**STATE OF NEW YORK**
**PUBLIC SERVICE COMMISSION**

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**Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure** **Case No. 18-E-0138**

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# PETITION SEEKING MODIFICATIONS TO THE ORDER APPROVING MANAGED CHARGING PROGRAMS

## I. PRELIMINARY STATEMENT

New York State Electric & Gas Corporation ("NYSEG") and Rochester Gas and Electric Corporation ("RG&E"), collectively the ("Companies"), hereby submit their petition seeking a modification to the Order Approving Managed Charging Programs with Modifications (the "Order") that directed the Companies to implement Electric Vehicle ("EV") Managed Charging Programs (hereafter "Programs").[1]

For the reasons detailed below, the New York Public Service Commission ("Commission") should approve the modifications to the Order as proposed by the Companies in their Managed Charging Implementation Plan ("MCIP") filed with the Commission on September 30, 2022. Specifically, the Companies' MCIP proposes two modifications to their respective EV Managed Charging programs:

1. Offer a one-time enrollment incentive of $25 for Intermediate tier Program Participants and a onetime enrollment incentive of $150 for Advanced tier Program Participants for Program start-up actions which include:
    a. Download of the Companies' Program mobile application;
    b. Registration of their compatible networked Level 2 EV charger or EV telematics;
    c. Creating an off-peak charging schedule including required State of Charge ("SOC") and Time Charge is Needed ("TCIN") for each day of the week (Advanced Tier Only).
2. Elimination of Demand Response from the Intermediate Tier.

## II. BACKGROUND

[1] CASE 18-E-0138 - Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure. Order Approving Managed Charging Programs with Modifications. July 14, 2022.

### a. Order Approving Managed Charging Programs

On July 14, 2022, the Commission issued its Order Approving Managed Charging Programs with Modifications. The Order approves, with modification, the Companies' Mass Market Managed Charging Program proposal ("Managed Charging Proposal") dated December 14, 2020, which was filed pursuant to the Commission's Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs dated July 16, 2020. The Companies filed a revised Managed Charging Proposal on June 4, 2021. The Companies' Managed Charging Proposal included three tiers: Baseline, Intermediate and Advanced. Each tier required increased managed charging activities in response to increased incentive levels. In approving the Managed Charging Proposal, the Commission directed the Companies to eliminate the Baseline program tier and incorporate the survey component of this tier into the Intermediate tier and exclude the associated incentive of $25 proposed for the Baseline tier. The Commission made no further modifications to the Managed Charging proposal.

### b. Enrollment and Participation Incentives

In Ordering Clause 12 of the Order, the Commission directed the Companies "to limit any enrollment incentive included in the Managed Charging Program to no more than $25 for passive programs, or no more than $150 for active programs. Further, the Commission directs that any Managed Charging Program that offers an enrollment incentive shall require a minimum participation period of at least three months." The Commission further directed in Ordering Clause 15 "that any participation incentives paid to customers of [the Companies] must be cost-based, and are not to exceed the difference between the default volumetric rate and a Commission approved time-varying or dynamic rate that reflects the value of the off-peak charging or event participation."

## III. RELIEF REQUESTED

### a. Enrollment Incentives

The Commission has directed that Participation Incentives must be cost-based. Under this incentive structure, however, the estimated maximum available incentives for participants in the Intermediate and Advanced tiers are far below the Companies' proposed incentive structure as well as the incentive budget submitted and approved under the Commission's Order. As detailed in the Companies' MCIP, the resulting cost-based incentives will not provide adequate incentive to encourage adoption of the Companies' Program, particularly in the Advanced tier where active customer engagement is critical to the program's success. In order to effectively promote the Managed Charging Program and achieve sufficient levels of customer adoption to achieve the state's carbon reduction and EV goals, the Commission should approve the Companies' proposal to offer enrollment incentives as proposed in their MCIP.

### b. **Demand Response**

Although Demand Response ("DR") can provide value, DR activities do not generate meaningful incentives under the cost-based incentive structure required by the Commission. Specifically, under the Commission's approach the Companies' estimate the value of the energy reduction from a single DR event to be less than $1.[2] The Companies' view this low level of monetary compensation as insufficient to incentivize customers to participate. Accordingly, the Companies seek the Commission's approval to focus the Program's Intermediate and Advanced tiers on promoting and incentivizing ongoing, off-peak charging habits.

## IV. CONCLUSION

Based on the foregoing reasons, the Companies respectfully request that the Commission approve modification to their Managed Charging Programs as follows:

(i) Offer a onetime enrollment incentive of $25 for Intermediate tier Program Participants and a onetime enrollment incentive of $150 for Advanced tier Program Participants for Program start-up actions, as described herein, and
(ii) Elimination of Demand Response from the Intermediate Tier.

October 31, 2022

Respectfully submitted on behalf of New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation

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[2] Under the Companies' original proposal the incentive for a single DR event would be $20.