

# CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

## ELECTRIC VEHICLE INFRASTRUCTURE MAKE-READY PROGRAM AMENDED IMPLEMENTATION PLAN

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CASE 18-E-0138

Pursuant to New York Public Service Commission's July 16, 2020  
*Order Establishing Electric Vehicle Infrastructure Make-Ready  
Program and Other Programs*, July 14, 2022 *Order Approving  
Modifications to Make-Ready Program*, and November 16, 2023 *Order  
Approving Midpoint Review Whitepaper's Recommendations with  
Modifications*

# Table of Contents

|       |  |    |
|-------|--|----|
| 1.0   | Introduction.....                          | 3  |
| 1.1   | Definitions.....                           | 4  |
| 2.0   | Program Eligibility Criteria .....         | 5  |
| 2.1   | General Eligibility Criteria.....          | 5  |
| 2.1.1 | Eligible Equipment or Infrastructure ..... | 5  |
| 2.1.2 | Eligibility Criteria .....                 | 7  |
| 2.1.3 | Make-Ready Incentive Levels .....          | 10 |
| 3.0   | Program Implementation.....                | 12 |
| 3.1   | Light-Duty Make-Ready Program .....        | 12 |
| 3.1.1 | Program Development Timeline .....         | 13 |
| 3.1.2 | Program Process.....                       | 13 |
| 3.1.3 | Contractor Approval .....                  | 17 |
| 3.1.4 | Futureproofing .....                       | 18 |
| 3.1.5 | Reporting Requirements .....               | 19 |
| 3.2   | Fleet Assessment Service.....              | 21 |
| 4.0   | Education and Outreach Plan .....          | 22 |
| 4.1   | Customer/Site Host/Developer Outreach..... | 22 |
| 4.1.1 | Tools and Marketing .....                  | 23 |
| 4.1.2 | Prioritization Strategy .....              | 23 |
| 5.0   | Make-Ready Program and Other Costs.....    | 24 |
| 6.0   | Appendix.....                              | 27 |

## 1.0 Introduction

Consolidated Edison Company of New York, Inc. ("Con Edison" or the "Company") submits<sup>1</sup> this Amended Electric Vehicle Make-Ready Program Implementation Plan ("AEV MRP Implementation Plan" or "Amended Plan") in accordance with the New York Public Service Commission's recent orders related to Make Ready Programs.<sup>2</sup> This AEV MRP Implementation Plan outlines the Company's plans for the implementation of a new Electric Vehicle Infrastructure Make-Ready Program ("PowerReady" or "Program") that will seek to incent make-ready infrastructure for new Level 2 ("L2") and Direct Current Fast Charging ("DCFC") electric vehicle ("EV") charging stations for light-duty vehicles in the Company's service territory. The 2023 Order authorized a new total budget of approximately \$700 million to install 21,371 L2 and 3,157 DCFC charging plugs in Con Edison's service territory. The budget increased by about 140% from the \$290 million budget authorized in the 2020 Order; accordingly, L2 plug targets increased by 15% (from 18,539 published in the 2020 Order), and DCFC plug targets increased by 591% (from 457 published in the 2020 Order). The Orders authorized other activities supporting the electrification of transportation, including the development of a Fleet Assessment Service.

The Company is facilitating clean transportation in its service area as part of its Clean Energy Commitment<sup>3</sup> and looks forward to expanding the availability of charging infrastructure to EV drivers. Electrifying the transportation sector is important to advancing the State's ambitious clean energy goals and, as the sector responsible for over a third of statewide carbon emissions,<sup>4</sup> is critical to achieving the Climate Leadership and Community Protection Act's ("CLCPA") target to reduce greenhouse gas emissions by 85 percent of 1990 levels by 2050.<sup>5</sup> Making charging infrastructure widespread, visible, and readily available to drivers supports this goal by reducing range anxiety such that charging an EV requires similar effort to refueling a diesel or gasoline-fueled vehicle.

This AEV MRP Implementation Plan explains key elements of PowerReady, including eligibility criteria, incentive levels, Program implementation processes, education and outreach plans, and Program costs, as well as the Fleet Assessment Service. This document provides Program Participants and stakeholders with guidelines for Program operation.<sup>6</sup>

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<sup>1</sup> The Amended Implementation Plan Filing reflects changes made to PowerReady per the Commission's 2023 Order. Some Program activities that are in progress or have already been completed since September 2020, when the original implementation plan was filed, may still be referred to as future activities.

<sup>2</sup> July 16, 2020 *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs* ("2020 Order")<sup>2</sup>, July 14, 2022 *Order Approving Modifications to Make-Ready Program* ("2022 Order"), and November 16, 2023 *Order Approving Midpoint Review Whitepaper's Recommendations with Modifications* ("2023 Order")

<sup>3</sup> Con Edison's Clean Energy Commitment is available at <https://www.coned.com/en/our-energy-future/our-energy-vision/our-energy-future-commitment>

<sup>4</sup> Reducing Greenhouse Gas Emissions, New York Department of Environmental Conservation, available at <https://www.dec.ny.gov/energy/99223.html>

<sup>5</sup> Chapter 106 of the Laws of 2019. CLCPA is available at <https://legislation.nysenate.gov/pdf/bills/2019/S6599>

<sup>6</sup> As more experience with the Program and specific projects is gained, the Company anticipates that Program guidelines will be updated.

## 1.1 Definitions

**Approved Contractor:** A contractor who has met the Joint Utilities<sup>7</sup> approval criteria, described in Section 3.13, to install EV charging infrastructure incentivized through the EV Make-Ready Program.

**Disadvantaged Communities:** 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). This definition was adopted by the Climate Justice Working Group (CJWG) on March 27, 2023. An updated map reflecting the CJWG’s final definition of *Disadvantaged Community* is available online.<sup>8</sup>

**Disadvantaged Communities Zone:** Geographic regions in which projects are eligible for higher funding levels for Disadvantaged Communities. For projects receiving eligibility letters before July 14, 2022, this zone includes areas within a one-mile buffer of the areas included in the CLCPA’s Climate Justice Working Group’s Disadvantaged Communities Map<sup>9</sup>. For projects receiving eligibility letters on or after July 14, 2022, this zone includes only areas included in the CLCPA’s Climate Justice Working Group’s (CJWG) Map. An updated map reflecting the CJWG’s final definition of *Disadvantaged Community* is available online.<sup>10</sup>

**E-Mobility Team:** Personnel supporting the implementation of Con Edison’s Make-Ready Program (“PowerReady”).

**EV Service Provider:** the business entity responsible for the operation and maintenance of the EV charging equipment; sometimes referred to as “operator.”

**Initial Incentive Determination:** The incentive determination provided after design and engineering are finalized but before construction begins.

**Final Incentive Determination:** The incentive determination that occurs at the end of the project once construction is complete and the Participant invoice has been submitted for the customer-side work.

**Multi-Unit Dwelling:** A multi-unit residential building with five or more dwelling units.

**Participant:** An entity, including its subsidiary or affiliate, that applies for and/or receives the incentives available through the PowerReady Program. This includes:

- **Developer:** An entity responsible for designing, constructing, and commissioning an EV charger site. This entity may also be responsible for owning, managing, and operating the chargers.

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<sup>7</sup> The Joint Utilities are Central Hudson Gas & Electric Corporation, Con Edison, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

<sup>8</sup> [https://data.ny.gov/Energy-Environment/Final-Disadvantaged-Communities-DAC-2023/2e6c-s6fp/about\\_data](https://data.ny.gov/Energy-Environment/Final-Disadvantaged-Communities-DAC-2023/2e6c-s6fp/about_data)

<sup>9</sup> [https://climate.ny.gov/assets/leaflet/New%20York%20City\\_incl\\_counties.html](https://climate.ny.gov/assets/leaflet/New%20York%20City_incl_counties.html)

<sup>10</sup> [https://data.ny.gov/Energy-Environment/Final-Disadvantaged-Communities-DAC-2023/2e6c-s6fp/about\\_data](https://data.ny.gov/Energy-Environment/Final-Disadvantaged-Communities-DAC-2023/2e6c-s6fp/about_data)

- **Equipment Owner:** The entity that purchases and owns or controls the EV charging equipment once it is installed.
- **Site Host:** The owner or operator of the site on which the EV charging equipment is installed. The Site Host may or may not be the Equipment Owner.
- **Customer:** An entity taking service from Con Edison.
- **Approved Contractor:** As defined above.

**Program Website:** Con Edison's website that provides information on PowerReady and resources for Participants. [POWERREADY Electric Vehicle Program | Con Edison](https://www.coned.com/en/our-energy-future/technology-innovation/electric-vehicles/power-ready-program)<sup>11</sup>

**Publicly Accessible:** An EV charging station that is accessible to public EV drivers without an access fee for charging.

## 2.0 Program Eligibility Criteria

### 2.1 General Eligibility Criteria

PowerReady Program Participants must meet certain eligibility criteria to qualify for incentive payments.

This section discusses the (i) eligible equipment or make-ready infrastructure that the Program can incentivize, (ii) criteria a project must meet to qualify for the incentive, and (iii) range of incentive levels that a project can qualify for based on its attributes.

#### 2.1.1 Eligible Equipment or Infrastructure

The following are the make ready infrastructure components associated with EV Make Ready.

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<sup>11</sup> <https://www.coned.com/en/our-energy-future/technology-innovation/electric-vehicles/power-ready-program>

**Figure 1: Make-Ready Infrastructure Components**

|                             | System Reinforcement | New Business                    | Utility side Make-Ready        |   | Customer side Make-Ready |  |                                    | Developer Costs <sup>2)</sup>      |                                |
|-----------------------------|----------------------|---------------------------------|--------------------------------|---|--------------------------|--|------------------------------------|------------------------------------|--------------------------------|
|                             | Substation           | Distribution above/under-ground | Distribution transformer & pad | EDF, CIAC & Accommodation <sup>1)</sup> | Meter                    | Customer transformer & pad <sup>1)</sup> | Trenching                          | Panel & pre-EVSE wiring            | Charger, pedestal installation |
|                             | 1                    | 2                               | 3                              | 4                                       | 5                        | 6  | 7                                  | 8                                  | 9                              |
| <b>Make-Ready Incentive</b> |                      |                                 |                                | ✓                                       |                          | ✓  | ✓                                  | ✓                                  |                                |
| <b>Who pays</b>             | Utility              | Utility                         | Utility                        | Customer with support of incentive      | Utility                  | Customer with support of incentive       | Customer with support of incentive | Customer with support of incentive | Customer                       |
| <b>Budget</b>               | System Reinforcement | New business                    | New business                   | Make-Ready Program                      | New business             | Make-Ready Program                       | Make-Ready Program                 | Make-ready Program                 | n.a.                           |
| <b>Who owns</b>             | Utility              | Utility                         | Utility                        | Utility <sup>1)</sup>                   | Utility                  | Customer                                 | Customer                           | Customer                           | Customer                       |

Point of entry

New business
  Make-Ready ("MR") components
  Developer costs

1) EDF and similar or associated costs are treated as utility-side Make-Ready  
 2) Developer costs are not within the Make-Ready program scope and are not paid by utility customers

There are two categories of make-ready infrastructure that are eligible for incentives under PowerReady as shown in Figure 2:

1. **Utility-side Make-Ready Infrastructure (Columns 4-5):** Utility electric infrastructure needed to connect and serve the load associated with new EV charger(s) that would have otherwise been paid by the Participant as Excess Distribution Facilities<sup>12</sup> ("EDF"), contributions in aid of construction<sup>13</sup> ("CIAC") and/or accommodation charges. This may include traditional distribution infrastructure that will be installed, owned and operated by Con Edison, such as step-down transformers, overhead or underground service lines, and utility meters.
2. **Customer-side Make-Ready Infrastructure (Columns 6-9):** EV equipment or infrastructure necessary to make a Customer site ready to connect an EV charger to the electric grid. This electric infrastructure may include conductors, trenching, and panels needed for the EV charging station, as well as other costs, such as project management and site scoping and design. Advanced technologies, including energy storage<sup>14</sup> and load management software and hardware solutions used for the EV charging stations, also constitute electric infrastructure. Customer-side make-ready infrastructure is developed,

<sup>12</sup> Excess Distribution Facilities are those constructed when the Company provides distribution facilities in excess of or in place of those normally provided or otherwise designated by the Company.

<sup>13</sup> Contributions paid by customers for reimbursement of electric assets that the Company constructs to serve those specific customers using the assets.

<sup>14</sup> Only energy storage paired exclusively with EV charging equipment is eligible for PowerReady incentives; the Participant cannot have received funding through a different Company incentive program for the storage equipment.

owned, and maintained by the charging station Developer, Equipment Owner, or Site Host. All customer-side make-ready infrastructure must be installed by an Approved Contractor (see Section 3.1.3 for details) to be eligible for PowerReady incentives.

Additional infrastructure may be eligible for incentive as part of futureproofing (see Section 3.1.4 for details).

### 2.1.2 Eligibility Criteria

A project must have been constructed beginning on or after July 16, 2020 and satisfy the following criteria to be considered for a PowerReady incentive:

1. **Application:** Prospective Participants must apply for the Program through the Program Website.<sup>15</sup> Con Edison will review, evaluate, and as appropriate, approve applications.
2. **Location Capacity:** EV charging stations must follow guidelines to be eligible for incentive.
  - a. Participant Requirements:
    - i. All stations (L2 and DCFC) must have a minimum of two plugs and serve light-duty vehicles.
  - b. Con Edison Portfolio Level Requirements:
    - i. Within New York City, the Company will limit the number of two-plug stations that can receive an incentive to no more than 50 percent of Con Edison's target number of plugs (*i.e.*, no more than 10,685 L2 charger plugs and 1,578 DCFC plugs); after commitments<sup>16</sup> for these threshold plugs have been issued, no further commitments for plugs at sites with two-plugs stations will be issued.
    - ii. The number of DCFC plugs at locations in excess of 30 plugs cannot exceed 50 percent of Con Edison's target number of plugs, (*i.e.*, no more than 1,578 DCFC plugs).
    - iii. Sites with demand exceeding 6MW will be allowed to participate in the make-ready program under the condition that developing the site does not cause the Company to incur new business costs greater than those that would have been incurred to develop a site with a maximum demand of 6MW.
3. **EVSE Communication Standards Requirements:** Sites that receive PowerReady incentives must meet technical communication standards, including the International Organization for Standardization's ("ISO") ISO 15118 and Open Charge Point Protocol's ("OCCP") 2.0.1.0 ) ISO 15118 -2 and -20 address network and application protocol

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<sup>15</sup> <https://www.coned.com/en/our-energy-future/electric-vehicles/power-ready-program>

<sup>16</sup> A commitment refers to a committed project: one that has received a Program Agreement from the utility for the incentive offered through the program

requirements and -3 addresses the physical and data link layer.<sup>17</sup> ISO 15118-capable hardware ensures enough processing power is available for ISO 15118-conformant software to operate. OCPP 2.0.1 requires chargers to operate an open-source application protocol for communication between EV charging stations and centrally managed charging station networks. The effective dates that govern whether projects must use equipment conforming to these standards, to receive PowerReady incentives, are below. The compliance requirements updated in this version of the Implementation Plan reflect the Public Service Commission's ruling<sup>18</sup> on a petition the Joint Utilities filed recommending changes to the communications standards requirements.<sup>19</sup>

### **Summary of Requirements**

- a. ISO 15118 hardware conformance must meet the definition specified in the Commission's petition ruling:
  - i. Hardware conformance with ISO 15118-3 and
  - ii. Hardware capable of enabling ISO 15118 -2 or -20.
- b. ISO 15118 software conformance must meet the definition specified in the Commission's petition ruling:
  - i. Software conformance with ISO 15118 -2 or -20.
- c. EVSE must also comply with OCPP 2.0.1 or later.

### **Summary of Compliance Timelines for L2 Chargers**

- a. EVSE installed at sites committed before June 1, 2025 are not required to comply with any communication technical standards.
- b. EVSE installed at sites committed on or after June 1, 2025 must achieve conformance to all requirements described above in the section titled "Summary of Requirements."<sup>20</sup>

### **Summary of Compliance Timelines for DCFC Chargers**

- a. As of the filing date of this Implementation Plan, all new commitments for projects must use equipment that can achieve ISO 15118 hardware conformance as defined above in the section titled "Summary of Requirements" (i.e., equipment that satisfies ISO 15118-3 and ISO 15118 -2 or -20).

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<sup>17</sup> ISO 15118 includes technical specification of the Vehicle-to-Grid Communication Interface that enable electric road vehicles to "recharge in the most economic or most energy efficient way" and allow for a convenient billing systems. Available at <https://www.iso.org/obp/ui/en/#iso:std:iso:15118:-4:ed-1:v1:en>

<sup>18</sup> Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, ("EVSE&I Proceeding"), Order Approving Modification to Make-Ready Program. (issued and effective September 20, 2024) (Commission's Petition Ruling).

<sup>19</sup> Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, ("EVSE&I Proceeding"), Joint Utilities' Petition Requesting Changes to Make-Ready Order Requirements Regarding Equipment Communications Standards and Medium-and Heavy-Duty Pilot Eligibility (filed March 15, 2024)

<sup>20</sup> Originally, the effective date for ISO 15118 hardware and software conformance & OCPP hardware conformance were December 16, 2023, and November 16, 2024, respectively. These compliance dates for L2 projects are superseded by the currently effective dates listed in the Order Approving Modification to Make-Ready Program. (issued and effective September 20, 2024).



- b. Projects committed on or after December 16, 2023 must have equipment that can achieve ISO 15118-2 or -20 software conformance by November 16, 2024. If the project is committed after November 16, 2024, then the project must have equipment that can achieve ISO 15118-2 or -20 software conformance immediately upon project completion.
- c. Beginning on November 16, 2024, all new project commitments must also use EVSE that achieves OCCP hardware conformance (equipment satisfies OCPP 2.0.1 or later).

The following table summarizes modifications to the communication standards requirements.

|                                | <b>L2</b>                           |  | <b>DCFC</b>                          |  |  |
|--------------------------------|-------------------------------------|--|--------------------------------------|--|--|
|                                | <i>Committed before Jun 1, 2025</i> | <i>Committed on or after Jun 1, 2025</i>         | <i>Committed before Dec 16, 2023</i> | <i>Committed between Dec 16, 2023 and Nov 15, 2024</i> | <i>Committed on or after Nov 16, 2024</i>        |
| ISO 15118 hardware conformance | No requirement                      | 15118-3, capable of enabling 15118-2 or 15118-20 | No requirement                       | 15118-3, capable of enabling 15118-2 or 15118-20       | 15118-3, capable of enabling 15118-2 or 15118-20 |
| ISO 15118 software conformance | No requirement                      | 15118-2 or 15118-20                              | No requirement                       | 15118-2 or 15118-20 by Nov 16, 2024                    | 15118-2 or 15118-20                              |
| OCPP hardware conformance      | No requirement                      | OCPP 2.0.1 or later                              | No requirement                       | No requirement   | OCPP 2.0.1 or later                              |

The Joint Utilities (JU) website (<https://jointutilitiesofny.org/ev/make-ready>) contains information on how Participants can request that their preferred EVSE supplier attest to the EVSE meeting the requirements described above. The JU will collect attestations for the requirements specified in the table above as of the filing date of this Implementation Plan. By March 1, 2025, the JU-managed eligible equipment list will be archived and become inaccessible to Make-Ready Program participants. Starting on March 1, 2025, the Electric Power Research Institute (EPRI)<sup>21</sup> will manage the eligible equipment list. To be eligible for the Con Edison's PowerReady Program, equipment must be listed on the EPRI Vetted Product List (VPL).<sup>22</sup> As of the date of this Implementation Plan's publication, Con Edison

<sup>21</sup> The Electric Power Research Institute (EPRI) is a research organization that conducts research related to the electric power industry. More information available at <https://www.epri.com/about>

<sup>22</sup> The VPL can be access at <https://www.epri.com/vpl> by selecting "Joint Utilities of NY – EPRI Vetted Product List"

will only issue Program Agreements that reflect equipment whose supplier original equipment manufacturer (OEM) is able to provide said attestations or for equipment that is listed on EPRI's VPL.

- 4. Operational Requirements:** Participants are required to meet operational requirements contained in the Orders.<sup>23</sup> Relevant metrics will be tracked and reported as part of the reporting requirements in Section 3.1.5 of this Amended Plan. Participants that fail to provide the required data will not be eligible for new Program incentives and may be required to return the make-ready payments received or revocation of service so that the station can be operated by an alternate market Participant. These operational requirements include:
- a. DCFC plugs must be operational 95 percent of the time annually;
  - b. DCFC charging stations must be operational 99 percent of the time annually, with a minimum of half of the plugs considered to be “up” at all times;
  - c. All charging stations in the Program must operate for a minimum of five years;
  - d. Ownership of EV charging stations may change, or stations may be upgraded during the five-year term, as long as the number of plugs and the capacity of the station does not decrease, and the site continues to meet all performance and reporting obligations of the Program; and
  - e. All chargers receiving PowerReady incentives must display easily identifiable, up-to-date contact information for the EV service provider.<sup>24</sup> Participants must provide a photograph of the contact information displayed on the chargers at project close out.

### 1.1.3 Make-Ready Incentive Levels

Con Edison will provide make-ready incentives to Participants based on the criteria and ceiling levels described in Table 1. No single Participant shall receive incentives equal to or greater than 50 percent (i.e., approximately \$292.5 million) of Con Edison's total make-ready incentive budget. The Company has full discretion to limit incentives to a single participant at a lower value.

The process for determining the actual incentive dollar amount to be provided to a Participant project is described in the Program Process Section 3.1.2 below.

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<sup>23</sup> 2020 Order, 2022 Order, and 2023 Order

<sup>24</sup> An EV service provider is the business entity responsible for the operation and maintenance of the EV charging equipment.

**Table 2: Incentive Levels and Criteria**

| Criteria Component  |      | Up-to-50%   | Up-to-90%   | Up-to-100% <sup>†</sup>   |
|---|------|---|---|---|
| Accessibility   |      | Non-publicly accessible sites, including workplace and privately-owned pay-to-park lots | Publicly accessible sites, including municipal paid parking, that accept common forms of payment <sup>25</sup>  |   |
| Plug Type <sup>26</sup>   | L2   | Sites utilizing proprietary plugs   | Sites utilizing non-proprietary plugs, such as SAE J1772 plugs  |   |
|   | DCFC | Sites utilizing proprietary plugs   | Sites utilizing non-proprietary plugs, such as CCS plugs, or at sites where a proprietary plug type is colocated with an equal number of non-proprietary plug types of equal or greater capacity where both plugs can simultaneously charge at 50 kW or above |   |
| Disadvantaged Communities Zone <sup>27</sup> or Premise-specific Criteria | L2   |   |   | Sites located at Multi-Unit Dwellings that meet premise-specific criteria defined in the 2023 Order <sup>28</sup> |
|   | DCFC |   |   | Curbside plugs in or adjacent <sup>29</sup> to a Disadvantaged Community  |
|   |      |   |   | Publicly accessible sites located within Disadvantaged Communities Zone   |

<sup>†</sup> The up-to-100% tier is sometimes referred to as the enhanced incentive tier or the up-to-100% enhanced incentive tier.

<sup>25</sup> Sites at workplaces (e.g., shopping malls, hospitals, hotels, etc.) and Multi-Unit Dwellings can be considered publicly accessible if they are open and available to the public without an access fee.

<sup>26</sup> Plug types and technologies may be re-examined and this eligibility criteria may be subject to change. North American Charging Standard (NACS) plugs constitute proprietary plugs under the 2023 Order; however, plugs with Tesla's Magic Docks – an adapter from NACS to CCS, or NACS to J1772 -- are considered non-proprietary.

<sup>27</sup> Con Edison will provide this up-to-100 percent incentive until expenditures reach 20 percent of its authorized L2 incentive budget and 25% of its authorized DCFC incentive budget, after which Con Edison will continue to support development within Disadvantaged Communities at the standard applicable up to 90 or 50 percent incentive levels.

<sup>28</sup> Multi-unit dwelling where occupants of at least 25% of units have a calculated household income no more than 80% of the greater of the Area or State Median Income; Eligibility can be demonstrated via qualifying housing

## 3.0 Program Implementation

### 3.1 Light-Duty Make-Ready Program

The Company provides (below) the timeline for Program development and implementation, process steps for Program Participants, and some specific elements of the Program. The Company has developed key Program principles, listed immediately below, that have guided Program design and implementation to support achievement of the State policy goals.

- **Simplicity:** Establish a program that is clear, concise, and provides straightforward information to charging station Developers, Equipment Owners, and Site Hosts
- **Scalability:** Launch a program that is effective and can expand as the market grows
- **Speed:** Deploy a program that can meet EV charging development needs
- **Flexibility:** Allow for continuous improvement through adjustment of Program parameters to match evolving market conditions
- **Fairness:** Provide fair and equitable opportunity for all Program Participants

As the Program and market continue to mature and throughout the duration of the program, the Company will focus on implementing refinements to the Program so that projects move through the Program successfully to maximize Program achievement.

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contracts with a local, state or federal agency or via rent roll, for which the Company will provide a template. (A rent roll is a document that reports occupants' income.)

<sup>29</sup> An area is adjacent to a Disadvantaged Community where the Disadvantaged Community border stops short of the street (i.e., if one side of the street is in a designated Disadvantaged Community, the opposite side of the street would be adjacent).

### 3.1.1 Program Development Timeline

The timeline in Figure 2 shows the high-level tasks the Company will undertake over the duration of the Program along with other activities in the Orders.<sup>30</sup>

**Figure 2: Con Edison Make-Ready Program Timeline<sup>31</sup>**

|   | Activity  | 2020 |    |    |    | 2021 |    |    |    | 2022 |    |    |    | 2023 |    |    |    | 2024 |    |    |    | 2025 |    |    |    |
|---|---|------|----|----|----|------|----|----|----|------|----|----|----|------|----|----|----|------|----|----|----|------|----|----|----|
|   |   | Q1   | Q2 | Q3 | Q4 | Q1   | Q2 | Q3 | Q4 | Q1   | Q2 | Q3 | Q4 | Q1   | Q2 | Q3 | Q4 | Q1   | Q2 | Q3 | Q4 | Q1   | Q2 | Q3 | Q4 |
| Establish a Make-Ready Program          | Develop online application portal, Phase I            |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   | Develop online application portal, Phase II           |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
| Implement a Make-Ready Program          | Develop and submit annual and semi-annual reports     | ▲    |    |    |    | ▲    |    |    |    | ▲    |    |    |    | ▲    | ▲  |    |    | ▲    | ▲  |    |    | ▲    | ▲  |    |    |
|   | Participate in mid-point review                       |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   | Develop straw-man proposal for EVIIWG†                |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   | Develop data compliance plan                          |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   | File semi-annual implementation plan                  |      |    |    |    |      |    |    |    |      |    |    |    | ▲    | ▲  |    |    | ▲    | ▲  |    |    | ▲    | ▲  |    |    |
|   | Participate in program review to facilitate ramp-down |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   |   |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
| Establish and/or Support Other Programs | Participate in Staff-led working groups               |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   | File tariff revision                                  |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   | File managed charging plan                            |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   | File micromobility implementation plan with O&R ††    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   | File micromobility annual report with O&R ††          |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |
|   | File MHD implementation plan                          |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |

† EVIIWG: Electric Vehicle Infrastructure Interconnection Working Group

†† O&R: Orange and Rockland Utilities, Inc.

### 3.1.2 Program Process

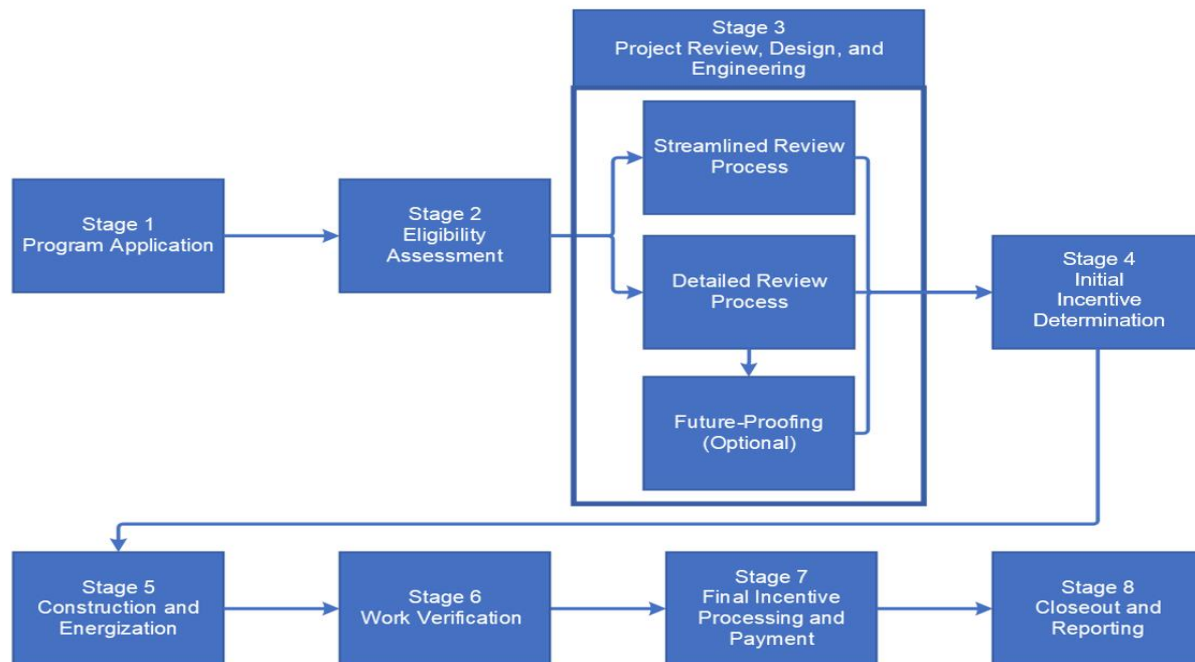
Figure 3 below shows a high-level overview of the various stages of development an EV charging station is expected to go through when participating in PowerReady. Each of these high-level stages has significant levels of complex sub-processes, and Con Edison has created the workflows to identify, prioritize, and create the functionality required for each of the high-level stages below. The Company will continually refine the Program mechanics and structure as the market matures and the E-Mobility Team will continue communicating with potential Participants to encourage their feedback on Program design and experience. Each of the elements is described in greater detail in the paragraphs that follow.

As described in Section 4.1, Con Edison will conduct education and outreach to encourage applications from different market segments (*e.g.*, Developers and Customers).

<sup>30</sup> 2020 Order, 2022 Order, and 2023 Order

<sup>31</sup> Phase II of the application portal was launched in March 2022.

**Figure 3: PowerReady Program Process**



### **Stage 1: Program Application**

The Program Website<sup>32</sup> contains links to the Program application, application instructions, the Program Participant Guide<sup>33</sup> (which includes Program eligibility, incentives and Participant requirements), Approved Contractors list, and other Program information.

Participants apply for Program eligibility and submit service requests via an application and program management portal, which was launched in March 2022. Con Edison implemented a process for evaluating co-located storage projects in Phase Two of the application and program management portal development.<sup>34</sup>

The application requests that Participants provide the information below for the Company to process and evaluate the application.

- The applicant's name and contact information
- A description of the project, including the number of plugs, charging output and plug type of each, location (and if in a Disadvantaged Community), load management software or hardware, whether the EV supply equipment will be bi-directional at

<sup>32</sup> <https://www.coned.com/en/our-energy-future/electric-vehicles/power-ready-program>

<sup>33</sup> Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, ("EVSE&I Proceeding"), Joint Utilities EV Infrastructure Make-Ready Program Participant Guide (filed January 12, 2024) and available under the heading "Program Overview" at <https://jointutilitiesofny.org/sites/default/files/JU%20EVs/January%202024%20update/JU%20Make-Ready%20Program%20Participant%20Guide.pdf>.

<sup>34</sup> The Company's Phase II application and program management portal launched in March 2022.

- present or in the future or exclusively load, and any collocated distributed generation or energy storage
- Futureproofing needs and expansion plans

As part of the application, the Participant can also identify their contractor for the project from the list of Approved Contractors. They can modify their contractor selection, as long as selected from the Approved Contractor list, at a later date at their discretion.

Con Edison launched a Program platform that allows for a seamlessly integrated application, Program portal, and connection to back-end systems. Applicants will use this portal for the remainder of the program.

### **Stage 2: Eligibility Assessment**

Con Edison's E-Mobility Team will manage the Program application intake process. Upon receipt of the application, the E-Mobility Team will evaluate the information provided compared to the eligibility criteria outlined in Section 2.1, including requesting and receiving from the Participant, as required, additional information or answers to any questions. Once Program eligibility is confirmed, the E-Mobility Team will communicate to the Participant that their project qualifies for the Program and can move on to the next step as detailed below.

### **Stage 3: Project Review, Design, and Engineering**

In this stage, the Company will determine the utility-side work required for interconnection. Con Edison's Energy Services Department will review the Participant's application to determine if an engineering analysis is required. Depending on that review, the project will go through one of the two following pathways:

- **Streamlined Review Process:** Some sites will have low enough capacity requirements to move through the process in an expedited fashion because existing service at the site is adequate to supply the additional requested load. These projects requiring primarily customer-side work will move to the Initial Incentive Determination phase once the Participant has finalized the customer-side engineering and cost estimates.
- **Detailed Review Process:** For larger projects that may require more extensive utility-side work, Con Edison will complete an initial engineering ruling to determine if the existing service at the site is adequate. If the engineering analysis shows that utility-side upgrades are required or if the Participant requests a new design or point of entry for their service, Con Edison will provide the Participant a Company-preferred service option at the location where the utility-side costs are the lowest. If the Participant requests a different design or point of entry for service, the Company will evaluate the customer-proposed locations for service and provide the amount of associated utility-side costs to the Customer. Con Edison and the Participant will work together on the service design and seek to moderate total project costs. Once the Participant has accepted a service design and point of entry and finalized their customer-side costs, Con Edison will complete the final design and engineering for the utility-side work.

- **Futureproofing:** If the Participant proposes to futureproof their site, they will provide information on their proposed additional plugs, parking spaces, or higher capacity equipment in the Program Application. Con Edison will evaluate the necessary upgrades and related costs required to provide this futureproofed service during the engineering analysis described above. Future-proofing criteria are described in Section 3.1.4.

The Participant is responsible for designing the make-ready infrastructure on the customer-side of the meter and providing the design and estimated cost to Con Edison. Con Edison will review all submissions to check that they are reasonable and accurate prior to final approval and Initial Incentive Determination. At this stage, Con Edison can estimate customer- and utility-side make-ready costs and will work with the Participant on the design to minimize the overall make-ready cost.

#### **Stage 4: Initial Incentive Determination**

Con Edison will provide the Participant with an Initial Incentive Determination with a not-to-exceed incentive amount based primarily on (i) the finalized utility-side costs, and (ii) Participant-provided and Company vetted (for reasonableness) estimates of customer-side make-ready costs.

Initially, the Company will implement a simple incentive calculation that allows for some cost containment and is based on utility- and customer-side costs and the incentive eligibility level of the project (*e.g.*, up to 50%, 90%, or 100%). The incentive determination will be designed to minimize overall make-ready costs, with a preference – expressed via incentive caps and other mechanisms – for projects requesting incentive amounts below the 2023 Order’s baseline cost. While the Company may use incentive caps, Participants will be allowed to apply for projects with higher make-ready costs and the Company will review any supporting information the Participant wishes to provide for such projects. Con Edison reserves the right either to reject the project or to work with the Participant provided they agree to accept a smaller incentive. Con Edison continuously gains additional information and experience related to customer-side costs throughout program administration, allowing for modifications and refinements of the initial incentive determination, if needed.

Con Edison may explore mechanisms to evolve the initial incentive determination framework to encourage more efficient spend of Program funding, respond to changes in the marketplace, expedite the speed at which projects are complete, and advance the goals of the Program. The Company’s improvements to the framework will result, in part, from the Company gaining more experience and information related to project costs as the program continues. These frameworks will encourage cost containment while supporting projects that are publicly accessible, with standard non-proprietary equipment, and near Disadvantaged Communities. Specific incentive levels are available on [PowerReady Incentive Dashboard | Con Edison](#).

The Participant must sign a Program Agreement, agreeing to the service connection layout, the initial incentive offering, and other terms, before the Approved Contractor can start construction.

#### **Stage 5: Construction and Energization**



Once approved for construction, the Approved Contractor will secure necessary permits and complete the customer-side construction. If utility-side upgrades are also required, the Participant will coordinate with Con Edison so that construction of the utility-side work can be scheduled once the Customer demarcation point (*e.g.*, manhole, service end box) and any required infrastructure is installed. Once the customer-side construction is complete, any utility-side work is completed for connection and energization.

#### **Stage 6: Work Verification**

Once the project is complete, the Participant will submit the required project documentation and provide support for any required inspections by Con Edison before incentive payments are approved and dispersed. This could include photographs, equipment specifications, contractor and subcontractor records, and final site plans. Con Edison will verify that the make-ready installation and the charging station facilities (*e.g.*, number of plugs, public accessibility, etc.) match the project submittals and approved incentive parameters.

#### **Stage 7: Final Incentive Determination and Payment**

After project validation, the Participant will submit invoices supporting the actual cost incurred for the customer-side make-ready infrastructure for review and approval by the Company. The authorized incentive amount will be recalculated if approved actual incurred costs are lower than estimated costs established during the Initial Incentive Determination phase. If actual incurred costs are higher than estimated costs established during the Initial Incentive Determination phase, the Company will not recalculate the incentive and will pay the incentive amount agreed to in the program agreement. The final incentive will then be approved for distribution to the Participant and Con Edison will disburse funds to the Participant.

#### **Stage 8: Closeout and Reporting**

After incentives are paid, the E-Mobility Team will close out the project with proper documentation and update the project status in all internal project tracking and reporting tools. Con Edison will use this tracking to report on the utility-side information. Ongoing monitoring begins once the Participant's project is complete and in service. See Section 3.1.5. for reporting details. Con Edison will also receive Participant feedback to continually improve the Program.

### **3.1.3 Contractor Approval**

Participants are required to use Approved Contractors for the installation of make-ready infrastructure to be eligible for Program incentives. The Company's PowerReady Website will maintain a regularly updated list of Approved Contractors.

To become an Approved Contractor, entities must apply by providing self-certification that they are registered to do business in the State of New York and by indicating the area(s) in the State where they plan to do make-ready work; they must also have all the appropriate licenses and certifications needed to do work in those area(s). The JU will issue a decision on the application within one month of application submittal. If approved, and after Con Edison receives the contractor's self-certification, the Approved Contractor will be placed on Con Edison and the Joint

Utilities' websites listing Approved Contractors. During the course of the approved contractor application process, prospective contractors will receive information on the available New York State Research and Development Authority (NYSERDA) workforce development programs so they are aware of opportunities and incentives to hire and train new workers, thereby prioritizing residents in Disadvantaged Communities in their new hiring.

While the Joint Utilities seek to remain inclusive by minimizing barriers to participating as Approved Contractors, the Joint Utilities, in consultation with New York Department of Public Service ("DPS") Staff, maintain the ability to suspend or remove a contractor from the posted list of Approved Contractors if the Joint Utilities and/or the Company becomes aware of non-compliance with any of the criteria or if there are performance or other concerns raised. Contractors falling out of standing can be reinstated upon demonstration of renewed criteria compliance or successfully completing the reinstatement process.

### 3.1.4 Futureproofing

Con Edison will limit futureproofing costs to no more than eight percent of Con Edison's DCFC and Level 2 Make-Ready budget, approximately \$46.8 million. The Company will track the costs associated specifically with futureproofing work. Sites installing any combination of L2 and/or DCFC plugs are eligible for futureproofing incentives.

#### **Futureproofing Eligibility Criteria**

Con Edison will implement and provide incentives towards futureproofing activities under the Program rules; all futureproofing costs not covered by the Program or otherwise provided as a utility service are the responsibility of the Participant. Approved examples of futureproofing for L2 chargers and DCFC include:

- Oversized or additional conduit;
- Oversized panels;
- Additional conduit and connections points (including trenching and conduit to additional parking spaces for future chargers);
- Service for the station; and
- Larger transformers or additional transformers and transformer pads.

#### **Futureproofing Process**

Participants must include a request for futureproofing work in their application, including explaining future expansion plans for the site, such as additional plugs, power needs, parking spots on-site, land, and any other relevant information. After the application is received, Con Edison will evaluate the futureproofing request, and as part of the Project Review, Design, and Engineering stage discussed above, the Company will work with the Participant to determine the feasibility of the futureproofing plans from grid and site perspectives. The evaluation of the proposed futureproofing work may include various factors such as:

- **Plans for expansion:** Is futureproofing needed based on the Developer's plans to install additional plugs or upgrades to a higher kW unit in the future?

- **Expansion feasibility:** Can the site accommodate the identified additional make-ready infrastructure and, if relevant, additional parking spots or higher kW charging equipment?

For each site, the futureproofing costs covered by the Program will be determined based on the evaluation described above and will be limited to no more than ten percent of the project's make-ready costs. For costs not covered by the Con Edison incentive, the Participant will be required to pay the excess costs. In this instance, the Company will only conduct any utility-side futureproofing work after securing funding from the Participant.

### 3.1.5 Reporting Requirements

#### Participant Requirements

At a minimum quarterly, Participants must provide data regarding the installation and use of the EV charging equipment installed through this Program to a statewide third-party consultant. The reporting requirement facilitates tracking of the station's operations, effectiveness, and compliance with station operational requirements (discussed in Section 2.1.2). The information required is below:

Plug and charging session data such as:

- Number of sessions daily;
- Start and stop times of each charge;
- Amount of time each vehicle is plugged in per session;
- Peak kW per charging session;
- kWh per charging site (aggregated monthly per site; including site capacity, charger nameplate capacity, and peak kW load management adjustment);
- Plug outage information including the number and duration of outages, which must be differentiated by expected outages (for maintenance) and unexpected outages;
- Annual aggregated kWh per charging site;
- Annual aggregated percent utilization per site;
- Annual aggregated hours charging; and
- Plug outage information (the number and duration of outages, differentiated by expected outage and unexpected outages).

The third-party consultant will anonymize and aggregate the Participant EV charging equipment data before sending the data to Con Edison for incorporation into an annual report and semi-annual reports (discussed in further detail under the Con Edison Requirements section below). Con Edison and the third-party consultant will not disseminate station-specific and session-level data publicly or use it for any commercial purposes. Data must be provided to the third-party consultant in a format or through a data transfer mechanism that the third-party consultant can accept.

As noted in Section 2.1 on General Eligibility Criteria, Participants that fail to provide the required data will not be eligible for new Program incentives and, upon direction of DPS Staff, may be

subject to return of the make-ready payments already received or revocation of service so that the station can be operated by an alternate market Participant. For existing Participants of Con Edison's Make Ready Program, Con Edison will educate Participants on data collection and the consequences for failing to provide the data. Further direction will be provided in the Data Reporting Compliance Plan discussed below.

## Con Edison Requirements

Con Edison will file an annual report to the Commission by March 1 of 2024. Thereafter, a semiannual report will be filed starting in August 2024. The reporting cadence is as follows:

- **March 1, 2024:** Annual report due; report to contain data from 2023.
- **August 23, 2024:** First semiannual due. The semiannual report will report on the first half of the 2024 calendar year and will contain the newly required<sup>35</sup> data points from both charging stations committed before the 2023 Order's issuance and those committed afterward; the report will reflect as much retroactive data to meet the 2023 Order requirements as available from legacy participating stations committed before the 2023 Order's issuance.<sup>36</sup>
- **March 1, 2025:** Semiannual report due; report will include data from the latter half of 2024.
- **September 1, 2025:** Semiannual report due; report will include data from the first half of 2025.
- **Beyond 2025:** Semiannual reports will be filed until the program end, which may occur beyond 2025 if plug targets are not meant or if budget is not depleted.
- **At program end:** the Company will file an end-of-program report 80 days after achieving either the L2 or DCFC plug target or depleting the budget, whichever occurs first. The end of program report shall include the same data described above and a summary of the lessons learned and best practices from the program.

The report will build on the reporting for the DCFC Per Plug Incentive Program required by the DC Fast Charger Framework Order.<sup>37</sup> The report will include the anonymized and aggregated data provided by the Participants consolidated by the statewide third-party consultant and additional data provided by Con Edison. Con Edison is responsible for reporting the following data:

- Reporting period Program participation information:
  - Reporting year;
  - Site ID;

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<sup>35</sup> 2023 Order required retroactive reporting of newly required data points

<sup>36</sup> The August 2024 report will be filed at the same time as the March 1, 2025 report as a result of an approved extension request the Joint Utilities requested with the Public Service Commission. See Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, ("EVSE&I Proceeding"), Ruling on Extension Request (issued August 5, 2024)

<sup>37</sup> EVSE&I Proceeding, Order Establishing Framework for Direct Current Fast Charging Infrastructure Program (issued February 7, 2019) ("DC Fast Charger Framework Order").

- Census tract;
- Whether the site is located in a geographic Disadvantaged Community;
- Percent of service applications that have matured into operating stations;
- Number of station owners participating;
- Number of sites for which incentives were issued;
- Number of plugs installed;
- Aggregated kW Nameplate Capacity;
- Infrastructure costs (broken out by customer and company infrastructure, allocated by make-ready costs and new business costs);
- Incentive levels a site received (up-to-50, 90, or 100 percent);
- Total incentives paid per site;
- Whether the site received funding from the Medium- and Heavy-Duty Pilot;
- Whether the site received funding from the Transit Authority Make-Ready Program; and
- Whether the site received Operating Cost Relief from a Demand Charge Alternative Program.

Con Edison will continue to publish a publicly accessible online plug and budget tracker that monitors committed and completed L2 and DCFC plugs.<sup>38</sup> The committed and completed L2 and DCFC budgets are reported as separate dollar figures. In addition, the Company will work with the Joint Utilities to develop and publish a consolidated online tracker,<sup>39</sup> which will contain the same information and will separate out projects in the up-to-100% tier. The tracker will be updated at least monthly.

Con Edison will also work with the Joint Utilities to develop a Data Reporting Compliance Plan that outlines methods each utility will use to collect data from station owners.<sup>40</sup> The Data Reporting Compliance Plan will be filed by the Joint Utilities no later than March 1, 2024.<sup>41</sup>

### 3.2 Fleet Assessment Service

Con Edison will offer a Fleet Assessment Service for light-, medium-, and heavy-duty fleet operators interested in electrifying their fleet. The Fleet Assessment Service will help fleet operators evaluate certain costs and benefits associated with fleet electrification, including an analysis of infrastructure needs for installing EV charging and projected charging costs. The Fleet Assessment Service will include site feasibility and rate analyses.

The site feasibility analysis will be based on the maximum power draw of supplying the proposed electrified fleet to determine if the local distribution system can accommodate the increased load,

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<sup>38</sup> See “Progress to Goals” heading at <https://www.coned.com/en/our-energy-future/electric-vehicles/power-ready-program/contractor-resources/powerready-incentive-dashboard>

<sup>39</sup> See “Plug and Budget Tracker” heading at <https://jointutilitiesofny.org/ev/make-ready>

<sup>40</sup> Station owners may need to rely on their equipment’s data network to provide the appropriate data

<sup>41</sup> Note that as of this update, the Data Reporting Compliance Plan has been filed. Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, (“EVSE&I Proceeding”), Joint Utilities of New York Electric Vehicle Infrastructure Data Reporting Compliance Plan (filed March 1, 2024)

including an engineering analysis of the impact of the increased transformer and cable loading. This analysis will include an assessment of planned utility work on the distribution system both nearby and on the infrastructure serving the existing depot, to find cost-saving synergies that may be leveraged to meet the new fleet electrification load.

If the site feasibility analysis is positive, Con Edison will then provide a rate analysis, examining the estimated operating costs the fleet operator may incur under electrification and implementing best practices, including managed charging, to mitigate these costs. Con Edison will tailor the rate analysis to each depot location and anticipated load curve and will inform the fleet manager of rate options available, as well as a range of costs they may likely expect based on the fleet's charging behavior. This rate analysis is for illustrative purposes only and does not guarantee the exact cost a fleet operator may incur.

Initially, the Fleet Assessment Service will be provided by Company personnel. Some analytics tools may be developed to support the assessment analyses. The Company will consider additional assessment activities and other services for fleet operators as the Program progresses. Con Edison, along with the Joint Utilities, will develop a single online application form for the Fleet Assessment Service and the Medium- and Heavy-Duty Pilot that will prompt applicants to provide the necessary information so that their application is properly filtered and sent to the appropriate utility. The application will be on Con Edison's Program Website and the Joint Utilities website. The Joint Utilities will also develop a Customer satisfaction survey to gather information from Participants, such as the usefulness of the analyses, likelihood they will electrify their fleet in the near- and long-term, biggest barriers they have identified to fleet electrification, their interest in additional services a utility may provide to support their electrification, and other questions.

## 4.0 Education and Outreach Plan

### 4.1 Customer/Site Host/Developer Outreach

Con Edison's education and outreach plan consists of a segmented approach based on Customer or Developer size. The different pathways into the Program will be approached as follows:

- **Large Customers:** The E-Mobility Team's internal business development manager ("BDM") will conduct direct outreach and engagement to large Customers (*i.e.*, potential Site Hosts) and provide site or business guidance. The BDM will actively build relationships with Customers and connect them with Developers.
- **Large Developers:** The E-Mobility Team will conduct direct outreach and engagement to large Developers to understand their market preferences, business models, and Customer acquisition strategies and provide guidance on Program eligibility.
- **Smaller Developers and Customers:** Con Edison will conduct marketing, which is described in the following section. Smaller Customer interest in the Program will also be supplemented by the Developers' own marketing efforts. Relevant Program information, including the list of Approved Contractors, will be on the Company's Program Website.

Marketing to smaller Customers and Developers will continue for the duration of the Company's PowerReady Program.

- **Specialized Customers:** Con Edison will continue established relationships with specialized Customers, such as municipalities and governmental agencies, to determine how they can participate in the Program.

Con Edison's BDM will also conduct direct outreach to special interest organizations, such as municipal entities, and consider engagement with community-based organizations ("CBO"). Con Edison may engage with CBOs, particularly in Disadvantaged Communities, to better understand the unique needs and interests of these communities or to disseminate information about the Program and educate their constituencies.

Finally, the Company will work with its call center representatives to respond to any inquiries regarding the Program and direct Customers and Developers to relevant Program resources and appropriate contacts in the E-Mobility Team.

#### 4.1.1 Tools and Marketing

Con Edison will use several tools to inform and engage with Customers and Developers. The primary resource for Program information will be the Company's Program Website, which will outline details such as Program rules, eligibility requirements, and the list of Approved Contractors. Maps showing Con Edison's load serving capacity and areas within a Disadvantaged Communities Zone, which are discussed in the following section, will inform outreach to Customers and Developers. Con Edison also hosts regular webinars for developers to provide program updates, compliance requirements, and changes to the Make-Ready program. In future years, the Company may develop additional tools.

Con Edison's marketing strategy will include a variety of print, digital, and in-person channels. The E-Mobility Team will consider developing printed educational materials, such as Program fact sheets and brochures, for mail campaigns to Customers with parking locations. The E-Mobility Team will also engage Customers through email, digital, and social media campaigns to educate them on the Program and promote incentive amounts. Finally, the E-Mobility Team will participate and speak at various industry events, including conferences, webinars, or other community events, to promote the Program.

#### 4.1.2 Prioritization Strategy

Con Edison's prioritization strategy is designed to guide developers to areas of sufficient load capacity and to promote the development of EV charging stations in locations that might be overlooked by Developers or Site Hosts who are unfamiliar with the benefits of EV charging. Con Edison will act as a trusted advisor and provide useful information and tools to interested Participants. Con Edison's education and outreach efforts will be guided by three suitability criteria: the EV charging infrastructure forecast, load serving capacity maps, and strategic locations.



- The **EV charging infrastructure forecast** will continue to identify locations where growth in EV load is expected and thus, areas of potentially high EV charging utilization.
- The Company also maintains active **electrification load serving capacity maps** that Developers can use to identify areas of adequate load service capacity for EV charging.<sup>42</sup> The maps will help Developers identify potential sites that might have lower interconnection costs, but they are not a substitute for locational specific utility engineering studies. The maps will also indicate areas within a Disadvantaged Communities Zone. The maps will be next updated by January 16, 2024 to show capacity for both EV and clean heat developments and will be updated annually.
- The Company may use information provided by the EV charging infrastructure forecast and the load serving capacity maps to identify **strategic locations**, which will be prioritized by the marketing team and the BDMs as they conduct targeted outreach and build relationships with Developers and Customers. Strategic locations may also include areas not considered in the EV charging infrastructure forecast and the load serving capacity maps, such as areas within a Disadvantaged Communities Zone.

## 5.0 Make-Ready Program and Other Costs

Con Edison will implement PowerReady within the budget included in the 2023 Order. Table 2 outlines Con Edison's five-year budget for PowerReady and other activities authorized in the Orders.<sup>43</sup>

**Table 2: Con Edison Make-Ready Five-Year Budget (\$M)**

| Program Area                                      | Budget (\$M)   |
|---|----------------|
| Incentive Budget                                  | \$585.0        |
| <i>L2 Budget<sup>†</sup></i>                      | \$237.8        |
| <i>DCFC Budget<sup>††</sup></i>                   | \$347.2        |
| Futureproofing                                    | \$46.8         |
| Program Implementation & Fleet Assessment Service | \$87.8         |
| Transit Authority Make-Ready Program              | \$3.0          |
| <b>Total</b>                                      | <b>\$722.6</b> |

<sup>†</sup>The 2023 Order states that a carveout equaling 20% of the total L2 incentive budget will be directed to plugs eligible for the up-to-100% enhanced incentive tier.

<sup>††</sup>The 2023 Order states that a carveout equaling 25% of the total DCFC incentive budget will be directed to plugs eligible for the up-to-100% enhanced incentive tier.

<sup>42</sup> Information on Con Edison's load serving capacity maps can be found here: <https://www.coned.com/en/business-partners/hosting-capacity>

<sup>43</sup> 2020 Order, 2022 Order, and 2023 Order



The 2023 Order directed each of the Joint Utilities to report administration budget using the following eight categories and to develop uniform and consistent definitions for administration budget report across the Joint Utilities:

- Education and outreach
- Information technology requirements
- Data collection and management
- Fleet assessment services
- Service staffing
- Vendor costs
- General implementation costs
- Evaluation

Accordingly, Table 3 lists budget categories and their definitions.

**Table 3: Con Edison's Program Implementation & Fleet Assessment Service Budget by Category with Definition**

| <b>Category</b>                     | <b>Definition</b>  |
|-------------------------------------|--|
| 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 and bi-annual reports.  |
| Fleet Assessment                    | Costs associated with fleet assessment services administered by the utility, excluding service staff as that is under service staffing. Examples of costs included technology and data management tools and vendors supporting fleet assessment. <sup>44</sup>   |
| 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.   |

<sup>44</sup> As of this filing, Con Edison accepts all customers, in addition to fleets, for fleet assessment.

|                              |  |
|------------------------------|--|
| General Implementation Costs | All other non-vendor costs that do not fall into other expense categories.   |
| Evaluation                   | Costs associated with completing required program evaluation, including contracting with a third-party evaluation service, creating, distributing, and analyzing participant surveys and creating end-of-program report. |

While Con Edison is still designing certain aspects of the Program and continues to evolve the Program support tools, Table 4 lists categories for the expenditure of the budget for administration and implementation of the Program and the Fleet Assessment Service and estimates of the budget allocation across these categories.<sup>45</sup> The total amount authorized for budget expenditure is \$87.8 million.

**Table 4: Con Edison's Program Implementation & Fleet Assessment Service Budget from 2020 to End of Program**

| Budget Components                   | Forecasted |
|-------------------------------------|------------|
| Education and Outreach              | ~ 4% - 5%  |
| Information Technology Requirements | ~15% - 18% |
| Data Collection and Management      | ~5% - 7%   |
| Fleet Assessment                    | ~1% - 2%   |
| Service Staffing                    | ~55% - 60% |
| Vendor Costs                        | ~1% - 2%   |
| General Implementation Costs        | ~3% - 4%   |
| Evaluation                          | ~1% - 2%   |

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<sup>45</sup> Budget allocation for each category has been updated for this filing to take into account budget expended to date. The estimated range reflects actual and forecasted expenditures combined.

## 6.0 Appendix

This appendix summarizes changes made to Con Edison's Make-Ready Implementation Plan from March 2024 onward.

| Version         | Filing Date      | Section                                | Change Summary   | Justification  |
|-----------------|------------------|--|--|--|
| 5 <sup>46</sup> | January 12, 2024 | 3.1.2 – Program Process                | Changed link to the Program Participant Guide in the footnote from Con Ed's site to the Joint Utilities (JU) website                               | For consistency purposes, because the Participant Guide is filed by the JU.  |
|                 |                  | 3.1.3 – Contractor Approval            | Added a sentence clarifying contractor application approval timeline   | 2020 Make-Ready Order directive  |
|                 |                  | 3.1.4 - Futureproofing                 | Changed the futureproofing budget from \$28 million to \$46.8 million to reflect the changes in the February 15, 2024 errata notice. <sup>47</sup> | Public Service Commission errata notice correcting futureproofing budget calculation from eight percent of each utility's DCFC Make-Ready budget to eight percent of each utility's overall Make-Ready program budget. <sup>48</sup> |
|                 |                  | 3.1.5 – Reporting Requirement          | Added a footnote with a link to access the plug and budget tracker on the Joint Utilities website  | 2023 Midpoint Order directive  |
|                 |                  | 5.0 Make-Ready Program and Other Costs | Changed the futureproofing budget in Table 2 to \$46.8 million and updated the total program budget to \$722.6 million.                            | Public Service Commission errata notice correcting futureproofing budget. <sup>49</sup>  |

<sup>46</sup> Con Edison filed its first implementation plan on 9/15/2020 (version 1), and subsequently updated the plan four times in August 2022 (version 2), July 2023 (version 3), August 2023 (version 4), and January 2024 (version 5).

<sup>47</sup> Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure* (EV Proceeding), Errata Notice (issued February 15, 2023).

<sup>48</sup> *Ibid.*

<sup>49</sup> *Ibid.*

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| 6 | July 12, 2024    | 2.0 – Program Eligibility Criteria       | Added a note explaining the November 16, 2024, enforcement date for ISO 15118 software and OCCP 2.0.1 hardware requirement is removed until the Public Service Commission rules on the formal petition the Joint Utilities filed in March 2024. Deleted the summary table illustrating communication standards requirements so it doesn't conflict with the removal of the November 16, 2024, enforcement date. | To reflect the latest change affecting program implementation                          |
|   |                  | 3.1.5 – Reporting Requirement            | Added a footnote referencing the Data Reporting Compliance Plan filed with the Public Service Commission.   | To reflect the latest update to the PowerReady program                                 |
|   |                  | 5.0 – Make-Ready Program and Other Costs | Added a table that lists the eight administration budget reporting categories and their definitions. Added a separate table that lists budget allocation from 2020 to the end of program.   | 2023 Midpoint Order Directive  |
| 7 | October 18, 2024 | 2.0 – Program Eligibility Criteria       | Added modifications to the communication standards requirement to reflect a petition's ruling issued on September 20, 2024 specifying certain changes affecting Make-Ready program eligibility criteria.  | To reflect the latest change affecting program implementation and eligibility criteria |
| 8 | January 10, 2025 | 2.0 – Program Eligibility Criteria       | Added information on the eligible equipment list's transition from the Joint Utilities' website to EPRI's Vetted Product List.  | To reflect the latest change affecting program implementation and eligibility criteria |
|   |                  | 3.1.5 – Reporting Requirement            | Added clarification on the filing timeline for the semiannual report due August 2024.   | To reflect the latest update to the PowerReady program                                 |

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| 9 | March 7,<br>2025 | 2.0 –<br>Program Eligibility<br>Criteria | Updated a footnote to clarify different budget<br>allocations for L2 and DCFC in<br>Disadvantaged Communities. | Updated for accuracy |
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