



November 14, 2024

Via Electronic Mail

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

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

Dear Secretary Phillips,

Department of Public Service staff (Staff) will host a technical conference on December 17, 2024, via WebEx. The purpose of the technical conference is to consider interoperability and universal accessibility of electric vehicle charger hardware, such as plug type, charger design, charging adapters, and software in the context of Make-Ready Program eligibility. Additional details will be provided in a Secretary's Notice, including the WebEx link and registration information for the technical conference, at a future date.

In advance of this technical conference, Staff has prepared a list of questions for Stakeholders. To the extent time allows, the questions and answers thereto may be covered during the roundtable discussion period of the technical conference. Interested parties are also encouraged to submit written responses to these questions by December 31, 2024.

Staff encourages parties interested in giving a brief presentation related to the attached questions to contact Zach Archibald at zachary.archibald@dps.ny.gov.

Sincerely,

Stephanie McDermott

Stakeholder Questions

Staff has prepared the following questions to gauge the current state of electric vehicle supply equipment (EVSE), following recent developments by the Society of Automotive Engineers (SAE) to standardize the North American Charging Standard (NACS) as SAE J3400:

1. What is the anticipated timeline for the standardization and market readiness of J3400 EVSE products and when do stakeholders anticipate widespread availability of J3400 EVSE products?
 - a. Is there anticipated to be a difference in market supply or developer interest in J3400 EVSE for L2/AC charging vs DCFC charging?
 - b. Are there any notable differences between Combined Charging Standard (CCS) and J3400 technical standards?
 - c. Will J3400 EVSE be capable of meeting the program rules of the Make-Ready Program such as the software and hardware requirements?
 - d. Is it feasible or practical to retrofit existing EVSE to a different connector (*i.e.*, CCS to J3400)?
2. At this time, which plug types should be considered non-proprietary?
 - a. Do you consider J3400 to be non-proprietary at this time, given expected timelines for standardization and adoption? Why or why not?
 - b. Should J1772 and CCS continue to be eligible for incentives? If so, at what level?
3. What is the anticipated timeline for the adoption of native J3400 ports on future electric vehicles?
 - a. Are there any challenges that may lead to delays of the currently proposed automaker timelines ?
4. What is the current outlook on the use of combined connectors (*i.e.*, Tesla's Magic Dock or ChargePoint's Omni Port)?
 - a. What additional costs are incurred in the installation and maintenance of EVSE with a combined connector in comparison to equivalent non-combined connector EVSE?
5. What is the anticipated role of adapters in the transition to J3400? Will J3400 adapters be capable of both AC and DC charging?
 - a. What is the anticipated timeline for the full standardization of adapters including safety certification and availability on the market?
6. What are the expectations on the use of J3400 for medium- and heavy-duty vehicle charging?
 - a. What is the current outlook on charging in the medium- and heavy-duty market as a whole? Do MHD automakers anticipate coalescing around one connector type?