

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

Proceeding on Motion of the Commission )  
Regarding Electric Vehicle Supply )  
Equipment and Infrastructure )

Case 18-E-0138

**JOINT UTILITIES' PETITION TO EXTEND THE MANAGED CHARGING  
PROGRAMS**

To promote grid beneficial charging behavior and expand grid flexibility, the New York State Public Service Commission's (Commission) July 2022 *Managed Charging Programs* Order<sup>1</sup> requires the Joint Utilities<sup>2</sup> to implement Managed Charging Programs (Programs) for light-duty electric vehicle (EV) drivers.<sup>3</sup> Absent a new Commission authorization, the Programs will expire at the end of 2025. To continue building on program successes, the Joint Utilities seek Commission approval to:

- 1) Continue the Programs through 2026 and initiate a process to reauthorize the Programs beyond 2026, and
- 2) Shift portions of O&R's incentive budget for implementation and enrollment.

Extending the Programs (and approving an O&R funding reallocation) will: (1) maintain Program stability to prevent near- and long-term gaps in program benefits to participants and (2) allow for the development of additional information on matters such as program design,

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<sup>1</sup> Case 18-E-0138, Proceeding on the Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, *Order Approving Managed Charging Programs with Modifications* (issued July 14, 2022) ("Order").

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

<sup>3</sup> The managed charging programs primarily focus on residential EV drivers. Con Edison's program also includes light-duty commercial fleets.

customer participation, and technology capabilities, to refine the Programs. First, it is important to avoid a pause or disruption in the Programs to maintain momentum and provide stability for participating customers. The Programs' participants have high overnight or off-peak charging usage rates and benefit from the Programs' incentives. Continuation of the Programs, both in the near- and long-term, will build on these successes, whereas a pause could lead to reduced enrollment and unbalanced customer experiences. Second, additional time will offer utilities more learnings to improve the Programs and reach more customers.

Under the Order, the Joint Utilities developed managed charging programs, including Central Hudson's EV ChargeSmart Program, Con Edison and O&R's SmartCharge New York Program, National Grid's EV Charge Smart Plan, and NYSEG and RG&E's OptimizEV, which have been available for approximately two years. These Programs promote grid beneficial charging behavior, thereby reducing EV demand at peak times by shifting EV charging to off-peak and overnight hours. The Programs have achieved grid beneficial charging with an average of about 80 percent of participants charging off-peak<sup>4</sup> across the utilities (*see* Appendix 2 for details). Enrollment across all programs has also been steadily increasing; Con Edison and O&R have longer running programs, reaching approximately 25 percent and 45 percent enrollment of EVs in their service territories, respectively.<sup>5</sup> During this time, the Joint Utilities have been developing expertise and data necessary for continued Program improvements.<sup>6</sup>

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<sup>4</sup> Off-peak hours vary across the utilities.

<sup>5</sup> Con Edison has a managed charging EAM authorized from 2023-2025 and O&R for 2025-2027. The EAMs encourage utilities to increase enrollment while maintaining strong peak avoidance. In 2023, Con Edison did not earn the EAM; 2024 EAM achievement will be reported in June 2025. Central Hudson, National Grid, NYSEG, and RG&E do not currently have approved managed charging EAMs.

<sup>6</sup> Through their respective programs, the Joint Utilities have developed expertise and data on program design, efficacy of enrollment efforts, driver participation, technology capabilities, and charging behavior.

## **Petition Proposal Components**

To enable continued success of the Programs, the Joint Utilities petition proposal has two components.

### **Proposal Component #1: Reauthorize Programs and Allow for Continued Implementation**

The Joint Utilities request the Commission to: (1) extend the Programs until they are reauthorized to prevent any gaps in program implementation,<sup>7</sup> and (2) initiate a managed charging program reauthorization process after Managed Charging Implementation Plans are filed by January 30, 2026. Absent this authorization, the Programs will not continue.<sup>8</sup> Pausing the programs might lead to decreases in enrollment and participation. A programmatic break would result in customer and market uncertainty, impacting enrollment and charging behavior of both new and existing customers. For example, participants in the Con Edison prior Smart Charge program that ended in 2022 and started in 2023 were required to reconnect to the platform; this decreased enrollment from about 24 percent to 16 percent of EVs in the service territory (*see* Appendix 5).

Moreover, the managed charging programs have encouraged EV drivers to charge during off-peak hours, and a pause could shift EV charging to peak times absent an incentive.<sup>9</sup> Continuation of the Programs will allow the Joint Utilities to grow managed charging, rather than facing a period without the program and then needing to spend time recovering lost

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<sup>7</sup> During the extension period, utilities ask that cost recovery for implementation and enrollment incentive program costs remain consistent with the Order to be recovered through the EV Make-Ready surcharge during the subsequent program year.

<sup>8</sup> In this case, if the program ceases, the incentives will end, enrollment will cease and there will be no participants.

<sup>9</sup> In Con Edison and O&R's service territories, utilities with longer running managed charging programs, enrollment in SmartCharge New York is higher than in time of use rates (*see* Appendix 5 for details).

enrollment and reiterating efforts to influence charging behavior of customers who reverted to charging during peak times.

Managed charging programs help advance New York State climate policy goals by increasing value streams, and as EV adoption continues to scale, adds to grid flexibility. The Commission concluded in its most recent Managed Charging Order that these Programs encourage behaviors critical to advancing the State’s clean energy and infrastructure goals.<sup>10</sup> The Programs’ potential value will grow with statewide EV adoption rates and as EV owners learn to charge off-peak. Continuing to understand how to best influence drivers will provide a pathway for future managed charging programs and continuous implementation will support New York State policy goals while benefiting customers.

Additional time allows utilities to continue to gather insights to improve the Programs, especially as some Programs are in early implementation. Already, utilities have incorporated measures shaped by early lessons from the programs, including developing effective marketing and outreach strategies to increase enrollment; working with implementation vendors to overcome technology challenges and build pathways for more devices (*e.g.*, telematics and chargers) to participate in the Programs; and modifying Program design to increase customer accessibility.

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<sup>10</sup> Case18-E-0138, Proceeding on the Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, *Order Approving Modifications to Managed Charging Programs and Making Tariffs Permanent* (issued June 21, 2024)

## **Proposal Component #2: Shift Part of O&R's Incentive Budget to Implementation and Enrollment**

To sustain its current enrollment efforts, O&R requests approval to shift \$600,000 from its Incentive budget to its Implementation and Enrollment budget. O&R is not requesting any additional funding for the program, but needs the flexibility to transfer funds between budgets to maintain its success in enrolling and serving customers.<sup>11</sup> Thus far, O&R has (1) a 45 percent enrollment level, which is above the 25 percent target, and (2) an 85 percent customer satisfaction rate, which is above the 75 percent target. O&R has achieved this success through outreach and education about SmartCharge New York, including advertisements and web ads. Absent authority to shift funds to its Implementation and Enrollment budget, O&R would be required to ramp down marketing efforts, potentially leading to a plateau in EV driver enrollment and a decrease in enrollment rate.

### **Conclusion**

The Joint Utilities request that the Commission approve the proposal to (1) initiate a process to reauthorize the Programs in 2026 and extend the managed charging Programs under the current Order until that reauthorization, and (2) shift Incentive budget for Implementation and Enrollment for O&R.

Date: April 9, 2025

Respectfully submitted,

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<sup>11</sup> For O&R, the Commission approved a July 2022 to December 2025 budget of \$14 million, including \$8.2 million for Incentives and \$5.8 million for Implementation and enrollment efforts. To fund the program for an additional year, O&R requests permission to use a portion of the authorized funds for incentives on implementation and enrollment. Central Hudson, Con Edison, National Grid, NYSEG, and RG&E have sufficient budgets authorized under the Order to continue their respective programs through the extension period (*see* Appendix 4 for details).

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## Appendix 1. Joint Utilities' Program Enrollments by Month

The table below shows each utility's program enrollment numbers by month through February 2025. The monthly enrollment numbers reflect incremental data, whereas the totals represent cumulative values.

	2023												Total
	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	
Central Hudson	-	-	-	-	-	-	-	-	-	-	3	8	11
Con Edison	4,284	901	344	1,013	809	915	661	621	650	635	809	944	12,586
National Grid	-	-	-	-	-	-	26	30	24	25	23	31	159
NYSEG	-	-	-	-	-	-	1	5	10	10	23	24	73
O&R	-	-	-	478	217	157	170	201	127	156	120	147	1,773
RGE	-	-	-	-	-	-	3	12	5	18	17	19	74

	2024												Total
	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	
Central Hudson	27	15	17	13	44	34	22	26	27	26	15	66	343
Con Edison	1,112	947	758	955	869	871	944	1,338	1,034	767	696	673	23,550
National Grid	26	27	34	27	17	33	9	50	292	123	427	334	1,226*
NYSEG	46	38	32	34	35	39	49	44	45	83	117	42	677
O&R	128	135	204	135	213	237	236	247	230	266	274	273	4,351
RGE	20	20	15	28	28	20	38	28	26	75	90	48	510

\*National Grid's total includes Phase II only (Aug – Dec 2024)

	2025		Total
	Jan	Feb	
Central Hudson	35	35	413
Con Edison	720	655	24,925
National Grid	232	158	1,616
NYSEG	73	80	830
O&R	238	213	4,728
RGE	54	37	601

## Appendix 2. Joint Utilities' Participant Charging Behavior

The table below shows the percent of off-peak charging in 2024 by utility. Percent off-peak charging was calculated using aggregated kWh consumption data for on- and off-peak periods.

Utility	Percent Off-Peak Charging
Central Hudson	93%
Con Edison	62%
National Grid	86%
NYSEG	76%
O&R	70%
RGE	89%

## Appendix 3. Joint Utilities' Program Participant Attrition by Reason

The table below shows the number of participants who dropped out of the program by utility and reason, if provided.

	Device connection issues	Not enough monetary incentive	Got rid of vehicle enrolled in the program	Other	Unknown	Total
Central Hudson	5			2		7
Con Edison			333		279	612*
National Grid	23	11		5	6	44**
NYSEG	2			3	18	23
O&R					91	91
RGE	1			1	15	17

\*Count of vehicles that are no longer supported or asked to be removed from the program.

\*\*National Grid's total includes Phase II only (Aug – Dec 2024).



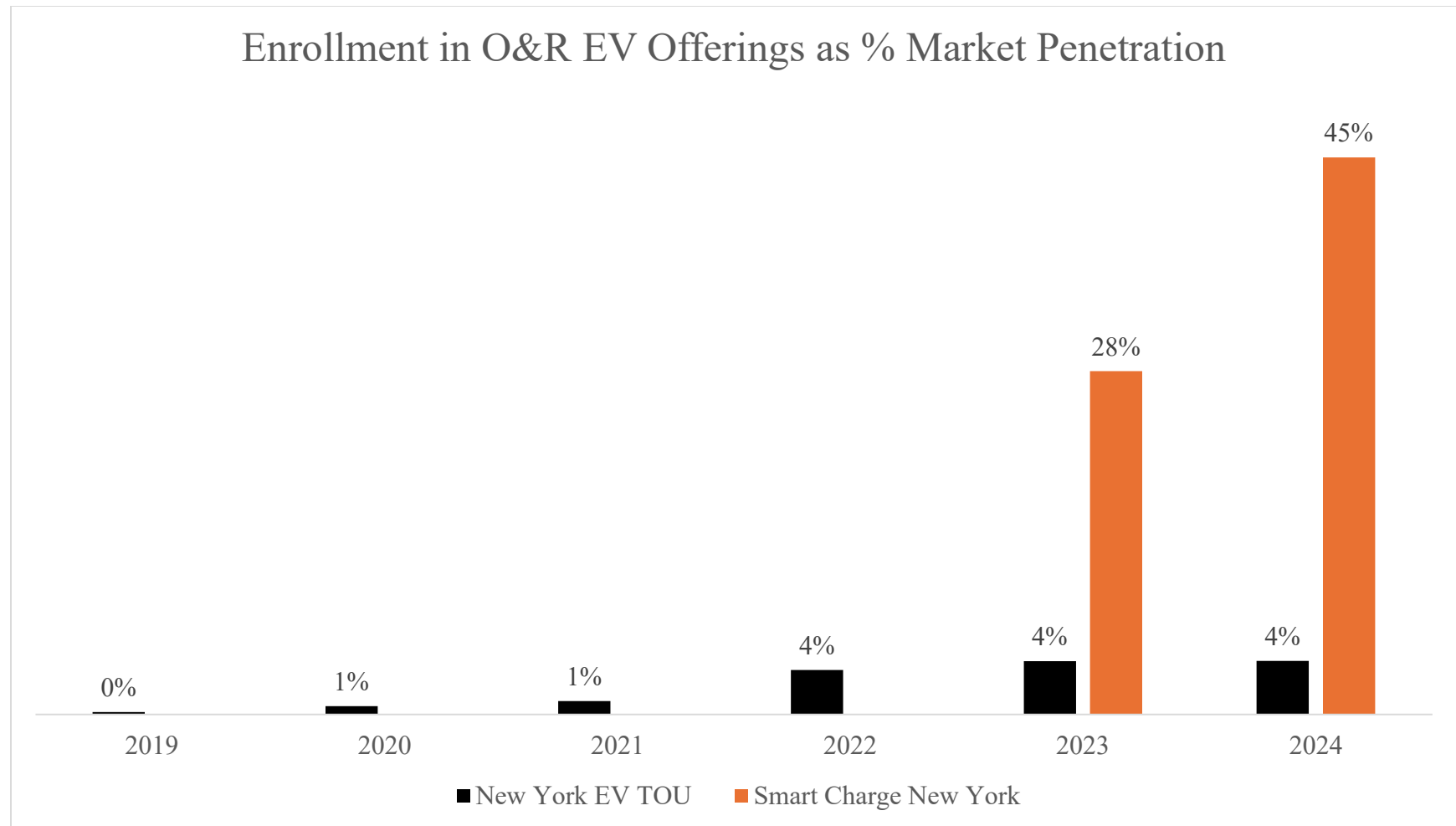
**Appendix 4. Joint Utilities' Program Budget Availability**

The table below shows the approved and forecasted remaining implementation and enrollment budget after 2025 for each utility.

Utility	Implementation & Enrollment Budget	
	Approved budget	Forecasted remaining budget after 2025
Central Hudson	\$4,519,282	\$1,091,197
Con Edison	\$30,950,067	\$17,150,067
National Grid	\$29,068,474	\$23,138,659
NYSEG	\$18,817,422	\$16,624,824
O&R	\$5,788,333	\$1,188,333
RGE	\$9,004,806	\$7,892,072

## Appendix 5. Managed Charging Versus Time-of-use Rate Enrollment

The graphs below present enrollment data as a percentage of market penetration for O&R's and Con Edison's managed charging program and time of use rates, the longest running managed charging programs in the State.



Enrollment in Con Edison Offering as % Market Penetration

