

October 3, 2022

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

RE: Case No. 18-E-0138: Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure – Comments by ChargePoint in response to questions included in Notice of Meeting and Commencement of the Make-Ready Program Mid-Point Review

Dear Secretary Phillips,

Attached for electronic filing in the above-referenced matter, please find comments on behalf of ChargePoint, Inc. Please let me know if you have any questions.

Respectfully,



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I. Introduction and Background

ChargePoint, Inc. (“ChargePoint”) is pleased to offer these comments to the New York Public Service Commission (“the Commission”) in response to the questions presented in *the Notice of Meeting and Commencement of the Make-Ready Program Mid-Point Review* filed by the Commission on August 30, 2022.

A. Background on ChargePoint

ChargePoint is a world-leading EV charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and transport fleets of all types. ChargePoint’s cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

ChargePoint’s hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint’s software and cloud services enable EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

ChargePoint’s primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other

parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

B. Summary of Comments

ChargePoint's comments on Make-Ready program modifications are presented as responses to the questions posed by the Commission in the *Notice of Meeting and Commencement of the Make-Ready Program Mid-Point Review*.¹ ChargePoint recommends that the Commission:

- Increase maximum Make-Ready incentives to align with actual average per-port costs incurred.
- Expand incentives for the MHD segment to 50% of customer-side Make-Ready costs and investigate larger changes to the MHD pilot in a separate proceeding.
- Expand eligibility for the 90% incentive level to workplace, MUD, and pay-to-park sites.
- Direct the Joint Utilities (JU) to adopt a list of qualified vendors (QVL).
- Direct the Technical Standards Working Group to investigate standardized uptime and reliability reporting standards.
- Delay implementing commercial VGI pilot programs until demand charge alternatives for commercial properties are approved in Case 22-E-0236.
- Expand Make-Ready incentives for utility-side equipment to enable co-located DCFC/battery storage deployment until a rate-solution to demand charges is available.
- Simplify data reporting requirements to allow data sharing to occur through API integrations.
- Establish a 1-year "waiting period" for sites that NYPA proposes to develop to provide an opportunity for the private market to establish intent to develop, plus 18 months to allow the private market to begin construction.

II. Program Budget and Incentive Levels

A. Commission Questions

- 1. Provide comments and suggested modifications for the non-DAC incentive levels for both the light-duty program and the Medium Heavy Duty (MHD) Make-Ready pilot.**

¹ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Notice of Meeting and Commencement of the Make-Ready Program Mid-Point Review, (issued August 30, 2022).

The light-duty non-DAC incentive covers 90% of utility-side Make-Ready costs for public and non-proprietary Level 2 (L2) and DC fast chargers (DCFC), and 50% of Make-Ready costs for private access or proprietary L2 and DCFC. Incentives are capped at \$6,000 per-port for L2 and \$357 per-kW for DCFC in Orange & Rockland, National Grid, Central Hudson, NYSEG, and RG&E territories, and \$11,257 per-port for L2 and \$667 per-kW for DCFC in ConEdison territory.

Considering the large range of actual per-port costs reported in each service territory and the likelihood that several utilities will not meet their L2 deployment goals, the Commission should modify the light-duty L2 incentive program to reflect actual average costs incurred. Specifically, the program should cover 90% of Make-Ready costs with a maximum incentive level up to \$8,000 per-port for Level 2 ports for Central Hudson, Orange & Rockland, National Grid, NYSEG, and RG&E, and up to \$15,000 per-port for Level 2 ports in ConEdison territory.

The MHD non-DAC incentive covers 90% of utility-side Make-Ready costs. The JU noted that most MHD customers are not able to meaningfully participate in Make-Ready programs at this time.² Make-Ready incentives for the MHD pilot only cover utility-side Make-Ready costs, which incur low costs compared to customer-side Make-Ready costs, which are not eligible for incentives. The Commission should expand the MHD pilot to offer support for 50% of customer-side Make-Ready costs to encourage greater participation in the program.

2. Provide comments regarding the state of the EV charging station market and its continued need for make-ready subsidies. Is the market ready to begin reducing the percentage of make-ready costs subsidized by the program from 90 percent for publicly accessible non-proprietary stations and 50 percent for other types of chargers? If so, what percentage of costs should be subsidized?

New York's EV market remains in its earliest stages. As of June 2022, 5.3% of new car sales in New York are EVs and 1.5% of all vehicles on the road in New York are EVs.³ Utility support for Make-Ready infrastructure is one of the most effective policy tools at the Commission's disposal to spur the competitive charging market and to influence vehicle purchase decisions in favor of EVs. ChargePoint recognizes and anticipates that Make-Ready incentives

² Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, EV Make-Ready Program Midpoint Review Kickoff at 31, (filed September 20, 2022) ("Midpoint Review Kickoff Presentation")

³ Alliance for Automotive Innovation, "Electric Vehicle Sales Dashboard," (accessed Sept. 28, 2022), available at: <https://www.autosinnovate.org/resources/electric-vehicle-sales-dashboard>

will need to be phased out as the competitive market for EV charging matures. As EV adoption accelerates, higher station utilization will make the installation of charging stations economic for site hosts without incentives.

At this time, Make-Ready support is still needed to incentivize charging station deployment. It is not yet time to withdraw support because projects are dependent on incentives to be cost-effective and subsequently do not move forward without incentives. Even at the current incentive levels, several utility service territories, including NYSEG and RG&E, report that they are unlikely to meet the mid-point port deployment targets. This suggests an expansion of incentive eligibility is appropriate. ChargePoint discusses recommendations for eligibility in response to other questions below.

III. The Need for Additional Phases of the Program

A. Commission Questions

1. What program modifications would improve the MHD Make-Ready pilot?

In addition to expanding incentives to cover 50% of customer-side Make-Ready costs as recommended above, the Commission should commence a separate proceeding to fully investigate infrastructure incentives and rate design for MHD vehicles. The JU reported that 96% of fleets engaged by the utilities have been unable to participate in the pilot program.⁴ Low participation is not due to a lack of demand for electric MHD vehicles, but due to program design that is suited to light-duty segments and does not adequately address the unique barriers to electrification of MHD vehicles. Considering the extent of non-participation, a more thorough review and stakeholder process is necessary to identify what changes will improve efficacy of the MHD pilot program.

It would be prudent to consider major changes to the MHD pilot and changes to rate design together. In the Make-Ready Order, the Commission declined to consider EV rate designs and indicated that the issue would be re-visited during the midpoint review process.⁵ Case 22-E-0236 is an ongoing proceeding to design alternatives to traditional demand charges for EV charging in the light-, medium-, and heavy-duty segments. A more thorough review of MHD programs and

⁴ Midpoint Review Kickoff Presentation at 31.

⁵ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs at 143 (issued July 16, 2020) (“Make-Ready Order”).

rate design will ensure that lagging MHD pilot program participation can be evaluated more comprehensively and with greater guidance than the midpoint review process.

ChargePoint generally supports the goals and objectives of the pending *Petition for the Initiation of a Proceeding and Interim Measures Addressing Electric Vehicle Supply Equipment and Infrastructure for Medium- and Heavy-Duty Electric Vehicles* by CALSTART, Inc., Environmental Defense Fund, and other parties.⁶ The petition encourages the Commission to investigate current charger deployment and expected need, modify and rescale current MHDV pilot programs, and initiate a comprehensive stakeholder process to create a full-scale MHDV infrastructure program.”

2. Should the Commission consider creating eligibility criteria and program requirements for specific MHD vehicle use cases or vehicle-types, to address the varying charging infrastructure needs across the class 2 – 8 vehicle markets? If so, which vehicle types or use cases should have unique program requirements?

ChargePoint does not recommend creating additional eligibility criteria and program requirements for specific MHD vehicle use cases. Additional eligibility criteria may complicate program administration and confuse potential participants. Although MHD vehicle use cases may require a different solution than the light-duty vehicle (LDV) segment to enable participation, greater program segmentation within the class 2-8 markets would be premature without a more thorough investigation into the barriers for deployment for MHD vehicles in a separate proceeding.

3. Should additional equipment be added as eligible EV make-ready costs, for either the light- duty or MHD Make-Ready pilot?

In the midpoint review kickoff presentation delivered on September 20, 2022, the JU noted that participation in Make-Ready programs increased when there was an opportunity to take advantage of stackable incentives to cover both Make-Ready and equipment costs. It may be appropriate to consider offering charging station equipment incentives for the MHD segments that have largely been unable to benefit from the Make-Ready pilot program so far. The Commission should consider EVSE incentives for MHDVs in a separate proceeding, as recommended earlier.

⁶ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Petition for the Initiation of a Proceeding and Interim Measures Addressing Electric Vehicle Supply Equipment and Infrastructure for Medium- and Heavy-Duty Electric Vehicles (filed May 11, 2022).

If the Commission adds EVSE incentives to the MHDV pilot program, eligible equipment should be required to be networked, ENERGYSTAR-certified (for Level 2), and UL-listed for safety.

4. Should Vehicle to Grid Integration (VGI) pilots be considered as part of the Midpoint review?

VGI may refer to any method of altering the time, charging level, or location at which EVs charge or discharge to optimize grid management and benefit all ratepayers. The most basic applications of VGI include the use of price signals or active load control to optimize charging times or throttle EV load during peak times. Certainty in rate design is a critical foundation to understanding the role that VGI should play in the next iteration of the Make-Ready program. DPS Staff recently released a White Paper that provides recommendations for the design of demand charge alternatives.⁷ The recommendations in the Staff White Paper include Commercial Managed Charging Program and an EV Phase-In Rate Solution. While the primary intention of the White Paper is to address high demand charges for EV chargers, Staff recommends design elements that prioritize peak avoidance.⁸

ChargePoint recommends that the Commission refrain from offering a VGI pilot for commercial customers until an Order in Case 22-E-0236 clarifies the future of the rate structure. If the Commission decides to proceed with a VGI pilot as part of the midpoint review, implementation should focus on the residential sector, which has the highest potential to deliver cost savings for ratepayers and grid management.⁹ Since residential (at-home) chargers will not be directly affected by the demand charge alternatives under consideration in Case 22-E-0236, managed charging programs for residential customers can begin to deliver benefits of VGI without duplicating or overlapping programs. ChargePoint recommends that a residential active charge management program be considered alongside residential Make-Ready programs.

IV. Redirecting unused program funding to multi-unit dwellings and workplace or redefining the accessibility criteria to include multi-unit dwellings and workplaces

⁷ Case 22-E-0236, *Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Vehicle Charging*, “Department of Public Service Whitepaper Regarding Alternatives to the Traditional Demand Charge for Commercial Customer Electric Vehicle Charging,” (September 26, 2022) (“Staff White Paper”).

⁸ Staff White Paper at 37.

⁹ California Public Utilities Commission, “Final Report of the California Joint Agencies Vehicle-Grid Integration Working Group” at 24 (June 30, 2020), available at: <https://gridworks.org/wp-content/uploads/2020/07/VGI-Working-Group-Final-Report-6.30.20.pdf>

A. Commission Questions

1. Provide comments on whether program funding should be further directed to multi-unit dwellings and workplaces.

The 50% funding level is inadequate for key use cases that are considered “private,” including parking for workplaces and multi-unit dwellings outside of disadvantaged communities. Over 90% of charging happens at home and at work.¹⁰ Limiting Make-Ready incentives to 50% of costs is an under-investment in the segments that support the most charging behavior and are most influential in a driver’s decision to purchase an EV. For example, workplace charger access makes a driver six times more likely to purchase an EV.¹¹ Incentives should be expanded in segments that are most likely to drive EV adoption. MUDs in particular need higher levels of Make-Ready support to address the split incentive between building owners and renters. Incentive parity will further the goals of the program and ensure the utilities unlikely to meet midpoint port deployment targets can meet 2025 targets.

V. Revising the accessibility criteria to include public pay to park lots

A. Commission Questions

1. Should nonmunicipal pay to park lots be eligible for the higher incentive tier?

Private lots are currently eligible for incentives that cover 50% of Make-Ready costs, whereas municipal paid lots are considered publicly accessible and receive incentives to cover 90% of Make-Ready costs. Pay to park lots should be eligible for the higher incentive level. Expanding incentive eligibility will incentivize more port deployments, particularly in the L2 segment, where several utility service territories are unlikely to meet their midpoint port targets. Aligning incentive levels and providing incentive parity will better achieve the goals of the program to expand access to charging and support electrification.

VI. Revisiting future-proofing requirements and budgets

A. Commission Questions

¹⁰ Smart, John, “Lessons Learned About Workplace Charging in the EV Project,” Idaho National Labs (2015), available at https://www.energy.gov/sites/prod/files/2015/07/f24/vss170_smart_2015_p.pdf

¹¹ US Department of Energy, “Workplace Charging Challenge,” (2016), available at: https://www.energy.gov/sites/prod/files/2017/01/f34/WPCC_2016%20Annual%20Progress%20Report.pdf

- 1. Should battery energy storage systems be added as eligible equipment for the make-ready program? Are there other forms of advanced technologies that should be considered for eligibility in the make-ready program?**

ChargePoint recognizes the potential benefits of co-locating energy storage systems with EV charging to manage peak loads and alleviate demand charges, particularly for high-power DCFC stations. Under the current rate structure, co-located storage will incentivize greater deployment of DCFC. Energy storage can reduce energy charges and improve overall project economics, but it comes at an additional cost; real estate, permitting requirements, and increased capital costs limit the number of sites that benefit from battery storage systems. A change in rate design to address the barrier of high demand charges is preferable because it offers a non-infrastructure solution that all EV charging sites can participate in, including the many that are not good candidates for a combined EVSE/storage solution.

Although a rate-based solution is currently under consideration in a separate proceeding, a Commission Order is not expected until the third quarter of 2023, and a new rate design option may not be available for participation until 2025.¹² In the meantime, developers will not add energy storage to a DCFC project unless storage is required to make the project economic under the current rate structure. Because high demand charges continue to present difficult economics for charging stations, ChargePoint recommends the Commission expand Make-Ready incentive eligibility to cover the cost of storage-related equipment. Make-Ready incentives should not cover the cost of the battery storage asset itself; should the Commission choose to incentivize storage deployment beyond Make-Ready infrastructure, ChargePoint recommends doing so through a separate storage incentive, rather than utilizing limited Make-Ready funds.

VII. Reviewing implementation requirements and budgets

A. Commission Questions

- 1. The Make-Ready Order, on pages 104-109, describes the information needed for an annual Make-Ready Report. Provide comments on and any suggested modifications to the annual data collection and reporting requirements.**

¹² Staff White Paper at 50.

Data is a useful tool to provide a robust picture of charger utilization and program efficacy. However, data collection and reporting come at a cost, which is translated to higher expenses for site hosts and may slow down EV charger deployment. ChargePoint recommends the Commission review data reporting requirements, assess how data collected so far is utilized, and determine whether its collection leads to desired outcomes. Data reporting requirements that do not provide meaningful insight to the program should not continue to be required for reporting. For example, it is unclear how reporting on station financial information, such as operating costs differentiating between energy-related and non-energy related costs, provides actionable information to the utility or the customer.

As another example, reporting on plug outage information can be a challenge for network operators because there is no industry standard. Subsequently, data provided can vary by network company, limiting its usefulness to understand reliability outcomes. In addition, reporting outage information will not necessarily lead to better reliability outcomes because there is no defined enforcement mechanism for repairing broken chargers in the Commission's Make-Ready Order. ChargePoint recommends eliminating the requirement to report outage data and convening the Technical Standards Working Group to assess how reliability and uptime reporting may be standardized as the next iteration of the Make-Ready program is considered in 2025.

2. Provide comments on the quarterly reporting process. Are any modifications necessary that can optimize the data collection and reporting process?

The quarterly reporting process requires quarterly bulk data submissions, a process that is more costly and burdensome than it needs to be to share information between the site host, network company, JU, and Commission. While charging equipment may store data in a backend system or make it visible in a customer-facing platform, compiling raw data and submitting it in bulk on a quarterly basis is significantly more complex and resource-intensive. Furthermore, large data uploads are not the most effective way to collect and report relevant metrics for the JU and Commission. Rather than mandating quarterly reports, in which the charging network providers manually upload data in bulk, the Commission should allow data sharing via API integration with charging networks. This will significantly reduce the costs incurred by data reporting requirements, effectively reducing the cost of networked charging equipment for site hosts.

B. Additional Comments

- 1. The Commission should direct utilities to develop a list of qualified EVSE vendors and limit Make-Ready incentives to products on the qualified list.**

Although utilities may choose to offer “EV equipment lists” to help customers select EVSE, Make-Ready program participants do not universally receive support on the selection of charging equipment. ChargePoint recommends that the utilities adopt a list of qualified vendors (QVL) in addition to the list of qualified contractors. Equipment on the QVL should be networked, ENERGY STAR-certified, and UL-listed for safety. Site hosts that wish to install EV chargers with Make-Ready funds should be required to choose from equipment listed on the qualified vendors list. QVLs for EVSE are common practice for Make-Ready programs in other states, such as those offered by National Grid in Massachusetts,¹³ Eversource in Connecticut,¹⁴ and PG&E in California.¹⁵ A QVL will also allow manufacturers, who have experienced sales teams, to speak directly with customers about strategy to ensure successful projects, including maintenance plans that will ensure timely repair and reliability of stations.

The NYSERDA Charge Ready NY maintains a list to provide guidance to Charge Ready NY participants on qualified vendors.¹⁶ Although many site hosts have stacked NYSERDA equipment incentives on top of utility Make-Ready, the Charge Ready NY program has exhausted funds and is no longer offering incentives. It is unclear when stackable EVSE incentives will return. The lapse of the Charge Ready NY program means Make-Ready program participants are unlikely to be receiving continued guidance on selection of a qualified EVSE vendor as they proceed with Make-Ready projects. ChargePoint recommends that a QVL for the Make-Ready program align with the requirements for the Charge Ready NY programs to simplify program administration.

¹³ See National Grid’s Qualified EVSE list, available at: <https://www.nationalgridus.com/media/pdfs/bus-ways-to-save/ee7387-mass-evse-list.pdf>

¹⁴ https://www.eversource.com/content/docs/default-source/save-money-energy/ct-ev-charger-list-commercial.pdf?sfvrsn=7ab18262_10

¹⁵ https://www.pge.com/en_US/small-medium-business/energy-alternatives/clean-vehicles/ev-charge-network/program-participants/approved-program-vendors.page

¹⁶ NYSERDA, Qualified Charging Equipment and Networks, (accessed September 30, 2022), available at: <https://www.nyserra.ny.gov/All-Programs/ChargeNY/Charge-Electric/Charging-Station-Programs/Charge-Ready-NY/Qualified-Charging-Equipment-and-Networks>

VIII. Utility ownership of charging station hardware

A. Commission Questions

1. **The Make-Ready Order allows for NYPA participation in the Make-Ready Program, with certain conditions. Specifically, NYPA is directed to build 10 fast charging locations in every Regional Economic Development Council region by 2022, with a budget cap of \$15M. The Commission also authorized \$15M for NYPA's Evolve NY Program to help build out a robust network of DC Fast Chargers across the State. As part of the program, NYPA must make each of its proposed sites available for inquiry by other station developers to reduce the risk of co-location. Provide comments on the effectiveness of NYPA's public notification process and provide any suggestions for improvement.**

ChargePoint has found that the public notification process does not effectively reduce the risk of co-location and maximize the ability of the competitive charging market to build stations, as the Commission recommended in its order.¹⁷ NYPA's public notification process includes monthly online postings of NYPA selected project sites and their stages of development. However, postings are not accurate or prompt enough to provide time for private developers to identify conflicts. For example, sites in Gouverneur and Potsdam appeared for the first time in April 2022 listed as "Pre-Construction," skipping site identification and site negotiation stages that might have allowed opportunity for intervention by private developers.

Under the official requirements of the program, NYPA is not required to abandon a site unless another private developer has a signed site license agreement. Because co-location severely impacts utilization and therefore ROI, site hosts are generally unwilling to sign such agreements until after the site has been abandoned by NYPA, though signed MOUs are generally available at that stage of development.

The Commission should amend the reporting model to ensure that NYPA-owned sites do not overlap with private development. ChargePoint recommends that NYPA post a list of locations it intends to develop one year ahead of construction. Third-party developers should have the one-year "waiting period" to review sites and provide notice that they intend to deploy chargers at that location via a signed MOU with a site host, after which they should have 12 months to begin construction. NYPA should proceed with charger deployment at its selected sites if no developers

¹⁷ Make-Ready Order at 30.

provide a signed MOU with a site host at the identified location within one year or if a developer fails to begin construction within 12 months of providing the signed MOU. This process will ensure that NYPA is not deploying charging stations at locations the competitive market is ready to serve and instead focuses on complementing private market development by filling travel corridor gaps and other underserved areas.

IX. Emerging plug standards

A. Commission Questions

- 1. Are there any topics that the Technical Standards Working Group should address that are not already delineated in the Make-Ready Order or have not been discussed in previous TSWG meetings?**

Reliability and uptime requirements can ensure the investments being made now continue to serve EV drivers for years to come and that site hosts have a good, hassle-free experience installing and maintaining EVSE. However, station reliability and uptime have only been discussed in the context of payment processing by the TSWG. TSWG should discuss uptime and reliability requirements, including how to best report on reliability data considering an absence of an industry standard.

X. Potential need for residential make-ready

A. Commission Questions

- 1. Provide comments on the potential need for residential make-ready.**

Home charging is one of the most convenient ways for drivers to fuel an EV. Utility investments in residential Make-Ready can provide much-needed financial support, particularly as EV adoption becomes more mainstream and potential EV drivers get more cost-sensitive to the expense of installing charging at home.

The cost of home charger equipment and installation is \$1,200 on average, but may reach \$2,500.¹⁸ A residential Make-Ready program could offer financial incentives to help ensure homes are EV-ready, encompassing: (1) 240V wiring near the customer's parking space; 240V outlet

¹⁸ Fixr.com, "How much does it cost to install an electric vehicle charging station at home?" (accessed September 30, 2022), available at: <https://www.fixr.com/costs/home-electric-vehicle-charging-station#:~:text=The%20national%20average%20cost%20range,an%20existing%20120%2Dvolt%20outlet.>

equipment and installation; (3) EVSE installation; and (4) associated panel upgrades, service upgrades, and permits. Without incentive support, the costs of these investments could deter EV adoption.

Further, as EV adoption grows, unmanaged home charging will present high costs to ratepayers through upgrades necessary for the grid. A residential Make-Ready program should offer incentives for residential customers to install a networked charger and require participation in load management programs in return. Incentivizing networked charger deployments and encouraging participation in load management programs to access residential Make-Ready will provide direct benefits to EV drivers and allow utilities to measure and anticipate the grid impacts of EV drivers across service territories. ChargePoint recommends that the JUs propose a program for residential Make-Ready and charging equipment incentives within 90 days of the Commission's final Order at the end of Midpoint Review.

XI. Conclusion

ChargePoint appreciates the opportunity to provide comments as the Commission commences the Make-Ready Program midpoint review process. ChargePoint looks forward to continuing to work with the Commission, Staff, the Joint Utilities, and other stakeholders over the course of this proceeding.