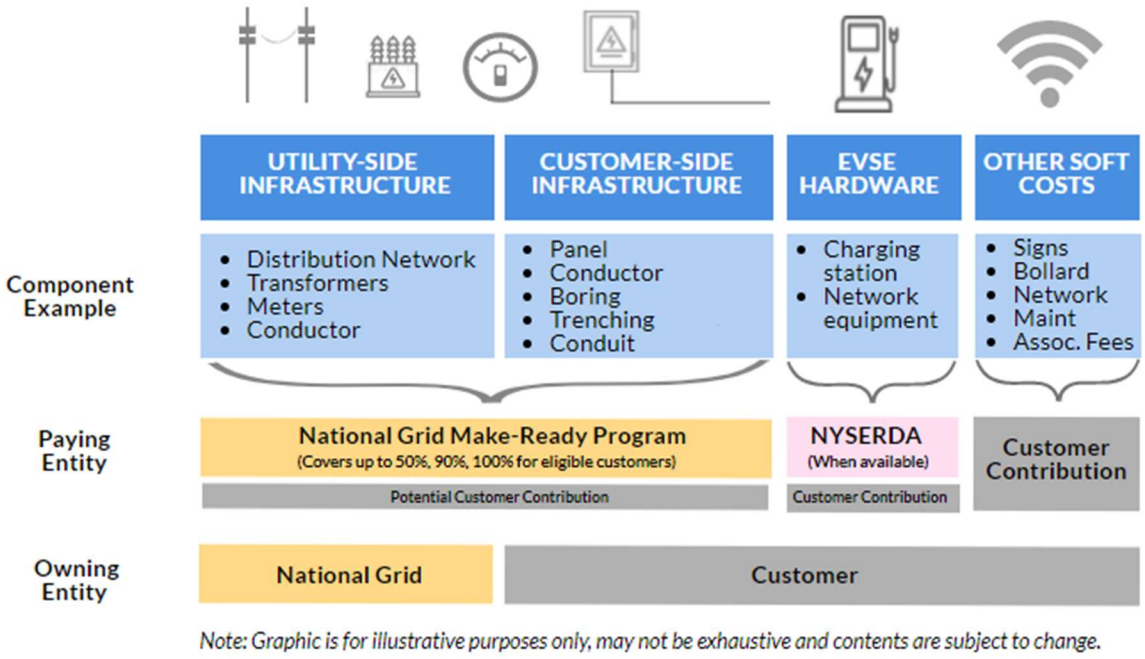
i. **Utility-side Make-Ready Infrastructure -** Utility electric infrastructure needed to connect and serve a new EV charger. This may include traditional distribution infrastructure such as step-down transformers, overhead service lines, and utility meters that will continue to be owned and operated by the utility.

ii. **Customer-side Make-Ready Infrastructure -** EV equipment or infrastructure necessary to make a site ready to accept an EV charger that is owned by the charging station Developer, Equipment Owner, or Site Host. This may include electric infrastructure such as conductors, trenching, and panels needed for the EV charging station as well as cost-reducing advanced technologies including energy storage and Automated Load Management Systems. EVSE and their software are

not eligible for incentives. Likewise, bidirectional chargers are not eligible for make-ready incentives.

Table 3, below, illustrates an example of the components applicable to utility-side and customer-side infrastructure, as well as the entity responsible for funding and owning the components.

Table 3: Make-Ready Program Components



Note: Graphic is for illustrative purposes only, may not be exhaustive and contents are subject to change.

The MRP incentives apply to both utility-side and customer-side infrastructure, but in different ways. The utility owns, operates and maintains the utility-side infrastructure, while customers own, operate and maintain the infrastructure on the customer-side. Absent the make-ready incentives, customers would pay for utility-side infrastructure through contribution-in-aid of construction ("CIAC") payments calculated so that National Grid recovers the entire cost to install the relevant infrastructure. Under the MRP, make-

ready incentives first are allocated to cover the cost of the CIAC payment. If the approved amount of make-ready incentive is greater than the CIAC payment, the remaining amount is applied to customer-side infrastructure. Many projects, particularly those for L2 plugs that do not require a new service, have low or no utility-side costs. Many DCFC plug projects that do require new service incur utility-side costs.

The Company may also approve future-proofing at the host site as described more fully in Section III. All customer-side make-ready work must be conducted by Approved Contactors to be eligible for the incentives under the MRP. Equipment associated with the EV charger itself, such as the actual EV charger, power block, modules, mounting hardware, or co-located distributed generation, are not eligible for incentives under the MRP. Cost-reducing advanced technologies, such as energy storage and Automated Load Management Systems, are eligible following the Make-Ready Midpoint Order.

B. Site Eligibility Criteria and Incentives

To be eligible for incentives through the MRP, the Site Host must be a National Grid delivery customer. The Applicant must submit an application meeting the eligibility requirements outlined below. The project application must be approved by National Grid and, per the specification in the Make-Ready Program and Midpoint Orders, project construction cannot have started prior to July 16, 2020. Fully completed MRP applications are required for National Grid to determine incentive level eligibility. The application process is discussed more fully in Section III.

The level of incentive available to Participants in the MRP varies by both project type and the project's actual make-ready costs. Within Disadvantaged Communities, public

DCFC projects and L2 projects at multi-unit dwellings ("MUDs") are eligible to receive incentives up to 100 percent of the actual cost of make-ready infrastructure. Additionally, L2 projects at MUDs outside of Disadvantaged Communities that meet site specific criteria and Curbside L2 chargers with designated EV parking spaces within or adjacent to Disadvantaged Communities[8] are eligible to receive incentives up to 100 percent of the actual cost of make-ready infrastructure. Publicly available L2 and DCFC projects with standardized plug types are eligible for incentives of up to 90 percent of their actual make-ready infrastructure costs. To be eligible for incentives covering up to 100 percent or up to 90 percent of their actual make-ready infrastructure costs, projects must have at least as many standardized plugs of an equal or greater charging capacity as compared to the proprietary plugs. Projects in non-public locations or those consisting of fewer standardized plugs of an equal or greater charging capacity as compared to the proprietary plugs, are eligible for incentives up to 50 percent of their make-ready infrastructure costs.

[8] "Adjacent to DAC" means the charger is on the street that is the dividing line/perimeter between the DAC and non-DAC.

Table 4: Overview of Incentive Level Eligibility Criteria by Project and Site Type*

Incentive Level	Eligible Project Example
Up to 100 percent	DCFC projects with standardized plug types at publicly-available locations within Disadvantaged Communities, or within one or two miles of a DAC depending on location.[9] DCFC projects with proprietary plugs with an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs located within Disadvantaged Communities, or within one or two miles of a DAC depending on location.
	L2 projects at multi-unit dwelling sites located within Disadvantaged Communities or meeting site specific criteria.
	Curbside L2 chargers with designated EV parking spaces within or adjacent to Disadvantaged Communities.
Up to 90%	L2 and DCFC projects with standardized plug types at publicly-available locations. Includes municipal pay-to-park and free parking locations.
	L2 and DCFC projects with proprietary plugs with an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs at publicly-available locations.
Up to 50%	Non-public L2 and DCFC projects, including workplaces or multi-unit dwellings with restricted access and privately-owned pay-to-park lots.
	L2 and DCFC projects consisting only of proprietary plugs.
	L2 and DCFC projects where proprietary plugs are not co-located with a similar number of standardized plugs of equal or greater charging capacity.
** Table is provided for illustrative purposes. See additional details in the following sections of this plan. National Grid reserves the right to make determinations regarding incentive-level eligibility based on its best interpretation of the proposed project and available information at the time of review.*	

[9] For public DCFC projects within the city boundaries of Albany, Buffalo, Schenectady, Syracuse, and Troy, the site must be located within one mile of a Disadvantaged Community. For all other publicly-accessible DCFC projects, the site must be within two miles of a Disadvantaged Community.

If located outside of a Disadvantaged Community, MUDs are eligible for the enhanced incentive if:

- the building has an affordable housing regulatory agreement in place with a state, federal or city entity that requires at least 25 percent of units to be affordable to households at or below 80 percent of Area or State Median Income. For Applicants demonstrating eligibility via regulatory agreement, the term of the agreement must extend for 30 years from the date of application for new buildings and 10 years for existing buildings.
- the building demonstrates via rent roll that at least 25 percent of the units have a calculated household income no more than 80 percent of the greater of the Area or State Median Income.

C. Accessibility Eligibility Criteria

To receive an incentive of up to 90 percent (or up to 100 percent for DCFC or curbside L2), site locations must be both publicly-accessible and accept common forms of payment. Publicly-accessible charging includes stations that are:

- Open to the public without fee or access restrictions;
- Municipally-owned parking including both free and pay-to-park (includes L2 curbside charging);
- Privately owned parking that is available to the public without an access fee; or
- In multi-unit dwellings outside Disadvantaged Communities and without site specific criteria, if the public has unlimited access without parking fees.

Sites that do not meet the publicly-accessible criteria are eligible for an incentive of up to 50 percent. Examples of sites eligible for up to the 50 percent incentive level include:

- Privately owned pay-to-park parking lots;
- Private or employee-only workplace parking.

EV charging stations dedicated to a single owner's personal use (*e.g.*, home charging or dedicated rented parking) do not qualify for any portion of the Make Ready Program.

D. Plug Type Eligibility Criteria

All projects (L2 and DCFC) must contain at least two plugs. On a programmatic level, projects with only two plugs may not exceed 25 percent of the target number of total plugs established in the Make-Ready Midpoint Order for National Grid. Therefore, the number of plugs at two-plug sites is limited to 332 DCFC plugs and 1,860 L2 plugs. For the purpose of counting DCFC plugs, only those which can be in use simultaneously at a rate of at least 50 kW count as unique plugs. For example, a station containing a SAE Combined Charging System ("CCS")[10] plug and a CHAdeMO[11] plug mounted to the same charger that can only charge either a SAE CCS compatible vehicle or a CHAdeMO compatible vehicle at any given session counts only as one plug. By contrast, a station containing a SAE CCS plug and a CHAdeMO plug mounted to the same charger that are capable of simultaneously charging

[10] CCS stands for "Combined Charging System" and is a charging standard developed by the Society of Automotive Engineers ("SAE") and the European Automobile Manufacturers Association that supports both AC and DC charging, combined in a single plug design. Definition provided by the Electric Power Research Institute, 2019.

[11] CHAdeMo is an abbreviation of "CHArge de MOve", a DC fast-charging standard co-developed by Tokyo Electric Power Company and Japanese automakers. Definition provided by the Electric Power Research Institute, 2019.

both a SAE CCS compatible vehicle and a CHAdeMO compatible vehicle at greater than 50 kW counts as two plugs (*i.e.*, one standardized, one proprietary).

DCFC sites with more than ten plugs and/or demand in excess of 3 MW are allowed to participate in the MRP under the condition that developing the site does not cause National Grid to incur New Business costs greater than those that would have been incurred to develop a site with a maximum demand of 3 MW. The number of plugs at locations in excess of 10 plugs may not exceed 50 percent of the target number of 1,329 DCFC plugs. Thus, in the National Grid electric service territory, the total number of DCFC plugs eligible for incentives at sites with more than 10 plugs each can not exceed 665 plugs.

The Midpoint Order revised equipment eligibility requirements to include updates for hardware and software. The updates require the following:

- Make-Ready projects that are committed on or after December 16, 2023, and complete installation of chargers before November 16, 2024, must use chargers that are International Organization for Standardization ("ISO") 15118 hardware capable (ISO 15118 parts 2 and 20).
- Make-Ready projects that complete installation on or after November 16, 2024, must use chargers that are ISO 15118 hardware and software capable, and OCPP version 2.0.1 (or later) hardware capable, regardless of the date the project is committed.
- Make-Ready projects that were committed before December 16, 2023, and complete installation before November 16, 2024, do not have to comply with these requirements.

E. Disadvantaged Communities Eligibility Criteria

To encourage siting of EVSE in Disadvantaged Communities, the MRP offers higher incentive levels (up to 100 percent of the eligible make-ready costs) for chargers sited in such communities or within the MRP established Disadvantaged Community buffer zones. The Company, in accordance with the Make-Ready Midpoint Order, has updated the definition of Disadvantaged Communities that was adopted by the Climate Justice Working Group ("CJWG") on March 27, 2023. To be eligible for incentives up to 100 percent one of the following criteria must be met:

- For public DCFC projects within the city boundaries of Albany, Buffalo, Schenectady, Syracuse, and Troy the site must be located within one mile of a Disadvantaged Community. For all other publicly-accessible DCFC projects, the site must be within two miles of a Disadvantaged Community.
- Projects at Multi-unit dwellings ("MUDs") that are within a Disadvantaged Community; or meet site specific criteria as described in Section II.
- Curbside L2 chargers with designated EV parking spaces within or adjacent to Disadvantaged Communities.

To assist Applicants with determining site eligibility, the Company has created an updated map highlighting the eligible Disadvantaged Communities and the applicable buffer zones according to the Make-Ready Midpoint Order. The map includes a search function in which Applicants can enter the physical address of the potential project and determine if it falls

within the eligible buffer zone. The map is accessible via National Grid's MRP Landing Page.[12]

As determined in the Make-Ready Program and Midpoint Orders, 20 percent of the MRP's L2 and DCFC make-ready budget of $108.465M is carved out for sites that meet the DAC requirements for a total of $21.693M. That total budget is reserved for sites meeting the criteria to receive up to 100 percent of infrastructure costs. Once that total budget threshold has been met, eligible sites for the up to 100 percent incentive will only be eligible for up to 90 percent or 50 percent of the eligible make-ready costs, for DCFC or MUD sites, respectively.

III. Program Implementation

The Company is deploying the following implementation practices to deliver on the Make-Ready Program and Midpoint Orders, adjusting as necessary to best serve customers, the market, and the goals of the MRP.

A. Make-Ready Program

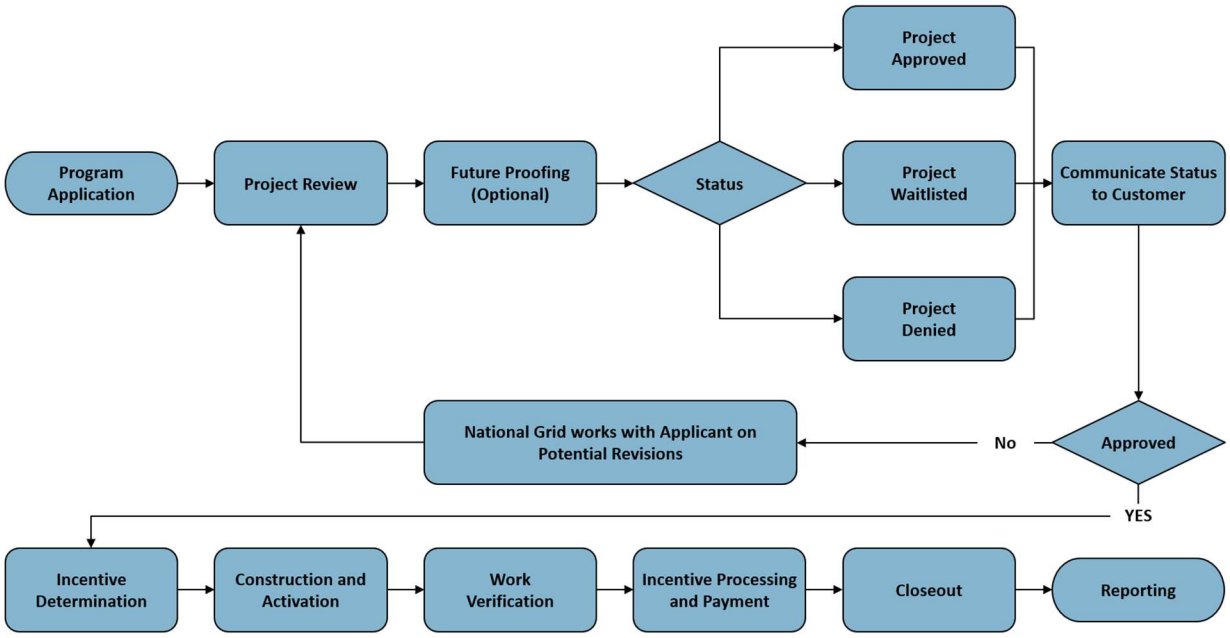
The Company's MRP seeks to enable stations as cost-effectively as possible by offering a user-friendly, customer-centric process.

There are three important steps in the MRP. First, an Applicant submits their application. Second, National Grid evaluates the application. The Company either approves, waitlists, or denies the application with an explanation of the rationale to the Applicant. Third, after application approval, the Applicant becomes a Participant and can move

[12] National Grid MRP Disadvantaged Community Eligibility Map- https://ngrid.maps.arcgis.com/apps/webappviewer/index.html?id=e90cc8f135d545378d93cf8b43eca615

forward to construction. The construction phase ends once the EV chargers are activated. Finally, after receiving proof of construction completion and evaluating relevant project documentation, National Grid disburses the incentive payment.

Figure 1: MRP Application Process



1. Application Process

National Grid utilizes an online Application Portal, which was updated in late 2023. Applicants are required to submit project applications through the portal.

2. Application Evaluation

The Company deploys a cross-functional team (detailed in Section V) to approve, waitlist, or deny applications based on eligibility criteria as well as cost, load capacity, station type, location, equipment requirements, and other details of the project. The

Company periodically adjusts the specific process over time to better reflect customers' needs and program best practices.

Projects are evaluated on a case-by-case basis to ensure electrical infrastructure will meet the project needs. If necessary, the Applicant is directed to submit a Work Request for utility-side upgrades. The Work Request process for EV projects is the same as for non-EV projects, with the exception of Work Requests that trigger CIAC payments. For Work Requests with CIAC payments that are participating in the MRP, the Applicant has the option to sign an adjusted Service Proposal showing the CIAC amount and indicating that it will be subtracted from the MRP incentive payment, rather than being required to pay it prior to National Grid proceeding to install utility infrastructure.

National Grid notifies the Applicant if their project is approved, waitlisted, or denied. If approved, the Applicant receives an approval package indicating the designated incentive amount, net of the CIAC (if applicable). Once the Applicant signs and returns the documents within the approval package, including MRP Terms and Conditions, they transition to be a Participant. The Company periodically reviews program participation to ensure that no single Participant exceeds the authorized incentive amounts.

3. Construction and Make-Ready Incentive Payment

Once approved, the Participant can begin construction using an Approved Contractor. If the Participant intends to make any significant changes to the site design or project scope after National Grid designates the incentive amount, the Participant must consult with National Grid prior to doing so. National Grid evaluates proposed changes for their impact on project eligibility, incentives and/or construction timeline.

Upon construction completion, the Participant submits completion documentation to National Grid via the Application Portal.[13] When all documentation is received and verified, National Grid remits payment to the designated payee.

4. Customer Resources Including Application Portal

The Company maintains an MRP Landing Page hosted on the Company's website to serve as the primary communication vehicle with customers for the MRP. Customers are able to access a program overview, specific program details, relevant application materials, and other information on embedded pages. These subpages include, but are not limited to:

- **Electrification Capacity Map** – The MRP Landing Page includes a link to the Company's Electrification Capacity Map to assist potential Applicants in selection of strategic locations for EVSE deployment.
- **Disadvantaged Community Map** – The MRP Landing Page includes a link to the Company's DAC Map to assist customers in determining their project eligibility for the DAC incentive level.

5. Future-proofing

Pursuant to the Make-Ready Midpoint Order, National Grid is authorized to support up to approximately $5.4M for future-proofing charging stations in the MRP. Future-proofing refers to the practice of oversizing certain pieces of equipment at sites relative to their current charging station capacity such that increasing station capacity in the future will be less costly. This includes installing oversized or additional conduit, oversized panels

[13] Required completion documentation may include but not be limited to proof of activated stations, W9s, invoices, letters of compliance stamped by a licensed Professional Engineer in New York State, photos of job site, and as-built drawings.

to accommodate adequate space associated with expansion, installing additional conduit and connections points (including trenching and conduit to additional parking spaces for future chargers), and oversized service for the station to accommodate the potential load at the site. Such future-proofing can be used for both L2 and DCFC stations.

The Company determines which equipment qualifies for future-proofing, tracks all costs of future-proofing separately from the other make-ready costs, and ensures future-proofing costs do not negatively impact the Company's selection of projects.

Future-proofing is subject to both project specific and program-level cost limits. For individual projects, future-proofing costs covered by the MRP may not exceed ten percent of the site-specific make-ready costs. At a programmatic level, future-proofing costs may not exceed eight percent of the Company's overall MRP incentive budget.

If a Participant opts to future-proof a site, and the cost is greater than ten percent of that site's MRP cost, the Participant is required to pay for future-proofing costs in excess of the ten percent limit. In those instances, the Company performs the future-proofing work after securing funding from the Participant if the costs of future-proofing are related to utility-side make-ready infrastructure. Thus, the Developer can choose to future-proof equipment not eligible for a utility incentive for future-proofing, but that Developer is responsible for 100 percent of such future-proofing costs.

Participants must apply for future-proofing and specify which costs are related to future-proofing. It is not a requirement to future-proof a site to participate in the MRP and Applicants and Participants are under no obligation to future-proof sites.

6. Contractor Approval Process

The Joint Utilities' combined website includes a list of contractors available for the Make-Ready Program and an application form for contractors that wish to become an Approved Contractor.

The information required to be added to the list of contractors includes self-certification that the contractor is registered to do business within NY and that the contractor has all appropriate licenses and certifications that are needed for all jobs in the area(s) where they perform work. The contractor is also asked to indicate the areas of NYS in which it plans to perform make-ready work. Additionally, the contractor can indicate if they perform commercial and/or residential work.

National Grid, in consultation with Staff, shall have the ability to remove contractors from the qualifying list for either: (a) falling out of standing with the qualification criterion/criteria established by the Joint Utilities, or (b) performance concerns and/or customer complaints.

- Contractors who fall out of standing on one or more of the qualifying criterion/criteria and subsequently correct that deficiency shall be reinstated upon demonstration of compliance.
- National Grid, in consultation with Staff, may place any contractor who receives consistent customer complaints, or who consistently fails to satisfy performance or participation standards, on probation and require that contractor to file a corrective action plan within 30 days of the start of the probationary period. Failure to provide the corrective action plan and/or the continuance of customer complaints will result

in the suspension of the contractor's ability to provide work for Participants in the Company's service territory. Contractors may be reinstated upon a reasonable demonstration of their actions to address and mitigate recurrence of customer complaints, and to resolve identified performance or participation deficiencies.

B. Operational Requirements

The EV Make-Ready Program requires that all sites meet a specific minimum set of performance standards, which are to be tracked and reported by the Participant as part of the overall reporting requirements outlined in Section 6, below. These operational standards are:

- DCFC plugs must be operational 95 percent of the time (annually);
- DCFC charging stations must be operational 99 percent of the time (annually), with a minimum of 50 percent of the DCFC plugs considered to be "up" at all times;
- All charging stations in the EV Make-Ready Program must operate for a minimum of five years;
- Ownership of EV charging stations may change, or stations may be upgraded during the five-year term, as long as the number of plugs and the capacity of the station do not decrease, and the site continues to meet all performance and reporting obligations of the Program; and
- All chargers in the EV Make-Ready Program (committed after January 12, 2024) must display easily identifiable, up-to-date contact information for the EV charging service provider.

C. Reporting Requirements

In accordance with the Make-Ready Program Order, as well as the DCFC Framework Order,[14] the Company filed annual reports in March 2022 and April 2023. As required under the Midpoint Order, the Company will file its next annual report on March 1, 2024, and semi-annual reports, beginning August 23, 2024. Under the Midpoint Order the information to be included in annual and semi-annal reports starting with the March 1, 2024 Annual Report differs from what was required in the 2022 and 2023 filings.

Beginning with the March 1, 2024 annual report, the Company will provide two categories of information. Category one includes Program Participation data that the Company collects and tracks internally based on information submitted by Participants during the application process. Category two includes Plug and Charging Session Data, which must be provided on an ongoing basis by Participants (vendors or Site Hosts/owners or their network provider) to the Company's third-party consultant(s), who is contracted to aggregate and anonymize the data. With the support of the Company's third-party consultant(s), the Company is expected to update Staff on granular, confidential data outside of the annual report filings and therefore Participants are expected to make the information available on a quarterly basis, or potentially more frequently if necessary and feasible. Specific information required in each category is listed below including an indication of whether the Company or the Participant is responsible for providing the data.

[14] EVSE&I Proceeding, Order Establishing Framework for Direct Current Fast Charging Infrastructure Program (issued February 7, 2019) ("DCFC Framework Order").

1. **Program Participation (Provided by the Company):**
    a. reporting year;
    b. site ID;
    c. census tract;
    d. if the site is located within a geographic DAC;
    e. the percent of service applications that have matured into operating stations;
    f. number of station owners participating;
    g. the number of sites for which incentives were issued;
    h. the number of plugs installed;
    i. aggregated kW nameplate capacity;
    j. infrastructure costs incurred;[15]
    k. incentive levels a site received;
    l. total incentives paid per site;
    m. if the site received funding from the MHD pilot;
    n. if the site received fuding from the Transit Authority Make-Ready Program;
    o. if the site is receiving ongoing support from the Demand Charge Rebate program.
2. **Plug and Charging Session Data (Provided by the Participant):**
    a. the number of sessions daily;
    b. start and stop times of each charge;

[15] Infrastructure costs are differentiated by equipment and installation costs for customer-owned assets as well as equipment and installation costs for Company-owned assets. The cost details for Company-owned assets are broken out into costs that are considered make-ready and costs that are considered New Business.

c. amount of time each vehicle is plugged in per session;

d. peak kW per charging site (aggregated monthly per site; including site capacity;

e. charger nameplate capacity, and peak kW load management adjustment;

f. kWh per charging session;

g. plug outage information. Plug outage information is to include the number and duration of outages and to be differentiated by expected outages (for maintenance) and unexpected outages.

h. annual aggregated kWh per site;

i. annual aggregated percent utilization per site;

j. annual aggregated hours of charging per site.

Consistent with the Program and Midpoint Orders, program Participants that fail to meet the operational requirements or fail to provide the required data will not be eligible for new Make-Ready Program incentives and may be subject to claw back of the make-ready payments received or revocation of service so that the station can be operated by an alternate market participant. Additionally, the Joint Utilities will develop a preferred network list as part of a Data Reporting Compliance Plan by March 1, 2024. After March 1, 2024, networks will be given more information about how they can be added to the preferred network list, and how to maintain their status on the list. The Joint Utilities will provide Participants with the preferred network list and educational materials about data collection and the consequences for failing to provide the data.

The Joint Utilities will publish a publicly accessible tracker that monitors both the committed and completed L2 and DCFC plug installations, as well as committed and completed L2 and DCFC budgets reported as separate dollar figures and by service territory and will designate, at a minimum, incentives and plug totals committed and installed to benefit Disadvantaged Communities. The tracker will be updated monthly and made available at jointutilitiesofny.org.

D. Program Timeline

The Company anticipates adhering to the following timelines:

Table 5: MRP Timeline

Date	Item	Description
7/16/2020	Make-Ready Program Order	Customers could begin applying for MRP.
8/18/2020	Participant Guide filed with Commission	The Joint Utilities filed a comprehensive Participant Guide available on the JU website.
9/14/2020	Implementation Plan filed with Commission	The Company filed an Implementation Plan detailing how it envisions deploying the MRP.
10/1/2020	Phase 1 Make-Ready Program application cut-off	The date by which the Company stopped accepting applications for the Phase 1 Make-Ready Program. Only applications for the MRP were accepted after this date.
10/15/2020	Phase 1 Make-Ready Program approval deadline	The final date by which the Company reviewed and approved applications for the Phase 1 Make-Ready Program.
10/16/2020	Application Portal Phase 1	The Company opened the Application Portal. All applications must be submitted via portal.
12/31/2020	Capacity Maps	The Company published load serving capacity maps for EV charging.
1/16/2021	Application Portal Phase 2	The Company published Phase 2 of its Application Portal.
3/1/2021	Annual Report	The Company filed its 2020 annual report.
4/18/2022	Annual Report	The Company filed its initial 2021 annual report.
6/24/2022	Annual Report	The Company revised its 2021 annual report.
9/26/2022	MRP Evaluation	The Company filed its Make-Ready Program Evaluation Report

EV INFRASTRUCTURE MAKE-READY PROGRAM IMPLEMENTATION PLAN		
10/1/2022 (through 5/30/2023)	MRP Midpoint Review	The Company submitted required information for the midpoint review process, including DPS MRP Whitepaper Comments, Technical Conferences, and Midpoint Review Reply Comments.
3/1/2023	Annual Report	The Company filed its 2022 Annual Report
7/11/2023	MRP Implementation Plan Revised	The Company filed a revised MRP Implementation Plan.
11/16/2023	MRP Midpoint Order	PSC issued the Midpoint Order
12/22/2023	DAC Reporting	The Company filed its Climate Act DAC reports for 2020, 2021, and 2022.
1/12/2024	MRP Implementation Plan and Participant Guide Updated	The Company files a revised Implementation Plan detailing how it is modifying the MRP per the Midpoint Order. The Joint Utilities file a revised Participant Guide. Changes from the Midpoint Order go into effect for Applicants and Participants.
1/12/2024	Electrification Capacity and DAC Maps	The Company updates Electrification Capacity Map and DAC map.
3/1/2024	Annual Report	The Company will file its 2023 Annual Report
3/1/2024	Compliance Plan	The Joint Utilities will file a Data Reporting Compliance Plan
5/14/2024	Customer Bill Impact Framework	The Joint Utilities will file a Customer Bill Impact Framework
8/23/2024	Semi Annual Report	The Company will file its 2024 semi annual report
3/1/2025	Annual Report	The Company will file its 2024 Annual Report
8/23/2025	Semi Annual Report	The Company will file its 2025 semi annual report
12/31/2025 (or beyond)	MRP Closes	The Company will close the MRP on or before this date, depending on when program goals and funding levels are met. If plug goals are not met by this date, the MRP shall remain in effect until the plug goals are met or budgets are depleted.
TBD	End of Program Report	The Company will file an end-of-program report within 80 days of either the plug goals being met, or program budget being depleted, whichever comes first.

E. Fleet Assessment Service

The Company offers a Fleet Assessment Service to light, medium, and heavy-duty vehicle fleet customers. As specified in the Make-Ready Program Order,[16] for interested

[16] EVSE&I Proceeding, Make-Ready Program Order, pp. 127-128.

customers that request the service, the Company provides a site feasibility analysis to determine if the local distribution system can accommodate their estimated increased load (based on the maximum power draw of the electrified fleet under consideration), and includes analysis of planned utility work nearby to identify potential cost-saving opportunities. If the site feasibility analysis is positive, the Company performs a rate analysis for each fleet depot location to provide fleet operators with an understanding of the available rate options, potential maximum bill impact of fleet electrification based on the fleet's charging behavior, and potential to mitigate bill impact with managed charging.

To facilitate the process, the Company has a Fleet Assessment Services intake form on both the Company's website and on the Joint Utilities of New York website. The Company worked with the Joint Utilities to design a common Fleet Assessment Services survey to determine satisfaction with the program, usefulness of the analysis, likelihood of fleet electrification, any additional barriers to fleet electrification, and other offerings the Company could provide to these customers to support electrification.

IV. Education and Outreach Plan

The Company executes an education and outreach plan to drive awareness of, and participation in, the MRP among commercial customers, especially among municipalities and those located in DACs. The plan prioritizes outreach to Developers and potential Site Hosts that are determined to be in the most beneficial locations identified in the Suitability criteria outlined below.

The Company's communication channels reach throughout its service territory, and the Company communicates with customers monthly through bills and home energy

reports, and less regularly through other channels such as email, social media, billboards, digital, print and radio media. The Company leverages these capabilities, findings from currently offered programs, communication to internal EV/Energy Efficiency sales teams, and external partnerships with an advertising agency as well as developers, contractors and trade allies to execute the Education and Outreach Plan. The Plan is crafted to empower commercial customers to make informed decisions about the benefits of installing EV charging stations for business or public charging and highlight opportunities to accelerate fleet electrification.

More specifically, the Company works with the aforementioned teams and partners to execute the plan and an accompanying multi-channel marketing campaign to:

- Identify and prioritize site hosts including workplaces, multi-unit dwellings, and public charging sites and promote the benefits of EV charging accessibility to increase Site Hosts' familiarity with EV charging as an amenity for employees, customers, tenants, and the community.
- Identify and educate corporate parties and commercial customers that may benefit from fleet electrification and on-premise charging.
- Perform dedicated outreach to targeted environmental organizations, non-profits, state agencies, and consumer advocacy groups to ensure the Company is reaching DACs and appropriate stakeholders across the jurisdiction. In coordination with existing stakeholders and contacts through energy efficiency programs, the Company looks to expand outreach and engage new entities in the deployment of EV charging and related programs. This outreach helps to maintain continued

engagement with these groups, as well as support coordination to ensure DACs are benefiting from the MRP investments and that stakeholders and representative organizations have the opportunity to provide feedback on community needs, infrastructure gaps, and can provide targeted outreach at the community level to identify potential locations for deployment or interested site hosts.

- Develop messages that highlight the Company's charging infrastructure and fleet offerings and deliver them through multiple channels, listed below, and direct communication to internal teams, external trade allies, contractors, and developers.
- Deliver developed messaging through channels such as:
  - Company channels (website, social media, bill inserts, call centers, sales team);
  - Partner channels (EVSE vendors, NYSERDA, local auto dealers and original equipment manufacturers ("OEMs"), and trade groups).
  - Press coverage (local print, broadcast, and digital media outlets);
  - Purchased media (advertising: digital, print, and radio);
  - EV advocacy groups (Electric Drive Transportation Association, Edison Electric Institute, Plug In America); and
  - Trade ally and developer communication and engagement.

The Company anticipates refining the above-mentioned foundational tactics with input from the selected advertising agency and using data derived from research and input from the partners prior to any campaign launch.

A. Tools for Project Developers

National Grid developed tools for potential Applicants and developers to help determine suitable locations for EVSE development and perform targeted outreach in locations deemed favorable for EVSE development. Locational load serving capacity data is made available to developers through the updated Electrification Capacity Map on the Company's System Data Portal (which has replaced the former Electric Vehicle Load Serving Capacity Map).[17] The initial release of the load capacity map provided potential Applicants with a simplified analysis of the remaining headroom measured in MW at the feeder head for the purpose of siting EVSE installations. Load serving capacity maps were made available in 2020, and subsequent iterations have offered incremental improvements based on user feedback.

V. Make-Ready Program Administrative Costs

The Make-Ready Midpoint Order set a maximum budget of $16,269,772 for National Grid's MRP Administration and Fleet Assessment Services. Program administration costs include, but are not limited to, those related to incremental staffing, education and marketing, IT support, data collection and management, and evaluation. The Company's cost allocation for each category is described in more detail below.

A. Education & Outreach

The Company has deployed a robust education and outreach effort as outlined in Section IV above and informed by the Suitability criteria.

[17] Available at https://www.nationalgridus.com/Business-Partners/NY-System-Portal.

B. IT Requirements

The Company uses an online portal to accept MRP applications. The first phase was deployed on October 16, 2020 and an updated portal became available in October 2023. To enable an effective online customer experience, the Company aligns design approaches with certain back-end systems.

C. Data Collection & Management

The Company coordinates with the Joint Utilities to contract a third-party consultant(s) to manage data collection, aggregation, and anonymization.

D. Fleet Assessment Service

The Company offers a Fleet Assessment Service (detailed in Section III-D) and deploys a small amount of marketing to communicate to relevant customers and survey participants, respectively.

E. Incremental Staffing

The Company is currently utilizing ten full-time employees (full-time equivalents ("FTEs")) to implement the MRP, while increasing to eleven for the remainder of the Program. As described below in Table 6, the roles of Manager, Program Manager, Customer Connections Representative, Analyst, and Marketing Specialist are staffed and will continue through the end of the Program. The Company has been leveraging multiple individuals to fill the three (3) FTE positions of one (1) Technical Specialist and two (2) Channel Sales Representatives when their work supports the Program. Moving forward, the Company is adding another Technical Specialist role to support the increasing complexity of EV projects. The Company's current staffing plan includes:

Table 6 – Positions to be added for Make Ready Program

Count	Title	Role Description
1	Manager	Responsible for overall implementation of the MRP, other implementation Staff, and program budget.
3	Program Manager	Responsible for reviewing and approving MRP applications, including L2, DCFC and Transit. May be split by region or technology as program needs require.
2	Technical Specialist	Responsible for technical evaluation of projects across all of the Company's service territory (especially those requiring new service), liaising with the Customer Connections Representatives, and coordinating with area planners to screen for potential system impacts or efficiencies.
1	Customer Connections Representative	Responsible for in-taking MRP-related new electric service work requests and serving as job owner to ensure necessary work is performed and coordinated among various internal groups, helping to prevent potential backlog from an increase in work requests.
1	Analyst	Responsible for tracking installations, costs, reporting to customer teams on a regular cadence, and facilitating timely payment to Participants.
2	Channel Sales Representative	Responsible for engaging customers (especially DAC), MRP Participants, contractors, vendors, and others to introduce them to and promote use of the MRP.
1	Marketing Specialist	Responsible for overall communication of the MRP including outreach, education, and all associated marketing efforts, especially to EJ Communities and LMI customers.

F. General Implementation Costs

The Company anticipates some other miscellaneous costs associated with the implementation of the Make-Ready Program. Such costs could include project post-inspections and travel to in-person meetings.

G. Evaluation

The Company hired an independent, third-party evaluation expert to evaluate the Company's MRP, assessing the outcomes of the program and, where possible, quantifying its effects. The evaluation report was filed September 26, 2022.

H. Summary

The Company may need to re-allocate administrative funding between categories based on program, customer, and market needs to most effectively implement the MRP. All of the costs included in this Implementation Plan conform to the limits set for National Grid in the Make-Ready Program Order and Midpoint Order. The administrative allocations are set forth below.

Table 7: Approximate Administrative Cost Allocation Summary Table

Administrative Component	Budget ($M)
Education & Outreach	$3.88
IT Requirements	$3.80
Data Collection & Management	$0.20
Fleet Assessment Service	$0.21
Incremental Staffing	$6.98
General Implementation Costs	$1.00
Evaluation	$0.20
Total	$16.27

The Company seeks cost recovery in conformance with the Make-Ready Program Order. For utility make-ready work, including future-proofing, costs are treated as capitalized plant in service with cost recovery under traditional ratemaking methodologies. In accordance with the Make-Ready Program Order, the Company seeks to recover the associated revenue requirements through a surcharge until such times as the investments are reflected in the Company's base rates. Interim recovery is from all customers in proportion to each class based on a per kilowatt hour for energy-billed customers and on a kilowatt basis for demand-billed customers. The Company excludes such utility-owned make-ready work from its plant in service reconciliation.

Incentives paid for customer-owned make-ready work, including future-proofing facilities, are included in base rates as a regulatory asset collected over 15 years in the Company's next rate case. Until the Company's base rates reflect these incentive payments, the Company recovers these costs through the surcharge mechanism allowed in the Make-Ready Program Order.