

New York Electric Vehicle Infrastructure Make-Ready Program Midpoint Review

IMPLEMENTATION PLAN



Submitted by: New York State Electric & Gas
Corporation and Rochester Gas and Electric Corporation

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Table of Contents

EXECUTIVE SUMMARY AND PROGRAM DESCRIPTION	1
1.1 EXECUTIVE SUMMARY.....	1
1.2 PROGRAM DESCRIPTION	2
EV MAKE-READY PROGRAM ELIGIBILITY CRITERIA.....	3
2.1 ELIGIBLE EQUIPMENT	3
2.2 ELIGIBILITY CRITERIA & INCENTIVES	3
2.3.1 Definition of Disadvantaged Communities.....	7
PROGRAM IMPLEMENTATION	8
3.1 APPLICATION PROCESS.....	8
3.2 APPLICATION APPROVAL PROCESS.....	8
3.3 APPROVED CONTRACTOR LIST.....	10
3.4 FLEET ASSESSMENT SERVICE.....	11
3.5 FUTUREPROOFING.....	12
3.6 OPERATIONAL REQUIREMENTS	13
3.7 REPORTING REQUIREMENTS	13
EDUCATION AND OUTREACH PLAN.....	15
4.1 STRATEGIES AND TACTICS	15
4.2 FOCUS ON DISADVANTAGED COMMUNITIES	16
4.3 LOAD SERVING CAPACITY MAPS.....	16
CHAPTER FIVE: PROGRAM COSTS	17
5.1 TOTAL PROGRAM COSTS	17
5.2 PROGRAM ADMINISTRATION COSTS.....	17

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EXECUTIVE SUMMARY AND PROGRAM DESCRIPTION

NYSEG and RG&E EV Make-Ready Program Midpoint Review Implementation Plan

1.1 EXECUTIVE SUMMARY

New York State Electric & Gas Corporation (“NYSEG”) and Rochester Gas and Electric Corporation (“RG&E”) (hereinafter “the Companies”) hereby submit this EV Make-Ready Implementation Plan (“Implementation Plan”) in compliance with the New York State Public Service Commission’s (“Commission”) November 16, 2023 “Order Approving Midpoint Review Whitepaper’s Recommendations with Modifications” (“Order”).¹

The Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs (2020 Make-Ready Order),² issued by the Public Service Commission (Commission) on July 16, 2020, established programs to accelerate the buildout of electric vehicle charging infrastructure, stimulating electric vehicle adoption across New York State (Make-Ready Program).

The 2020 Make-Ready Order directed the Department of Public Service Staff (“DPS Staff or Staff”) to commence a formal midpoint review of the Make-Ready Program by no later than October 1, 2022, to ensure the programs remain effective as the market evolves. The Implementation Plan reflects the accumulated learnings from data collection and Stakeholder

¹ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*. Order Approving Midpoint Review Whitepaper’s Recommendations With Modifications, Nov. 16, 2023.

² Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*. Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs, Jul. 16, 2020.

input since the initial Make-Ready Program Order to achieve New York's aggressive greenhouse gas emissions reduction goals.

1.2 PROGRAM DESCRIPTION

The Companies' EV Make-Ready Program provides incentives to program participants for eligible EV make-ready infrastructure as described in this Implementation Plan up to the target number of plugs and/or the authorized budget shown in Table 1A. Incentive levels may cover up to 100% of eligible make-ready costs dependent upon the Eligibility Criteria, the Companies Project Approval Process, and the available program budget. Incentive levels are limited by other criteria described in the Implementation Plan, including the quantity, type and capacity of EVSE plugs, and a cap on the maximum incentive a single program participant may receive in each of the Companies' Service areas. Additionally, to be eligible to receive make-ready incentives, all make-ready work must be completed by an approved contractor chosen from a list of approved contractors located and maintained on the JU website. Finally, by accepting make-ready incentives, program participants must adhere to operational and reporting requirements defined in this Implementation Plan.

Target Plugs and Authorized Incentive Budgets by Operating Company	
NYSEG	RG&E
<i>Target L2 Plugs: 3,526</i>	<i>Target L2 Plugs: 2,437</i>
Authorized L2 Budget: \$20,723,056	Authorized L2 Budget: \$14,174,887
<i>Target DCFC Plugs: 594</i>	<i>Target DCFC Plugs: 466</i>
Authorized DCFC Budget: \$31,345,270	Authorized DCFC Budget: \$40,728,971

Table 1A: Target Plugs and Authorized Incentive Budgets

EV MAKE-READY PROGRAM ELIGIBILITY CRITERIA

2.1 ELIGIBLE EQUIPMENT

Two categories of equipment or infrastructure are eligible for incentives under the EV Make-Ready Program:

1. Utility-side Make-Ready Infrastructure: Utility electric infrastructure needed to connect and serve a new EV charger. This may include traditional distribution infrastructure such as step-down transformers, overhead service lines, and utility meters that will continue to be owned and operated by the utility.

2. Customer-side Make-Ready Infrastructure: EV equipment or infrastructure necessary to make a site ready to accept an EV charger that is owned by the charging station Developer, Equipment Owner, or Site Host. This electric infrastructure may include conductors, trenching, panels, and advanced technologies including energy storage and Automated Load Management Systems needed for the EV charging station.

Eligible future proofing to the site and equipment may also be approved as part of this infrastructure. All EV supply equipment must be installed by utility-approved contractors to be eligible for the incentives available through this EV Make-Ready Program. Equipment associated with the EV charger itself, such as the actual EV chargers, power blocks, modules, mounting hardware, co-located distributed generation, or networking fees, are ineligible for incentives under the EV Make-Ready Program.

2.2 ELIGIBILITY CRITERIA & INCENTIVES

To receive incentives through the EV Make-Ready Program, a program participant must satisfy the following criteria:

1. Approved Application: An application for a proposed EV charging station within either of the Companies' service areas must be submitted by the program participant and accepted into the EV Make-Ready Program. The Companies will review, evaluate, and, approve applications that meet the application requirements. See Application Approval Process Section 3.2.

2. Communication Standards: EV charging stations must comply with the following communication standards by the effective dates listed below.

- ISO 15118 compliance:
 - EV charging stations must be hardware capable for ISO 15118 parts 2 and 20, effective for new incentive commitments as of December 16, 2023.
 - For new installations, EV charging stations must achieve software conformance with ISO 15118 as of November 16, 2024.
- OCPP version 2.0.01 or later:
 - Applicants and participants must obtain hardware conformance with OCPP 2.0.1 or later, effective November 16, 2024, for new installations.

3. Location Capacity: EV charging stations must conform to capacity guidelines including:

- EV charging sites must have a minimum of two plugs. A DCFC station is considered a two-plug charging station if the charger provides two plugs (either SAE CCS or CHAdeMO types) capable of simultaneously charging at 50 kW or greater.
 - The number of two-plug sites that can receive incentives through the Program is limited to no more than 25 percent of the target number of plugs in the Companies' Service areas as shown in Table 2A.

Maximum Number of Plugs Allowed at Sites with Only Two Plugs by Operating Company	
NYSEG	RG&E
<i>Target L2 Plugs: 3,526</i>	<i>Target L2 Plugs: 2,437</i>
Maximum L2 Plug Target: 881	Maximum L2 Plug Target: 609
<i>Target DCFC Plugs: 594</i>	<i>Target DCFC Plugs: 466</i>
Maximum DCFC Plug Target: 148	Maximum DCFC Plug Target: 116

Table 2A: Number of Plugs Allowed at Sites with Only Two-Plugs

- DCFC sites with more than ten plugs and/or demand more than 3MW will be allowed to participate in the EV Make-Ready Program under the condition that developing the site does not cause NYSEG or RG&E to incur new business costs greater than those that would have been incurred to develop a site with a maximum demand of 3MW.
 - The number of plugs at locations with greater than ten plugs is limited to no more than 50 percent of the target number of plugs in each of the Companies' Service areas as shown in Table 2B.

Maximum Number of Plugs Allowed at Sites with Greater than 10 Plugs	
NYSEG	RG&E
<i>Target L2 Plugs: 3,526</i>	<i>Target L2 Plugs: 2,437</i>
Maximum L2 Two Port Chargers: 1,763	Maximum L2 Two Port Chargers: 1,218
<i>Target DCFC Plugs: 594</i>	<i>Target DCFC Plugs: 466</i>
Maximum DCFC Two Port Chargers: 297	Maximum DCFC Two Port Chargers: 37

Table 2B: Number of Plugs Allowed at Locations with Greater than 10 Plugs

Participants in the EV Make-Ready Program are eligible to receive incentives covering up to the given cost of Make-Ready infrastructure based upon the criteria listed in Table 2C.

Incentive Level	Eligible Project Criteria
Up to 100%	<ul style="list-style-type: none"> Publicly available DCFC projects with standardized plug types located within Disadvantaged Communities including a 1-mile buffer for RG&E and a 2-mile buffer for NYSEG. Projects with proprietary plug types must have an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs. L2 projects within a DAC census tract sited at multi-unit dwellings or L2 projects at multi-unit dwellings that meet affordable housing criteria Curbside L2 chargers with designated EV parking spaces located in and adjacent to a DAC
Up to 90%	<ul style="list-style-type: none"> Publicly available L2 and DCFC projects with standardized plug types. Includes municipal pay-to-park locations and free parking offered while charging. Publicly available L2 and DCFC projects including proprietary plugs must have an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs.
Up to 50%	<ul style="list-style-type: none"> Non-public L2 and DCFC projects, such as workplaces or MUDs with restricted access and privately owned pay-to-park lots. Public and non-public L2 and DCFC projects consisting only of proprietary plugs. Public and non-public L2 and DCFC projects where proprietary plugs are not co-located with an equal number or greater number of standardized plugs of equal or greater charging capacity.

Table 2C: NYSEG/RG&E Incentive Eligibility Criteria

L2 projects eligible for the 100% incentive tier must be located within a Disadvantaged Community (DAC) or, regardless of location, must be multi-unit dwelling buildings that have an affordable housing regulatory agreement in place with a state, federal or city entity that requires at least 25% of units to be affordable to households at or below 80% of Area or State Median Income; or, alternatively, to buildings that can demonstrate via rent roll that at least 25% of the units have a calculated household income no more than 80% of the greater of the Area or State

Median Income. Curbside L2 chargers with designated EV parking spaces located in and adjacent to DAC's are also eligible for the up to 100% incentive tier.

Up to 100 percent eligibility for Disadvantaged Communities is available until expenditures reach 20 percent of the authorized incentive budget, and 90 percent eligibility thereafter for the remainder of the EV Make-Ready Program budget as shown in Table 2D.

Maximum Budget for Up to 100% Eligibility by Operating Company	
NYSEG	RG&E
<i>Authorized L2 Budget: \$20,723,056</i>	<i>Authorized L2 Budget: \$14,174,887</i>
Maximum Budget: \$4,144,611	Maximum Budget: \$2,834,977
<i>Authorized DCFC Budget: \$31,345,270</i>	<i>Authorized DCFC Budget: \$40,728,971</i>
Maximum Budget: \$6,269,054	Maximum Budget: \$8,145,794

Table 2D: Up to 100% Eligibility Maximum Budget

No single program participant may receive incentives greater than 50 percent of any utility-specific Make-Ready Incentive budget as shown in Table 2E.

Maximum Incentive for a Single Program Participant by Operating Company	
NYSEG	RG&E
<i>Authorized L2 Budget: \$20,723,056</i>	<i>Authorized L2 Budget: \$14,174,887</i>
Maximum Budget: \$10,361,528	Maximum Budget: \$7,087,444
<i>Authorized DCFC Budget: \$31,345,270</i>	<i>Authorized DCFC Budget: \$40,728,971</i>
Maximum Budget: \$15,672,635	Maximum Budget: \$20,364,486

Table 2E: Maximum Incentive Eligibility for a Single Program Participant

2.3.1 Definition of Disadvantaged Communities

Disadvantaged Communities: Per the Climate Justice Working Group (CJWG), DAC are defined as 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. This definition was adopted by the CJWG on March 27, 2023³.

PROGRAM IMPLEMENTATION

3.1 APPLICATION PROCESS

Interested program participants can access the Companies application portal through links located on the EV Make-Ready Program Portals (NYSEG: [NYSEG EV Make-Ready Program](#) RG&E: [RG&E EV Make-Ready Program](#)).

3.2 APPLICATION APPROVAL PROCESS

Beyond supporting state climate goals and encouraging greater EV adoption, the Companies believe that one of the most important aspects of the Program is to provide maximum value to ratepayers. Therefore, the primary evaluation metric for project approval is project cost. In addition to project cost, the Companies will also evaluate projects for location suitability and accessibility.

Cost Evaluation Metrics: The cost evaluation metric is categorized by two cost criteria:

- **Baseline:** Defined by the expected average cost per plug as stipulated in the Order. For Upstate NY the expected average cost per plug for L2 chargers is \$7,000. For DCFC the expected average cost baseline is based on 150 kW output. For NYSEG, the baseline is \$450/kW and for RG&E, the baseline is \$745/kW.
- **Over Baseline:** Defined by those projects that exceed the Baseline cost per plug.

³ Climate Justice Working Group, Disadvantaged Communities Criteria
<https://climate.ny.gov/Resources/Disadvantaged-Communities-Criteria>.

Projects submitted to the Companies that meet or are below Baseline cost criteria will be reviewed, approved, and incentives accrued with priority. Projects submitted to the Companies that are Over Baseline will be reviewed, approved and incentives accrued on a project-by-project basis and if approved, will only be eligible for baseline incentives.

Over Baseline Project Approval

1. Projects submitted to the Companies that are Over Baseline will be reviewed and may be approved if, at the time of project submission, the entire portfolio of projects received by the Companies to date is sufficiently below Baseline to support funding of the project.
2. Projects submitted to the Companies that are Over Baseline must provide justification of all project costs. Such justification should include support for other evaluation criteria described in this Section.
3. Projects submitted to the Companies that are Over Baseline will be placed on hold or denied if, at the time of project submission, the entire portfolio of projects received by the Companies to date is insufficiently below Baseline to support funding of the project, or if insufficient justification is provided.
4. Over Baseline projects placed on hold or denied will be reconsidered or may be resubmitted if the entire portfolio of projects received by the Companies to date becomes sufficient to support funding of the project, or if additional justification is provided.

Cost Reduction Strategies

In all cases, the Companies will work collaboratively with Program Participants to identify cost reductions strategies to ensure the best opportunity for project success.

Cost Evaluation Metric Review: The Companies will regularly track and analyze actual costs of all approved projects and will use that information to evaluate and, if necessary, revise the Cost Evaluation Metric on an annual basis.

Project Suitability Evaluation Criteria: Projects submitted to the Companies will be evaluated for alignment with the suitability criteria that the Companies have identified to be favorable for EVSE development. These criteria include:

- Available upstream capacity in the proposed project location.
- Local capacity availability in the proposed project location.
- Project location in relation to existing local infrastructure (i.e. no additional line extensions required).
- Distance of the proposed EVSE from the planned point of service.
- Ability to optimize the use of all available existing utility infrastructure.

Project Suitability Enhancement Strategies

In all cases, the Companies will work collaboratively with Program Participants to identify project suitability strategies to ensure the best opportunity for project success.

Project Accessibility Evaluation Criteria: Projects proposed in locations that expand EV charging access to areas within the Companies' service area beyond those with high EV adoption rates or areas with high levels of existing EVSE saturation will be given priority. This includes locations that fall under the definition of Disadvantaged Communities.

Project Accessibility Strategies

In all cases, the Companies will work collaboratively with Program Participants to identify project accessibility strategies to ensure the best opportunity for project success.

3.3 APPROVED CONTRACTOR LIST

To receive incentives for eligible make-ready infrastructure, work must be performed by an approved contractor. The JU have developed a common application which must be submitted by contractors who will provide make-ready work services, and approved by the JU, prior to being added to the approved contractor list.

The contractor application is accessible from the JU website or from links on the NYSEG or RG&E websites. Contractors seeking to be added to the approved contractor list must certify:

- They are registered to do business within New York State; and
- They have all appropriate licenses and certifications that are needed for all jobs in the area(s) where they do work.

Contractors will be asked to indicate areas within New York State in which they plan to do make-ready work.

Utilities, in consultation with Staff, shall have the ability to remove contractors from the qualifying list for either: (1) falling out of standing with qualification criterion/criteria established by the Joint Utilities; or (2) performance concerns and/or customer complaints.

1. Contractors who fall out of standing on one or more of the qualifying criterion/criteria and subsequently correct any deficiencies shall be reinstated upon demonstration of compliance.
2. A utility, in consultation with Staff, may place any contractor who receives consistent customer complaints on probation and require that contractor to file a corrective action plan to the utility within 30 days of the start of the probationary period. Failure to provide and implement the corrective action plan and/or the continuance of customer complaints will result in the suspension of the contractor's ability to provide work for Make-Ready Program Participants in that utility's service territory. Contractors may be reinstated upon a reasonable demonstration of their capabilities.

3.4 FLEET ASSESSMENT SERVICE

The Companies offer a fleet assessment service consistent with the Order. The fleet assessment service uses a common JU application for inquiries to the service and is available to light, medium, and heavy-duty fleet operators. The application is posted to the JU website and is included on a new fleet assessment service landing page on the Companies' web sites.

Customers interested in electrification of their commercial fleets will be provided with an analysis of site feasibility for anticipated load increases and rate analysis to determine appropriate rates and estimated billing impact for increases in energy consumption. The site feasibility analysis would include the load serving capacity of existing utility infrastructure at the proposed site and an estimate of additional local and potential upstream utility infrastructure that would be required to serve the proposed load resulting from new charging infrastructure.

The JU has developed a common fleet assessment services satisfaction survey to understand customer's perceptions of the fleet assessment service, what the likelihood of fleet electrification is before and after participation, and what additional services should be offered. The Companies will develop lessons learned and gain useful insights into the fleet assessment service and increase services offerings as appropriate.

3.5 FUTUREPROOFING

The futureproofing budget is 8% of the Companies' total EV-Make Ready Program incentive budget. The futureproofing budget does not reduce the Companies' overall make-ready budget but provides additional funding for futureproofing activities specifically related to make-ready infrastructure. Futureproofing costs will not be included in the Companies' Cost Evaluation Metrics described in Section 3.2 when evaluating project costs. However, since futureproofing costs are limited, the Companies will apply the same cost criteria methodology described in Section 3.2 separately to project futureproofing proposals.

The Order caps total futureproofing costs for any site at 10% of the total make-ready costs for that site. Therefore, in the case of futureproofing, the Companies will use 10% of the project's total make-ready cost as the Baseline for futureproofing costs.

Additionally, futureproofing costs for equipment or infrastructure that are ineligible for make-ready incentives will not be eligible for futureproofing incentives.

3.6 OPERATIONAL REQUIREMENTS

The EV Make-Ready Program requires that all sites meet a specific minimum set of performance standards, which will be tracked and reported by the program participant as part of the overall reporting requirements outlined in Section 3.7 below. These operational standards are as follows:

- DCFC plugs must be operational 95 percent of the time (annually);
- DCFC charging stations must be operational 99 percent of the time (annually), with a minimum of 50 percent of the plugs considered to be “up” at all times;
- All charging stations in the EV Make-Ready Program must operate for a minimum of five years;
- Ownership of EV charging stations may change or stations may be upgraded during the five-year term, if 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
- All chargers in the EV Make-Ready Program must display easily identifiable, up-to-date contact information for the EV charging service provider.

Additionally, program participants must report all customer complaints to the Companies and DPS Staff. Details of customer complaints will not be made public and will be used by the Companies to develop best practices for the EV Make-Ready Program.

3.7 REPORTING REQUIREMENTS

Program participants will provide the Companies with the necessary data regarding the installation and use of the EVSE to facilitate necessary tracking of the EV Make-Ready Program’s overall operation and effectiveness on a quarterly basis. This data includes:

- Plug and charging session data, including:
 - 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 site (aggregated monthly per site; including site capacity, charger nameplate capacity, and peak kW load management adjustment);
- 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).

All data subject to the reporting requirements identified in this section will be provided, at minimum, on a quarterly basis to the Companies after a third-party consultant designated by the Joint Utilities anonymizes and aggregates the data.

Consistent with the Order, program participants that fail to provide the required data will not be eligible for new Make-Ready Program incentives and will either be subject to claw back of the make-ready payments received or revocation of service so that the station can be operated by an alternate market participant. Additionally, the Joint Utilities will develop a preferred network list as part of a Data Reporting Compliance Plan by March 1, 2024. After March 1, 2024, networks will be given more information about how they can be added to the preferred network list, and how to maintain their status on the list. The Joint Utilities will provide participants with the preferred network list and educational materials about data collection and the consequences for failing to provide the data.

The Joint Utilities will publish a publicly accessible tracker that monitors both the committed and completed L2 and DCFC plug installations, as well as committed and completed L2 and DCFC budgets reported as separate dollar figures and by service territory and will designate, at a minimum, incentives and plug totals committed and installed to benefit Disadvantaged Communities. The tracker will be updated monthly and made available at jointutilitiesofny.org.

EDUCATION AND OUTREACH PLAN

4.1 STRATEGIES AND TACTICS

The Companies conduct education and outreach to promote the EV Make-Ready Program to developers and potential site hosts throughout their service areas. The Companies develop marketing and communication strategies that identify key objectives, audiences, and messaging. These marketing and communication plans inform the Companies tactics to increase awareness of the EV Make-Ready Program and drive participation. The Companies have primarily used digital media advertising such as Google search, Google Display ads and Linked In to reach target audiences such as retail and other destination locations, multi-unit property owners, and municipalities with specific messages. In the latter part of 2022 and early 2023, the Companies deployed limited Out-of-Home (“OOH”) marketing tactics such as billboards at critical travel corridors and radio advertising.

Another key element of the Companies’ education and outreach is to engage state and local leaders in government, education, medical institutions, private sectors, and community organizations. The Companies held many meetings and continue to meet with multiple entities by leveraging their internal government and community relations resources. In addition, the Companies attend industry events to promote the EV Make-Ready Program and generate media interest through press releases that promote new EV charging site deployments.

Finally, the Companies have learned through experience that engagement with trade-allies is critical to increasing awareness among potential site hosts. The contractor community is wide and robust across the state. Contractors are promoting EV chargers to their customers, and it is essential that they have the right information regarding the EV Make-Ready Program. Accordingly, the Companies hold regular contractor webinars, hold “Counter Days” at area distributors and issue regular digital newsletters to their contractor distribution lists with important news, facts, and project testimonials.

4.2 FOCUS ON DISADVANTAGED COMMUNITIES

The Order continues to place significant emphasis on Disadvantaged Communities. In addition to enhanced incentive tiers, eligibility requirements have been broadened and new programs designed to reach these communities, such as the micro-mobility program are authorized. The Companies will work collaboratively with municipal, economic development, community organizations, and developers to form partnerships with the purpose of enabling increased accessibility to EV charging infrastructure.

4.2.1 Disadvantaged Communities

Eligibility criteria have been expanded outside of Disadvantaged Communities to include MUDs meeting affordable housing criteria. The Companies will work with agencies responsible for the regulation of affordable housing to communicate the new eligibility criteria and increase awareness of available incentives for these properties. In addition, eligibility for the enhanced tier incentive has been extended to curbside L2 chargers in and adjacent to Disadvantaged Communities. The Companies will work with municipalities and other organizations to communicate the availability of enhanced incentives for L2 curbside chargers.

4.3 LOAD SERVING CAPACITY MAPS

The Companies have load serving capacity map links located on their EV Make-Ready Portals. The Companies recognize that load serving capacity maps provide developers and potential site hosts with an important piece of information regarding the available upstream capacity at any given site which is one component of the Program suitability criteria. Load serving capacity information is an added feature to the Companies existing hosting capacity maps. For any location the information to be displayed will include substation transformer rating, current loading, and remaining capacity. Load serving capacity maps will be updated on an annual basis.

CHAPTER FIVE: PROGRAM COSTS

5.1 TOTAL PROGRAM COSTS

The Companies' total EV Make-Ready Program budget is established by the amounts authorized in the Midpoint Review Order. The budgets for each of the Companies' service areas are shown in Table 5A.

Program Budget by Operating Company (\$M)	
NYSEG	RG&E
<i>L2 and DCFC Incentives</i>	<i>L2 and DCFC Incentives</i>
L2 Incentives: \$20.7	L2 Incentive: \$14.2
DCFC Incentives: \$31.3	DCFC Incentives: \$40.7
<i>Futureproofing</i>	<i>Futureproofing</i>
8% of DCFC Incentives: \$2.5	8% of DCFC Incentives: \$3.3
<i>Implementation and Fleet Assessment Services</i>	<i>Implementation and Fleet Assessment Services</i>
Administrative: \$7.8	Administrative: \$8.2
Total: \$62.3	Total: \$66.4

Table 5A: Program Budget (\$M) Not Including Transit

5.2 PROGRAM ADMINISTRATION COSTS

The Order directs the Companies to include the reporting of the administration budget in their updated implementation plans. Further, the Commission directed that the administration budget reporting include separate line items for the forecasted and actual costs of:

1. Education and outreach;
2. Information technology requirements;
3. Data collection and management;
4. Fleet assessment;
5. Service staffing;
6. Vendor costs;

7. General implementation costs, and
8. Evaluation.

Additionally, the Commission directed the JUs to coordinate the development of uniform and consistent definitions to be included as part of the first semi-annual update to the implementation plans. The Companies will work with the JUs as directed to develop standard definitions for the first semi-annual update to their implementation plans. Until such definitions are established, and for the purposes of this Midpoint Implementation Plan, the Companies will provide program administration costs for the following categories,

1. Education and outreach;
2. Information technology requirements;
3. Data collection and management;
4. Fleet assessment;
5. Service staffing;
6. General implementation costs; and
7. Evaluation.

In the 2020 Make-Ready Order, the Commission directed the Companies to provide estimated incremental administrative costs for implementation of the Make-Ready Program in their implementation plans⁴. The Companies interpret incremental administration costs, when applied to Service staffing, to be those incremental staffing costs not included in the Companies' most recent rate case and/or third party, contracted Service staffing specifically related to administration of the Make-Ready Program. Since all the Companies' Service staff are included in the Companies' most recent rate case and no third party, contracted Service staff are hired by the Companies, this Companies have included on those incremental Service staff costs not previously captured in rates. The planned and actual program administration costs are shown on tables 5B for NYSEG and 5C for RG&E.

⁴ See 2020 Make-Ready Order, pg. 75

Admin Budget Items	Y1 Budget JUL-DEC '20	Y1 Actual JUL-DEC '20	Y2 Budget JAN-DEC '21	Y2 Actual JAN-DEC '21	Y3 Budget JAN-DEC '22	Y3 Actual JAN-DEC '22	Y4 Budget JAN-DEC '23	Y4 Actual JAN-DEC '23	Cumulative Budget (through 12/31/23)	Cumulative Actual (through 12/31/23)
Education & Outreach ¹	\$ -	\$ -	\$ -	\$ 252,081	\$ 631,512	\$ 606,087	\$ 524,998	\$ 430,653	\$ 1,156,510	\$ 1,288,822
IT Requirements ²	\$ -	\$ -	\$ -	\$ 19,997	\$ 5,134	\$ 6,709	\$ 125,215	\$ 46,003	\$ 130,349	\$ 72,709
Data Collection & Management	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 19,028	\$ -	\$ 13,136	\$ -	\$ 32,164
Fleet Assessment ³	\$ -	\$ -	\$ -	\$ 12,250	\$ 90,418	\$ 103,702	\$ 79,135	\$ 162,195	\$ 169,553	\$ 278,147
Staffing (incremental staff only) ⁴	\$ -	\$ -	\$ -	\$ 26,413	\$ -	\$ 49,855	\$ -	\$ 16,488	\$ -	\$ 92,755
General Implementation Costs ⁵	\$ -	\$ -	\$ -	\$ 1,374	\$ -	\$ 6,402	\$ 8,400	\$ 7,484	\$ 8,400	\$ 15,260
Total ⁶	\$ -	\$ -	\$ 573,786	\$ 285,702	\$ 727,064	\$ 741,929	\$ 737,748	\$ 659,471	\$ 2,038,599	\$ 1,687,102
Annual % of total		0%		50%		102%		89%		83%

Note 1: Education and Outreach includes all advertising, program collateral material, trade ally network coordination and communications and lead generation activity.

Note 2: IT Requirements include Customer Relationship Management (CRM) system licences and maintenance.

Note 3: NYSEG contracts with a 3rd party to provide Fleet Services. Labor and evaluation costs are included in this section.

Note 4: Incremental Staffing is not included in the Company's Program Administration Planned Budgets and therefore not included in the total program administration cost. Staffing costs are direct labor costs and do not include Company Overhead. 2021 Labor Costs are inclusive of July - December. 2023 Labor Costs are inclusive of January - April.

Note 5: General Implementation Costs include Travel, Training, Work Meals and Office Supplies.

Note 6: In 2021 NYSEG did not allocate its planned budget for specific line items.

Table 5B: NYSEG Program Administration Budget and Costs

Admin Budget Items	Y1 Budget JUL-DEC '20	Y1 Actual JUL-DEC '20	Y2 Budget JAN-DEC '21	Y2 Actual JAN-DEC '21	Y3 Budget JAN-DEC '22	Y3 Actual JAN-DEC '22	Y4 Budget JAN-DEC '23	Y4 Actual JAN-DEC '23	Cumulative Budget (through 12/31/23)	Cumulative Actual (through 12/31/23)
Education & Outreach ¹	\$ -	\$ -	\$ -	\$ 109,853	\$ 323,742	\$ 348,045	\$ 238,000	\$ 187,096	\$ 561,742	\$ 644,994
IT Requirements ²	\$ -	\$ -	\$ -	\$ 6,493	\$ 2,295	\$ 2,970	\$ 60,000	\$ 21,096	\$ 62,295	\$ 30,559
Data Collection & Management	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9,174	\$ -	\$ 7,742	\$ -	\$ 16,916
Fleet Assessment ³	\$ -	\$ -	\$ -	\$ 35,049	\$ 37,911	\$ 36,310	\$ 37,920	\$ 59,645	\$ 75,831	\$ 131,003
Staffing (incremental staff only) ⁴	\$ -	\$ -	\$ -	\$ 26,413	\$ -	\$ 49,855	\$ -	\$ 16,488	\$ -	\$ 92,755
General Implementation Costs ⁵	\$ -	\$ -	\$ -	\$ 258	\$ -	\$ 4,130	\$ 4,800	\$ 11,156	\$ 4,800	\$ 15,544
Total ⁵	\$ -	\$ -	\$ 274,948	\$ 151,653	\$ 363,947	\$ 400,629	\$ 340,720	\$ 286,735	\$ 979,615	\$ 839,017
Annual % of total		0%		55%		110%		84%		86%

Note 1: Education and Outreach includes all advertising, program collateral material, trade ally network coordination and communications and lead generation activity.

Note 2: IT Requirements include Customer Relationship Management (CRM) system licences and maintenance.

Note 3: RG&E contracts with a 3rd party to provide Fleet Services. Labor and evaluation costs are included in this section.

Note 4: Incremental Staffing is not included in the Company's Program Administration Planned Budgets and therefore not included in the total program administration cost. Staffing costs are direct labor costs and do not include Company Overhead. 2021 Labor Costs are inclusive of July - December. 2023 Labor Costs are inclusive of January - April.

Note 5: General Implementation Costs include Travel, Training, Work Meals and Office Supplies.

Note 6: In 2021 RG&E did not allocate its planned budget for specific line items.

Table 5C: RG&E Program Administration Budget and Costs

