STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

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

JOINT UTILITIES' REPLY COMMENTS ON THE COMPREHENSIVE RESIDENTIAL MANAGED CHARGING REPORT

The Joint Utilities[1] respectfully submit these reply comments in response to stakeholder comments filed regarding the Joint Utilities' Comprehensive Residential Managed Charging Report[2] ("Comprehensive Report") and the associated Technical Conference.[3] Stakeholders generally agree that managed charging programs are delivering meaningful value to customers and the electric grid and support continued investment in managed charging as New York State advances transportation electrification. The Joint Utilities appreciate the stakeholder engagement and perspectives provided by commenters representing a range of stakeholder groups, including current and prospective utility managed charging technology platform vendors whose participation and experiences are important to the continued development of effective managed charging programs. Managed charging is a fragmented, nascent, and rapidly developing market, and this is demonstrated in the diversity of valid considerations that stakeholders raise.

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[1] The Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric and 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).

[2] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, JU Managed Charging Comprehensive Report (filed March 16, 2026).

[3] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Joint Utilities Technical Conference Slides (filed April 10, 2026).

The Joint Utilities reply comments address three issues raised by stakeholder comments: (1) the need to improve implementation flexibility and avoid prescriptive statewide requirements; (2) the need to continue refining cost-effectiveness and benefit-cost evaluation methods without impacting program continuity; and (3) the appropriate procedural treatment of bidirectional charging and vehicle-to-grid ("V2G") issues.

I. The Commission Should Improve Implementation Flexibility and Avoid Prescriptive Statewide Requirements

Stakeholder comments demonstrate broad support for the continuation of residential managed charging programs,[4] while also reflecting differing views on how these programs should be designed and implemented. Commenters offered a range of recommendations regarding participation pathways, technology standards, data requirements, interoperability, vendor practices, incentive structures, and future program objectives. These differing perspectives reinforce the Comprehensive Report's recommendation that utilities expand flexibility to tailor managed charging programs to their respective service territories, customer populations, program objectives, and grid needs.

The diversity of stakeholder recommendations[5] regarding which participation pathway should be used underscores the point that there currently is not one individual pathway that is clearly optimal. The Joint Utilities support the principle that managed charging programs should be accessible to as many EV drivers as possible, and the lack of evidence that one pathway alone

[4] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Comments of ACE NY & Advanced Energy United, Alliance for Automotive Innovation, Alliance for Transportation Electrification, ChargeScape, DVM Industries, EnergyHub, Environmental Defense Fund, EVCAN, ev.energy, Gridsight, Sagewell, VGIC, and WeaveGrid (filed July 17, 2026).
[5] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Comments of ChargeScape, EnergyHub, Gridsight, Sagewell and WeaveGrid (filed July 17, 2026).

can maximize access reinforces the importance of preserving multiple participation pathways. Maintaining multiple pathways helps maximize participation, minimize the exclusion of EV drivers based on vehicle type or available charging infrastructure, and avoid premature statewide requirements that could unintentionally favor certain technologies or business models, which could disadvantage other viable business models and potentially limit the landscape of competitive solutions.

Stakeholder comments also illustrate the lack of consensus regarding a preferred program design. Some commenters advocate for AMI or meter-based approaches,[6] while others emphasize telematics, OEM-authorized integrations, open standards, renewable alignment, active managed charging, distribution optimization, or other advanced capabilities.[7] This lack of consensus reflects the complex reality of a nascent, developing, and fragmented market. No single participation pathway, technology, vendor model, or future program objective should be given preferential treatment at this stage. Each pathway presents different tradeoffs regarding customer eligibility, functionality, cost, data quality, operational reliability, scalability, and implementation timing. Improving flexibility will allow utilities to pursue expanded program objectives where appropriate, while maintaining alignment with Commission policy goals. Conversely, restricting the available program implementation choices at this time would hinder the development of the market for managed charging services.

The Joint Utilities' proposed program modification framework is consistent with this need for flexibility while maintaining appropriate oversight. As described in the Comprehensive

[6] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Comments of Gridsight and Sagewell (filed July 17, 2026).
[7] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Comments of ChargeScape, EnergyHub and WeaveGrid (filed July 17, 2026).

Report, the proposed framework distinguishes between routine program adjustments, modifications implemented in consultation with Staff, and fundamental program design changes requiring Commission approval. This structure would allow utilities to make necessary operational updates to improve program performance and cost-effectiveness based on data and lessons learned, while preserving Commission oversight for significant program changes.

II. Cost-Effectiveness and Benefit-Cost Evaluation Methods Should Continue To Be Refined Without Impacting Program Continuity

The Joint Utilities agree that continued evaluation of managed charging benefits is important and acknowledge stakeholder interest in developing more comprehensive benefit-cost frameworks.[8] In fact, the Comprehensive Report explicitly recognizes that current valuation approaches do not fully capture all potential managed charging benefits and identifies future framework development as an important next step. However, the Joint Utilities do not believe that development of a more complete valuation framework should be a prerequisite to continued program authorization.[9] Managed charging programs are already delivering measurable customer and grid benefits, and as previously argued by the Joint Utilities,[10] program continuity remains important as utilities continue gaining operational experience, refining evaluation methodologies, and supporting long-term customer behavior change.

[8] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Comments of Alliance for Automotive Innovation and Environmental Defense Fund (filed July 17, 2026).
[9] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Comments of Alliance for Automotive Innovation and Environmental Defense Fund (filed July 17, 2026).
[10] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Joint Utilities' Petition to Extend the Managed Charging Programs (filed April 9, 2025).

The Joint Utilities also recognize stakeholder interest in evaluating locationally-specific managed charging value[11] and acknowledge that managed charging may provide additional value in areas with localized distribution constraints or other grid needs. At the same time, EV charging presents unique evaluation challenges because EVs are mobile loads and customers may charge in various or unpredictable locations. In addition, realizing and measuring location-specific value will require further integration among managed charging platforms and utility systems, which presents both technological and operational challenges that continue to evolve. Additional study is therefore needed before assigning location-specific value to individual residential managed charging participants or using such value as a condition for program authorization. In particular, such study may consist of multiple analyses because of the substantial variation in the magnitude and sources of locational value across different electric system topologies.

The evergreen structure proposed in the Comprehensive Report is designed to provide program continuity while preserving opportunities for future review. The proposed triennial review process would allow the Commission, Staff, the Joint Utilities, and stakeholders to revisit program performance, budgets, customer participation, and evaluation methods on a regular basis. Continued refinement of cost-effectiveness frameworks should inform future reviews but should not delay or create uncertainty around continued program operation.

[11] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Comments of Environmental Defense Fund and EnergyHub, (filed July 17, 2026).

III. Opportunities to Support Bidirectional Charging Should be Discussed in the Appropriate Forum

Several stakeholders[12] identify vehicle-to-grid and related technologies as promising areas of continued development. The market, customer adoption patterns, equipment availability, and operational considerations associated with these technologies continue to evolve. The Joint Utilities agree[13] that bidirectional charging technologies may provide additional opportunities for some customers and the electric grid in the future. As these technologies mature, further consideration of their potential role within New York's clean energy and transportation strategies may be warranted. Given that the impact of bidirectional charging goes beyond managed charging programs to include interconnection processes and a combination of charging and discharging compensation structures that are addressed across various proceedings including the Value of Distributed Energy Resources,[14] Grid of the Future, battery storage and others, the Joint Utilities recommend addressing the topic of bidirectional charging through a broader policy discussion that can evaluate these interconnected issues holistically, rather than as part of the comments on the managed charging program Comprehensive Report.

IV. Conclusion

The stakeholder comments broadly support the continuation of residential managed charging programs and validate the recommendations presented in the Comprehensive Report.

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[12] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Comments of ACE NY & Advanced Energy United, Alliance for Automotive Innovation, ev.energy and VGIC (filed July 17, 2026).

[13] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Comments of Alliance for Automotive Innovation and VGIC (filed July 17, 2026).

[14] The Commission previously determined that Vehicle-to-Grid should be compensated via the Value of Distributed Energy Resources (VDER) tariff. Case 18-E-0138, Order Approving Midpoint Review Whitepaper's Recommendations With Modifications, Issued November 16, 2023, pages 64-67.

Where stakeholders differ, those differences largely concern the specific technologies, methods, standards, and program features that should be favored going forward. That diversity of perspectives reinforces the need for utility-specific flexibility, program continuity, and regular opportunities for review and refinement.

For the reasons discussed above and in the Comprehensive Report, the Joint Utilities respectfully request that the Commission improve implementation flexibility, support continued refinement of cost-effectiveness and benefit-cost evaluation methods without affecting program continuity, and address bidirectional charging and V2G issues in the appropriate forum.

Respectfully submitted,

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