STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

CASE 24-E-0364 – In the Matter of Proactive Planning for Upgraded Electric Grid Infrastructure.

CASE 20-E-0197 – Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy growth and Community Benefit Act.

CASE 18-E-0138 - Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure.

CASE 18-M-0084 - In the Matter of a Comprehensive Energy Efficiency Initiative.

RECOMMENDATIONS FOR ADDRESSING ELECTRIC VEHICLE CHARGER LOAD INTERCONNECTION ISSUES

Dated: June 15, 2026

INTRODUCTION AND BACKGROUND

In the Midpoint Order, the Public Service Commission (Commission) directed Department of Public Service staff (DPS Staff) to initiate the Electric Vehicle (EV) Infrastructure Interconnection Working Group (EVIIWG).[1] The purpose of the EVIIWG was to address the issues of transparency, queue length, wait times, and application development related to EV chargers.[2] The EVIIWG met ten times and collectively developed the EV Applications Queue Management Manual (the Manual), meeting the goal of the EVIIWG.

In the subsequent Queue Management Order,[3] the Commission adopted the Manual, with modifications. The Queue Management Order further directed the utilities to expand the document to include: (1) a standardized set of required practices; (2) a utility-by-utility implementation matrix; and (3) implementation timelines for in-progress strategies and target dates for practices still under development, such as cancellation policies.

In addition to its work on the Manual, the EVIIWG identified a list of topics for Commission consideration that were outside of the scope of the earlier directives. The Queue Management Order acknowledged the accelerating growth of electric demand, and that considerable examination is needed to address the interconnection issues and solutions brought up in

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[1] Case 18-E-0138, Ordering Approving Midpoint Review Whitepaper's Recommendations with Modifications (issued November 16, 2023) (Midpoint Order); see also Matter 24-00339, In the Matter of EV Infrastructure Interconnection Working Group.

[2] Midpoint Order, p. 28.

[3] Case 18-E-0138, Order Adopting Proposal for Queue Management with Modifications (issued September 19, 2025) (Queue Management Order).

the EVIIWG and by stakeholders in other proceedings.[4] Consequently, the Queue Management Order directed DPS Staff to advance a solution that could thoroughly and systematically address the interconnection of electric load, including the issues and solutions identified by the EVIIWG.[5] The Queue Management Order directed DPS Staff to file a proposal outlining a scope of issues that could be addressed.[6]

To gain insight into the extent of the load interconnection issues, the Secretary to the Commission issued the November Notice, soliciting stakeholder feedback on a list of questions, in order to assist DPS Staff in identifying a scope and developing the proposal directed by the Queue Management Order.[7] In response to the Commission's directive in the Queue Management Order, and to address comments received pursuant to the November Notice, DPS Staff provides the following process-related recommendations for addressing electric load interconnection issues, including EV charger load.

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[4] Queue Management Order, pp. 15-16.

[5] Id.

[6] Queue Management Order, p. 16.

[7] Case 18-E-0138, et al., Notice Soliciting Comments (issued November 6, 2025) (November Notice).

Summary of Stakeholder Feedback

Below is a brief summary of stakeholder feedback received, organized into common categories related to electric load interconnection issues.

Stakeholder Concerns

Capacity Constraints and Costly Upgrades:

- Many legacy circuits were not designed for significant new EV charger load, leading to insufficient distribution-grid hosting capacity without substantial upgrades.
- Projects often face costly and long-lead-time upgrade requirements, such as the construction of "blockhouses" in dense urban areas for projects above 3 megawatts (MW), or significant Contribution in Aid of Construction (CIAC) for substation upgrades or voltage conversions.
- The applicant normally pays for infrastructure upgrades when connecting new generators or large loads, which can make projects financially infeasible, especially when costs go beyond simple connection to include primary equipment like transformers and utility poles.
- Queue congestion and extended review timelines due to traditional interconnection requirements create bottlenecks, forcing utilities to manage large volumes of applications with lengthy studies and approvals. This strains internal resources and delays system planning and operational readiness.
- There is a lack of transparency regarding which areas of the utility system can support projects and which could benefit from certain project types (e.g., electrification, energy efficiency, generation), leading to wasted effort

and resources if work is completed that ultimately cannot be utilized due to system constraints.

Interconnection Queue Length and Delays:

- The interconnection queue for new energy projects has expanded dramatically, particularly for renewable and energy storage facilities.
- Interconnection processes can be complex and time-consuming, especially where local utility upgrades intersect with bulk-power-system needs.
- Unpredictable and extended timelines frequently delay projects by months due to utility processes getting caught at a single step without clear expected timelines for each step.
- Energization delays are critical, with some projects having completed construction for many months before energization.
- Load study delays are increasingly common, with some studies taking up to 20 weeks, which significantly slows project progress as significant funds cannot be committed without study completion.
- The lengthy timeline required for transportation electrification projects is a critical concern, often taking longer than anticipated (i.e., a few months upstate, a year or longer downstate).
- The misalignment between Distributed Energy Resource (DER) readiness and grid preparedness means that while EV fleets may be delivered in a few months, necessary infrastructure upgrades and interconnection approvals often take six months or longer, slowing project progress and discouraging DER installations. This disproportionately affects smaller projects with thinner financial margins and larger projects where delays erode investment value.

- Each day of interconnection delay after contract signing can lead to a significant increase in customer cancellations and substantial revenue loss.

Lack of Standardization and Transparency:

- Separate utility processes exist for each utility (e.g., design timelines, easement requirements, transformer availability and specifications, and incentive applications), creating inconsistencies.
- Utilities often lack advanced tools or integrated systems to provide accurate, up-to-date hosting capacity data and queue transparency. This makes it harder to forecast system impacts, manage stakeholder expectations, and optimize grid utilization.
- The inconsistent application process due to utility and/or state-specific requirements, variable costs, and differing technical standards forces developers to navigate a patchwork of processes, increasing both project timelines and costs.
- Service layout drawings are rarely provided for customer review, leading to discrepancies, unforeseen costs, and construction delays.
- There is a lack of transparency regarding the service determination process, making it difficult for customers to understand if and when utilities can serve their intended load well before load letter submission. This can lead to fully planned projects being cancelled or starting over due to unexpected grid constraints.
- In the context of bidirectional chargers paired with Energy Storage Solutions (ESS), there is a misalignment between the timing of the EV load study and the Commission's Standardized Interconnection Requirements (SIR) process,

potentially leading to changes in service determination after a load agreement is signed.

- Lack of transparency in the interconnection queue can disadvantage bidirectional chargers, as unidirectional chargers can claim available substation capacity before a bidirectional project's Coordinated Electric System Interconnection Review (CESIR) study is complete.
- Limited communication between distributed generation and EV load utility teams exacerbates issues for bidirectional charger interconnection.
- Without clear rules, utilities may default to treating any "bidirectional-capable" EV as a potential DER, creating unnecessary DER interconnection applications for what are essentially loads with optional islanded backup use.

Regulatory and Procedural Ambiguity:

- Limited adoption of flexible interconnection standards due to regulatory uncertainty or lack of standardized processes prevents utilities from accelerating energization even when partial capacity could be safely accommodated.
- Flexible connection solutions are inconsistently available, with varying levels of understanding and comfort among different utility teams and individuals, leading to uneven customer experiences.
- Permitting challenges through both utilities and municipalities represent critical barriers, especially where interconnection processes involve multiple agencies with overlapping responsibilities. These can lead to prolonged back-and-forth communication and delays.
- Cost allocation issues mean that costs can be shifted to other customers if large loads in the interconnection queue

do not materialize, or if their energy demands fluctuate unpredictably.

- There is a need for technical interconnection standards for extremely large loads, particularly data centers with demands of 25 MW or greater, as their unique load profiles pose challenges to the grid.

Other Specific Barriers:

- Burdensome easement requirements are consistently one of the longest and most contentious parts of the interconnection process, as property owners are often unwilling to grant permanent land rights, and utilities can be inflexible.
- Power quality concerns generated by certain charger types can exceed utility limits, requiring collaboration among stakeholders to ensure compliance and safeguard grid assets.
- Multi-site electrification portfolios are not currently planned holistically, meaning customers might electrify a constrained site first, unaware that other sites might offer quicker energization.
- Leased site electrification projects can create conflicts, potentially locking customers into their lease and disadvantaging them in negotiations.

Stakeholders' Proposed Solutions

- Adopt and implement a comprehensive flexible interconnection framework. This framework should include a programmatic baseline for options utilities must offer, ensuring all customers have opportunities to participate and maximizing grid benefits. Flexible interconnections can accelerate energization, manage capacity shortfalls,

defer or avoid costly upgrades, promote equitable access, and contribute to downward pressure on rates.

- Implement flexible interconnection pathways to allow for faster interconnection of EV charging load in grid-constrained areas.
- Standardize flexible connection processes both within and across utilities. This can help utilities and customers move beyond simple "yes/no" answers to "counteroffer" structures or initial capacity allowances, addressing timeline and service determination issues.
- Offer a menu of flexible interconnection arrangements including static, scheduled, and dynamic limit options to maximize program effectiveness.
- Flat (or static) flexible interconnections incorporate a fixed load limit, suitable as interim or "bridge-to-wires" solutions until upstream upgrades are completed.
- Scheduled load limits provide firm capacity that varies based on a pre-defined schedule (hourly, monthly, seasonal) to reflect shifting system conditions and customer needs, offering greater access during off-peak periods.
- Dynamic limits provide non-firm capacity that varies with real-time or forecasted grid conditions, enabling load adjustments based on the actual state of the grid. These are more sophisticated and can unlock significant grid capacity, especially with tools like Distributed Energy Resource Management Systems (DERMS).
- Require clearly defined parameters for flexible interconnection agreements, including guaranteed minimum load limits and consideration for customer compensation for voluntarily limiting their load.

- Expedite interconnection consideration for large loads that pair with their own generation (co-located or contractual relationship).
- Integrate flexibility into interconnection terms for curtailable or flexible large loads to expedite interconnection by avoiding or deferring local and transmission system upgrades.
- Broader implementation by utilities of flexible interconnection frameworks which leverage DERMS to manage load dynamically and defer costly upgrades.
- Better tracking and reporting on interconnection timelines.
- Require utilities to track and report on timelines for all load projects, especially EV charger applications, to provide insights into processing speed and identify areas for streamlining.
- Track and separate EV charger applications by end-use and break out small (i.e., less than 300 kilowatts (kW)) and large (i.e., 300 kW and above) EV charger projects to compare timelines across similar sizes and complexities.
- Start with end-to-end timeline tracking (i.e., initial application submission through project energization) for ease of implementation and consistent reporting across utilities.
- Account for partial energization in phased connection agreements by reporting both the date of the first phase and the date of full project energization.
- Conduct a pace of energization study to determine if current timelines are sufficient to meet the state's climate goals and if policy reforms are necessary.
- Establish predictable timelines for key milestones like application review and load studies.

- Mandate tracking and public reporting of end-to-end interconnection timelines through a standardized, easy-to-read public tracking dashboard to identify barriers.
- Harmonize load and distributed generation interconnection processes.
- Address the misalignment of timelines between EV load studies and the SIR process for ESS. Solutions could include linking application ID numbers, offering a single utility point of contact, and/or offering a joint application.
- Develop transparency and fairness for bidirectional charger interconnection by ensuring that unidirectional chargers do not claim available substation capacity before a bidirectional project's CESIR study is complete. A publicly accessible EV interconnection queue (including load) would aid developers.
- Expand communication between distributed generation and EV load utility teams to foster transparency regarding project determination and timelines.
- The Interconnection Technical Working Group (ITWG) should address both distributed generation and load side of EV interconnections to manage capacity constraints at EV sites where developers deploy distributed generation.
- Clarify Vehicle-to-Home (V2H) interconnection policy.
- Distinguish between bidirectional charging systems operating only when islanded, and those enabled for parallel operation with the utility grid.
- Explicitly define "Bidirectional Charging Enabled Only When Islanded" as requiring no generation/storage interconnection review.

- Explicitly define " Bidirectional Charging Enabled When Operating in Parallel with the Grid" as requiring full interconnection review. This clarity will reduce administrative burden, ensure alignment, and protect the DER interconnection queue.
- Increase resources for initial feasibility and/or utility desk studies to provide early "thumbs-up/thumbs-down" feedback before significant time and effort are committed to full project design.
- Consider a streamlined process for adding incremental electric vehicle supply equipment (EVSE) to an existing service where panel upgrades are not necessary, allowing utilities to determine if further review is needed without requiring a full case submission.
- Leverage existing working groups or establish new ones to facilitate early discussions and collaborations with utilities, assess project impacts, and identify synergies.
- Provide more frequent updates to utility published capacity maps (including ad-hoc updates for major grid status changes) to better direct projects to locations with required capacity.
- Critically review and simplify large load interconnection policies and procedures at both local utility and bulk transmission levels, avoiding new regulatory burdens and prioritizing simplified, transparent processes.
- Limit the DPS Staff Proposal to recommending improvements to the New York Independent System Operator, Inc.’s (NYISO) existing large load interconnection process to enhance administrative efficiency rather than creating entirely new processes.

- Prioritize and encourage early coordination between the Commission, local utilities, and NYISO regarding interconnection to prevent overlapping or inconsistent state-level activities and promote regulatory consistency.
- Develop technical interconnection standards for extremely large loads (e.g., data centers with demands of 25 MW or greater, especially those at 50 MW and above).
- Maximize load flexibility by providing incentives or requirements for data centers to operate flexibly during key hours, reducing peak system needs and costs. Tariffs should enable participation in flexible-load models.
- Require data centers to pay their fair share for infrastructure investments by developing a large load tariff with stringent financial requirements, including long-term contracts, high initial payments (e.g., non-refundable deposits, study fees, collateral), minimum bills, and exit fees.
- Improve forecast certainty by implementing large load tariffs with stringent financial requirements to reduce speculative requests, and requiring utilities to report frequent updates on interconnection queues.
- Hold utilities accountable for demonstrable performance improvements in processing and managing large-load interconnection requests, including clear, enforceable timelines, transparent metrics, and consequences for underperformance.
- Provide a complete service determination, including service layout drawings for customer review, within a predictable timeframe (e.g., two weeks from an information request).

- Standardize technical requirements (where possible) by requiring utilities to publish and maintain clear, consistent technical specifications for common equipment.
- Allow for integrated utility access rights in lease agreements (instead of full easements) to reduce project delays.
- Ensure hosting capacity maps are sufficiently current and accurate and that customers are confident in using them for planning, potentially through customer education or revision of map creation.
- Invest in utility capacity and customer guidance by hiring additional engineering and interconnection support staff and offering advisory services and clear guidance on requirements.
- Allow select design changes for DER projects during the review process, especially if accurate grid capacity information was not initially provided. This could involve considering alternative system designs (original and modified with reduced capacity or adjusted scheduling) to avoid re-submission.
- Implement a consistent application process with standardized timelines and improved transparency through consistent publication of interconnection queue data and hosting capacity information.
- Establish unified permitting frameworks at the State, federal, or utility regulatory level to reduce inconsistencies across jurisdictions and streamline processes. This could include fast-track permitting pathways for projects with minimal grid impact.
- Implement flexible and adaptive interconnection standards, similar to those in California, Australia, and Europe,

which allow DERs to adjust discharge levels based on grid conditions.

- Require utilities to provide a comprehensive customer-facing document that outlines process flows, timelines, application completeness criteria, re-study vs. minor modification definitions, dispute resolution pathways, and standard escalation mechanisms.

DPS STAFF RECOMMENDATIONS

DPS Staff acknowledges and appreciates the comprehensive responses and comments received from stakeholders to-date. While some of the comments and suggestions provided by stakeholders fall outside the Commission's authority under the Public Service Law, other matters may be ripe for future consideration as part of various proceedings and/or existing working groups. Given the broad scope of topics, DPS Staff proposes the following processes to address stakeholder comments received to-date on EV load interconnections.

Preliminarily, several Commission and DPS Staff actions have already started to address some of the issues discussed above. Regarding interconnections for large loads, the Commission instituted Case 26-E-0045 on February 12, 2026, to review the planning and interconnection processes, cost-allocation mechanisms, and tariff structures relating to the integration of large loads within the State's transmission and distribution systems.[8] DPS Staff will be scheduling a technical conference before December 31, 2026 and is preparing a whitepaper, for Commission consideration, detailing the range of issues associated with large load interconnection, as addressed

[8] Case 26-E-0045, Interconnection Reforms for Large Loads, Order Instituting Proceeding and Soliciting Comments (issued February 12, 2026).

in these proceedings. Issues related to large load interconnections should be addressed as part of Case 26-E-0045.

Topics such as vehicle to grid (V2G), V2H, vehicle to everything (V2X) or other bidirectional technologies are currently being addressed, and should continue to be addressed, in the ITWG.[9] To date, the ITWG discussions associated with V2G and other bidirectional technologies have been minimal due to limited deployment and activities across the State, but the electric utilities have confirmed that any V2G applications submitted would follow the established SIR process.

DPS Staff is currently considering the merits of a flexible interconnection pilot program in Case 26-E-0052.[10] DPS Staff will also continue to consider other relevant interconnection-related issues in the ITWG and the Interconnection Policy Working Group (IPWG).[11] Likewise, Case 24-E-0621 (related to modifications to the SIR) and Case 24-E-0415 (related to the timely interconnection of DERs) provide additional venues to more broadly discuss EV interconnection-related issues.

Finally, DPS Staff is actively reviewing the feedback provided by stakeholders in response to the notice issued in Case 18-E-0138 on March 12, 2025, related to a review of the performance of the EV Make-Ready Program.[12] Such feedback may

[9] Additional information regarding the ITWG is available at the Commission's website at https://dps.ny.gov/interconnection-technical-working-group.

[10] See Case 25-E-0052, Petition of Niagara Mohawk Power Corporation d/b/a National Grid (filed January 1, 2026).

[11] Additional information regarding the IPWG is available at the Commission's website at https://dps.ny.gov/interconnection-policy-working-group.

[12] See Case 18-E-0138, Notice of Commencement of Make-Ready Program Review (issued March 12, 2025).

inform a DPS Staff proposal on a possible future program. In the event that DPS Staff files such a proposal in the future, stakeholders will be afforded an opportunity at that time to provide feedback.