# CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

# MANAGED CHARGING IMPLEMENTATION PLAN

Filed January 30, 2023

Case 18-E-0138

Pursuant to New York Public Service Commission's July 14, 2022
*Order Approving Managed Charging Programs with Modifications*

# Contents

# 0. Version Control

| Revision Effective Date | Changes |
|---|---|
| 9/26/22 | Initial filing |
| 1/30/23 | Version 2 |

# 1. Introduction

## 1.0 Background and Summary of Order

The New York Public Service Commission's ("PSC") July 2022 Managed Charging Order ("Order")[1] directed utilities to file Managed Charging Implementation Plans ("MCIP"), detailing the design and operation of programs that incent grid-beneficial electric vehicle charging behavior. That is, the programs that help customers to charge their vehicles at times that will not contribute to peak electric load. Consolidated Edison Company of New York, Inc.'s ("Con Edison" or "Company"), SmartCharge NY ("SCNY"), which began in 2017, incents customers to avoid Electric Vehicle EV charging during peak hours and instead charge during overnight off-peak hours. The Company's program has 25% of registered vehicles in our service area enrolled in the program and intends to build on this success. The Order continued this program through 2025, with some changes, including, for example, setting cost-based incentive levels and establishing a more structured participant dispute resolution mechanism.

This MCIP includes planned implementation information for the program through 2025 as well as the Order's additional requirements. Topics covered[2] include:

- Eligibility
- Incentives
- Technology
- Marketing
- Customer Engagement

This initial version of the MCIP is intended to act as a road map for launch features Con Edison will offer starting in 2023.[3]

## 1.1 Con Edison Perspective on Electric Vehicles

Con Edison is committed to effectively implementing Commission authorized programs supporting state policy goals seeking to delivering a clean energy future to customers. Supporting the transition to electric vehicles aligns with these policy objectives, as the critically important transportation sector accounts for 28% of New York's statewide greenhouse gas emissions[4] and is a key policy target for reductions under New York's Climate Leadership and Community Protection Act.

Satisfying peak demand growth, including growth driven by EV charging, typically requires the installation of expensive infrastructure resources across supply and delivery systems. Through a managed charging program, Con Edison aims to promote and entrench grid-

[1] Case 18-E-0138, "Order Approving Managed Charging Programs with Modifications" (issued July 14, 2022), henceforth "the Order".

[2] Some information related to future market solicitation and implementation is currently unavailable and therefore not included in this version of the MCIP. As Con Edison learns more about what the market can deliver, these sections will be included in future versions of this document.

[3] Con Edison may, at its discretion, alter or change any of the plans If changes are made, Con Edison will update this implementation plan and file a revised versions of this plan with PSC in this docket,

[4] "2021 Statewide GHG Emissions Report", New York State Department of Environmental Conservation, published 12/24/2021.

beneficial charging behavior that reduces EV demand at peak times by shifting EV charging to times that are sensitive to grid needs and peak periods. The Company plans to achieve this behavioral shift by offering EV drivers positive incentives to avoid peak period charging and charge during overnight hours, yet in a manner that permits drivers meaningful control over how and when they charge their vehicles.

Con Edison also offers additional incentives to help make transportation electrification easier for customers. The Company's PowerReady Program offers incentives to install electric vehicle supply equipment EVSE and is committed to installing over 19,000 Level 2 (L2) and direct current fast charging (DCFC) plugs to the service territory by 2025.

### 1.2 Program Structure

SCNY promotes grid-beneficial charging behavior through two categories of incentives targeted at EV drivers and/or operators: (i) a primary incentive for avoiding on-peak EV charging during summer weekdays (June-September) and (ii) a secondary incentive to encourage overnight off-peak (midnight-8 am) charging. The primary incentive requires consistent behavior over the entire month over which the Company disburses incentives, *i.e.*, on a monthly or quarterly basis, whereas the secondary incentive is earned on a rolling basis with monthly or quarterly incentive disbursements; it is on a rolling basis since it depends on the volumetric energy use during off peak hours.

The Company has restructured SCNY to focus specifically on entrenching grid beneficial charging behavior even as, and especially because, the EV market is still in the early stages of development. Such positive incentives described in greater detail further below represents an effective bill reduction.

As required by the Order, the Company has set incentive levels so they are below the ceiling level as directed in the Order; thus limiting incentives to be lower than the difference between standard and time of use or alternative off-peak rates for the supply and delivery portions of an illustrative EV charging electricity bill. Consequently, SCNY has altered its participant pool, limiting participation to mass-market customers who are not on any time of use rate structures[5] and commercial customers who are currently eligible to participate in SCNY [6].

## 2. Managed Charging Program Implementation

### 2.0 Eligibility Criteria

Any fleet or non-fleet EV owner or operator who charges their electric vehicle(s) within the Con Edison service territory is eligible to fully participate if they have the technology that is

[5] A minority of existing customers, currently around 500 out of over 7,000 enrollees, would not be able to participate in SCNY if they continue to remain on time variant rates.

[6] The Company notes here that as of January 19, 2023, and in compliance with Public Service Law (PSL) §66-s which requires consideration of EV charging market needs in individual utility service territories for operating cost relief; the Commission authorized the development of a commercial managed charging program as one of means by which to provide such operating cost relief to chargers in compliance with state law. The Company intends to transition the heavier classes of vehicles as well as fleets that currently participate in SCNY to the new commercial managed charging program. The Company will work with Department of Public Service ("DPS" or "Staff") on the timing and mechanism for such a transition.

compatible with Con Edison's SCNY platform to verify performance and satisfy certain electric service[7] criteria. The eligibility criteria and a list of compatible technologies is publicly available.

## 2.1 Enrollment Incentives

Since SCNY relies on customer response to price signals as opposed to active utility curtailment, the program is categorized as a passive managed charging program. Enrollment incentives are therefore capped at $25 per applicant by Ordering Clause 17 and the Company offers enrollment incentives at that level. This incentive is earned on a per-vehicle or per-charger basis after three months of continued participation[8] in SCNY; continued participation means that the participant charges at least once monthly for three months.

## 2.2 Charging Incentives

SCNY is structured so that participants, regardless of vehicle class, are incentivized to avoid a specific 4-hour window for charging their vehicle to mitigate system resources. Participants are further incentivized to explicitly charge their vehicle during the overnight off-peak period, when these same resources are likely to have available capacity. Con Edison will determine the service classification of the primary charging address listed in the participant's registration information at the time of application. The incentives listed below replaced the existing incentive structure on January 1, 2023.

The on-peak charging incentive is earned on a per-vehicle or per-charger basis when there are no charge sessions in the specified 4-hour period that was to be avoided for the month. A charge session is defined as >1 kilowatt-hour (kWh). Following up on customer feedback received, the Company will allow participants to use a limited amount of energy to permit some behavioral slippage during the summer months and is described below in section 3.3.1.

To spur high and consistent levels of performance, this MCIP introduces a bonus incentive, which is earned when the participant records no charge sessions during the 4 hour on-peak period for the entire 4-month summer period (June 1- September 30).[9]

The off-peak charging incentive is a volumetric (per kWh) incentive for energy consumed during the 8-hour off-peak period of 12 midnight – 8 am.

### 2.2.1 Light Duty Vehicles

Charging incentives for light-duty are structured around two separate preferred behavior outcomes: 1) avoiding on-peak charging (weekdays 2 pm – 6 pm) during summer months (June – September) to mitigate adding to the system peak load that

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[7] EV owners and operators may not participate in the program if their primary charging location address receives electric service on a residential or small commercial TOU rate. Customers receiving service under SC 9 may not participate under SC 9 III or any high-tension delivery rate. For a complete list of included service classes, see §4.2.4 "Incentive Summary" of this document.

[8] Active participation is defined as at least one recorded charge session per month in Con Edison service area where the net energy transfer to the vehicle is greater than 1 kWh. If vehicle-specific charge data cannot be shared, the participant can earn only one enrollment reward (total of $25).

[9] On-peak incentives can only be earned on a per-vehicle or per-EVSE basis. If a participant cannot share vehicle-specific data, they are only entitled to earn on-peak charging incentives for each registered EVSE that meets the charging criteria described above.

drives long-term infrastructure needs, and 2) shifting charging to the overnight, off-peak period hours (12 midnight – 8 am, year-round) when infrastructure constraints are typically less pronounced.

| ***Category*** | **Incentive Amount** | **Notes** |
|---|---|---|
| *Avoided on-peak charging weekdays 2 pm – 6 pm* | $35/mo./vehicle | Earned in summer months only |
| *100% Performance Bonus* | $35/vehicle | Earned once annually if 100% performance is achieved during 4-month summer period (June 1-September 30) |
| *Overnight off-peak charging (12 midnight – 8 am)* | $0.10/kWh | Available everyday |

*Table 1: Light duty charging incentives*

In order to allow for a small level of Participant slippage, *i.e.*, lower level of participant performance, in the early stage in the customer adoption of EVs, Con Edison will offer a reduced incentive amount rather than offering no incentive. Such reduction in incentive will be based on the number of times participants charge during the 4 hour on-peak period as well as their peak energy consumption for the charging session in the summer months. Charging sessions recorded during the on-peak period will be logged as infractions and a participant is allowed a peak demand limit per month. Con Edison is working with our selected vendor to determine such a limit. Infractions and energy use are accumulated monthly and refreshed at the start of each month. The incentive amount is reduced for the month in which the infraction(s) occurred based on the table below. As noted above, to incent no slippage behavior, the Company separately is instituting a bonus incentive for customers who perform perfectly with no slippage in the summer period.

| ***Charging Session Infractions (per month)*** | **Total Charging Amount during peak hours** | **Incentive Amount Reduced to** |
|---|---|---|
| *Any* | > TBD | $0/vehicle/month |
| *One* | < TBD | $35/vehicle/month |
| *Two* | < TBD | $17.5/vehicle/month |
| *Three and more* | Any registered charging session | $0/vehicle/month |

*Table 2: On-Peak Charging Slippage Incentive*

### 2.2.2 Medium- and Heavy-Duty Vehicles

Charging incentives for MHDV vehicles are structured around two separate preferred behavior outcomes as well: 1) avoiding on-peak charging during a 4-hour network peak call window during summer months (June – September) to mitigate adding to network peak load that drives long-term infrastructure needs, and 2) shifting

charging to overnight, off-peak hours (12 midnight – 8 am, year-round) when infrastructure constraints are typically less pronounced[10].

| ***Category*** | **Incentive Amount** | **Notes** |
|---|---|---|
| *Avoided on-peak charging during 4-hour network peak call window* | $250/mo./vehicle | Earned in summer months only |
| *100% Performance Bonus* | $250/vehicle | Earned once annually if 100% performance is achieved during all four summer months |
| *Overnight off-peak charging* | $0.0221/kWh | Available everyday |

*Table 2: Medium- and heavy-duty charging incentives*

## 2.3 Participation Requirements

EV owners/operators actively enrolled in SCNY as of December 2022 had the option to enroll in the new Program before January 1, 2023, except for mass-market participants that are on a TOU rate or had neither an EV model nor charging station that was not supported by the new program. To ease the transition, participants were notified in early December 2022 that the previous program was ending and informed them of the 2023 iteration of SCNY. Con Edison began enrolling these participants in December 2022, to promote a smooth transition between program implementations. Transitioned participants agreed to new program terms and conditions prior to enrollment in the new SCNY platform. Prospective participants will need to complete an application form online to be onboarded into the program.

Vehicles who participated in the previous SCNY program have the option to either transition to eligible vehicle-based telematics or networked EVSE channel. The original equipment manufacturer (OEM) application programming interface (API) option is limited to certain vehicle makes, models, trims, and years with capabilities to connect to the SCNY platform. The networked EVSE option is also limited to certain EVSE makes and models that the SCNY platform can communicate with. A list of SCNY supported EVs and EVSEs are outlined in Appendix 1. This list of compatible technologies will be further refined as the Technology Standards Working Group receives approval for qualified product criteria.

For an applicant to enroll in SCNY, they will need to provide personal information to the technology platform that can be used to verify an applicant's eligibility. Applicants will self-identify if they are on a TOU rate during enrollment. The applicant will then connect their vehicle or EVSE through their (OEM) API or EVSE network to the SCNY platform. The applicant agrees to the program T&Cs prior to connection and data transfer. Con Edison will review all applicants who apply to the program and verify if they are on a TOU rate. Applicants who are identified as being on a TOU rate will be notified and removed from the SCNY program.

[10] The Company notes that considering the authorization of commercial managed charging by the Commission on January 19, 2023, charging incentives and structure for medium- and heavy-duty vehicles may be covered under commercial managed charging once the regulatory process is concluded. The Company will work with Department of Public Service ("DPS" or "Staff") on the timing and mechanism for such a transition.

It is the responsibility of the EV owner/operator to either: 1) initially install an eligible networked EVSE and follow instructions to connect to the SCNY platform, or 2) register their eligible vehicle via the onboard telematics/API to the SCNY platform. This connection must be maintained with their EVSE or API so that charge data continues to be shared with Con Edison. The Company is not responsible for data reporting issues that may transpire with a vehicle telematics or an EVSE and can only allow participants to earn incentives if data is shared. If a connection is lost, the SCNY program will notify the EV owner/operator immediately and will assist where possible to reestablish the connection. The participant is responsible for reporting any suspected reporting issues to the SCNY program as soon as possible to facilitate troubleshooting and resolution. Further details on data gaps are covered in §5.4 "Dispute Resolution Framework".

## 2.4 Eligible Technology

As per the Order, Con Edison will permit program participation through onboard vehicle telematics and networked EVSEs. Specific supported vehicle makes, and models supported by the telematic option and specific networked EVSEs will be listed online[11] as part of program materials. To permit anticipated frequent updates to supported technologies, this list will be posted publicly.[12]

Since the last filing of the Managing Charging Implementation plan[13], Con Edison underwent a competitive bid process and selected ev.energy as administrator of the SmartCharge program. With ev.energy, 60 EV makes and models are supported in addition to 4 chargers are outlined in Appendix 1.

To control costs, Con Edison has retired device-based telematics technology in favor of manufacturer-installed reporting capabilities. Con Edison is participating with the Joint Utilities Technical Standards Working Group to identify and test additional technology for inclusion in the program. The method and plan for this testing will be consistent with Ordering Clause 6.

## 2.5 Program Timelines

The following table lays out the proposed major pre-launch activities of the program. Once an implementation partner is selected, Con Edison will update this table to show post-launch features and milestones.

| Milestone | Date |
|---|---|
| MCIP Filed | September 2022 |
| RFP Issued | September-October 2022 |
| RFP Proposals Due | October 2022 |

[11] Available online at: https://www.ev.energy/scny/faq.

[12] Printed media may be prepared from time to time to support the Program's outreach strategy. Examples of this media will be detailed in Appendix 2, starting in January 2024.

[13] Con Edison filed its initial Managed Charging Implementation Plan on September 26, 2022.

| | |
|---|---|
| Vendor Selection | November 2022 |
| Marketing Activities | December 2022 |
| New Program Begins | January 2023 |
| Updated MCIP Filed | January 2023 |

*Table 3: Program launch timeline*

## 2.6 Customer Resources

Con Edison will implement a new participant portal by May 2023. The portal will function like Con Edison's existing participant portal, which offers customers the opportunity to view their prior behavior and update the details of their participation. Prior reward period statements are available, giving customers the opportunity to confirm the status of incentive payments and review the criteria that led to their incentive determination.

The SCNY participant dashboard includes a mobile app and mobile-friendly website that allows participants to view the status of their vehicle: connection, plug-in status, battery level. Once participants have successfully completed enrollment in the program and connected their hardware, a history of their charging sessions in the program will become available to them.

Con Edison will work with the Joint Utilities to prepare and publish a list of qualified contractors operating within the Con Edison service territory with the ability to perform EVSE installations.

# 3. Program Budget

## 3.0 Budget Forecast[1]

| Cost Category | | 2023 | 2024 | 2025 | Total |
|---|---|---|---|---|---|
| **Administration** | | $6,990,000 | $9,830,000 | 13,100,000 | $29,910,000 |
| **Implementation** | | $610,000 | $610,000 | $610,000 | $1,810,000 |
| **Incentives** | Enrollment[2] | - | - | - | - |
| | Participation[3] | $15,100,000 | $23,930,000 | 32,760,000 | $71,770,000 |
| **Marketing** | | $50,000 | $50,000 | $50,000 | $150,000 |
| **Evaluation** | | $75,000 | $75,000 | $75,000 | $225,000 |
| **Total** | | $22,825,000 | $34,495,000 | 46,595,000 | $103,865,000 |

Note: Forecast for total EVs in service territory and participation in the MC program identified in the Order authorizing the program in July 2022

[1] The budget is based on the high participation scenario previously discussed with staff and does not reflect the anticipated savings from the selected vendor. The budget is shown and to be used against as a benchmark.

[2] Maximum available incentive, assuming participating customers entirely avoid charging at peak during summer months.

[3] Maximum available incentive, assuming participating customers charge entirely between midnight and 8am.

The Company has not changed the budget assumptions used in the Order authorizing the program since the Company is in the early stages of implementing the program. The Company will update the budget periodically. The Administration section covers all costs associated with selected vendor and, at the current time, Con Edison anticipates seeing cost savings on a per vehicle basis relative to the budgeted amount. Conversely, Con Edison expects to see some increases to the implementation, marketing, and evaluation costs. The Company still expects to implement the program through 2025 within the authorized budget levels.

## 3.1 Incentive Derivation

### 3.1.1 Guiding Principles

In setting incentive levels, Con Edison worked with two key rules in mind:

1. Develop cost-based incentives:
   Ordering Clause 15 requires incentives offered through SCNY be cost-based, based on the difference between flat standard and off-peak supply and delivery costs for conventional and time-of-day service.
2. Prevent participant from receiving payments to charge:
   Incentive rates should be set at a relevant level to eliminate the possibility of net-positive credits, *i.e.*, credits that exceed the electricity costs to charge, to the customer following charging activity. This will be discussed in further detail in the following section.

### 3.1.2 Scope

Not every Con Edison service class (SC) will see electric load attached to it. Of the service classes published in the tariff,[14] only three are likely to have electric vehicle load affiliated with them. An overview of active tariffs and their expected participation is listed below.

| *Service Classification* | Purpose | EV load expected? | Type of vehicles |
|---|---|---|---|
| *SC 1* | Residential & Religious | ✓ | Light duty |
| *SC 2* | General – Small | ✓ | Light duty |
| *SC 5* | Traction Systems | | |
| *SC 6* | Street Lighting | | |
| *SC 8* | Multiple Dwelling – Redistribution | | |
| *SC 9* | General – Large | ✓ | Light duty, MHDV |
| *SC 11* | Buy-Back Service | | |
| *SC 12* | Multiple Dwelling – Space Heating | | |
| *SC 13* | Bulk Power – Housing Developments | | |

*Table 4: Con Edison service classes and purpose*

### 3.1.3 Incentive Calculation

While this approach naturally lends itself to the default residential rate, SC 1, commercial service classes are constructed using demand delivery rates. A breakdown of the relevant Con Edison service classes and their subclasses into their component elements is detailed in the table below.

| *Tariff Rate Property* | Customer Charge ($) | Conventional Energy Supply Charge ($/kWh) | Conventional Energy Delivery Charge ($/kWh) | TOD Energy Delivery Charge ($/kWh) | Conventional Demand Delivery Charge ($/kW) | TOD Demand Delivery ($/kW) |
|---|---|---|---|---|---|---|
| *SC 1 Rate I* | ✓ | ✓ | ✓ | | | |
| *SC 1 Rate II* | ✓ | ✓ | | ✓ | | |
| *SC 1 Rate III* | ✓ | ✓ | | ✓ | | |
| *SC 2 Rate I* | ✓ | ✓ | ✓ | | | |
| *SC 2 Rate II* | ✓ | ✓ | | ✓ | | |
| *SC 9 Rate I* | | ✓ | | | ✓ | |
| *SC 9 Rate II* | ✓ | ✓ | | | | ✓ |
| *SC 9 Rate III* | ✓ | ✓ | | | | ✓ |
| *SC 9 Rate IV** | ✓ | ✓ | | | | ✓ |
| *SC 9 Rate V** | ✓ | ✓ | | | | ✓ |

[14] Consolidated Edison Company of New York, Inc. "Schedule for Electricity Service," effective 4/1/2022.

*Table 5: Con Edison tariff elements*

* Class is subject to standby rates, which include a contract demand delivery charge and as-used daily demand delivery charges,

For purposes of this document, we offer the following definitions:

Standard Charges

- Customer Charge: A flat rate paid regardless of energy or demand consumption.

Energy Charges

- Conventional Energy Supply: Charges pertaining to the cost of the energy commodity consumed. Does not vary based on the time-of-day energy is delivered.
- Conventional Energy Delivery: Charges pertaining to the cost of delivering the energy commodity consumed. Does not vary based on the time-of-day energy is delivered.
- TOD Energy Delivery: Charges pertaining to the cost of the energy commodity consumed. Varies based on the time of day (TOD) the energy is consumed.

Demand Charges

- Conventional Demand Delivery: Charges pertaining to the cost of supplying the peak power consumption. Does not vary with the time-of-day of delivery.
- TOD Demand Delivery: Charges pertaining to the cost of supplying the peak power consumption. Varies based on when the power is consumed.

The following sections detail the development of the incentives for each subclass. In each case, the assumed shift to off-peak charging was 362.5 kWh and 75 kW. Historic supply data was obtained from publicly available sources,[15] and all available data was used to construct supply ranges.

#### *3.1.3.1 Residential – SC 1*

For residential and religious participants under this class, Con Edison created ranges for both energy supply and delivery rates by comparing standard (Rate I) rates to TOD rates (Rate III which is voluntary). Proposed incentive levels were then tested against these ranges so that incentive levels fell within the bounds prescribed by the Order and adhered to Guiding Principles 1 and 2.

Con Edison also looked at SC 1's two voluntary TOD-based rates, Rates II and III. While the standard approach for TOD rates is to compare the difference between the summer peak and off-peak periods (discussed below), it should be noted that these subclasses currently receive customer charge reductions for

[15] Specifically, Con Edison's MSC Supply Lookup File, available online at: https://dcx-downloads-prod.azureedge.net/file-downloads/LDS_APPND.CSV

customers who register an electric vehicle with the Company. They are therefore excluded from program participation.[16]

#### *3.1.3.2 Commercial – SC 2, SC 9*

##### (1) SC 2 – General, Small

SC 2 customers are defined as small, non-residential customers with under 10 kilowatts (kW) of peak demand. Since some L2 chargers operate below this threshold, it is possible some charging may happen at these customer locations. SC 2 Rate I is the standard rate for this class, and the evaluation of incentive eligibility was similar to the process for SC 1.

SC 2 II however, is the voluntary time-of-day rate for this service class and therefore the default TOD rate. Since any incentives on top of the base tariff would violate Guiding Principle 1, it was stricken from further consideration and customers registering EVs or EVSE associated with this service class will be ineligible to participate in the program.

##### (2) SC 9 – General, Large

Since subclasses of rates for SC 9 rates are designed differently, a different approach is required to setting incentives. For example, SC 9 Rate I charges for peak demand on a single monthly maximum basis, whereas the voluntary TOD class SC 9 Rate III has three separate windows where demand values are calculated. This precludes an apples-to-apples approach and thus the Company used a whole-bill comparison to meet the requirements of Guiding Principle 1.

Delivery incentives for SC 9 Rate I were set by first estimating charges for both this standard rate and the lowest-cost TOD rate (SC 9 Rate IV) and subtracting the latter from the former on an annual basis. This difference was then compared to the lowest overnight delivery rate and the lower of the two values was used to cap incentive payouts to prevent violating both Guiding Principles. Supply incentives were also bounded in a manner similar to SC 1 Rate I and used to create a range of incentives.

Con Edison continues to review the appropriateness of including commercial TOD rates in SCNY.

Supply incentives for the commercial TOD rates are also complex. In this case, the supply difference between peak times and off-peak times is on average sufficient to drive modest value that can be provided to customers in this rate class. Con Edison therefore intends to

[16] As part of its pending rate case filing, Case 22-E-0064, Con Edison proposed removing this customer charge. Should this revised tariff receive Commission approval, Con Edison will revisit incentives for the least-cost service class of either SC1 II or SC1 III post Commission approval. For details on the proposed customer charge changes, see Case 22-E-0064: "Consolidated Edison Company of New York, Inc. Direct Testimony - Electric Rate Panel", Exhibit_(ERP-2), pgs. 7-8 (filed January 8, 2022)

use the daily on/off peak supply delta as a cost-based value driver for program incentives. Con Edison will continue to review this approach.

#### 3.1.4 Incentive Summary

After completing the review above, customers receiving Con Edison electric service under the following service classes will be eligible to participate in SCNY.

| ***Rate Classification*** | **Participation Eligible?** |
|---|---|
| *SC 1 I* | ✓ |
| *SC 1 II* | |
| *SC 1 III* | |
| *SC 2 I* | ✓ |
| *SC 2 II* | |
| *SC 9 I LT* | ✓ |
| *SC 9 I HT* | ✓ |
| *SC 9 II LT* | ✓ |
| *SC 9 II HT* | ✓ |
| *SC 9 III LT* | ✓ |
| *SC 9 III HT* | ✓ |
| *SC 9 IV LT* | ✓ |
| *SC 9 IV HT* | ✓ |
| *SC 9 V LT* | ✓ |
| *SC 9 V HT* | ✓ |

*Table 6: SCNY permitted service classes*

### 3.2 Cost Recovery

As per Ordering Clause 24, program costs associated with SCNY are to be recovered through the Make-Ready surcharge. These costs will be published in the "Program Budget" section of the MCIP prior to collection. Costs will be recovered one year after being incurred with a weighted average cost of capital set at the Company's regulated rate of return accruing during the year's lag.

Costs will be allocated to the relevant service classes based on the proportional share of participation incentive dollars paid out each year. Program administration and implementation costs will be similarly proportionally split. Fleet vehicles will always be recovered through SC 9.

## 4. Program Outreach and Feedback

### 4.0 Marketing, Outreach and Education

#### 4.0.1 Participant Acquisition

SCNY plans to build on its prior success by using several media channels as well as in-person engagement to acquire new participants. These media channels include sending out quarterly email/print collateral, webinars, surveys, podcasts, websites, newsletters, social media, and targeted digital engagement, (i.e., display advertising and search engine marketing). Participants are also acquired via the Refer a Friend program which has expanded into working with marketing partners. SCNY program management reviews opportunities for in-person engagement (e.g., through ride-and-drive events,

auto enthusiast meetups, fleet shows, auto shows, etc.) on a rolling basis and seeks to focus on events with high impact returns to program enrollment.

The Company will also engage with auto manufacturers and dealerships about connected car subscription costs that may create financial barriers for customers to participate in the SCNY program. The Company will also work towards establishing partnerships with auto manufacturers and dealerships to boost enrollment.

#### 4.0.2 Outreach Materials and Participant Education

The Company's SCNY outreach strategy is a multifaceted approach that aims to engage potential customers across a variety of channels. Chief among these features is developing program participant leads to actively seek out prospective participants. These leads will organize and attend events, advocate for the program, and be available to assist participants in signing up for SCNY. This section will be updated annually, as updated materials become available.

Online, program information will be posted on the Con Edison EV web portal as well as the application website, including frequently asked questions (FAQs), testimonial videos, instructional videos, infographics, and an incentive calculator. Con Edison also engages in program marketing through targeted advertising and will continue this outreach in 2023 and beyond.

The Company will partner with various EV owner's clubs, non-governmental organizations, dealerships, developers, building management companies, and other businesses to help educate their members, employees, and customers about SCNY.

### 4.1 Customer Satisfaction

Con Edison will solicit participant feedback, with details, covering: the clarity of the program, satisfaction with program elements, and any issues that may have been encountered and detail the results of these efforts. This effort will be undertaken during the first year of the program, and the results will be published in the January 2024 MCIP.

A dedicated customer outreach specialist will work across different organizations within the Company to prepare regular customer satisfaction surveys in accordance with program needs and regulatory requirements. Survey results will be used to improve customer experience in addition to a process of continuous improvement.

### 4.2 Customer Complaints and Inquiries

The Company is implementing a process for customers to provide feedback about program user experiences, preferred enhancements, and concerns.

#### 4.2.1 Sources

The SCNY program will address customer complaints and inquiries appropriately and in a timely manner. Program participants may file complaints and inquiries through:

- Phone: Con Edison customer service hotline, SCNY customer service hotline

- Email: SCNY program email, ev.energy's customer service center

If the program participant is unsatisfied with the initial response, the Company has identified an escalation pathway to reach a resolution. All customer inquiries are categorized and will be responded to. If first response resolution is not achieved, inquiries will be internally prioritized and reviewed further for internal escalation. Escalated inquiries will be reviewed and the SCNY program team will provide a dispute resolution to the customer. A high-level overview of complaints and inquiries will be presented as part of the January 2024 MCIP.

# 5. Categorization of Complaints & Inquiries

The Company will group customer queries into 14 main categories to help process and track issues in an effective and consistent manner. The Company will use a common categorization tagging approach in order to develop standardized processes and communication for common issues. These are the 14 main categories:

1. Charging data or location incorrect
2. Charging data missing
3. Customer portal unresponsive
4. Connect >1 EV
5. Complaint about connected-car subscription fees charged by the auto OEM
6. EV not compatible
7. EV offline/disconnected
8. EVSE not compatible
9. EVSE offline/disconnected
10. General query about program eligibility or rules
11. Incentives/payment query
12. Other
13. Trouble connecting EV
14. Trouble connecting EVSE

The program customer service representative(s) will be trained to confirm which category the issue fits under and a pathway to resolution. It may be necessary to create new categories as the Program evolves.

## 5.0 Dispute Resolution Framework

### 5.0.1 Procedure

Disputes are different from complaints and inquiries due to an implication that an acceptable solution cannot be easily reached with the customer. Con Edison expects disputes with customers will primarily be restricted to missing or inaccurate charging data, described in detail below. Con Edison will employ its customer service representatives in the customer call center to handle basic questions about program

issues and instruct them to pass advanced queries over the program personnel[17] for resolution.

Con Edison is offering SCNY as a utility incentive program and does not anticipate disputes around electric meter accuracy given that meter data is not currently used for SCNY. The Company is still working to understand the limitations of load disaggregation technology on the market today.

#### *5.0.1.1 Missing Data*

In this case, Con Edison simply has no records of customer charging behavior during the time in question, due to either EV/EVSE connectivity issues or data corruption. This is frustrating to the customer, as they expect to be compensated for positive actions they have undertaken. It is also a challenge to the program administrator, which relies on the uptime, reliability and connectivity of the auto OEMs and EVSE manufacturers whose hardware is eligible for the Program. In extreme cases, if there is alternate data available, for example from the customer's vehicle OEM or EVSE app, Con Edison may accept data from an alternate source so long as it does not provide a pathway for double-incentivization (e.g., a participant submits at-home EVSE records to supplement missing vehicle telematic data for overnight charging).

Considering this, Con Edison's policy is to remind program participants that they are responsible for checking their charging behavior is being recorded appropriately within the customer portal after they first connect and on a regular basis thereafter. Con Edison may provide benefit of doubt to customers on occasional disruptions but may choose to remove an auto OEM or EVSE manufacturer from the list of eligible hardware if there are persistent issues with data quality across participants.

#### *5.0.1.2 Inaccurate Data*

For cases where Con Edison data and participant data sources disagree, Con Edison must necessarily rely on the participant to raise a concern. Given the nascence of the managed charging market and the lack of standard technology requirements, it is entirely conceivable that two sources could report moderately different behavior.

To provide a seamless customer experience, Con Edison will accept cases where customers report a charging or invoicing discrepancy in their favor so long as they are able to provide a record of the behavior in question from

[17] A customer outreach specialist in the SCNY program team will act as a point of escalation for customer issues. This specialist will work to improve customer experience, assist with enrollment, incentive payments, or other issues in accordance with program rules. This resource is also responsible for tracking customer issues in a consistent format and reporting them in the "Dispute Summary" section below on an annual basis.

their auto OEM or EVSE charging app. This record must be produced by a third party and not altered in any way. Con Edison will limit payouts to light duty EV drivers in this manner. Repeated inaccurate data reports from the same participants may trigger a reevaluation of the equipment with which the customer participates in the program. For example, if a customer's EVSE is consistently reporting higher charging values than from the vehicle, Con Edison will seek to automatically pull the data from the EVSE instead to reduce administrative burden.

Con Edison will look for common issues with OEM equipment in the marketplace and work to stay ahead of any widespread issues. This may include de-listing technology that would otherwise be accepted to minimize participant negative experiences.

1.1 Program Evaluation and Measurement

SCNY is developing an Evaluation, Measurement, & Verification Plan (EM&V Plan) to measure the effectiveness of the managed charging programs to be included in the annual reports. The plan will examine the broader impacts of the program, including how the market is evolving, understanding the effects of emerging technologies and trends. EV participants' attitudes and behaviors regarding EV managed charging will also be noted in annual reports.

The EM&V Plan will collect and report program data (the results of which will be documented in the annual MCIP filing) including program enrollment, number of participants enrolled by month, attrition rate by month, and incentive payout by month. Program data and evaluation results will be available after the first year of program operations are complete, in January 2024. The Company will also include information around program administration.

## 5.1 Billing Impacts

Billing impacts, which for Con Edison program consists of incentives provided for desired charging behavior that effectively reduce charging bills, will be collected, reviewed, and compiled in subsequent MCIPs as the next phase of SCNY is implemented. The table(s) will include the following information:

- Average participant and non-participant savings
- Associated equivalent bill impacts
- Value of participation incentives differentiated by delivery and supply costs
- Updated supply rate forecast once the new supply rate is calculated
- Subsequent adjusted managed charging credit modified in coordination with the updated supply forecast that informs the EV TOU rates

### 5.1.1 Participant Charging Behavior

- Average duration of charging sessions
- Aggregated kWh consumption data for on- and off-peak periods, by season, if applicable
- Aggregated number of charging events for on- and off-peak periods, by season, if applicable
- Aggregated duration of on-peak charging events and off-peak charging events

- Provide the information requested in 2.a-2 d for load relief hours if applicable
- Events opt-out rate for active managed charging programs

### 5.1.2 Participant Satisfaction

Con Edison will establish and implement a Net Promoter Survey. Following current practice, the survey will take place around the beginning of the fourth quarter of each year so that recent results can be published in the January MCIP. Following discussion with Staff, the Net Promoter survey will use the following language to gauge customer interest:

*On a scale of 0 to 10, how likely are you to recommend the Con Edison's Managed Charging program (SmartCharge New York) to other EV owners? (0=Not at all likely and 10=Extremely likely)*

An aggregate response of under 7.5 on a per-participant average basis will trigger an automatic review of program procedures and operations. Following this review, Con Edison will file an updated MCIP detailing options it considered and programmatic changes it is implementing to improve the customer experience.

Working with a partner, the Net Promoter Survey will be distributed via email to registered program participants. Con Edison drafts a communication package including invites and reminders that is sent to participants. The survey is currently offered in English, and Con Edison is reviewing the benefits of including other prominent service territory languages as well. In 2022, over 7,000 participants received an invite to the survey. Email reminders are sent out throughout the duration of the survey period. Con Edison offers a $25 bonus to participants who complete the survey as a marketing expense. From 2020-2022, the average response rate was 72 +/- 3%.

In addition to the core mission of gauging baseline satisfaction with the program, survey results are used to determine the efficacy of program features and demographic makeup of program participants. These responses are critical to helping Con Edison understand the drivers of customer behavior in its service territory and stay ahead of any emerging program issues.

Con Edison will review the efficacy of current incentive levels with Staff throughout the duration of the program. Incentive efficacy will be primarily measured through participation in the program.

# 6. Glossary: Abbreviations, Acronyms and Definitions

| | |
|---|---|
| API | Application Programming Interface. Allows two applications to communicate without the need for human interaction. Some auto manufacturers or OEMs (original equipment manufacturers) have APIs that can be accessed by a third-party for use in SmartCharge New York to share charge data directly from the vehicle via the onboard telematics. |
| Applicant | Any entity who has submitted program registration details to Con Edison 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 Supply Chain to work at Con Edison. |
| CLCPA | Climate Leadership and Community Protection Act |
| Commission or PSC | New York Public Service Commission |
| Company | Consolidated Edison Company, of New York, Inc. (“Con Edison”) |
| Connected Car Device | Geotab Go9 Device. This device plugs into a vehicle’s onboard diagnostic (OBDII) port and collects charging and other vehicle data through the vehicle CAM Bus. |
| Customer | A person or organization that is billed for Con Edison 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. |
| Implementation Plan | Outlined proposal to facilitate the execution of a managed charging program plan. |
| 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. Con Edison’s MRP is known as PowerReady. |
| 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. |
| MSC | Market Supply Charge. Cost of energy commodity reflected on customer bills. Varies by time and service class and available on Con Edison's website. (https://www.coned.com/en/accounts-billing/your-bill/rate-calculators/market-supply-charge) |
| Mass Market | Private individual consumers who charge vehicles in the Con Edison service territory. |
| 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. |
| PSC | New York State Public Service Commission. Con Edison's utility service regulator. |
| Service Classification (SC) | Service class. Electric service delivered under one of Con Edison's tariffs, as filed with the PSC. |
| SCNY | SmartCharge New York, Con Edison's managed charging program |
| Staff | Staff of the Department of Public Service. |
| Telematics | Onboard tracking that measures speed, mileage, charging, updates, and other operational characteristics of a vehicle. Data collection can be via pre-installed technology or via third-party device and is sent to a repository via cellular or Wi-Fi connection. |

# 7. Appendices

## Appendix 1: SCNY Supported EVs and EVSEs

SCNY is continually working to expand the list of vehicles and EVSEs that are eligible for program enrollment based on market sales and program waitlist data. As new technology comes to market, the Company will continue to explore the feasibility of expanding the list of supported vehicles and EVSEs.

The following networked EVSEs will communicate with the SCNY platform:

- ChargePoint
- Enel X JuiceBox
- SmartEnit
- Siemens Versicharge

Below is the list of EVs that can communicate with the SCNY platform.

**Audi**
- A5 PHEV 2022+
- A7 PHEV 2021+
- A8 IPHEV 2020-21
- Q4 e-Tron 2022+
- Q5 PHEV 2020+
- e-Tron 2019+

**BMW**
- 3-series PHEV 2017+
- 5-series PHEV 2017+
- 7-series PHEV 2017+
- i3 (+REX) 2017-2021
- i8 2017-2020
- iX 2021+
- X3 PHEV 2020-21
- X5 PHEV 2017+

**Cadillac**
- CT6 PHEV 2017-18
- ELR 2017-16

**Chevrolet**
- Bolt (incl. EUV) 2017+
- Volt 2017-19

**Chrysler**
- Pacifica Hybrid 2017+

**Ford**
- Escape PHEV 2021+
- F-150 Lightning 2022+
- Fusion PHEV 2020
- Mach-E Mustang 2021+

**Hyundai**
- IONIQ5 2022+
- IONIQ BEV 2017-21
- IONIQ PHEV 2018+
- Kona 2019+
- SantaFe PHEV 2022+
- Sonata PHEV 2017-19
- Tucson PHEV 2022+

**Jaguar**
- i-pace 2019+

**Jeep**
- Cherokee 4xe 2022+
- Wrangler 4Xe 2021+

**Kia**
- e-Niro 2019+
- EV6 2022+
- Optima PHEV 2017-2020
- Niro PHEV 2018-19
- Sorrento PHEV 2022+
- Soul BEV 2017-2020

**Land Rover**
- Range Rover P400e 2019-21

**Lincoln**
- Aviator 2020+
- Corsair 2021+

**Mini**
- SE Countryman 2018+
- SE Hardtop 2020+

**Nissan**
- Leaf 2017+

**Rivian**
- R1S 2022+
- R1T 2022+

**Tesla**
- Model 3 2017+
- Model S 2012+
- Model X 2016+
- Model Y 2020+

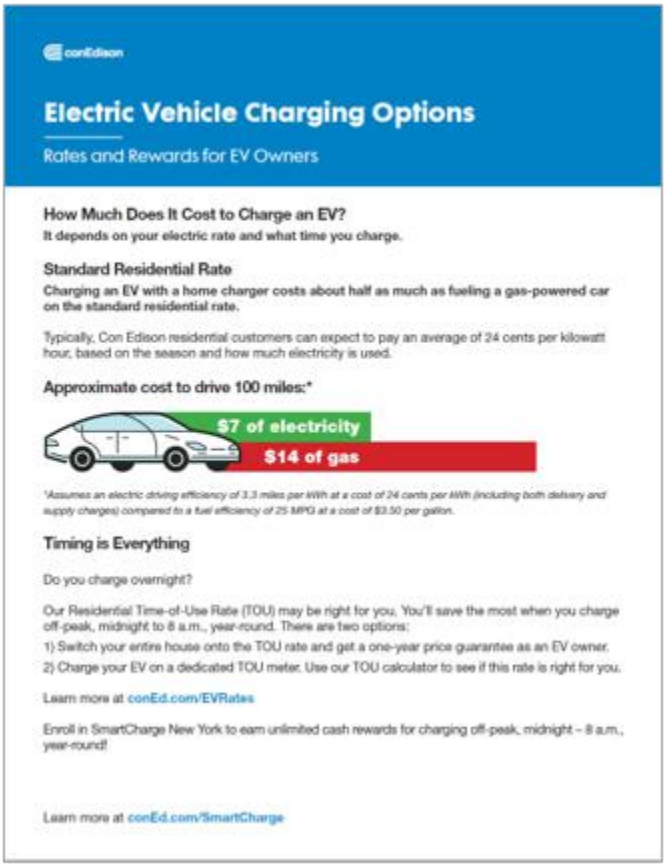
**Toyota**
- Prius Prime 2021+
- RAV4 Prime 2021+
- BZ4X 2023 +

**Volvo**
- C40 Recharge 2022+
- S60/S90 PHEV 2018-21
- XC40 Recharge 2021+
- XC60 PHEV 2018 – 2021
- XC90 PHEV 2016+

## Appendix 2: Marketing Materials

Samples of marketing materials will be available in later iterations of the MCIP. These samples include outreach materials such as bill inserts, e-mails, advertisements, and webpage layouts. Con Edison will develop these materials during the first year of program operations and will include them in this section.

Examples of outreach materials used in prior marketing campaigns. These materials will be updated for the new program in 2023.



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**Electric Vehicle Charging Options**

Rates and Rewards for EV Owners

**How Much Does It Cost to Charge an EV?**

It depends on your electric rate and what time you charge.

**Standard Residential Rate**

Charging an EV with a home charger costs about half as much as fueling a gas-powered car on the standard residential rate.

Typically, Con Edison residential customers can expect to pay an average of 24 cents per kilowatt hour, based on the season and how much electricity is used.

**Approximate cost to drive 100 miles:***



*Assumes an electric driving efficiency of 3.3 miles per kWh at a cost of 24 cents per kWh (including both delivery and supply charges) compared to a fuel efficiency of 25 MPG at a cost of $3.50 per gallon.

**Timing is Everything**

Do you charge overnight?

Our Residential Time-of-Use Rate (TOU) may be right for you. You'll save the most when you charge off-peak, midnight to 8 a.m., year-round. There are two options:

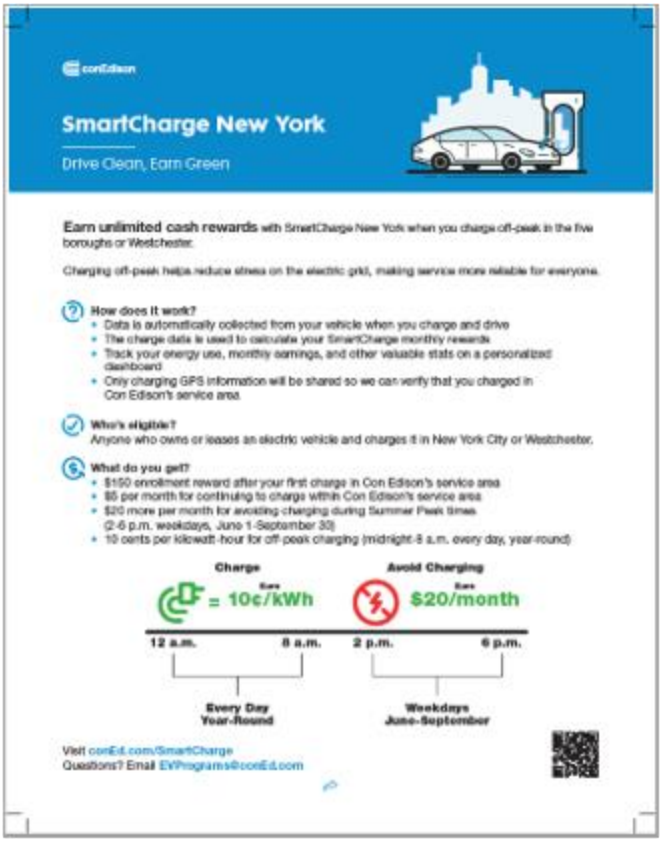
1) Switch your entire house onto the TOU rate and get a one-year price guarantee as an EV owner.

2) Charge your EV on a dedicated TOU meter. Use our TOU calculator to see if this rate is right for you.

Learn more at conEd.com/EVRates

Enroll in SmartCharge New York to earn unlimited cash rewards for charging off-peak, midnight – 8 a.m., year-round!

Learn more at conEd.com/SmartCharge



conEdison

## SmartCharge New York

Drive Clean, Earn Green

**Earn unlimited cash rewards** with SmartCharge New York when you charge off-peak in the five boroughs or Westchester.

Charging off-peak helps reduce stress on the electric grid, making service more reliable for everyone.

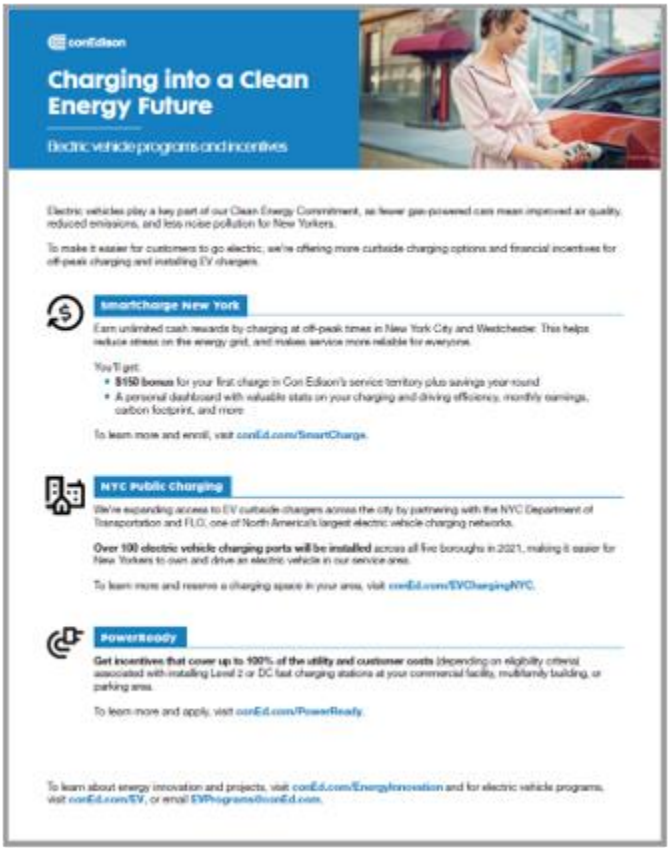
**How does it work?**
- Data is automatically collected from your vehicle when you charge and drive
- The charge data is used to calculate your SmartCharge monthly rewards
- Track your energy use, monthly earnings, and other valuable stats on a personalized dashboard
- Only charging GPS information will be shared so we can verify that you charged in Con Edison's service area

**Who's eligible?**
Anyone who owns or leases an electric vehicle and charges it in New York City or Westchester.

**What do you get?**
- $150 enrollment reward after your first charge in Con Edison's service area
- $5 per month for continuing to charge within Con Edison's service area
- $20 more per month for avoiding charging during Summer Peak times (2-6 p.m. weekdays, June 1-September 30)
- 10 cents per kilowatt-hour for off-peak charging (midnight-8 a.m. every day, year-round)



Visit conEd.com/SmartCharge
Questions? Email EVPrograms@conEd.com



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## Charging into a Clean Energy Future

Electric vehicle programs and incentives

Electric vehicles play a key part of our Clean Energy Commitment, as fewer gas-powered cars mean improved air quality, reduced emissions, and less noise pollution for New Yorkers.

To make it easier for customers to go electric, we're offering more curbside charging options and financial incentives for off-peak charging and installing EV chargers.

### SmartCharge New York

Earn unlimited cash rewards by charging at off-peak times in New York City and Westchester. This helps reduce stress on the energy grid, and makes service more reliable for everyone.

You'll get:
- **$150 bonus** for your first charge in Con Edison's service territory plus savings year-round
- A personal dashboard with valuable stats on your charging and driving efficiency, monthly earnings, carbon footprint, and more

To learn more and enroll, visit conEd.com/SmartCharge.

### NYC Public Charging

We're expanding access to EV curbside chargers across the city by partnering with the NYC Department of Transportation and FLO, one of North America's largest electric vehicle charging networks.

**Over 100 electric vehicle charging ports will be installed** across all five boroughs in 2021, making it easier for New Yorkers to own and drive an electric vehicle in our service area.

To learn more and reserve a charging space in your area, visit conEd.com/EVChargingNYC.

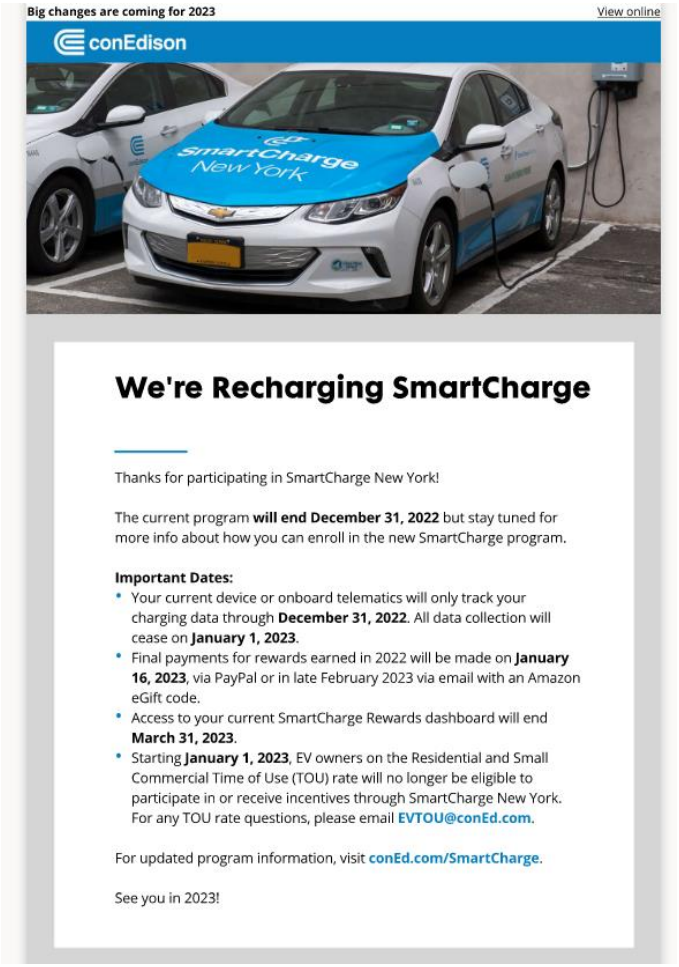
### PowerReady

**Get incentives that cover up to 100% of the utility and customer costs** (depending on eligibility criteria) associated with installing Level 2 or DC fast charging stations at your commercial facility, multifamily building, or parking area.

To learn more and apply, visit conEd.com/PowerReady.

To learn about energy innovation and projects, visit conEd.com/EnergyInnovation and for electric vehicle programs, visit conEd.com/EV, or email EVPrograms@conEd.com.

Below are images from our revised marketing campaign for 2023 as customers transition to our new vendor and platform.



Big changes are coming for 2023 View online

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## We're Recharging SmartCharge

Thanks for participating in SmartCharge New York!

The current program **will end December 31, 2022** but stay tuned for more info about how you can enroll in the new SmartCharge program.

**Important Dates:**

- Your current device or onboard telematics will only track your charging data through **December 31, 2022**. All data collection will cease on **January 1, 2023**.
- Final payments for rewards earned in 2022 will be made on **January 16, 2023**, via PayPal or in late February 2023 via email with an Amazon eGift code.
- Access to your current SmartCharge Rewards dashboard will end **March 31, 2023**.
- Starting **January 1, 2023**, EV owners on the Residential and Small Commercial Time of Use (TOU) rate will no longer be eligible to participate in or receive incentives through SmartCharge New York. For any TOU rate questions, please email **EVTOU@conEd.com**.

For updated program information, visit **conEd.com/SmartCharge**.

See you in 2023!

New things coming next year! View online

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# A Smarter SmartCharge in 2023

Thanks for participating in SmartCharge New York!

The current program with Geotab ends on **December 31, 2022**, and will relaunch in 2023 with our new vendor **ev.energy**. Your current device or onboard telematics will only track your charging data through December 31.

To continue with the program in 2023, you'll need to **re-enroll with the new platform**—it's simple and easy to connect and you'll **earn $25** just for signing up.

The new program is even better, thanks to you! We listened to your survey feedback and added a mobile app to track your charging and earned incentives.

If you have a connected car device, you may remove and properly dispose of it on or after January 1, 2023.

**Note**: you'll have access to your current SmartCharge Rewards dashboard through March 31, 2023, and final payments for rewards earned in 2022 will be made on January 16, 2023 via PayPal, or in late February 2023 via email with an Amazon e-Gift code.

For the most up-to-date information, visit **conEd.com/SmartCharge**, or email **EVPrograms@conEd.com**.

For help enrolling in the new program or downloading the app, email **SCNY@ev.energy**, or call 1-419-909-6237.

**Get Started**

## Appendix 3: Customer Service Materials

Samples of CSR scripts and training materials will be included in this section at a later date. These materials continue to be enhanced as the program welcomes new participants and identifies the most common types of inquiries.

Here are sample images our customers will see when they have successfully enrolled in our program and via the customer app