

NEW YORK ELECTRIC VEHICLE LOAD MANAGEMENT TECHNOLOGY INCENTIVE PROGRAM

Implementation Plan Submitted by:

Central Hudson Gas & Electric



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Version 2

Case 22-E-0236

Pursuant to New York Public Service Commission's Order dated August 19, 2024, *Order Establishing Load Management Technology Incentive Programs*

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II. Background

On January 19, 2023, the New York State Public Service Commission (Commission) issued the Order Establishing Framework for Alternatives to Traditional Demand-Based Rate Structures¹ (Demand Charge Alternatives Order), in this proceeding. In the Demand Charge Alternatives Order, the Commission sunset the Direct Current Fast Charging (DCFC) Per-Plug Incentive (PPI) Program and directed the Joint Utilities² to develop and file plans to redeploy previously accumulated and unspent funds from the DCFC PPI Program to fund a new program to incentivize EV charging demand management technologies. Consistent with that directive, the Joint Utilities filed a proposal to implement a new Load Management Technology Incentive Program (LMTIP or “Program”) within each of the Utilities’ service territories. This new program is designed to provide incentives for eligible technologies, such as energy storage projects, including on-site energy storage, and energy storage integrated directly into charging equipment, as well as other advanced load management software and equipment. The Commission’s August 19, 2024, Order Establishing Load Management Technology Incentive Programs³ approved the Joint Utilities’ LMTIP proposal with modifications. Central Hudson (“the Company”) will implement the LMTIP per the Order and according to this Implementation Plan.

A. Definitions and Abbreviations

- **Applicant:** Any entity who has submitted program application details to Central Hudson but has not yet been accepted.
- **Charging Site:** One or more EV chargers at a single location.
- **Commercial Managed Charging Program (CMCP):** defined in the Demand Charge Alternatives Order.⁴
- **Commission:** New York Public Service Commission (PSC).
- **Customer:** A person or organization that is billed for Central Hudson’s electric service.
- **Disadvantaged Community:** 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. ECL § 75-0101(5). The Climate Justice Working Group (CJWG) adopted final

¹ Case 22-E-0236, *Proceeding to Establish Alternatives to Traditional Demand-Based Structures for Commercial Electric Vehicle Charging* (EV Solution Proceeding), New York State Public Service Commission Order Establishing Framework for Alternatives to Traditional Demand-Based Rate Structures (issued January 19, 2023) (Demand Charge Alternatives Order).

² The Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation (RG&E).

³ Case 22-E-0236, EV Solution Proceeding, New York State Public Service Commission Order Establishing Load Management Technology Incentive Programs (issued August 19, 2024) (LMTIP Order).

⁴ Case 22-E-0236, EV Solution Proceeding, Demand Charge Alternatives Order (issued January 19, 2023).

criteria to identify Disadvantaged Communities in the State on March 27, 2023. The Disadvantaged Community map can be accessed at:
<https://climate.ny.gov/Resources/Disadvantaged-Communities-Criteria>.

- **DCFC:** Direct current fast charger.
- **DCFC Per-Plug Incentive Program (DCFC PPI):** Utility program to provide rate relief to DCFC EV Charging Sites, as ordered in DPS proceeding 18-E-0138 and subsequent filings.⁵
- **DCR:** Demand Charge Rebate defined in the Demand Charge Alternatives Order.⁶
- **EMS:** Energy Management System: Software or hardware, such as meters and sensors, which monitor energy in whole buildings, including heating and cooling, lighting, and EV charging.
- **EV:** Electric vehicle.
- **EVSE:** Electric Vehicle Supply Equipment.
- **Joint Utilities (JU):** the Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric Gas & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation (RG&E).
- **L2:** Level 2 EV charger.
- **Make-Ready Program (MRP):** Utility Program incentivizing the cost of commercial customer- and utility-side infrastructure upgrades to support EV charging of light duty vehicles, as described in DPS proceeding 18-E-0138.⁷ In this document, references to Make-Ready Program may also refer to the Medium- and Heavy-Duty Pilot.
- **Medium- and Heavy-Duty Pilot (MHD Pilot):** Utility Program incentivizing the cost of commercial customer- and utility-side infrastructure upgrades to support EV charging of Medium- and Heavy-Duty vehicles, as described in DPS proceeding 18-E-0138.⁸
- **Participant:** Any accepted applicant enrolled in the program
- **Program Portal:** Customer-facing portal to be used for application and program details (<https://ch-evmakeready.customerapplication.com>)
- **The Company:** Central Hudson Gas & Electric

⁵ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, New York State Public Service Commission Order Establishing Framework for Direct Current Fast Charging Infrastructure Program (issued February 7, 2019) (DCFC PPI Order).

⁶ Case 18-E-0138, EV Proceeding, New York State Public Service Commission Order Establishing Framework for Direct Current Fast Charging Infrastructure Program (issued February 7, 2019) (DCFC PPI Order).

⁷ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, New York State Public Service Commission Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs (issued July 16, 2020), and subsequent filings.

⁸ Ibid.

III. Technology Eligibility

The LMTIP incentivizes customer-owned demand management technologies capable of reliably balancing, curtailing, or deferring a customer's net EV charging demand on the electric grid.⁹ Eligible technologies fall into four distinct segments: (1) on-site energy storage; (2) energy storage integrated directly into charging equipment; (3) load management software; and (4) load management hardware. Eligible technologies are defined by their ability to meet performance requirements and compliance with technical specifications. As described further in the Incentive Eligibility section, incentives for each technology segment will be assessed differently based on the characteristics of the technology and the customer type. Should Central Hudson or the Joint Utilities become aware of load management technology solutions that warrant the creation of an additional technology segment, the Joint Utilities will align on a set of requirements, publish key information including incentive information for participants, and update this implementation plan.

A. Eligible Technology Segments

1. On-site battery energy storage

On-site battery energy storage systems and related equipment installed for the primary purpose of supporting EV charging load management are eligible for incentives. On-site energy storage systems are defined as customer-owned, behind-the-meter battery energy storage systems installed as stand-alone equipment that provide either pooled or separate¹⁰ energy storage services for EV charging stations. The typical load management use cases of these systems include using the battery to minimize demand charges, avoid disruption to power, and deliver the maximum charge to chargers using power sharing at a site. Equipment associated with energy storage, including, but not limited to, inverters, power cabinets, foundations, and temperature control units are eligible in addition to the energy storage equipment. Energy storage equipment will be eligible for incentives up to the max kW output that can be used for EV charging (whether charger nameplate or setpoint of the charging output). Equipment that is sized in excess of the max EV charging output is not eligible.

On-site generation or other distributed energy resources paired with energy storage (e.g., solar photovoltaic systems) are not eligible technology for LMTIP.

2. Energy storage integrated EVSE

EVSE with batteries directly integrated into the device are eligible for LMTIP incentives for the energy storage component of the device that is delivering a load management benefit. The charging station and ports themselves are not eligible for incentives. In situations when the cost of the integrated battery is difficult to separate from the charger (e.g., when the battery integrated EVSE is always invoiced as a single unit), incentives are assessed based on the value delivered by the integrated battery using a proxy \$/kW value, as described in the Incentive Levels section. Energy storage equipment will be eligible for incentives up to the max kW output that can be used for EV charging (whether charger nameplate or setpoint of the charging output). Equipment that is sized in excess of the max EV charging output is not eligible.

⁹ The Joint Utilities intend to direct incentive funds only to EV load management technologies and not other technologies that support onsite generation.

¹⁰ In this context, pooled or separate means that all of the energy storage units can be tied together to support all of the EVSE (pooled) or individual energy storage units can be dedicated to specific EVSEs (separate).

3. Load management software

Software-based load management solutions are eligible for LMTIP incentives. The load management software costs, such as an energy management software (EMS) fee, may be separate from or integrated into EVSE networking or service fees. While such costs may be a recurring expenditure rather than a one-time cost incurred at the time of the EVSE site design and installation, the LMTIP incentive will be paid as a one-time upfront incentive for contracted services. These technologies will be eligible for LMTIP incentives covering costs for up to five (5) years. To be eligible, the software must provide active load management, (i.e., have the ability to influence the charging power, time, and/or duration of charging sessions to meet a set of load management objectives).

4. Load management hardware

Load management hardware solutions that are not associated with energy storage are eligible for LMTIP incentives. Eligible load management hardware equipment includes power cabinets and switches to enable power-sharing across multiple charging ports or other equipment that provides similar load-limiting functionality. Load management hardware technologies may also be eligible for incentives under the Make-Ready Program (MRP) or external funding sources; for eligibility in the LMTIP, load management hardware equipment must be directly supporting load management at the site.

B. Ineligible Costs

Customer costs ineligible for LMTIP incentives include, but are not limited to:

- Non-energy storage EVSE costs including bidirectional chargers EVSE installation.
- Bollards, signage, lighting, and other site costs.
- Operations and maintenance costs (other than Load Management Software).
- Energy costs.
- Freight.
- Cloud/networking services not supporting load management.
- On-site generation such as solar photovoltaic systems.

C. Eligible Technology Determination

The installation of eligible technologies must be configured for load management as the primary use case. Eligible technologies are not required to be separately metered from other on-site loads such as non-EV charging loads or distributed generation.

In addition to the criteria defined for each technology segment, eligible technology must meet technical specifications and industry certifications. A complete list of technical specifications will be published on the Joint Utilities website and may be updated as new technologies are approved. Technology requirements for LMTIP will only cover specific requirements to meet the intent of the program and will be aligned across the Joint Utilities.¹¹ LMTIP projects will be subject to compliance with all applicable local, state, and federal requirements as well as utility specific connection standards. While Central Hudson may direct customers to review these other requirements, the LMTIP application process will defer compliance to the appropriate third parties.

¹¹ To the extent that the Joint Utilities is not aligned on Technology Requirements specific to LMTIP, the appropriate Utility will file a petition per the Order.

In the event that a customer applies to the LMTIP to receive an incentive for a new technology, the Joint Utilities will make an eligibility determination at that time to promote a consistent approach across the State. Although the Joint Utilities intend that LMTIP funding be widely accessible, each utility reserves the right to establish eligibility standards and/or requirements for EV load management equipment to ensure compatibility with its system.

IV. Customer Eligibility

The LMTIP eligibility criteria are designed to encourage broad adoption of load management technologies paired with an installation of EV charging infrastructure in a utility's service territory while also focusing on standardized, strategic technology types. The LMTIP will be available to all commercial customers who meet the following criteria:

1. Are an electric customer of the Company taking service (or will take service upon project completion) on a commercial rate.
2. Are using the above service to power EV chargers.
3. Are implementing load management technologies as described in this Implementation Plan
4. Are concurrently applying to,¹² enrolled in, or have completed one of the following Company EV Programs:
 - a. Make-Ready Program
 - b. Medium- and Heavy-Duty Pilot (MHD Pilot)
 - c. Demand Charge Rebate (DCR)
 - d. DCFC Per-Plug Incentive Program
 - e. Commercial Managed Charging Program (CMCP) (once available)
 - f. EV Phase-In Rate (once available)

The Company may periodically reevaluate and adjust the participant eligibility criteria based on program experience and participation levels.

V. Incentive Levels

A. Eligible Costs

Eligible costs to be included in the Technology Cost include customer-side costs, as well as utility-side investments needed to support an EV customer's load management. Eligible costs will be separated or shared with other make-ready incentive programs as described below. For example, eligible costs could include utility-owned equipment installed on the customer's premises. The incentive will be based on the total cost of engineering, procurement, and construction of the technologies, or on subscription fees for load management software services.

¹² In the case that an LMTIP applicant is applying to another EV program, and their application to the other program is rejected, cancelled, or withdrawn, their LMTIP application will also be cancelled (unless they still have a different EV program to maintain their eligibility)

B. Incentive Tiers

Individual project incentives will be up to 100% of the total LMTIP eligible project costs. For each technology segment, the incentive will be calculated by multiplying the Technology Cost by the applicable incentive tier. When a project has multiple technology segments included (ex: stand-alone energy storage and load management software) then the project incentive will be the sum of each technology segment's costs multiplied by each segment's incentive tier.¹³ Individual technology segments will each have their own definition of the Technology Cost and their own method of determining incentive tiers. See **Error! Reference source not found.** below for the Technology Cost methodology:

Table 1: Technology Cost Methodology

Technology Segment	Technology Cost Calculation
On-Site Energy Storage	Total invoiced cost of the energy storage system and installation. If the output (in kW) of the energy storage system is larger than the maximum output (in kW) of the EVSEs, then the total invoiced cost will be proportionally reduced based on the ratio of maximum output of the EVSEs to maximum energy storage system output.
Energy Storage Integrated EVSE	If inseparable from the EVSE unit costs, energy storage costs will be calculated from a proxy in \$ per kW for the value of the integrated energy storage, based on the maximum kW output of the energy storage equipment that can be used for EV charging, based on the maximum kW output of the energy storage equipment that can be used for EV charging. If separatable from the EVSE unit costs, energy storage costs will be follow the methodology of On-Site Energy Storage.
Load Management Software	Total contract cost of the software, for up to 5 years of a service contract.
Load Management Hardware	Total invoiced cost of the equipment and installation.

Within a technology segment, the applicable incentive tier will be determined by the project's Disadvantaged Community (DAC) status and other project features in alignment with the MRP.¹⁴ A project's DAC eligibility will be determined by the DAC location requirements of the MRP, including applicable buffer radii and affordable housing status.¹⁵ If a LMTIP project supports both Level 2 (L2) and DCFC plugs, then the DAC eligibility will follow the DCFC rules of the MRP. **Error! Reference source not found.** below documents the current incentive levels. The Company reserves the right to adjust incentive levels as needed to encourage participation and to ensure the budget can be fairly spread

¹³ For example, if a project has technology segments A and B, then the project incentive = [Technology Cost A] * [Incentive Tier A] + [Technology Cost B] * [Incentive Tier B]

¹⁴ LMTIP projects associated with EV charging stations that did not participate in the MRP, including those that participated in a previous phase of the MRP, will be assessed against the MRP criteria (specifically the light-duty vehicle Make-Ready criteria) to determine eligibility for up-to 50, 90, or 100% incentives.

¹⁵ See Definitions and Abbreviations section for DAC definition.

across the service territory. The latest incentive tiers will be publicly posted on the Company's program webpage for participants to reference as they prepare their applications.

Table 2: LMTIP Incentive Tiers

Technology Segment	Incentive Tier	Criteria
On-Site Energy Storage	Up-to 60%	Located within a DAC
	Up-to 50%	Located outside of a DAC
Energy Storage Integrated into EVSE	Up-to 60%	Located within a DAC
	Up-to 50%	Located outside of a DAC
Load Management Software	Up-to 100%	MRP Incentive Tier of 100%
	Up-to 90%	MRP Incentive Tier of 90% or MHD Pilot Participant located within a DAC
	Up-to 50%	MRP Incentive Tier of 50% or MHD Pilot Participant located outside of a DAC
Load Management Hardware	Up-to 100%	MRP Incentive Tier of 100%
	Up-to 90%	MRP Incentive Tier of 90% or MHD Pilot Participant located within a DAC
	Up-to 50%	MRP Incentive Tier of 50% or MHD Pilot Participant located outside of a DAC

When calculating the LMTIP incentive, the cost of any major equipment (e.g., switches, transformers, cabinets) that was already incentivized through the MRP and is removed to add load management equipment, will be subtracted from the total Technology Cost of the project. Participating in the LMTIP will not retroactively make a project eligible for additional Make-Ready funds, however previously funded sites that add new EVSE as part of the LMTIP may apply again for the MRP.

The LMTIP incentive can be stacked with other technology incentives funded by other sources. Participants are required to self-attest to total project costs and incentives from other sources in their Load Management Plan as part of their application. Customers participating in multiple funding programs for the same project must meet all requirements of other programs in addition to LMTIP requirements. Customers should note that equipment funded by the Company's MRP is ineligible to receive additional funding from any other utility program such as the LMTIP. However, additional load management equipment or software for the same project that is not funded by the MRP is eligible for LMTIP funding (see section "Cost Sharing Between LMTIP and Make-Ready Program or MHD Pilot" below for additional details).

C. Incentive Cap

In addition to calculating incentives as described above, the Company will apply two additional caps that can limit a project's incentives. First, if the total project incentive would exceed 20% of the Company's LMTIP incentive budget, then the total project incentive will be capped to that value.¹⁶ Additionally, the Company will ensure the project is not incentivized above 100% of participant's costs by using two approaches:

¹⁶ The individual project cap of 20% of the Company's incentive budget is \$635,600.42

- 1) For other incentives that have been determined, Participants will be required to self-report and attest to total project costs and incentives received from other sources. Any overlapping costs will be deducted from the LMTIP incentive.
- 2) For incentives that have not yet been determined, the Company will limit the incentive tier to an appropriate percentage such that the maximum potential amount of the undetermined incentive does not result in a combined incentive of over 100% of the cost of the technology.

The following example explains how this will be implemented. A participant has \$10,000 in Technology Costs, \$3,000 of which are already incentivized through other public or utility programs, leaving \$7,000 of net Technology Costs. The Company will apply the incentive tier, assumed in this example to be 90%, to the full \$10,000 Technology Costs, yielding a potential incentive of \$9,000. The Company will compare this \$9,000 result to the \$7,000 net Technology Costs and will use the lower of the two to determine the LMTIP incentive amount. Thus, the incentive would be \$7,000.

Alternatively, for additional incentives that do not have an attestable value, such as federal tax rebates, the incentive tier will be set up to prevent over-incentivizing a project. To this effect, the Company's energy storage incentive tier is set at up-to 60% to account for the 30% investment tax credit.¹⁷ The Company retains the ability to adjust the tax incentive cap based on the scope and availability of tax incentives.

D. Cost Sharing Between LMTIP and MRP or MHD Pilot

The Company expects that many participants will participate in LMTIP concurrently or after completing the MRP and/or Medium- and Heavy-Duty Pilot (MHD Pilot). When these situations exist, each piece of incentivized equipment will be attributed to either LMTIP or MRP. Contractors will be expected to allocate project expenses between EVMR and LMTIP, based on which costs are related to EV charging versus load management. For example, if a participant in both LMTIP and MRP is installing a battery, the cost of the battery (as a whole) can only be attributed to the LMTIP Program.¹⁸ If the contractor cannot portion costs between the two programs, then costs such as labor, permitting, and design will be attributed to the Make-Ready Program. While LMTIP project costs cannot be counted as MRP project costs, they can be counted as project costs for non-utility incentive programs, such that the requirements in the Incentive Cap section are met. For instances where an MRP project has been already completed prior to an LMTIP application, no equipment included in the MRP project costs is eligible for LMTIP incentives.

¹⁷ IRS, Alternative Fuel Vehicle Refueling Property Credit, <https://www.irs.gov/credits-deductions/alternative-fuel-vehicle-refueling-property-credit>

¹⁸ Equipment that can be simply portioned, i.e. lengths of conduit or wire can have their total cost split between LMTIP and MRP, however, no dollar can count towards both programs.

VI. Implementation

A. Program Participant Journey

1. DCFC PPI Program Opt-Out

The Demand Charge Alternatives Order¹⁹ directed the Joint Utilities to terminate the DCFC PPI Program for new participants and redeploy the unspent program funds for a new program to incentivize EV charging demand management technologies. The deadline for new applications to the DCFC PPI Program was March 20, 2023. Central Hudson provided DCFC PPI Program participants a one-time 60-day period to either continue participating in the DCFC PPI Program or to switch to the Immediate Solution available in Central Hudson's service territory: the Demand Charge Rebate.^{20,21}

2. Application Process

a) Application Submission

Interested customers can submit applications through the online commercial EV portal on the Central Hudson website.²² Central Hudson will utilize the same online application portal for LMTIP that it uses for the Make-Ready Program and the Medium- and Heavy-Duty Pilot. Applicants who are applying to both LMTIP and EVMR will submit a shared application to leverage common information²³ to streamline the application process. In addition to the documents required for EVMR, the Applicant will be required to submit their Load Management Plan and financial information about their proposed LMTIP project. If an Applicant is not concurrently applying to EVMR with LMTIP, then the Applicant may need to provide additional information such as one-line diagrams to prove the existence of EV Charging on site. Similar to the MRP, the Company deploys a cross-functional team to approve, waitlist, or deny applications based on eligibility criteria as well as cost, equipment requirements, and other details of the project.

b) Application Documentation

The following items are required to be eligible for LMTIP incentives:

- **Load Management Plan:** Participants are required to submit a Load Management Plan containing details about how the load management technology will operate. Details included in the Load Management Plan will contain:
 - Description of the load management technologies including how load will be managed.

¹⁹ Case 22-E-0236, EV Solution Proceeding, Demand Charge Alternatives Order (issued January 19, 2023).

²⁰ Participants remaining in the DCFC PPI Program will receive their declining annual incentives until the end of the DCFC PPI Program. Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure* (EV Proceeding), Order Establishing Framework for DC Fast Charger Infrastructure Program (issued February 7, 2019) (DC Fast Charger Framework Order).

²¹ Case 22-E-0236, EV Solution Proceeding, Order Implementing Immediate Solutions Programs (issued November 20, 2023).

²² Customers and their installers can access the online application portal at: <https://ch-evmakeready.customerapplication.com/>

²³ Common information may include address, billing account, and contact information.

- Configuration of the load management technologies, EVSE, distribution grid connection, and connections to other onsite equipment. This can be a single-line diagram or similar.
- Minimum and maximum power for any EVSEs and energy storage equipment.
- Technical specifications for load management technologies. These manufacturer-produced documents must contain technical details of hardware and/or software with explicit details on the load management functions provided:
 - Hardware: Cut sheets and other documents that demonstrate conformance with all technical certifications and standards. If relevant, must include output of the charging equipment in kW or energy storage battery capacity in kWh.
 - Software: Cut sheets and other documents that demonstrate load management capabilities delivered by the service package, screenshots of dashboard if a load management platform.
- Description of how the project intends to meet the data reporting requirements.
- **Customer-side project costs:** Copies of all estimated/final costs and billing associated with the project. These must be on official company letterhead and include site address and customer name. All submitted load management related costs must be separated from other project costs. If applicant is applying for funding from additional sources, quote or invoice must clearly show the expected or awarded amount from these sources.
- **If a customer is installing hardware, but not applying for EVMR funds, then they may need to submit a site plan with the following details:** Aerial image of project site showing all relevant and incentivized work being performed. This may be combined with the site plan submitted for EVMR work. Site plan should include:
 - Equipment locations
 - Equipment kW per unit
 - Service panel location
 - Utility meter location
 - Utility transformer location
 - All incentivized construction, including conduit and conductor runs, pull boxes, etc.

c) Application Review

The Central Hudson LMTIP implementation team will review the project application, determine eligibility, and calculate an incentive based on work qualified under the LMTIP Program, directed by guidelines set by the Joint Utilities.

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 LMTIP projects is the same as for non-EV projects. For Work Requests with CIAC payments that are participating in the LMTIP, the Applicant will pay the CIAC amount, submit documentation about the CIAC, and any CIAC will be included in the eligible costs calculation to determine the project incentive.

d) Incentive Determination and Payment

Upon approval of the project, Central Hudson will share with the customer an Incentive Disclosure form indicating the designated incentive amount and net of the CIAC (if applicable). If the project is receiving funding for both LMTIP and EVMR, the incentive awarded for both will be communicated on

the same document. LMTIP awardees will be expected to complete a Customer Authorization and Optional Rebate Reassignment to be completed by the manager/owner of the property.

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

Upon construction completion, the Participant submits completion documentation to Central Hudson via the Application Portal. When all documentation is received and verified, Central Hudson remits payment to the designated payee. If there is no field construction work necessary (for a software only Project), Central Hudson will request the completion documentation, so that payment can be processed once documentation is complete.

e) Additional Process Steps

Depending on the scope of the LMTIP project, there may be additional process steps, which may require engaging with additional engineering and customer teams at Central Hudson. A common scope component that may trigger additional processes would be an energy storage system that has the capability to discharge back to the distribution grid. All applications for generator and energy storage interconnections to utility distribution facilities sized 5 MW and smaller follow the New York State Standardized Interconnection Requirements (NYSSIR). The steps, timelines, and costs associated within the application process are dictated within the NYSSIR and depend on the characteristics of the DER System including but not limited to AC nameplate rating, protective equipment, and the existing distribution circuitry at the point of interconnection.²⁴

Table 3 below shows a high-level overview of the stages a commercial EV Charging Site is expected to go through when enrolling and participating in the LMTIP program.

Table 3: LMTIP Customer Journey

LMTIP Customer Stage	Stage Description
Application Received	The customer fills out the application and includes supporting documentation.
Initial Quality Check	Central Hudson confirms that all the documents and information are properly inputted into the application. If anything is missing change the status to "Application Flawed."
Technical Review	Central Hudson reviews the application for project eligibility
Pending Central Hudson Approval	Central Hudson creates the Incentive Disclosure, and it undergoes internal approval. Once the Incentive Disclosure is approved, it is sent to the customer to be signed.
Awaiting Final Documentation	If necessary, the customer completes construction of the project. Once complete, the customer submits the signed incentive

²⁴ DER Systems up to with an AC nameplate rating greater than 5 MW that do not qualify for the NYISO Interconnection Process will follow the processes and procedures in Section III. A. "Applications ≤ 5 MW" of Central Hudson's Interconnection Requirements, but may be subject to additional state and federal procedures. Timelines and costs may differ from those described in Section III. A. "Applications ≤ 5 MW." Refer to the Application Process for Energy Storage and Distributed Generation greater than 5 MW guide for more details regarding this process.

	disclosure, and final invoice if necessary. For projects with an equipment component, an account manager will schedule a time to perform a site visit.
Pending Final Approval	Central Hudson confirms site visit documentation and the incentive level. Once everything is approved, the status is moved to “Ready for Rebate.”
Ready for Rebate	Every Thursday, rebate batches are processed. The status is advanced to “Payment Pending.”
Payment Pending	Invoice and checks undergo final approval.
Application Completed	Customer receives payment.

3. Participant Data Reporting Requirements

Participants will be required to provide the data necessary for the program reporting on a monthly frequency to a Joint Utilities contracted third-party data aggregator. All participants will be required to provide EV charging session data and 15-minute (or shorter) interval data for each on site EVSE that is connected to or supported by the LMTIP.²⁵ All participants who receive incentives for energy storage equipment will additionally be required to provide the 15-minute (or quicker) interval data for the following power flows:

- Output of each on site EVSE that is connected to the energy storage equipment.
- Input to the energy storage equipment from the distribution grid.
- Output from the energy storage equipment to other non-EV charging equipment on site.
- Output from the energy storage equipment to the distribution grid (if applicable)
- Input to the energy storage equipment from any generation source other than via the distribution grid (if applicable)
- Input to the EVSEs and/or energy storage equipment of any Vehicle-to-Grid (V2G) activity (if applicable)

4. Project Start Date Requirements

Applications for load management software or hardware must be for new load management and must be approved prior to starting construction or contracting services. An exception will be made for customers who executed a contract for eligible load management software or hardware on or after August 19, 2024 (the effective date of the LMTIP Order), and before the LMTIP was open for enrollments; these customers may apply by December 31, 2024. Starting on January 1, 2025, new applications must be submitted and approved prior to starting construction or contracting services.

5. Pre-existing EV Charging Installations

Existing EV charging installations are eligible for LMTIP if they are installing new and incremental load management software services or additional load management hardware. Equipment that has

²⁵ Session Data includes the following for each charging session: start and stop date/times of the session, the duration of the session, and the kWh of the session.

already been incentivized through another incentive program, such as the MRP or MHD Pilot is not eligible for an LMTIP incentive. Participants of the MRP and MHD Pilot with in-progress projects (those than have been committed but not yet paid out) may modify their application to include LMTIP-eligible costs between August 19, 2024 – December 31, 2024.

VII. Education, Outreach, and Marketing

Central Hudson and the Joint Utilities will communicate the availability and details of this program to interested and potential customers. As with other EV programs for commercial customers, LMTIP will be presented with Central Hudson’s full suite of commercial EV offerings including MRP, MHD Pilot, Fleet Assessment Services, DCR, CMCP (once available), and EV Phase-In Rate (once available). Central Hudson’s marketing and communication efforts will include the following:

- Program website and materials detailing the LMTIP offering, including instructions on how to apply, and illustrative examples for how different EV load management technologies and customer scenarios will be incentivized. Program materials including a LMTIP one-pager, and refreshed MRP collateral with LMTIP program details.
- Marketing will be targeted at MRP Approved Contractors list and site hosts about the availability of these new load management incentives.
- Central Hudson will leverage existing and new relationships with commercial customers, trade groups, and advocacy organizations to educate potential customers about LMTIP as one of a suite of offerings.
- Given its relationship to the MRP, LMTIP will be featured in MRP marketing efforts.

A. Joint Utilities Website

The Joint Utilities will establish a program landing page for the LMTIP on the Joint Utilities’ website, with the following information:

- Marketing materials will link to the individual utility websites for additional information.
- The total budget amount for each utility available to be expended to be updated quarterly.
- Information on technology eligibility requirements and approved products.
- Information on customer eligibility requirements.

VIII. Program Costs

A. Program Budget

The incentive and administrative budget for the LMTIP is the net total funds available for the DCFC PPI Program following the one-time 60-day election period the Company provided to program participants on January 19, 2024, to either continue participating in the DCFC PPI Program or switch to CMCP and/or DCR. Table 4 below outlines Central Hudson’s budget for LMTIP. The administrative budget is 15% of the remaining DCFC PPI funds, which will be tracked according to the budget categories in Table 5. The administrative budget will cover staffing, development and refinement of an application portal, marketing and outreach, and other costs necessary for the successful implementation of the program. Should the opportunity arise, the Company may divert some funds from administration to incentives while remaining with the defined total budget to maximize the benefit of the program.

Table 4: Central Hudson LMTIP Budget

Cost Category	Budget
Administration	\$560,824
Incentives	\$3,178,002
Total	\$3,738,826

Table 5: Central Hudson LMTIP Administrative Budget Categories

Category Description	Definition
Education and Outreach	All program marketing costs associated with outreach to site hosts, developers, and other stakeholders through methods such as educational video content, bill inserts, giveaways, newsletters, social media, events, press releases, informational websites, direct mail, and advertisements for possible site hosts, and FAQs, webinars, and other resources about the application process for developers.
Information Technology Requirements	Costs associated with technology tools needed to support the program's operation, including maintaining online resources such as the application portals for incentives.
Data Collection and Management	Costs associated with collection and analysis of required program data, such as contracting with a consultant to manage data collection, aggregation, and anonymization to meet the requirements of the annual reports.
Service Staffing	Costs of staffing for the program, including all employee costs and including cost of some employee contractors (i.e., those who are hired for multiple functions of the program and thus do not clearly fall into other expense categories).
Vendor Costs	Third-party vendor services retained for functions that do not fall into other expense categories.
General Implementation Costs	All other non-vendor costs that do not fall into other expense categories.

B. Cost Recovery

As outlined in the February 7, 2019, Order Establishing Framework for Direct Current Fast Charging,²⁶ the DCFC PPI Program was funded by identified unencumbered, uncommitted NYSDA

²⁶ Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, *Order Establishing Framework for Direct Current Fast Charging Infrastructure Program* (Issued February 7, 2019).

legacy funds (i.e., remaining System Benefits Charges). Following the February 7, 2019, Order, NYSERDA transferred the funding to the Company to be used for the DCFC PPI Program. The Company will repurpose the DCFC PPI Program funds for LMTIP implementation and incentives.

Since DCFC PPI Program funds have already been collected from customers, further cost recovery from customers would not be required.

C. Program Reporting

On an annual basis, the Company will report data relating to the LMTIP as part of their March annual report for the MRP. Information reported will include number of applicants, number of customers receiving incentives, total incentives paid, and remaining budget for the Program.

On a quarterly basis, the Joint Utilities will also report LMTIP program data regarding remaining funding available by utility on the Joint Utilities website.

The Joint Utilities will provide aggregated LMTIP participant load profiles, to the extent available, as part of their Program Assessment filing, described below.

D. Program Assessment

The Joint Utilities will file a Program Assessment proposal to commence a single statewide LMTIP Program Assessment process at the earlier of: (1) when the first of the Joint Utilities expends 70 percent of its LMTIP incentive budget; or (2) the next statewide MRP review process as directed in the Midpoint Review Order, anticipated to begin no later than November 2025.

IX. Implementation Plan Revision Tracker

Table 6: Implementation Plan Revision Tracker

Date	Revision Description
October 2, 2024	First implementation plan filed.
July 11, 2025	Updated implementation plan to reflect requirements of 15-minute interval data for LMTIP projects.