

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on September 18, 2025

COMMISSIONERS PRESENT:

Rory M. Christian, Chair
James S. Alesi
David J. Valesky
John B. Maggiore
Uchenna S. Bright
Denise M. Sheehan, recusing
Radina R. Valova, recusing

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

ORDER ADOPTING PROPOSAL FOR
QUEUE MANAGEMENT WITH MODIFICATIONS

(Issued and Effective September 19, 2025)

BY THE COMMISSION:

INTRODUCTION

In the Midpoint Order, the Public Service Commission (Commission) directed Department of Public Service (DPS) staff to initiate the Electric Vehicle (EV) Infrastructure Interconnection Working Group (EVIIWG).¹ The Commission convened the EVIIWG to address the issues of transparency, queue backlog, wait times, and application development related to EV chargers.²

¹ Case 18-E-0138, Ordering Approving Midpoint Review Whitepaper's Recommendations with Modifications (issued November 16, 2023) (Midpoint Order).

² Id., p. 28.

In compliance with the Midpoint Order, DPS staff initiated the EVIIWG on March 15, 2024.³

The EVIIWG collectively developed the Electric Vehicle Application Queue Management Proposal (EV Queue Management Proposal or Proposal), which was filed on April 14, 2025. The EV Queue Management Proposal is a comprehensive document that reflects the differences in EV application queue management that exists between the upstate and downstate utilities.

By this Order, the Commission adopts the EV Queue Management Proposal, with the modifications described in the Discussion section as the EV Applications Queue Management Manual (the Manual). Furthermore, this Order directs DPS staff to advance a solution that could thoroughly and systematically address the topics identified by the EVIIWG that are outside the scope of the Commission's initial directives for the EVIIWG but are nevertheless significant to the development of EV charging infrastructure. This Order also addresses those interconnection topics identified in Appendix C of the EV Queue Management Proposal.

BACKGROUND

The Commission, in the Midpoint Order, directed DPS staff to commence a "[s]takeholder process [that] shall address and advance, among other issues, transparency, the queue backlog, wait times, and application development."⁴ The Midpoint Order additionally established that the goal of the stakeholder process is to develop "a standard process for the interconnection applications [that] may shorten, and ideally

³ Case 18-E-0138, Matter 24-00339, Electric Vehicle Infrastructure Interconnection Working Group Initiation Letter (filed March 15, 2024).

⁴ Midpoint Order, p. 28.

streamline, the intake of applications that are driven by electrification and the CLCPA.”⁵ Because of its ongoing work on interconnection and transparency issues, the Commission directed Consolidated Edison Company of New York, Inc. (Con Edison) to submit a straw proposal describing the efforts put forth in streamlining their queue management system for consideration and further development by the EVIIWG.⁶ In compliance with the Commission’s directive, Con Edison filed the Straw Proposal on March 15, 2024.⁷

Following the introduction of the Straw Proposal, the EVIIWG has met a total of ten times; recordings of the meetings can be found on the Department’s Document and Matter Management System (DMM) as well as the EVIIWG webpage.⁸ The EVIIWG meetings featured a combination of presentations from stakeholders and discussions of proposed and actualized modifications to the Straw Proposal. Outside of meetings, DPS staff involved with the EVIIWG also compiled comments submitted by stakeholders addressing the modifications to the Straw Proposal, which became the Queue Management Proposal. The comments submitted by stakeholders during the development of the Queue Management Proposal are attached to this Order as the Appendix.

Furthermore, during the course of its meetings, the EVIIWG identified a list of topics for Commission consideration that were outside of the scope of the directives from the

⁵ Id., p. 28.

⁶ Id., p. 29.

⁷ Case 18-E-0138, Con Edison Queue Management Straw Proposal for EVIIWG (filed March 15, 2024) (Straw Proposal).

⁸ Case 18-E-0138, Matter Number 24-00339, and <https://dps.ny.gov/electric-vehicle-infrastructure-and-interconnection-working-group-eviiwg>.

Midpoint Order but are nevertheless related and important to EV charging infrastructure.

THE PROPOSAL

The EV Queue Management Proposal provides a comprehensive framework of best practices for utilities to manage application queues related to the Commission's Make-Ready programs. The Proposal represents a collaborative effort between the Joint Utilities, DPS staff, and EVIIWG stakeholders, that is built upon Con Edison's Straw Proposal. The Proposal is intended to facilitate EV application interconnection queue and manage application surges across New York State utilities.

The Proposal focuses on application queue management for load only EV charging projects and outlines four primary methods informed by four guiding principles for the utilities to streamline its queue management practices. The four methods for streamlining queue management are: 1) operational measures; 2) participant informational tools for pre-engagement, planning, and project management; 3) participant communication strategies; and 4) utility-enterprise alignment. The four guiding principles are: 1) speed to goal; 2) flexibility and innovation; 3) participant experience; and 4) transparency. The Proposal recognizes that utilities may vary application of the best practices in accordance with the volume of applications that are received.

The operational measures described in the Proposal are intended to promote fairness and transparency, thus fostering a predictable participant experience. The operational measures described in the Proposal include a cancellation policy as well as methodology for putting a project "on-hold" rather than cancelling. The Proposal also suggests standardization in the process, including for correspondence and disputes.

To manage the Make-Ready Program application queue during high-volume application periods, the Proposal identifies several best practices. These best practices include sequencing of eligibility review and prioritization of multiple projects from the same participants. The Proposal identifies operational innovations that have already been implemented by some of the utilities and suggests the implementation of these innovations statewide. These operational innovations include identifying areas of flexibility across a participant's portfolio, matching the timeline to a participant's pace, and supporting strategies to deploy chargers at sites with limited hosting capacity.

Regarding participant informational tools for pre-engagement, planning, and management, the Proposal suggests best practices that could be implemented statewide. The Proposal notes that the costs for these services have not yet been analyzed by the utilities. The Proposal suggests expanding advisory services in order to improve pre-application preparation, which would, in turn reduce timelines. To reduce load on the utilities, the Proposal notes that participants can use self-service tools to help plan for their projects. This information is available to participants in a Make-Ready Program Participant Portal. Finally, the Proposal suggests publishing a flow diagram indicating which steps are owned by the participant and which are owned by the utility.

To assist in delivering a positive participant experience, the Proposal outlines Participant Communication strategies. These strategies focus on providing more information to participants and include publishing a refreshed budget and plug tracker, providing participants with educational opportunities regarding programmatic updates. Additionally, on an individual level, the Proposal suggests communicating a

timeline for each individual project and explaining participant-dependent deadlines to ameliorate resource allocation concerns.

The strategies outlined in the Utility Enterprise Alignment section focus on speed and flexibility. If a participant modifies the proposed project, the Proposal suggests that utilities should provide an updated timeline.

NOTICE OF PROPOSED RULE MAKING

Pursuant to the State Administrative Procedure Act (SAPA) §202(1), a Notice of Proposed Rulemaking (Notice) was published in the State Register on May 7, 2025 [SAPA No. 18-E-0138SP18]. The time for submission of comments pursuant to the Notice expired on July 7, 2025. The Commission received four sets of comments in response to the Notice. The comments received are addressed below.

COMMENTS

Environmental Defense Fund (EDF) and CALSTART, Inc. (CALSTART)

EDF and CALSTART emphasize the importance of an efficient and effective queue management process, particularly because charging installations will become more difficult and complex as the projects progress to sites that likely have lower utilization, as well as grid capacity and infrastructure requirements issues. EDF and CALSTART recommend, if the [Queue Management Proposal] is adopted, the best practices should be considered standard procedures and represent baseline expectations. EDF and CALSTART further recommend continuing with the EVIIWG stating that more work is required. They propose the EVIIWG undertake these next steps:

- standardize use of the best practices, including phased interconnection, laid out in the [Queue Management Proposal];

- continue the work of the EVIIWG to address EV charging-specific interconnection challenges; and
- expand the scope of the Interconnection Technical Working Group (ITWG) to address challenges and opportunities relevant to load interconnection generally.

EDF and CALSTART advocate for standardizing the best practices across all utilities and state that the [Queue Management Proposal] is currently insufficient as it does not require the implementation of phased interconnection solutions. EDF and CALSTART accentuate the important role phased interconnection plays in the interconnection process as it provides significant customer benefits with few operational changes required of the utility. EDF and CALSTART assert that phased interconnection is well within the scope of the EVIIWG and urges that the discussion continue within that group.

In addition to the continued phased interconnection discussion, EDF and CALSTART suggest the EVIIWG include other topics, such as the charging hardware interoperability and accessibility, including plug type, charger design, charging adapters, and charging software standards. EDF and CALSTART recommend that the Commission direct the EVIIWG to combine with the Technical Standards Working Group (TSWG), which is considering metering and testing standards for the accuracy of EV charging equipment. EDF and CALSTART also state that the EVIIWG is well situated to delve into discussions regarding vehicle-to-grid interconnection (V2G).

Additionally, EDF and CALSTART propose expanding the scope of the ITWG, stating that a collaborative approach is needed to address load interconnection topics beyond EV charging by including all load interconnection topics.

Interstate Renewable Energy Council (IREC)

In its comments, IREC proposes four recommendations: 1) amend the [Queue Management Proposal] to improve the document's usefulness to customers, 2) consider addressing other topics that could improve the energization process, 3) develop energization process standards that include timeline tracking and reporting, and 4) address flexible service connection via either the EVIIWG or the formation of another working group.

IREC proposes amending the [Queue Management Proposal] so that the practices listed would provide additional clarity for participants. Specifically, the [Queue Management Proposal] should be edited to classify strategies as either currently in effect, under development, or optional. For any strategies identified as being under development, a date should be provided as to when implementation will begin. IREC states that being clear allows stakeholders to understand how the strategies are being applied across the state. Furthermore, IREC asserts that providing clarity creates greater accountability and consistency. IREC proposes that the [Queue Management Proposal] should do three things. First, it should clearly standardize the set of required practices: identify which strategies must be implemented by all utilities and under what conditions (e.g., upon reaching a certain application volume threshold). Second, it should provide a utility-by-utility implementation matrix: include a table or appendix listing each utility alongside each strategy and indicating whether the strategy is: a) currently implemented; b) planned for future implementation (with target date); or c) optional or conditional (e.g., based on additional funding or volume of applications). Third, it should include implementation timelines for in-progress strategies: for practices still under development, such as cancellation policies, the [Queue Management Proposal] should include a

target date by which each utility is expected to complete implementation.

IREC proposes that each utility identify whether it offers phased connection. IREC states that EVIIWG stakeholders requested the inclusion of phased connections, maintaining that it can improve the economic viability of a project by allowing partial energization by way of using available capacity until grid upgrades are completed. IREC emphasizes that the [Queue Management Proposal] should include clear guidance to participants on the availability of phased connection for all utilities. IREC recommends defining the term "phased interconnection," and outlining the phases of the connection process in the definitions section of the [Queue Management Proposal]. IREC asserts that phased connection should be a standard option for participants that can be utilized when a service connection request requires a distribution grid upgrade.

IREC proposes that the EVIIWG should continue meeting to develop a standardized process for EV interconnection, highlighting that standardized processes improve transparency and set clear expectations for both participants and utilities. IREC stresses the importance of avoiding ambiguity by providing detailed process steps, determining responsibilities and defining timelines, doing so minimizes the potential for disparate treatment and provides greater certainty when navigating the interconnection process and recommends a process like New York's Standardized Interconnection Requirements (SIR).⁹ IREC proposes a topical outline for the continuation of the EVIIWG meetings stating that following this outline would offer

⁹ Distributed Generation Information, NYS Standardized Interconnection Requirements, <https://dps.ny.gov/distributed-generation-information>.

customers comprehensive guidance on the overarching process to help set expectations and demystify the process:

- General
 - Scope
 - Definitions
 - Order of Review
 - Application Submission and Processing
 - Applicable Standards
- Pre-Application Tools & Services
 - Fleet Advisory Services
 - Hosting Capacity Map
- Process Flow
 - Flow Charts for Downstream and Upstream Utilities
- General Provisions and Requirements
 - Load Management Requirements
 - Timelines and Extensions
 - Online Applications and Electronic Signatures
 - Dispute Resolution
 - Utility Reporting Requirement
 - Miscellaneous Requirements

IREC asserts that well-defined timeline tracking and reporting requirements can determine if the process requires improvement, the progression of EV infrastructure projects through the energization process, and how customers are impacted by delays. IREC states that mandated energization timelines have already been mandated in California and is being developed in Colorado and Illinois. IREC recommends that the utilities begin tracking and reporting on the timeline from the application submittal to project energization to be included in the [Queue Management Proposal] and eventually the Commission should mandate the timelines of each of the steps towards energization. IREC advocates for clear reporting requirements and explanations for any timeline outliers, allowing stakeholders to see energization timeline trends and identify challenges that need to be addressed. IREC points to Con Edison's Transportation Electrification Interconnection Timeline

Earnings Adjustment Mechanism tracking mechanism which requires timeline reporting for projects 300 kilowatts and above.¹⁰

IREC states that flexible interconnection would allow customers to match the design and operation of their EV charging project with currently available grid capacity through power import. IREC proposes that the EVIIWG or another working group discuss and develop connection strategies and procedures for flexible connection options on load forecasting and distribution system planning and determining the reporting requirements needed to evaluate the scale and efficacy of flexible connection agreements.

For additional information and guidance, IREC attached the "2025 Technical Report: A Grid Connection Roadmap for Utilities to Support Small Electric Vehicle (EV) Customers."¹¹

Additional comments from IREC submitted during the Queue Management Proposal development process are included in the Appendix.

Joint Utilities

The Joint Utilities state that they support the submission of the [Queue Management Proposal] but that the title should be changed to better reflect that the document represents unidirectional EV charging, and not bidirectional EV charging, as suggested in the title.

The Joint Utilities' comment also responds to some of the topics outlined in Appendix C of the [Queue Management Proposal]. First, the Joint Utilities state that flexible connection is a type of service and is not exclusive to EVs.

¹⁰ Cases 22-E-0064 and 22-G-0065, Con Edison - Rates, 2024 Con Edison Earnings Adjustment Mechanism Achievement Report (filed June 30, 2025).

¹¹ EPRI, A Grid Connection Roadmap for Utilities to Support Small Electric Vehicle (EV) Customers, published April 30, 2025, <https://www.epri.com/research/products/000000003002031160>.

Flexible connection can be defined to include service loads other than EV charging. The Joint Utilities assert that discussions on this topic should occur in forums inclusive of non-EV load stakeholders. Similarly, the Joint Utilities contend that the ITWG is the appropriate forum for stakeholder discussions on EV chargers that are paired with bidirectional charging capabilities or paired with an exporting resource such as solar and/or energy storage.

The Joint Utilities state that they are working to attain standard definitions and principles of flexible interconnection and plan on scheduling utility-led stakeholder sessions in 2026 to explore applications and interactions with grid policies.

NY-BEST

NY-Best supports the creation of a working group, either a continuation of the EVIIWG or as part of the ITWG, that focuses on the transparency and process of load interconnection queue management.

In its comments regarding Appendix C of the [Queue Management Proposal], NY-BEST recommends the Commission ensure that any working group that is established should address the lack of transparency and fairness for bidirectional interconnection. NY-BEST emphasizes that EV load directly interacts with the interconnection process for V2G and battery energy storage, therefore the processes should be coordinated with-in one working group. NYBEST emphasizes that colocated battery storage used solely to support charging can provide immediate capacity while avoiding or deferring upgrades and lowering demand charges and therefore should be treated as a phase in mitigation option in utility processes. NY-BEST identifies several suggestions for working group topics that address gridlock in the interconnection process: (1) a

standardized interconnection process should be established for V1G and an interconnection queue made publicly available; (2) synchronize the timelines of the EV load studies with the CESIR process to address situations where V1G projects reduce the hosting capacity needed for a V2G project by "jumping" the queue; (3) interconnection timelines should be established for different types of EV projects; and (4) the [Queue Management Proposal] should include a section for phased and flexible interconnection for EV fleets.

LEGAL AUTHORITY

Pursuant to Public Service Law (PSL) §5, the Commission has authority to direct utilities to "formulate and carry out long-range programs, individually or cooperatively, with economy, efficiency, and care for the public safety, the preservation of values and the conservation of natural resources." Under PSL §65, the Commission is authorized to ensure that every electric corporation furnishes and provides safe and adequate service, instrumentalities, and facilities at just and reasonable rates. PSL §66(1) provides that the commission shall "[h]ave general supervision of all ... electric corporations having authority ... to lay down, erect or maintain wires, pipes, conduits, ducts or other fixtures ... for the purpose of ... furnishing or transmitting electricity for light, heat or power" The Commission's review and disposition of the Queue Management Proposal falls within the ambit of this authority.

DISCUSSION

Queue Management Proposal

The Commission commends the EVIIWG on the collaboration to produce an application queue management

document that should provide guidance to utilities to streamline the application process. We agree with the commenters that the name of the document should be modified. The final document shall be titled the EV Application Queue Management Utility Manual (the Manual), as it better represents the purpose of the document.

While the Midpoint Order stated that the document should be a standardized statewide process, the Commission understands that there are broad differences that exist between the upstate and downstate utilities. Therefore, the Manual must address the difference(s) in application queue management between the upstate and downstate utilities, so long as there is standardization within the utilities' upstate and downstate practices. One difference between the upstate and downstate utilities, identified by the EVIIWG, is the number of applications entering the queue. We agree with commenters that it would be beneficial for the upstate utilities to establish a set number of queued applications required to activate the queue management tactics that the downstate utilities are currently implementing, thus standardizing the process across all utilities. The upstate utilities are directed to include this number in the filed Manual.

To be transparent, the Manual should be placed on each utilities' webpage and, as part of the application process, each applicant shall be sent an electronic copy of the Manual via email, as well as a link to the Manual on the utilities' website so that they are fully aware of the application queue management processes that the utility follows.

If the implementation of any of the policies or procedures in the Manual require additional funding, the Joint Utilities shall file a petition detailing the purpose(s) and budget amount(s).

Future Queue Management and Interconnection Work

While the Commission agrees that the basic objective of the EVIIWG, as described by the Midpoint Order, has been met, we agree with IREC's proposals to expand the document to include: (1) a standardized set of required practices; (2) a utility-by-utility implementation matrix, and; (3) implementation timelines for in-progress strategies.¹² The Joint Utilities shall submit the modified Manual within 90 days of the issuance of this Order. We also agree that a separate customer-sided document shall also be developed and filed within 90 days of the issuance of this Order. The customer-sided document shall provide clear and concise information that allows customers to understand each step in the application queue management process and shall contain a dispute resolution plan. The customer-sided document shall also be located on each utilities' webpage.

Once the Manual and the customer-sided documents are submitted, the Joint Utilities shall schedule and host a technical conference with the EVIIWG within 45 days after filing to review the Manual modifications and the newly formed customer-sided document.

Based on the numerous comments about phased interconnection and technologies related to load, such as flexible interconnection, the Commission supports the Joint Utilities' efforts to define these technologies and develop processes for the addition of load in preparation of further stakeholder sessions.

The Commission acknowledges that the interconnection of electric load is accelerating and that its expansion requires considerable examination in order to address the interconnection

¹² Case 18-E-0138, Matter 24-00339, Interstate Renewable Energy Council Comments (filed July 3, 2025), p. 4.

issues and solutions brought up in the EVIIWG and by stakeholders in other proceedings. Therefore, the Commission directs DPS staff to advance a solution that could thoroughly and systematically address the interconnection of electric load, including the issues and solutions identified by the EVIIWG. Because of the range of issues raised by stakeholders, noted by commenters throughout the EVIIWG process and in Appendix C of the Proposal, the Commission directs DPS staff to file a proposal, within 180 days of the issuance of this Order, outlining a scope of issues that could be addressed. Once a proposal for the scope of issues is developed, DPS staff is directed to host a technical conference or stakeholder session and solicit feedback from stakeholders. After the scope has been established, DPS staff is directed to develop and propose a solution to address those issues, including a timeline for Commission review and action.¹³ Ultimately, the Commission intends to develop a statewide solution to electric load interconnection issues.

Regarding any bidirectional grid flow delivered by systems, such as a bidirectional EV charger paired with solar and energy storage, we are convinced that any barriers that exist with these types of systems are currently being addressed in the ITWG and direct participants to that group.

CONCLUSION

In this Order, the Commission directs the Joint Utilities to expand the Queue Management Manual to include: (1) a standardized set of required practices; (2) a utility-by-utility implementation matrix, and; (3) implementation timelines

¹³ The solution could include a series of technical conferences that inform a DPS staff Whitepaper and/or the formation of a new working group.

for in-progress strategies. Additionally, the Joint Utilities are directed to develop a customer-sided document that provides clear and concise information so that a customer can understand each step in the application queue management process from their viewpoint and includes a dispute resolution plan that could also be located on each utilities' webpage. The Joint Utilities are directed to schedule and host a technical conference to review the Manual's modification and the customer-sided document. Also, the upstate utilities are directed to establish a set number of queued applications required to activate the queue management tactics that the downstate utilities practice. The topics raised by stakeholders that were considered to be outside of the scope of the EVIIWG, such load interconnection and varying load interconnection technologies, shall be addressed by DPS staff as conveyed in the discussion section of this Order.

The Commission orders:

1. The Electric Vehicle Application Queue Management Utility Manual is approved, with modifications, consistent with the discussion in the body of this Order.

2. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation are directed to file the updated Electric Vehicle Application Queue Management Utility Manual within 90 days of the issuance of this Order, consistent with the discussion in the body of this Order.

3. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, Orange and Rockland Utilities, Inc., and

Rochester Gas and Electric Corporation are directed to distribute the Electric Vehicle Application Queue Management Utility Manual consistent with the discussion in the body of this Order.

4. Niagara Mohawk Power Corporation d/b/a National Grid, Central Hudson Gas & Electric Corporation, New York State Electric & Gas Corporation, and Rochester Gas and Electric Corporation are directed to establish a threshold number of applications that trigger the procedure(s) outlined in the Electric Vehicle Application Queue Management Utility Manual.

5. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation are directed to develop and file a customer-side document reflecting the application process and a dispute resolution process for consideration by the Electric Vehicle Infrastructure Interconnection Working Group, within 90 days of the issuance of this Order.

6. Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation are directed to schedule and host a technical conference, co-hosted by the Electric Vehicle Infrastructure Interconnection Working Group, within 45 days of the filing of the Electric Vehicle Application Queue Management Utility Manual and customer-sided document.

7. Department of Public Service staff are directed to propose a scope as a first step to addressing issues related to electric load interconnection, within 180 days of the issuance of this Order, as discussed in the body of this Order.

8. Department of Public Service staff are directed to develop and propose a solution to address issues related to electric load interconnection, as discussed in the body of this Order.

9. In the Secretary's sole discretion, the deadlines set forth in this Order may be extended. Any request for an extension must be in writing, must include a justification for the extension, and must be filed at least three days prior to the affected deadline.

10. This proceeding is continued.

By the Commission,

(SIGNED)

MICHELLE L. PHILLIPS
Secretary

Comment Summaries*Alliance for Transportation Electrification (ATE)*

ATE supports the straw proposal and states that the four areas for streamlining queue management and the five guiding principles outlined in the document provide a comprehensive means to achieve interconnection of commercial EV charging stations in an optimal and timely manner.

ATE states that there are some issues that should be included in the final adopted interconnection process. (1) the preliminary steps prior to an application being filed (i.e., fleet advisory services); (2) the batching process that can increase the efficiency of review; and (3) utility and participant temporary pauses as this allows for the customer to be put "on hold" without having to be moved to the back of the queue while experiencing any unexpected delays.

ATE recommends that the working group exclude the V2G/V2X from current discussions as it is a small percentage of the applications across the State and introduces complicated factors. Instead, ATE, recommends that V2G and V2X issues be considered in the future as a separate working group activity and that the standard interconnection process could be amended to add standards related to V2G/V2X later.

ATE advocates for a policy that contains a holistic approach that includes state and local governments, as this would streamline the process. However, ATE states that it would be detrimental to place strict or rigid time limits on the interconnection process.

Lastly, ATE proposes providing flexibility to the utilities when adopting an interconnection process and that the Commission may need to consider providing additional resources to utilities that are not sufficiently funded. ATE states that in their experience, they have found that the lack of resources

dedicated to transportation electrification issues affects the implementation of pre-engagement services and fleet advisory services.

Concerned Citizen

Concerned Citizen states that Walmart Stores have large rooftops that can support high efficiency solar panels providing infrastructure that can accommodate 6 to 8 charging stations per Walmart Store. Concerned citizen states that charging solutions are necessary to get people invested with EVs.

Environmental Defense Fund (EDF)

EDF states that timely interconnection of EV chargers is necessary for the interconnection of light, medium, and heavy-duty vehicles and that proactively identifying and implementing best practices in the interconnection queue management process can shorten the interconnection timelines. Furthermore, EDF states that timely interconnections can also encourage the development of projects that may not have otherwise occurred.

EDF offers two recommendations for consideration in modifying the straw proposal to a Statewide process: (1) The inclusion of flexible and hybrid interconnection and (2) modification of Earnings Adjustment Mechanisms.

EDF recommends considering customers charging practices in the interconnection processes so that chargers can quickly become operational. EDF endorses flexible interconnection which allows customers to access grid capacity when there is a level of flexibility in their electric demands such as reducing or avoiding charging during periods of grid constraints. EDF explains that flexible interconnection can support the grid during upgrades. EDF affirms that a hybrid interconnection, coordinates the interconnection process for

loads and new generating resources by installing chargers alongside distributed energy resources such as solar and battery storage without requiring a separate interconnection process. EDF posits that the EVIIWG is well positioned to identify which specific variations of flexible and hybrid interconnection agreements are beneficial for deployment because of standby and buyback service rates.

EDF cautions that the addition of EAMS results in additional ratepayer cost while EV charging is expected to drive load growth that will require distribution system investments therefore, EDF recommends the creating negative EAMS that would hold utilities accountable when they fail to meet their obligations to provide timely service to customers.

EDF's recommendations for additions to the straw proposal include: (1) Implement flexible interconnection processes under which the utility establishes partial service to customers while completing system upgrades; and (2) Coordinate between the EV charger interconnection process and the SIR process for generating resources to streamline the interconnection process for EV charging projects installing hybrid resources; (3) the addition of positive and negative performance incentives.

NY-BEST

NY-BEST states that flexible assets, such as DERs, are needed to achieve New York States energy goals and that interconnection rules must coordinate processes with V2X and energy storage that is co-located with EVSE equipment. NY-BEST contends that the EVIIWG include bi-directional assets in the endeavor to optimize interconnections.

NY-BEST mentions specific points for the EVIIWG to take into consideration:

1) Barriers in the existing queue management and interconnection process currently exist that limit bidirectional projects, therefore NYBEST recommends that the EVIIWG create an interconnection policy that coordinates load and distributed generation for V2G.

2) NY-BEST proposes that the EVIIWG include discussions on DER, to advance V2G projects and EVSE paired with energy storage. Additionally, NY-BEST recommends coordinating the interconnection queues because of the separate requirements of power generation and load. NY-BEST advocates for the EVIIWG to address the coordination of these queues in a way that does not slow down deployment or unfavorably affect flexible assets.

3) NY-BEST advocates for developing procedures that realize the benefits of co-located battery storage coupled with EVSE which may avoid grid upgrades.

4) NY-BEST states that the feedback gathered from its members indicate that V2G service applications are handled by separate teams and departments creating a barrier to deployment. NY-BEST referred to a site that is installing V2G chargers that are eligible for PowerReady incentives, and that the customer needed to submit a CESIR study for the V2G and a PowerReady application to a separate energy services team. NY-BEST states that the two studies are not linked or connected, leading to situations where the EV project may have a service determination and a signed program agreement while the CESIR study is still in progress and may lead to conflicting results.

5) NY-BEST emphasizes that to avoid customer confusion it is essential that any incentive tied to specific infrastructure is made explicit in advance of applications. NY-BEST advocates for load management technology to be considered eligible for incentives when they directly impact interconnection costs for EVSE and that lessons learned from the

"The Load Management Technology Incentive Program" should be integrated when planning EVSE interconnections.

Interstate Renewable Energy Council (IREC)

Working Group Scope and Timeline

IREC proposes that the EVIIWG have a clear process with a defined scope so discussions remain relevant to the purpose of the working group further stating that any issues that should be addressed through other working groups should be identified. IREC recommends that the EVIIWG establish a timeline and schedule for developing new interconnection procedures, stating that an estimated timeline could be useful for planning purposes. I

Overall Structure of Standardized Interconnection Process

IREC notes that other jurisdictions developed a schedule that builds in time for adequate dialog and shared learning as well as establishes deadlines by topic area and if consensus is not reached by the deadline, the topic is taken to the Commission for a final decision. IREC states the straw proposal's four categories of streamlining the process should be expanded to capture the full EV infrastructure interconnection process and align with the customer perspective and experience. IREC recommends providing additional details to the steps in the straw proposal's flow chart which could be used as a starting point for the EV interconnection procedures. IREC states that developing interconnection stages and tasks could ascertain opportunities for greater efficiency by identifying steps that can be done simultaneously. Additionally, IREC advocates that the EVIIWG consider the timelines, fees, technical requirements, dispute resolution processes, and utility reporting requirements as is typically done for the procedures required for the interconnection of DERs.

IRECs Comments on Con Ed's Queue Management Straw Proposal

Operations Measures

- IREC stated that they "would like to learn more about how Con Ed has used flexible queue management practices to increase interconnection efficiency, and requests at least three examples detailing the circumstances, reasoning, and impacts specific to the use of flexible queue practices related to particular projects.

- IREC requests that "Con Ed identify whether projects are essentially reserving capacity when they are placed in the queue (similar to DER projects) or whether prioritizing certain projects over others has little to no effect on the ability of non-prioritized projects to move forward."

- IREC stated that" it would be helpful to know how Con Ed has implemented any phased deployment strategies which allow projects to interconnect and take advantage of available grid capacity before upgrades are constructed that will enable the project to draw more power from the grid. And how has Con Ed factored customer load management strategies (including use of certified Power Control Systems) and/or the addition of onsite solar and/or storage to enable faster interconnection or to avoid upgrades?"

- IREC requests that the EVIIWG discuss these phased deployment strategies to determine how best to implement them if they are not already being utilized by Con Ed or other utilities. IREC states that streamlining processes for projects that do not require any grid upgrades is another way to address efficiency in the review process.

- IREC states that it is important to determine any additional process improvements necessary, it

will be especially important to ascertain the current interconnection challenges faced by customers and that the EVIIWG should discuss the major interconnection barriers and how they can be addressed within the interconnection procedures.

Participant informational tools

IREC advocates for pre-application services stating that this service can save time and money by identifying viable project sites, and by providing site-specific information for project planning and design. IREC recommends that hosting capacity maps be updated frequently and accurately for customers to rely on them to make project-related decisions.

Participant communication strategies

IREC recommends that the topic of pre-application services and any other advisory services should be explored in EVIIWG to determine if improvements are necessary. IREC emphasizes the importance of information-sharing measures, such as customer deadlines and timeline estimate for utility completion of grid upgrades. IREC further states that it would be beneficial for utilities to keep customers informed by sharing detailed results on the service determination and/or engineering review process, including a description of the analysis performed and an explanation of how the conclusions were reached.

Utility Enterprise Alignment

IREC emphasizes the importance of improving project flows within the utility stating that it would be useful to know more about the customer-facing strategies Con Ed has adopted. IREC asserts that it is important to have utilities report on interconnection timelines and upgrade costs annually. Annual reporting allows stakeholders to regularly monitor how efficient and cost-effective the interconnection process is and identify

opportunities for improvement. IREC underscores timeline reporting stating that it can improve transparency by identifying how long each process step normally takes. IREC states that reporting on upgrade costs and timelines can highlight interconnection challenges such as process bottlenecks and increasing costs.

Interstate Renewable Energy Council (IREC)

IREC recommends that the "Queue Management Proposal" (Proposal) be revised to incorporate standardized procedures for connecting EV infrastructure loads that provide additional clarity and guidance for customers and utilities. IREC states that while the Proposal includes a list of some practices that can be utilized, it fails to define a standardized process for all utilities to follow and that the Proposal is a non-binding document that highlights some methods to improve the interconnection process but will likely fail at increasing process transparency and increasing efficiency of interconnection. IREC specifically highlights Section 4.2 of the Proposal as lacking clarity on whether customers can request project modifications and notes that Con Edison's footnote in this section defining its policy on project scope changes is helpful but should be included in the body of the Proposal, not as a footnote.

IREC argues that the Proposal should include a detailed standardized process and framework that clearly defines the process steps, requirements, and policies applicable to all utilities. IREC states that utilities would adopt the common set of requirements and could then make additions or variations based on unique and technical circumstances. IREC states that EV interconnection procedures do not have to mirror the Standardized Interconnection Requirements (SIR) but should take inspiration in detailing a similar list of steps that set clear

expectations and requirements. IREC recommends an outline for the Proposal to follow and states that the new structure would set comprehensive guidance, help set expectations, and demystify the interconnection process for EV interconnection.

IREC recommends that timeline tracking and reporting requirements be incorporated into the Proposal where utilities would be required to track and report on end-to-end timelines from application submittal to project energization. IREC further recommends including clear reporting requirements that list the data that must be reported by utility and an associated reporting frequency and format. IREC asserts that tracking and reporting would allow timeline outliers to be addressed and identify innovative practices to facilitate peer learning. IREC cites Con Edison's Transportation Electrification Interconnection Timeline Earnings Adjustment Mechanism (EAM) which requires timeline reporting for projects 300 kilowatts and above as an example of an existing mechanism for tracking and reporting that could be modeled in the Proposal. Once process steps are clearly defined, IREC recommends mandating timelines for each step and cites mandated timelines as providing greater customer certainty and a baseline expectation for when complaints are appropriate. IREC further states that these timelines set expectations for customer-owned process steps.

Regarding phased interconnection, IREC states that the Proposal should provide clear direction to customers on the availability of phased interconnection, define the term, and describe the process for selecting a phased interconnection agreement. IREC argues that phased interconnection should be a standard, highly visible option to EVSE interconnection applicants and can be utilized when a service connection request requires a distribution grid upgrade.

IREC further asserts that a streamlined review process is important to effectively allocating utility engineering capacity and ensuring that projects are not unnecessarily delayed. IREC cites that in the NY SIR, inverted-based systems up to 300kW follow an expedited process and calls for this type of streamlined process to be extended to EV infrastructure projects and working with the utilities to determine an appropriate threshold. IREC notes Con Edison has an internal auto-rule tool that automatically expedites projects that meet certain criteria. IREC calls for the utilities to publicize these criteria to help inform project design before an application is submitted.

IREC notes that the Proposal provides no detail on what must be communicated to the customer after review and recommends that utilities be required to provide detailed results following the service determination and/or engineering review process. IREC states that in the generator interconnection process, such explanations can enable customers to make informed decisions on how to modify projects to avoid grid constraints. IREC further states that detailed review results provide additional visibility into the load review process and provide guidance on project modification that can reduce a customer's overall costs and installation timeline.

IREC notes that project scope changes are addressed in the Proposal in Section 4.2 but asserts that project modification processes should be clearly spelled out in the Proposal and explicitly include project changes that would not require a new service determination. IREC states that if policies vary across the utility, each utility could describe its policy in more detail in a utility-specific procedures document.

IREC states that dispute resolution has been mentioned by multiple parties throughout the working group proceeding and support comments from the City of New York to implement an expedited dispute resolution process. IREC recommends developing a dispute resolution process for EV customers and incorporating this into the Proposal.

Finally, IREC recommends the EVIIWG continue to meet on certain topics in a Phase II period including remaining issues from Phase I and recommends changes to the structure of the EVIIWG. During Phase II, IREC notes that it, along with the Environmental Defense Fund (EDF) and VGIC, propose that the EVIIWG should develop and implement a flexible EV interconnection process in the next phase of the working group. IREC states that flexible interconnection will allow customers to match their projects with currently available grid capacity through power import limits and states that the associated requirements such as agreement types, load management methods, and customer communication process would be topics to determine in the EVIIWG.

IREC additionally recommends developing a mechanism to determine the current pace of energization and the pace required to meet New York's decarbonization goals such as the CLCPA in Phase II of the EVIIWG. IREC states that DPS staff should work with stakeholders, other agencies such as NYSERDA, and possibly outside consultants to develop a model to determine if energization is required at the rate to achieve electrification goals and mandates and states that the EVIIWG would then discuss how the tracking mechanism should inform the development of interconnection timelines.

Finally, IREC recommends that DPS staff modify the structure of the working group citing a lack of opportunity for meaningful discussion to determine consensus items and the

ability to weigh in on redlines to the Proposal. IREC states that DPS staff accommodated helpful presentation but were typically on the challenges faced by customers rather than proposals for the group to discuss incorporating in the Proposal. IREC states that outreach from Con Edison to IREC following initial comments would be better suited in an open decision-making process before the full working group. IREC states effective facilitation by DPS staff is required to prevent the dynamic where utilities are able to be the gatekeepers of potential improvements to the Proposal. IREC states that without this oversight, little progress will be made towards a set of standardized interconnection procedures. IREC recommends that DPS staff develop a schedule that builds in time for adequate discussion and establishes concrete deadlines by topic and to bring non-consensus items to the Commission for final determination.

Joint Utilities

The Joint Utilities state that they have worked closely with DPS staff and working group stakeholders on recommendations to provide transparency and to establish best practices for streamlining the application process for the Make-Ready Program. The Joint Utilities state that the Proposal is clearly reflective of the input of the Joint Utilities, customers, and stakeholders from the revision process and the seven EVIIWG meetings convened in 2024. The Joint Utilities state it is supportive of the Proposal.

Vehicle Grid Integration Council (VGIC)

VGIC states that the proposal provides an opportunity to address barriers and align the interconnection process with the rapid deployment of EV infrastructure needed to support the decarbonization goals of the state. VGIC states that a notable problem of the current interconnection structure is due to the

utility practice of treating EVs as continuous loads where nameplate ratings of all EVSE on site are added up and then the grid capacity sized to that total plus 25 percent, regardless of the customers' ability to manage load across EVSE. VGIC states that the need for flexible interconnection would help address the stated problem and that while it understands that New York utilities allow flexible service on an *ad hoc* basis, there exists a lack of clarity among stakeholders on the next procedural steps to standardize the process, or even where the topic should be addressed.

VGIC recommends that the Commission consider flexible interconnection through four focus areas: (1) grid data access and enabling tools; (2) process and customer engagement; (3) technical requirements and relevant standards for enabling technologies; (4) connection timelines data collection and reporting. VGIC recommends that the Commission modify the Proposal to establish clear pathways for the use of static load limits that allow EV charging stations that would trigger upstream upgrades the opportunity to begin operations sooner which it states could be implemented as firm or non-firm limits through strict service limits or penalizations, respectively. VGIC additionally recommends the Commission modify the Proposal to implement dynamic operating envelopes that allow EV charging stations to operate flexibly within capacity constraints that vary based on real-time grid conditions. VGIC states that this enables more efficient utilization of grid capacity and expedites interconnection timelines.

VGIC additionally recommends that the Proposal be modified to improve data portals and transparency to support flexible interconnection. VGIC recommends that the Commission direct the utilities to maintain and improve data portals with feeder- and substation-level hosting capacity maps and sees

benefit in maintaining and improving maps to a reasonable degree of accuracy and frequency. VGIC further recommends that the Commission direct utilities to provide frequent and detailed updates to stakeholders on interconnection statuses, estimated timelines, and identified constraints.

VGIC recommends modifying the Proposal to detail the customer engagement process for flexible interconnection. VGIC states that feedback on customer engagement tools should be obtained through the EVIIWG, the Make-Ready Proceeding, and/or the Grid of the Future Proceeding. VGIC recommends that customers be given, at a minimum, information on their utility on flexible service connection options if receiving exceptionally lengthy energization timelines. VGIC further states that the Commission direct utilities to notify customers when a timeline is at risk of not being met and that the notification should include the category and reason for delay, the new expected deadline, and flexible interconnection options. VGIC states that customers should be given the following options when faced with an exceptionally long timeline: (1) wait for necessary upgrades to be completed; (2) withdraw customer request and re-design site; (3) elect flexible interconnection option(s) based on site characteristics.

VGIC recommends that the Proposal clearly define what in-flight design changes are permissible without restarting the queue process and that allowing for certain in-flight design changes will help streamline interconnection. Finally, VGIC recommends that the queue management proposal be modified to establish data reporting requirements related to flexible interconnection. VGIC states that this data is critical to understanding the impacts of flexible interconnection and that reporting should include: (1) anonymized project identification information; (2) request type (i.e., new or upgrade) and size

(kW); (3) days lapsed since the initial request; (4) whether the flexible interconnection was proposed by the utility, accepted by customer, proposed by the customer, and/or accepted by the utility; (5) if applicable, the type of accepted flexible service connection (i.e., static or dynamic) and the type of flexible interconnection in use. VGIC states that this data will inform new and upgraded electrical load request and identify precisely where common bottlenecks exist. VGIC recommends the Commission leverage the data by creating formal mechanisms to solicit and incorporate stakeholder feedback.