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December 1, 2023

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

**Re: Case 22-E-0236 - Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Vehicle Charging
Central Hudson Revised Immediate Solutions Implementation Plan**

Dear Secretary Phillips:

Central Hudson Gas & Electric Corporation (“Central Hudson” or “the Company”) hereby files its revised Immediate Solutions Implementation Plan (“Implementation Plan”) in compliance with Ordering Clause 2 of the New York State Public Service Commission’s November 20, 2023 order in this proceeding.¹ This filing includes previously filed draft tariff leaves, as well as an attachment that shows the changes from the March 20, 2023 version of the Implementation Plan. Pursuant to Ordering Clause 4 of the Order, the Company plans to file its revised tariff leaves no later than January 18, 2024.

Please contact Michael Valentino (mavalentino@cenhud.com) at (845) 486-5452 or the undersigned with any questions regarding this matter.

Respectfully submitted,

/s/Paul A. Colbert

Paul A. Colbert

¹ Case 22-E-0236, *Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structure for Commercial Electric Vehicle Charging* (“EV Rate Design Proceeding”), Order Implementing Immediate Solutions Programs (issued November 20, 2023) (“Order”).

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CENTRAL HUDSON GAS & ELECTRIC IMMEDIATE SOLUTIONS IMPLEMENTATION PLAN

Filed December 1, 2023

Case 22-E-0236

Contents

- 0. Version Control 3
- 1. Introduction 4
 - 1.1 Background and Summary of Order 4
- 2. Immediate Solution 4
 - 2.1 Demand Charge Rebate Implementation 4
 - 2.1.1 Eligibility Criteria 4
 - 2.1.2 Incentive Structure..... 5
 - 2.1.3 Participation Requirements 5
 - 2.1.4 Program Timeline..... 5
 - 2.2 Program Marketing and Outreach..... 6
 - 2.2.1 Marketing, Outreach and Education..... 6
 - 2.3 Cost Estimate 7
 - 2.3.1 Cost Forecast..... 7
 - 2.3.2 Cost Recovery 8
 - 2.4 Accounting Details 8
 - 2.4.1 Expenditure Tracking 8
 - 2.5 Evaluation 8
 - 2.5.1 Overview 8
 - 2.6 Tariff Leaves..... 9
 - 2.6.1 Demand Charge Rebate 9
 - 2.6.2 Standby Exemptions 9
- 3. Glossary: Abbreviations, Acronyms and Definitions 10
- 4. Appendices 11
 - Appendix 1: Demand Charge Rebate Redline Draft Leaves 11
 - Appendix 2: Demand Charge Rebate Draft Leaves 11

0. Version Control

| Revision Effective Date | Changes |
|-------------------------|---|
| 12/1/2023 | Modifications to be consistent with Order Implementing Immediate Solutions Programs |

1. Introduction

1.1 Background and Summary of Order

On January 19, 2023, the New York Public Service Commission (“PSC” or “Commission”) issued an Order¹ requiring the Joint Utilities² to implement Immediate Solutions to relieve operating costs for commercial electric vehicle (“EV”) charging customers, including a Demand Charge Rebate that provides a 50 percent rebate against traditional demand charges for public Direct Current Fast Charging (“DCFC”) sites. Additionally, the EV Rate Design Order requires that the Upstate Utilities³ offer the same rebate to all eligible commercial charging customers. The program will continue until the Order’s required Near-Term⁴ Solution becomes operational. This document details Central Hudson’s proposed implementation of the Immediate Solution.

2. Immediate Solution

2.1 Demand Charge Rebate Implementation

2.1.1 Eligibility Criteria

Central Hudson will establish eligibility for the rebate through the computation of a Charging Ratio, where the customer’s maximum EV charging capacity (in kW) is equal to or greater than 50% of their maximum site demand. For customers that separately meter their EV load, the Charging Ratio will be equal to 100%. For all other customers, the Charging Ratio is defined as the ratio of the sum of the EV charging capacity in kW to the sum of the maximum simultaneous demand of all load on the account in kW. The Charging Ratio shall be determined at the time of application and shall remain the Charging Ratio until such time that the Customer provides a new load letter; however, the Company reserves the right to re-evaluate the Charging Ratio and program eligibility subsequent to application for service. The customer’s maximum potential load will be defined by the customer’s load letter generated as part of new or additional electric service request. An updated load letter may be requested to establish eligibility for the program if the load letter on file is outdated. The Charging Ratio computation will be updated when a customer makes any changes to their loads (i.e., EV charging load, non-EV loads, or both).

¹ Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Vehicle Charging (EV Solution Proceeding), Order Establishing Framework for Alternatives to Traditional Demand-Based Rate Structures (issued January 19, 2023) (EV Rate Design Order or Order).

² The Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson or the Company), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange & Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation (RG&E).

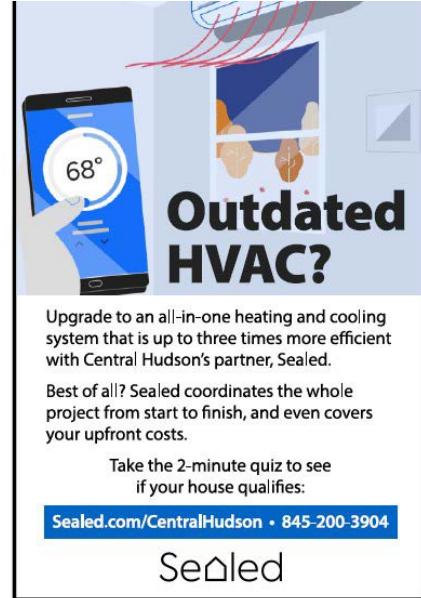
³ The Upstate Utilities are Central Hudson, NYSEG, National Grid, and RG&E.

⁴ The Order adopts an EV Phase-In Rate as the Near-Term Solution p.31.

2.1.2 Incentive Structure

The rebate will be determined for each billing period by taking the billed Demand Delivery Charges multiplied by the Charging Ratio multiplied by 50%. There will be no rebate against surcharges or supply charges that are billed on a per-kW basis. The rebate amount will be listed as a bill credit under the Payments and Adjustments section on a customer’s monthly statement. This will allow customers to easily identify the rebate amount and period. Below is a visual meant to show where a customer may expect to view the Demand Charge Rebate on their bill.⁵

| Electricity Used | | 14160 | 43.2 |
|--|--------------------------|------------|-------------------|
| Cost for Electricity Delivered (for 1.0 months) | | | |
| Basic Service Charge | 1.0 Mos. @ | 100.00000 | 100.00 |
| Delivery Svc Chg | 14160 kWh @ | 0.00424 | 60.04 |
| MFC Admin Chg | 14160 kWh @ | 0.00010 | 1.42 |
| Transition Adj | 14160 kWh @ | 0.00009 | 1.28 |
| Bill Credit | 14160 kWh @ | 0.00033 | 4.68 |
| SBC/RPS Chgs | 14160 kWh @ | 0.00633 | 89.64 |
| Misc. Charges | 14160 kWh @ | -0.02018 | -285.73 |
| RDM Chg | 14160 kWh @ | 0.00329 | 46.58 |
| Demand charge | 43.2 KW @ 11.91991 X 1.0 | | 514.94 |
| MISC II | 43.2 KW @ 0.87894 X 1.0 | | 37.97 |
| NYS & Local Taxes | | | 0.58 |
| Sales Tax | @ 8.125% | | 46.31 |
| Total Electric Delivery Charges: | | | \$617.71 |
| Electric Supplier Info - RATE E002 | | | |
| ELECTRIC SUPPLY ACCOUNT NO: 902705 | | | |
| Your Electric Supplier is IDT ENERGY INC. | | | |
| 520 BROAD STREET NEWARK NJ 07102 | | | |
| For Electric supply pricing information, call 877-887-6866 | | | |
| Cost for Electricity Supply | | | |
| Electric Supply Chg | 14160 kWh @ | 0.18000 | 2,548.80 |
| Sales Tax | @ | 8.125% | 207.20 |
| Total Electricity Supply Charges | | | \$2,756.00 |
| IDT Energy Customer Service hours are Monday thru Friday, 9am to 5pm EST. Call toll free - 1-877-887-6866. | | | |
| Payments and Adjustments | | | |
| CENTRAL HUDSON | | | |
| EV Demand Credit | | 03/07/2023 | \$-257.47 |
| Payment Received | | 02/22/2023 | \$1,687.12 |



2.1.3 Participation Requirements

Interested participants can apply for the Demand Charge Rebate by downloading an application from the Company website. The application includes the applicant’s name, contact information, EV site documentation including receipts or invoices as well as proof of the installation from a certified electrician. The Company will determine acceptance, calculate the customer’s Charging Ratio, and communicate these results to the Customer.

2.1.4 Program Timeline

Central Hudson plans to begin accepting applications for the Demand Charge Rebate on January 19, 2024. The Demand Charge Rebate will remain available to eligible Customers until such time as the EV Phase-In Rate, as described in the Commission’s January 19, 2023 EV Rate Design Order, is made available.

⁵ The visual is an illustrative example and the actual description may differ.

2.2 Program Marketing and Outreach

2.2.1 Marketing, Outreach and Education

Outreach and education are central to the success of the Demand Charge Rebate. Central Hudson regularly communicates with its customers about EVs through a range of channels, including e-newsletters, social media, events, press releases, websites, direct mail, and advertisements.

Central Hudson will primarily focus on two core audiences to identify potential participants: 1) Make-Ready Participants; and 2) EV project developers and other stakeholders.

Make-Ready Participant Outreach

Central Hudson will conduct an outreach campaign targeted at Make-Ready program participants. Tactics include direct mail, personal outreach, bill inserts or flyers. Through these various outreach tactics, Central Hudson will direct customers to program information on the Company website where they may learn more about the program and obtain a copy of the application.

EV Project Developers and Stakeholder Outreach

Other key audiences that Central Hudson will seek to engage are project developers and other stakeholders who populate the New York EV charging industry. Central Hudson will leverage existing outreach efforts with Make-Ready trade allies and developers to incorporate information about the launch of the Demand Charge Rebate program. This includes frequently-asked-questions guides and webinars about the application process. Through these various entry points, Central Hudson will direct EV project developers and other interested parties to the Demand Charge Rebate program information on its website.

Per-Plug Incentive Participant Outreach

Existing Per-Plug Incentive (PPI) program participants will be given a 60-day election period to choose between remaining in the PPI program or switching to the Demand Charge Rebate, beginning November 20, 2023.

Central Hudson is in the process of conducting outreach via phone and follow-up email. This outreach includes at least two attempts to contact participants via email, and at least one attempt to contact participants via phone. If an existing PPI program participant fails to respond to these attempts by the end of the 60-day window, the Company will infer that the participant chooses to continue participation in the PPI Program.

2.3 Cost Estimate

2.3.1 Cost Forecast

To estimate the cost required to support the Demand Charge Rebate program, Central Hudson analyzed Make-Ready program participants and their corresponding onsite electricity usage data. To qualify for the program, a 50% charging ratio must be achieved, meaning that the charger rating must be greater than or equal to 50% of the maximum demand at the site as described previously.

A low cost estimate was calculated by summing the average monthly maximum demand multiplied by the calculated charging ratio, then multiplied by the matched electricity demand charge rate by site, multiplied by the 50% rebate. If there was no utility data, then the EVSE capacity was used as a proxy of the monthly maximum demand multiplied by an 80% peak demand coincidence rate.

A high cost estimate was calculated by taking the higher kW value of either the max demand throughout the 12-month period by site or the total EVSE capacity onsite.

To account for costs from future plug growth, Central Hudson's Make-Ready Program project pipeline was used as a baseline. The Company developed a monthly cost-per-plug by dividing the number of plugs estimated to be complete through 2025 by the estimated monthly rebate calculated in the analysis of Make-Ready Program data described above.

To calculate the estimated total cost of the Demand Charge Rebate, Central Hudson averaged the low and high ranges of the forecast and assumed a 16-month program time period. Total costs include Demand Charge Rebate incentive costs and Implementation and Administration costs, which consist of:

- Marketing: Any costs by the company in marketing the Demand Charge Rebate program, including flyers, brochures, email outreach etc.
- Program Administration: Internal staffing needs.
- IT Requirements: Costs associated with upgrading billing software to allow for the Demand Charge Rebate program to function.
- Evaluation: Costs associated with hiring a third party to review the Demand Charge Rebate and provide any recommendations once there is experience to evaluate.

| Estimated Total Cost⁶ | |
|---|------------------|
| Demand Charge Rebate | \$550,00 |
| Implementation & Administration Costs | \$87,000 |
| Total Estimated Demand Charge Rebate | \$637,000 |

⁶ Cost estimates are based on projected participation and charging station utilization which are subject to change

2.3.2 Cost Recovery

Central Hudson will recover Demand Charge Rebate costs from all delivery customers on a one-year lag basis through the existing EV Make-Ready surcharge mechanism, with costs allocated among service classes using the transmission and distribution revenues allocator, recovered on a per-kW basis for demand-billed customers and on a per-kWh basis for non-demand billed customers. This is further detailed in the accompanying draft tariff leaves included as Appendix 1. Central Hudson proposes to recover the incremental labor costs associated with the Demand Charge Rebate through the EV Make-Ready surcharge.

2.4 Accounting Details

2.4.1 Expenditure Tracking

Central Hudson plans to issue Demand Charge Rebates via bill credits, which will be deferred as a regulatory asset in Work Order 3900A (182.94) with carrying charges at the utility's pretax overall weighted average cost of capital which will be accrued in WO 3902A (182.98). The recovery of the annual portions will be through the EV Make Ready surcharge mechanism and will be recorded under Work Order 3901A (182.94), allocated to all customers using the transmission and distribution revenues allocator, and recovered from demand-billed customers on a per-kW demand basis, and from non-demand billed customers on a per-kWh energy basis.

2.5 Evaluation

2.5.1 Overview

Central Hudson will work with an independent third-party evaluation vendor to review program performance, including assessments as directed in the Order.⁷ At a minimum, the evaluation will:

1. Assess the impact of the Demand Charge Rebate on deployment of EV charging;
2. Assess the costs and benefits of the program and their impacts on low- and moderate-income customers and Disadvantaged Community residents; and
3. Identify lessons learned from program implementation.

Central Hudson will seek to balance evaluation cost with a reasonable level of evaluation rigor, considering the ease in accessing data for analysis, the level of confidence provided by analysis activities, the cost of analysis activities, and the size and influence of the program. Central Hudson will work with the evaluation vendor to design a final evaluation plan; activities may include those listed in the table below.

⁷ Order, pp. 40-41.

| Evaluation Objectives | Possible Data Collection and Analysis Tasks |
|--|--|
| Assess impact on deployment of EV charging. | <ul style="list-style-type: none"> • Market research • Program data review • Participant interviews |
| Assess costs and benefits and their impact on LMI customers and DAC residents. | <ul style="list-style-type: none"> • Market research • Project mapping • Program data review • Participant interviews • Cost and benefit analysis |
| Identify lessons learned. | <ul style="list-style-type: none"> • Market research • Program data review • Program materials review • Participant interviews |

2.6 Tariff Leaves

2.6.1 Demand Charge Rebate

As directed in the EV Rate Design Order, the Company has included draft tariff leaves to address customer eligibility for the Demand Charge Rebate. Redlined and clean copies of the necessary draft tariff leaves are included as Appendices 1 and 2, respectively.

2.6.2 Standby Exemptions

As directed in the EV Rate Design Order, customers with energy storage systems with inverter capability greater than one megawatt and less than or equal to the sum of nameplate EV charging capability will be exempt from standby rates, provided that such installations meet all other applicable interconnection and standby service requirements. Redlined and clean copies of the draft tariff leaves necessary to implement this exemption are included as Appendices 1 and 2, respectively.

3. Glossary: Abbreviations, Acronyms and Definitions

| | |
|-----------------------------|---|
| Applicant | Any entity who has submitted program registration details to Central Hudson but has not yet been accepted. |
| Application Portal | Customer facing portal to be used for application and program details |
| Approved Contractor | An entity that has been approved by Demand Side Management to work at Central Hudson. |
| CLCPA | Climate Leadership and Community Protection Act |
| Commission or PSC | New York Public Service Commission |
| Company | Central Hudson Gas & Electric Corp. (Central Hudson) |
| Customer | A person or organization that is billed for Central Hudson electric service |
| DCFC | Direct Current Fast Charger. Electric vehicle chargers characterized by its improved charging capability vs. Level 2 (L2) chargers. |
| EV | Electric Vehicle. Any zero- or plug-in-hybrid electric vehicle, as defined by the New York State Department of Transportation. Any plug-in electric vehicle (BEV or PHEV). |
| EVSE | Electric Vehicle Supply Equipment. Electrical conductors, related equipment, software, and communications protocols that deliver energy efficiently and safely to the vehicle. EVSE includes L1, L2 (208/240V) and DCFC (480 V) chargers. And communicates charge data via Wi-Fi or a cellular connection. |
| Joint Utilities | Joint Utilities of New York, a consortium of energy service providers who frequently collaborate on state programs. |
| L2 | Level Two electric supply equipment, generally defined as offering between 7.5-20kW of charging capability. |
| LD | Light-duty vehicles defined as class 1-2 by the US Department of Transportation with a gross vehicle weight under 10,000 lbs. |
| MRP | Make-Ready Program to support the development of electric infrastructure and equipment necessary to accommodate an increased deployment of EVs within New York State by reducing the upfront costs of building charging stations. |
| Managed Charging Program | A utility managed charging program offers participants financial rewards for adopting grid-beneficial behavior. Can be active, where customer behavior is driven in response to direct utility signals, or passive, where the customer is free to participate or not based on their response to a price signal. |
| MHDV | Medium- and heavy-duty vehicles. Defined as vehicles that fall into US Department of Transportation's vehicle classes 3-8 and with a gross vehicle weight of over 10,000 lbs. |
| Participant | Any accepted applicant participating in and/or receiving program incentives. |
| Service Classification (SC) | Service class. Electric service delivered under one of Central Hudson's tariffs, as filed with the PSC. |
| Staff | Staff of the Department of Public Service. |

4. Appendices

Appendix 1: Demand Charge Rebate Redline Draft Leaves

Appendix 2: Demand Charge Rebate Draft Leaves

29. ENERGY COST ADJUSTMENT MECHANISM (Cont'd)

Miscellaneous Charges Factor (Cont'd)

Electric Vehicle Make-Ready Program Factor

The Electric Vehicle Make-Ready (EVMR) Program factor is designed to recover the following costs as addressed by the Commission in Case 18-E-0138:

- (a) Utility-Owned Make-Ready Work: Until these costs are recovered through base rates, the depreciation expense related to utility-owned make-ready work including work related to future-proofing Company infrastructure and the return, at the Company's currently authorized pre-tax cost of capital, on the average unrecovered portion of such investment net of deferred income taxes for each program year will be recovered over a subsequent one-year period;
- (b) Customer-Owned Make-Ready Work: Until these costs are recovered through base rates, incentives paid for customer-owned make-ready work, including carrying charges calculated at the Company's currently authorized pre-tax cost of capital applied to the net-of-tax balances of such incentives and carrying charges, will be recovered over a period of 15 years;
- (c) Other Programs: This includes costs associated with the Environmental Justice Community Clean Vehicles Transformation Prize, Clean Personal Mobility Prize, Clean Medium- and Heavy- Duty Innovation Prize, Fleet Assessment Service, and Medium- and Heavy- Duty Make-Ready Pilot Program. To the extent that costs in these programs are for utility-owned make-ready infrastructure, such costs will be recovered consistent with Utility-Owned Make-Ready Work as noted in (a) above. Other costs of these programs, including carrying charges calculated at the Company's currently authorized pre-tax cost of capital applied to the net-of-tax balances of such other costs and carrying charges, will be recovered over a period of 15 years; and,
- (d) Make-Ready Implementation Costs: Implementation costs inclusive of the Fleet Assessment Service, including carrying charges calculated at the Company's currently authorized pre-tax cost of capital applied to the net-of-tax balances of such other costs and carrying charges, will be recovered over a period of 5 years

~~(d)(e)~~ Demand Charge Rebate Program: Costs related to the rebates paid to participants under the Demand Charge Rebate described in the Special Provisions 2.1, 3.1, and 13.1

Cost recovery will be determined:

1. on an annual basis to be effective with the first billing batch in February, with the first program year ending December 31, 2020 and each subsequent program year comprising a successive annual term thereafter;
2. for each service classification or sub-classification in proportion to each class' transmission and distribution revenues;
3. on a kWh basis for non-demand customers and on a kW basis for demand customers;
- ~~4.~~ with the rate per kWh or kW determined by dividing allocable costs by estimated billed kWh deliveries or kW demand over the collection period;
- ~~5.~~

PSC NO: 15 ELECTRICITY

LEAF: 106.1.9

COMPANY: CENTRAL HUDSON GAS & ELECTRIC CORPORATION

REVISION: DRAFT

INITIAL EFFECTIVE DATE: ~~06/01/2024~~

SUPERSEDING REVISION: DRAFT

~~Issued in compliance with Order in Case 22-E-0236 dated January 19, 2023/19/2023~~
~~Issued in Compliance with Order in C.18-E-0138 dated July 16, 2020~~

~~6.4. by reconciling recoveries (eleven months actual, one month forecast) with allocable costs for each twelve-month recovery period ending December 31, with any over or under recoveries included in the development of succeeding rates. Reconciliation amounts related to the one month forecast will be included in the second subsequent rates determination, with the disposition of any resulting over or under recovery at the end of the program recovery period addressed by the Commission.~~

PSC NO: 15 ELECTRICITY

LEAF: 106.1.10

COMPANY: CENTRAL HUDSON GAS & ELECTRIC CORPORATION

REVISION: Draft

INITIAL EFFECTIVE DATE: 01/01/2024

SUPERSEDING REVISION: Draft

Issued in compliance with Order in Case 22-E-0236 dated January 19, 2023/19/2023 Issued in Compliance with Order in C.18-E-0138 dated July 16, 2020

29. ENERGY COST ADJUSTMENT MECHANISM (Cont'd)

Miscellaneous Charges Factor (Cont'd)

Electric Vehicle Make-Ready Program Factor (Cont'd)

Cost recovery will be determined (Cont'd):

5. by reconciling recoveries (eleven months actual, one month forecast) with allocable costs for each twelve-month recovery period ending December 31, with any over or under recoveries included in the development of succeeding rates. Reconciliation amounts related to the one month forecast will be included in the second subsequent rates determination, with the disposition of any resulting over or under recovery at the end of the program recovery period addressed by the Commission

The rates so determined for the EVMR Program will be stated in whole \$0.00001 per kWh and whole \$0.01 per kW and will be filed on the Statement of Electric Vehicle Make-Ready Program Charges not less than fifteen days prior to a proposed change in rates. These rates will be applied to the energy (kWh) and demand (kW) deliveries on the bills of all customers served under Service Classification Nos. 1, 2, 3, 5, 6, 8, 9, 13, and 14, except that customers taking service under the provisions of General Information Sections 41 (Excelsior Jobs Program) and/or 45 (Empire Zone Rate) will be exempt from the EVMR Program factor on the portion of their load served under these programs. Customers taking service under Service Classification No. 14 will be billed the rate applicable to their Parent Service Classification, which is the Service Classification that the customer would otherwise qualify for based on the customer's usage characteristics, with the rate applied to demand-billed customers on a contract demand basis.

For billing purposes, cost recovery for non-demand customers will be included in the Miscellaneous Charges, with the combined amount shown as one line item on customer bills. Cost recovery for demand-billed customers will be through the Miscellaneous Charges II, a separate line item on customer bills.

SERVICE CLASSIFICATION NO. 2 (Cont'd)

GENERAL SERVICE (Cont'd)

SPECIAL PROVISIONS

- 2.1 A customer who takes service under this service classification that has EV charging sites will be eligible for the Demand Charge Rebate as follows: To be eligible for the Rebate, a customer with an EV charging site is required to have a Charging Ratio of 50 percent or greater. For customers that separately meter their EV load, the Charging Ratio will be equal to 100%. For all other Customers, the Charging Ratio is defined as the ratio of the sum of the EV charging capacity in kW to the sum of the maximum simultaneous demand of all load on the account in kW. The Charging Ratio shall be determined at the time of application and shall remain the Charging Ratio until such time that the Customer provides a new load letter with additional electrification plans; however, the Company reserves the right to re-evaluate the Charging Ratio and program eligibility subsequent to application for service. For Customers with a Charging Ratio of 50 percent or greater, the Rebate will be determined for each billing period by taking the billed Demand Delivery Charges times the Charging Ratio times 50%. Customers participating in the Company's DCFC per-plug incentive program will have a one-time option to either continue participating in the Program for the remainder of the Customer's eligibility period or to begin receiving the Rebate. The Rebate will remain available to eligible Customers until such time as the EV Phase-In Rate Solution as described in the Commission's orders in Case 22-E-0236 is made available to Customers.

~~Not in use.~~

2.2 Not in use.

2.3 Not in use.

PSC NO: 15 ELECTRICITY LEAF: 187
COMPANY: CENTRAL HUDSON GAS & ELECTRIC CORPORATION REVISION: ~~DRAFT5~~
INITIAL EFFECTIVE DATE: ~~January 1, 2014~~ SUPERSEDING REVISION: ~~DRAFT5~~
Issued in compliance with Order in Case 22-E-0236 dated 1/19/2023

SERVICE CLASSIFICATION NO. 3 (Cont'd)

LARGE POWER PRIMARY SERVICE (Cont'd)

METERING REQUIREMENT

Customers taking service under this Special Provision must have in place an interval meter, and have telecommunications to the meter, that is compatible with the Company's MV-90 data acquisition system. On and after May 1, 2013, cellular communications to the meter will be installed by the Company for all new interval meter installations. Should the customer's premises not have adequate signal strength and require a dedicated phone line, the Company will arrange for the installation of, and be responsible for the ownership and maintenance of, a dedicated phone line. In addition to the monthly customer charge, customers will be assessed an incremental monthly charge of \$6.00 for customers where the Company has provided cellular communications to the meter. If a non-cellular enabled interval meter is installed and the customer's dedicated phone line is not installed or operational, for reasons not caused by the Company's equipment, when the Company attempts to read the meter, the customer shall be responsible for resolution of the problem, and the customer will be assessed an \$80.00 on-site meter reading charge each monthly cycle until the condition is corrected.

TERMS OF PAYMENT

Bills are due when personally served or three days after mailing. Bills shall be subject to a late payment charge in accordance with General Information, Section 16, if payment is not made by the date specified on the bill which date shall be not less than 20 days from the due date.

TERM

A minimum of one year from March 15, 1978, or from commencement of service under this classification after that date, and successive annual terms thereafter. A customer cannot resume service within one year at the same location under this classification if service has been taken during the intervening period under any other service classification.

SPECIAL PROVISIONS

The numbering of the paragraphs hereunder begins with the above service classification number.

- 3.1 A customer who takes service under this service classification that has EV charging sites will be eligible for the Demand Charge Rebate as follows: To be eligible for the Rebate, a customer with an EV charging site is required to have a Charging Ratio of 50 percent or greater. For customers that separately meter their EV load, the Charging Ratio will be equal to 100%. For all other Customers, the Charging Ratio is defined as the ratio of the sum of the EV charging capacity in kW to the sum of the maximum simultaneous demand of all load on the account in kW. The Charging Ratio shall be determined at the time of application and shall remain the Charging Ratio until such time that the Customer provides a new load letter with additional electrification plans; however, the Company reserves the right to re-evaluate the Charging Ratio and program eligibility subsequent to application for service. For Customers with a Charging Ratio of 50 percent or greater, the Rebate will be determined for each billing period by taking the billed Demand Delivery Charges times the Charging Ratio times 50%. Customers participating in the Company's DCFC per-plug incentive program will have a one-time option to either continue participating in the program for the remainder of the Customer's eligibility period or to begin receiving the Rebate. The Rebate will remain available to eligible Customers until such time as the EV Phase-In Rate Solution as described in the Commission's orders in Case 22-E-0236 is made available to Customers.

Not in use.

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Issued by: Michael L. Mosher Joseph Hally, Vice President Regulatory Affairs, Poughkeepsie, New York

DRAFT7

INITIAL EFFECTIVE DATE: 01/01/12

SUPERSEDING REVISION:

DRAFT6

Issued in compliance with Order in Case 22-E-0236 dated 1/19/2023

SERVICE CLASSIFICATION NO. 13 (Cont'd)

LARGE POWER SUBSTATION AND TRANSMISSION SERVICE (Cont'd)

SPECIAL PROVISIONS

The numbering of the paragraphs hereunder begins with the above service classification number.

- 13.1 -A customer who takes service under this service classification that has EV charging sites will be eligible for the Demand Charge Rebate as follows: To be eligible for the Rebate, a customer with an EV charging site is required to have a Charging Ratio of 50 percent or greater. For customers that separately meter their EV load, the Charging Ratio will be equal to 100%. For all other Customers, the Charging Ratio is defined as the ratio of the sum of the EV charging capacity in kW to the sum of the maximum simultaneous demand of all load on the account in kW. The Charging Ratio shall be determined at the time of application and shall remain the Charging Ratio until such time that the Customer provides a new load letter with additional electrification plans; however, the Company reserves the right to re-evaluate the Charging Ratio and program eligibility subsequent to application for service. For Customers with a Charging Ratio of 50 percent or greater, the Rebate will be determined for each billing period by taking the billed Demand Delivery Charges times the Charging Ratio times 50%. Customers participating in the Company's DCFC per-plug incentive program will have a one-time option to either continue participating in the program for the remainder of the Customer's eligibility period or to begin receiving the Rebate. The Rebate will remain available to eligible Customers until such time as the EV Phase-In Rate Solution as described in the Commission's orders in Case 22-E-0236 is made available to Customers.

PSC NO: 15 ELECTRICITY

LEAF: 272.1

COMPANY: CENTRAL HUDSON GAS & ELECTRIC CORPORATION

REVISION: Draft8

INITIAL EFFECTIVE DATE: 01/01/2023

SUPERSEDING REVISION: Draft7

Issued in compliance with Order in Case 22-E-0236 dated 1/19/2023 January 19, 2023 Issued in Compliance with Order in Case 19-E-0079 dated November 21, 2022

SERVICE CLASSIFICATION NO. 14 (Cont'd)

STANDBY SERVICE (Cont'd)

STANDBY SERVICE IS NOT APPLICABLE TO: (Cont'd)

Technologies Eligible Under Public Service Law ("PSL") §66-j and §66-l:

With the exception of customers taking service under Special Provision 14.12, Standby service rates shall not apply to customers owning or operating electric generating equipment as defined in PSL §66-j and §66-l, up to the system size limits contained in General Information Section 48.B, when such customers are taking service under the provisions of General Information Section 37, 38, 46 or 48 and comply with the Standardized Interconnection Requirements set forth in the SIR-Addendum of this Rate Schedule.

Hybrid Facilities

Standby service shall not apply to customers who pair energy storage systems with eligible electric generating equipment that receive compensation under General Information Section 48.B for Hybrid Energy Storage.

Energy Storage

Standby service shall not apply to customers with energy storage systems with a maximum capability up to and including 1MW. Standby service will also not apply to customers with energy storage systems with inverter capability greater than 1 MW and less than or equal to the sum of nameplate EV charging capability.

Emergency Generators

Standby service shall not apply to customers whose only generating units are emergency generators. For the purposes of this Service Classification, a generating unit must be designated in the customer's Application for Electric Standby Service with the Company as an emergency generator and must meet each of the following requirements to be considered an emergency generator:

- 1) the emergency generator is not capable of being operated in parallel with the Company's delivery system, except for closed-transition transfer switching where the term "closed-transition transfer" is characterized as a momentary make-before-break switching sequence, and
- 2) the emergency generator is used exclusively for purposes of supplying electrical power to the customer when electrical power is not available from the Company, and
- 3) no load is served by the emergency generator while electric service is available from the Company to the premises, except for regularly scheduled tests when the generator is required to operate under load or for NYISO Emergency Response Programs or for NYISO unforced capacity requirements for special case resources, and

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29. ENERGY COST ADJUSTMENT MECHANISM (Cont'd)

Miscellaneous Charges Factor (Cont'd)

Electric Vehicle Make-Ready Program Factor

The Electric Vehicle Make-Ready (EVMR) Program factor is designed to recover the following costs as addressed by the Commission in Case 18-E-0138:

- (a) **Utility-Owned Make-Ready Work:** Until these costs are recovered through base rates, the depreciation expense related to utility-owned make-ready work including work related to future-proofing Company infrastructure and the return, at the Company's currently authorized pre-tax cost of capital, on the average unrecovered portion of such investment net of deferred income taxes for each program year will be recovered over a subsequent one-year period;
- (b) **Customer-Owned Make-Ready Work:** Until these costs are recovered through base rates, incentives paid for customer-owned make-ready work, including carrying charges calculated at the Company's currently authorized pre-tax cost of capital applied to the net-of-tax balances of such incentives and carrying charges, will be recovered over a period of 15 years;
- (c) **Other Programs:** This includes costs associated with the Environmental Justice Community Clean Vehicles Transformation Prize, Clean Personal Mobility Prize, Clean Medium- and Heavy- Duty Innovation Prize, Fleet Assessment Service, and Medium- and Heavy- Duty Make-Ready Pilot Program. To the extent that costs in these programs are for utility-owned make-ready infrastructure, such costs will be recovered consistent with Utility-Owned Make-Ready Work as noted in (a) above. Other costs of these programs, including carrying charges calculated at the Company's currently authorized pre-tax cost of capital applied to the net-of-tax balances of such other costs and carrying charges, will be recovered over a period of 15 years; and,
- (d) **Make-Ready Implementation Costs:** Implementation costs inclusive of the Fleet Assessment Service, including carrying charges calculated at the Company's currently authorized pre-tax cost of capital applied to the net-of-tax balances of such other costs and carrying charges, will be recovered over a period of 5 years
- (e) **Demand Charge Rebate Program:** Costs related to the rebates paid to participants under the Demand Charge Rebate described in the Special Provisions 2.1, 3.1, and 13.1

Cost recovery will be determined:

1. on an annual basis to be effective with the first billing batch in February, with the first program year ending December 31, 2020 and each subsequent program year comprising a successive annual term thereafter;
2. for each service classification or sub-classification in proportion to each class' transmission and distribution revenues;
3. on a kWh basis for non-demand customers and on a kW basis for demand customers;
4. with the rate per kWh or kW determined by dividing allocable costs by estimated billed kWh deliveries or kW demand over the collection period;

29. ENERGY COST ADJUSTMENT MECHANISM (Cont'd)

Miscellaneous Charges Factor (Cont'd)

Electric Vehicle Make-Ready Program Factor (Cont'd)

5. by reconciling recoveries (eleven months actual, one month forecast) with allocable costs for each twelve-month recovery period ending December 31, with any over or under recoveries included in the development of succeeding rates. Reconciliation amounts related to the one month forecast will be included in the second subsequent rates determination. with the disposition of any resulting over or under recovery at the end of the program recovery period addressed by the Commission

The rates so determined for the EVMR Program will be stated in whole \$0.00001 per kWh and whole \$0.01 per kW and will be filed on the Statement of Electric Vehicle Make-Ready Program Charges not less than fifteen days prior to a proposed change in rates. These rates will be applied to the energy (kWh) and demand (kW) deliveries on the bills of all customers served under Service Classification Nos. 1, 2, 3, 5, 6, 8, 9, 13, and 14, except that customers taking service under the provisions of General Information Sections 41 (Excelsior Jobs Program) and/or 45 (Empire Zone Rate) will be exempt from the EVMR Program factor on the portion of their load served under these programs. Customers taking service under Service Classification No. 14 will be billed the rate applicable to their Parent Service Classification, which is the Service Classification that the customer would otherwise qualify for based on the customer's usage characteristics, with the rate applied to demand-billed customers on a contract demand basis.

For billing purposes, cost recovery for non-demand customers will be included in the Miscellaneous Charges, with the combined amount shown as one line item on customer bills. Cost recovery for demand-billed customers will be through the Miscellaneous Charges II, a separate line item on customer bills.

SERVICE CLASSIFICATION NO. 2 (Cont'd)

GENERAL SERVICE (Cont'd)

SPECIAL PROVISIONS

- 2.1 A customer who takes service under this service classification that has EV charging sites will be eligible for the Demand Charge Rebate as follows: To be eligible for the Rebate, a customer with an EV charging site is required to have a Charging Ratio of 50 percent or greater. For customers that separately meter their EV load, the Charging Ratio will be equal to 100%. For all other Customers, the Charging Ratio is defined as the ratio of the sum of the EV charging capacity in kW to the sum of the maximum simultaneous demand of all load on the account in kW. The Charging Ratio shall be determined at the time of application and shall remain the Charging Ratio until such time that the Customer provides a new load letter with additional electrification plans; however, the Company reserves the right to re-evaluate the Charging Ratio and program eligibility subsequent to application for service. For Customers with a Charging Ratio of 50 percent or greater, the Rebate will be determined for each billing period by taking the billed Demand Delivery Charges times the Charging Ratio times 50%. Customers participating in the Company's DCFC per-plug incentive program will have a one-time option to either continue participating in the Program for the remainder of the Customer's eligibility period or to begin receiving the Rebate. The Rebate will remain available to eligible Customers until such time as the EV Phase-In Rate Solution as described in the Commission's orders in Case 22-E-0236 is made available to Customers.
- 2.2 Not in use.
- 2.3 Not in use.

SERVICE CLASSIFICATION NO. 3 (Cont'd)**LARGE POWER PRIMARY SERVICE (Cont'd)****METERING REQUIREMENT**

Customers taking service under this Special Provision must have in place an interval meter, and have telecommunications to the meter, that is compatible with the Company's MV-90 data acquisition system. On and after May 1, 2013, cellular communications to the meter will be installed by the Company for all new interval meter installations. Should the customer's premises not have adequate signal strength and require a dedicated phone line, the Company will arrange for the installation of, and be responsible for the ownership and maintenance of, a dedicated phone line. In addition to the monthly customer charge, customers will be assessed an incremental monthly charge of \$6.00 for customers where the Company has provided cellular communications to the meter. If a non-cellular enabled interval meter is installed and the customer's dedicated phone line is not installed or operational, for reasons not caused by the Company's equipment, when the Company attempts to read the meter, the customer shall be responsible for resolution of the problem, and the customer will be assessed an \$80.00 on-site meter reading charge each monthly cycle until the condition is corrected.

TERMS OF PAYMENT

Bills are due when personally served or three days after mailing. Bills shall be subject to a late payment charge in accordance with General Information, Section 16, if payment is not made by the date specified on the bill which date shall be not less than 20 days from the due date.

TERM

A minimum of one year from March 15, 1978, or from commencement of service under this classification after that date, and successive annual terms thereafter. A customer cannot resume service within one year at the same location under this classification if service has been taken during the intervening period under any other service classification.

SPECIAL PROVISIONS

The numbering of the paragraphs hereunder begins with the above service classification number.

- 3.1 A customer who takes service under this service classification that has EV charging sites will be eligible for the Demand Charge Rebate as follows: To be eligible for the Rebate, a customer with an EV charging site is required to have a Charging Ratio of 50 percent or greater. For customers that separately meter their EV load, the Charging Ratio will be equal to 100%. For all other Customers, the Charging Ratio is defined as the ratio of the sum of the EV charging capacity in kW to the sum of the maximum simultaneous demand of all load on the account in kW. The Charging Ratio shall be determined at the time of application and shall remain the Charging Ratio until such time that the Customer provides a new load letter with additional electrification plans; however, the Company reserves the right to re-evaluate the Charging Ratio and program eligibility subsequent to application for service. For Customers with a Charging Ratio of 50 percent or greater, the Rebate will be determined for each billing period by taking the billed Demand Delivery Charges times the Charging Ratio times 50%. Customers participating in the Company's DCFC per-plug incentive program will have a one-time option to either continue participating in the program for the remainder of the Customer's eligibility period or to begin receiving the Rebate. The Rebate will remain available to eligible Customers until such time as the EV Phase-In Rate Solution as described in the Commission's orders in Case 22-E-0236 is made available to Customers.

SERVICE CLASSIFICATION NO. 13 (Cont'd)

LARGE POWER SUBSTATION AND TRANSMISSION SERVICE (Cont'd)

SPECIAL PROVISIONS

The numbering of the paragraphs hereunder begins with the above service classification number.

13.1 A customer who takes service under this service classification that has EV charging sites will be eligible for the Demand Charge Rebate as follows: To be eligible for the Rebate, a customer with an EV charging site is required to have a Charging Ratio of 50 percent or greater. For customers that separately meter their EV load, the Charging Ratio will be equal to 100%. For all other Customers, the Charging Ratio is defined as the ratio of the sum of the EV charging capacity in kW to the sum of the maximum simultaneous demand of all load on the account in kW. The Charging Ratio shall be determined at the time of application and shall remain the Charging Ratio until such time that the Customer provides a new load letter with additional electrification plans; however, the Company reserves the right to re-evaluate the Charging Ratio and program eligibility subsequent to application for service. For Customers with a Charging Ratio of 50 percent or greater, the Rebate will be determined for each billing period by taking the billed Demand Delivery Charges times the Charging Ratio times 50%. Customers participating in the Company's DCFC per-plug incentive program will have a one-time option to either continue participating in the program for the remainder of the Customer's eligibility period or to begin receiving the Rebate. The Rebate will remain available to eligible Customers until such time as the EV Phase-In Rate Solution as described in the Commission's orders in Case 22-E-0236 is made available to Customers.

SERVICE CLASSIFICATION NO. 14 (Cont'd)

STANDBY SERVICE (Cont'd)

STANDBY SERVICE IS NOT APPLICABLE TO: (Cont'd)

Technologies Eligible Under Public Service Law (“PSL”) §66-j and §66-l:

With the exception of customers taking service under Special Provision 14.12, Standby service rates shall not apply to customers owning or operating electric generating equipment as defined in PSL §66-j and §66-l, up to the system size limits contained in General Information Section 48.B, when such customers are taking service under the provisions of General Information Section 37, 38, 46 or 48 and comply with the Standardized Interconnection Requirements set forth in the SIR-Addendum of this Rate Schedule.

Hybrid Facilities

Standby service shall not apply to customers who pair energy storage systems with eligible electric generating equipment that receive compensation under General Information Section 48.B for Hybrid Energy Storage.

Energy Storage

Standby service shall not apply to customers with energy storage systems with a maximum capability up to and including 1MW. Standby service shall also not apply to customers with energy storage systems with inverter capability greater than 1 MW and less than or equal to the sum of nameplate EV charging capability.

Emergency Generators

Standby service shall not apply to customers whose only generating units are emergency generators. For the purposes of this Service Classification, a generating unit must be designated in the customer's Application for Electric Standby Service with the Company as an emergency generator and must meet each of the following requirements to be considered an emergency generator:

- 1) the emergency generator is not capable of being operated in parallel with the Company's delivery system, except for closed-transition transfer switching where the term “closed-transition transfer” is characterized as a momentary make-before-break switching sequence, and
- 2) the emergency generator is used exclusively for purposes of supplying electrical power to the customer when electrical power is not available from the Company, and
- 3) no load is served by the emergency generator while electric service is available from the Company to the premises, except for regularly scheduled tests when the generator is required to operate under load or for NYISO Emergency Response Programs or for NYISO unforced capacity requirements for special case resources, and



CENTRAL HUDSON GAS & ELECTRIC IMMEDIATE SOLUTIONS IMPLEMENTATION PLAN

Filed December 1,
2023 Case 22-E-0236

Contents

| | |
|---|----|
| 0. Version Control | 3 |
| 1. Introduction | 4 |
| 1.1 Background and Summary of Order | 4 |
| 2. Immediate Solution | 4 |
| 2.1 Demand Charge Rebate Implementation | 4 |
| 2.1.1 Eligibility Criteria | 4 |
| 2.1.2 Incentive Structure..... | 5 |
| 2.1.3 Participation Requirements | 5 |
| 2.1.4 Program Timeline..... | 5 |
| 2.2 Program Marketing and Outreach..... | 5 |
| 2.2.1 Marketing, Outreach and Education..... | 6 |
| 2.3 Cost Estimate | 6 |
| 2.3.1 Cost Forecast..... | 6 |
| 2.3.2 Cost Recovery | 7 |
| 2.4 Accounting Details | 8 |
| 2.4.1 Expenditure Tracking | 8 |
| 2.5 Evaluation | 8 |
| 2.5.1 Overview | 8 |
| 2.6 Tariff Leaves..... | 9 |
| 2.6.1 Demand Charge Rebate | 9 |
| 2.6.2 Standby Exemptions | 9 |
| 3. Glossary: Abbreviations, Acronyms and Definitions | 9 |
| 4. Appendices | 11 |
| Appendix 1: Demand Charge Rebate Redline Draft Leaves | 11 |
| Appendix 2: Demand Charge Rebate Draft Leaves | 11 |

0. Version Control

| Revision Effective Date | Changes |
|-------------------------|---|
| 12/1/2023 | Modifications to be consistent with Order Implementing Immediate Solutions Programs |

1. Introduction

1.1 Background and Summary of Order

On January 19, 2023, the New York Public Service Commission (“PSC” or “Commission”) issued an Order¹ requiring the Joint Utilities² to implement Immediate Solutions to relieve operating costs for commercial electric vehicle (“EV”) charging customers, including a Demand Charge Rebate that provides a 50 percent rebate against traditional demand charges for public Direct Current Fast Charging (“DCFC”) sites. Additionally, the EV Rate Design Order requires that the Upstate Utilities³ offer the same rebate to all eligible commercial charging customers. The program will continue until the Order’s required Near-Term⁴ Solution becomes operational. This document details Central Hudson’s proposed implementation of the Immediate Solution.

2. Immediate Solution

2.1 Demand Charge Rebate Implementation

2.1.1 Eligibility Criteria

Central Hudson will establish eligibility for the rebate through the computation of a Charging Ratio, where the customer’s maximum EV charging capacity (in kW) is equal to or greater than 50% of their maximum site demand. For customers that separately meter their EV load, the Charging Ratio will be equal to 100%. For all other customers, the Charging Ratio is defined as the ratio of the sum of the EV charging capacity in kW to the sum of the maximum simultaneous demand of all load on the account in kW. The Charging Ratio shall be determined at the time of application and shall remain the Charging Ratio until such time that the Customer provides a new load letter; however, the Company reserves the right to re-evaluate the Charging Ratio and program eligibility subsequent to application for service. The customer’s maximum potential load will be defined by the customer’s load letter generated as part of new or additional electric service request. An updated load letter may be requested to establish eligibility for the program if the load letter on file is outdated. The Charging Ratio computation will be updated when a customer makes any changes to their loads (i.e., EV charging load, non-EV loads, or both).

¹ Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Vehicle Charging (EV Solution Proceeding), Order Establishing Framework for Alternatives to Traditional Demand-Based Rate Structures (issued January 19, 2023) (EV Rate Design Order or Order).

² The Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson or the Company), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange & Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation (RG&E).

³ The Upstate Utilities are Central Hudson, NYSEG, National Grid, and RG&E.

⁴ The Order adopts an EV Phase-In Rate as the Near-Term Solution p.31.

2.1.2 Incentive Structure

The rebate will be determined for each billing period by taking the billed Demand Delivery Charges multiplied by the Charging Ratio multiplied by 50%. There will be no rebate against surcharges or supply charges that are billed on a per-kW basis. The rebate amount will be listed as a bill credit under the Payments and Adjustments section on a customer's monthly statement. This will allow customers to easily identify the rebate amount and period. Below is a visual meant to show where a customer may expect to view the Demand Charge Rebate on their bill.⁵

| Electricity Used | | 14160 | 43.2 |
|--|--------------------------|------------|-------------------|
| Cost for Electricity Delivered (for 1.0 months) | | | |
| Basic Service Charge | 1.0 Mos. @ | 100.00000 | 100.00 |
| Delivery Svc Chg | 14160 kWh @ | 0.00424 | 60.04 |
| MFC Admin Chg | 14160 kWh @ | 0.00010 | 1.42 |
| Transition Adj | 14160 kWh @ | 0.00009 | 1.28 |
| Bill Credit | 14160 kWh @ | 0.00033 | 4.68 |
| SBC/RPS Chgs | 14160 kWh @ | 0.00633 | 89.64 |
| Misc. Charges | 14160 kWh @ | -0.02018 | -285.73 |
| RDM Chg | 14160 kWh @ | 0.00329 | 46.58 |
| Demand charge | 43.2 KW @ 11.91991 X 1.0 | | 514.94 |
| MISC II | 43.2 KW @ 0.87894 X 1.0 | | 37.97 |
| NYS & Local Taxes | | | 0.58 |
| Sales Tax | @ 8.125% | | 46.31 |
| Total Electric Delivery Charges: | | | \$617.71 |
| Electric Supplier Info - RATE E002 | | | |
| ELECTRIC SUPPLY ACCOUNT NO: 902705 | | | |
| Your Electric Supplier is IDT ENERGY INC. | | | |
| 520 BROAD STREET NEWARK NJ 07102 | | | |
| For Electric supply pricing information, call 877-887-6866 | | | |
| Cost for Electricity Supply | | | |
| Electric Supply Chg | 14160 kWh @ | 0.18000 | 2,548.80 |
| Sales Tax | @ 8.125% | | 207.20 |
| Total Electricity Supply Charges | | | \$2,756.00 |
| IDT Energy Customer Service hours are Monday thru Friday, 9am to 5pm EST. Call toll Free - 1-877-887-6866. | | | |
| Payments and Adjustments | | | |
| CENTRAL HUDSON | | | |
| EV Demand Credit | | 03/07/2023 | \$-257.47 |
| Payment Received | | 02/22/2023 | \$1,687.12 |

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2.1.3 Participation Requirements

Interested participants can apply for the Demand Charge Rebate by downloading an application from the Company website. The application includes the applicant's name, contact information, EV site documentation including receipts or invoices as well as proof of the installation from a certified electrician. The Company will determine acceptance, calculate the customer's Charging Ratio, and communicate these results to the Customer.

2.1.4 Program Timeline

Central Hudson plans to begin accepting applications for the Demand Charge Rebate on January 19, 2024. The Demand Charge Rebate will remain available to eligible Customers until such time as the EV Phase-In Rate, as described in the Commission's January 19, 2023 EV Rate Design Order, is made available.

2.2 Program Marketing and Outreach

⁵ The visual is an illustrative example and the actual description may differ.

2.2.1 Marketing, Outreach and Education

Outreach and education are central to the success of the Demand Charge Rebate. Central Hudson regularly communicates with its customers about EVs through a range of channels, including e-newsletters, social media, events, press releases, websites, direct mail, and advertisements.

Central Hudson will primarily focus on two core audiences to identify potential participants: 1) Make-Ready Participants; and 2) EV project developers and other stakeholders.

Make-Ready Participant Outreach

Central Hudson will conduct an outreach campaign targeted at Make-Ready program participants. Tactics include direct mail, personal outreach, bill inserts or flyers. Through these various outreach tactics, Central Hudson will direct customers to program information on the Company website where they may learn more about the program and obtain a copy of the application.

EV Project Developers and Stakeholder Outreach

Other key audiences that Central Hudson will seek to engage are project developers and other stakeholders who populate the New York EV charging industry. Central Hudson will leverage existing outreach efforts with Make-Ready trade allies and developers to incorporate information about the launch of the Demand Charge Rebate program. This includes frequently-asked-questions guides and webinars about the application process. Through these various entry points, Central Hudson will direct EV project developers and other interested parties to the Demand Charge Rebate program information on its website.

Per-Plug Incentive Participant Outreach

Existing Per-Plug Incentive (PPI) program participants will be given a 60-day election period to choose between remaining in the PPI program or switching to the Demand Charge Rebate, beginning November 20, 2023.

Central Hudson is in the process of conducting outreach via phone and follow-up email. This outreach includes at least two attempts to contact participants via email, and at least one attempt to contact participants via phone. If an existing PPI program participant fails to respond to these attempts by the end of the 60-day window, the Company will infer that the participant chooses to continue participation in the PPI Program.

2.3 Cost Estimate

2.3.1 Cost Forecast

To estimate the cost required to support the Demand Charge Rebate program, Central Hudson analyzed Make-Ready program participants and their corresponding onsite electricity usage data. To qualify for the program, a 50% charging ratio must be achieved, meaning that the charger rating must be greater than or equal to 50% of the maximum demand at the site as described previously.

A low cost estimate was calculated by summing the average monthly maximum demand multiplied by the calculated charging ratio, then multiplied by the matched electricity demand charge rate by site, multiplied by the 50% rebate. If there was no utility data, then the EVSE capacity was used as a proxy of the monthly maximum demand multiplied by an 80% peak demand coincidence rate.

A high cost estimate was calculated by taking the higher kW value of either the max demand throughout the 12-month period by site or the total EVSE capacity onsite.

To account for costs from future plug growth, Central Hudson’s Make-Ready Program project pipeline was used as a baseline. The Company developed a monthly cost-per-plug by dividing the number of plugs estimated to be complete through 2025 by the estimated monthly rebate calculated in the analysis of Make-Ready Program data described above.

To calculate the estimated total cost of the Demand Charge Rebate, Central Hudson averaged the low and high ranges of the forecast and assumed a 16-month program time period. Total costs include Demand Charge Rebate incentive costs and Implementation and Administration costs, which consist of:

- Marketing: Any costs by the company in marketing the Demand Charge Rebate program, including flyers, brochures, email outreach etc.
- Program Administration: Internal staffing needs.
- IT Requirements: Costs associated with upgrading billing software to allow for the Demand Charge Rebate program to function.
- Evaluation: Costs associated with hiring a third party to review the Demand Charge Rebate and provide any recommendations once there is experience to evaluate.

| Estimated Total Cost⁷ | |
|---|------------------|
| Demand Charge Rebate | \$550,00 |
| Implementation & Administration Costs | \$87,000 |
| Total Estimated Demand Charge Rebate | \$637,000 |

2.3.2 Cost Recovery

⁷ Cost estimates are based on projected participation and charging station utilization which are subject to change

Central Hudson will recover Demand Charge Rebate costs from all delivery customers on a one-year lag basis through the existing EV Make-Ready surcharge mechanism, with costs allocated among service classes using the transmission and distribution revenues allocator, recovered on a per-kW basis for demand-billed customers and on a per-kWh basis for non-demand billed customers. This is further detailed in the accompanying draft tariff leaves included as Appendix 1. Central Hudson proposes to recover the incremental labor costs associated with the Demand Charge Rebate through the EV Make-Ready surcharge.

2.4 Accounting Details

2.4.1 Expenditure Tracking

Central Hudson plans to issue Demand Charge Rebates via bill credits, which will be deferred as a regulatory asset in Work Order 3900A (182.94) with carrying charges at the utility's pretax overall weighted average cost of capital which will be accrued in WO 3902A (182.98). The recovery of the annual portions will be through the EV Make Ready surcharge mechanism and will be recorded under Work Order 3901A (182.94), allocated to all customers using the transmission and distribution revenues allocator, and recovered from demand-billed customers on a per-kW demand basis, and from non-demand billed customers on a per-kWh energy basis.

2.5 Evaluation

2.5.1 Overview

Central Hudson will work with an independent third-party evaluation vendor to review program performance, including assessments as directed in the Order.⁸ At a minimum, the evaluation will:

1. Assess the impact of the Demand Charge Rebate on deployment of EV charging;
2. Assess the costs and benefits of the program and their impacts on low- and moderate-income customers and Disadvantaged Community residents; and
3. Identify lessons learned from program implementation.

Central Hudson will seek to balance evaluation cost with a reasonable level of evaluation rigor, considering the ease in accessing data for analysis, the level of confidence provided by analysis activities, the cost of analysis activities, and the size and influence of the program. Central Hudson will work with the evaluation vendor to design a final evaluation plan; activities may include those listed in the table below.

| Evaluation Objectives | Possible Data Collection and Analysis Tasks |
|-----------------------|---|
|-----------------------|---|

⁸ Order, pp. 40-41.

| | |
|--|--|
| Assess impact on deployment of EV charging. | <ul style="list-style-type: none"> · Market research · Program data review · Participant interviews |
| Assess costs and benefits and their impact on LMI customers and DAC residents. | <ul style="list-style-type: none"> · Market research · Project mapping · Program data review · Participant interviews · Cost and benefit analysis |
| Identify lessons learned. | <ul style="list-style-type: none"> · Market research · Program data review · Program materials review · Participant interviews |

2.6 Tariff Leaves

2.6.1 Demand Charge Rebate

As directed in the EV Rate Design Order, the Company has included draft tariff leaves to address customer eligibility for the Demand Charge Rebate. Redlined and clean copies of the necessary draft tariff leaves are included as Appendices 1 and 2, respectively.

2.6.2 Standby Exemptions

As directed in the EV Rate Design Order, customers with energy storage systems with inverter capability greater than one megawatt and less than or equal to the sum of nameplate EV charging capability will be exempt from standby rates, provided that such installations meet all other applicable interconnection and standby service requirements. Redlined and clean copies of the draft tariff leaves necessary to implement this exemption are included as Appendices 1 and 2, respectively.

3. Glossary: Abbreviations, Acronyms and Definitions

| | |
|-----------------------------|---|
| Applicant | Any entity who has submitted program registration details to Central Hudson but has not yet been accepted. |
| Application Portal | Customer facing portal to be used for application and program details |
| Approved Contractor | An entity that has been approved by Demand Side Management to work at Central Hudson. |
| CLCPA | Climate Leadership and Community Protection Act |
| Commission or PSC | New York Public Service Commission |
| Company | Central Hudson Gas & Electric Corp. (Central Hudson) |
| Customer | A person or organization that is billed for Central Hudson electric service |
| DCFC | Direct Current Fast Charger. Electric vehicle chargers characterized by its improved charging capability vs. Level 2 (L2) chargers. |
| EV | Electric Vehicle. Any zero- or plug-in-hybrid electric vehicle, as defined by the New York State Department of Transportation. Any plug-in electric vehicle (BEV or PHEV). |
| EVSE | Electric Vehicle Supply Equipment. Electrical conductors, related equipment, software, and communications protocols that deliver energy efficiently and safely to the vehicle. EVSE includes L1, L2 (208/240V) and DCFC (480 V) chargers. And communicates charge data via Wi-Fi or a cellular connection. |
| Joint Utilities | Joint Utilities of New York, a consortium of energy service providers who frequently collaborate on state programs. |
| L2 | Level Two electric supply equipment, generally defined as offering between 7.5-20kW of charging capability. |
| LD | Light-duty vehicles defined as class 1-2 by the US Department of Transportation with a gross vehicle weight under 10,000 lbs. |
| MRP | Make-Ready Program to support the development of electric infrastructure and equipment necessary to accommodate an increased deployment of EVs within New York State by reducing the upfront costs of building charging stations. |
| Managed Charging Program | A utility managed charging program offers participants financial rewards for adopting grid-beneficial behavior. Can be active, where customer behavior is driven in response to direct utility signals, or passive, where the customer is free to participate or not based on their response to a price signal. |
| MHDV | Medium- and heavy-duty vehicles. Defined as vehicles that fall into US Department of Transportation's vehicle classes 3-8 and with a gross vehicle weight of over 10,000 lbs. |
| Participant | Any accepted applicant participating in and/or receiving program incentives. |
| Service Classification (SC) | Service class. Electric service delivered under one of Central Hudson's tariffs, as filed with the PSC. |
| Staff | Staff of the Department of Public Service. |

4. Appendices

Appendix 1: Demand Charge Rebate Redline Draft Leaves

Appendix 2: Demand Charge Rebate Draft Leaves