



May 16, 2021

VIA ELECTRONIC FILING

Hon. Michelle Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, New York 12223-1350

Re: Case 18-E-0138 – Proceeding on Motion of the Commission Regarding Electric Vehicle Supply
Equipment and Infrastructure

Dear Secretary Phillips:

Advanced Energy Economy Institute (AEE Institute) and the Alliance for Clean Energy New York (ACE NY) submit for filing their comments on the *Petition of Consolidated Edison Company of New York to Modify its EV Make-Ready Program to Improve Service to Disadvantaged Communities and Development of Fast Chargers*, which was published in the New York State Register on March 16, 2022.

Respectfully Submitted,

A handwritten signature in black ink that reads "Daniel Waggoner". The signature is written in a cursive, flowing style.

Daniel Waggoner
Policy Director
Advanced Energy Economy

Comments on the Petition of Con Edison to Modify its EV Make-Ready Program (18-E-0138)

Advanced Energy Economy Alliance for Clean Energy New York

Advanced Energy Economy (AEE Institute) is submitting these Comments in response to the *Petition of Consolidated Edison Company of New York to Modify its EV Make-Ready Program to Improve Service to Disadvantaged Communities and Development of Fast Chargers* (“Petition”). The Petition was published in the New York State Register on March 16, 2022. In order to respond to this Petition, AEE Institute is working with Advanced Energy Economy¹ and the Alliance for Clean Energy New York² (ACE NY) to craft the comments below. These organizations are referred to collectively in these comments as the “advanced energy companies,” “we,” or “our.”

We appreciate the efforts of the Consolidated Edison Company of New York (“Con Edison” or “the Company”) to improve the effectiveness of its make-ready program. We either support or have no objection to the modifications Con Edison has proposed to its EV Make-Ready Program. The Petition proposes to 1) narrow the eligibility criteria for the higher incentive levels for Disadvantaged Communities (DACs), 2) add new funding for the DAC make-ready incentives, 3) remove a mid-program spending cap on incentives for Level 2 chargers, and 4) to eliminate the 50% budget limitation for incentives provided to HVDC stations with more than 10 plugs and to raise the single-site cap on plugs from 10 to 30.

We support Con Edison’s proposal to remove the one-mile radius surrounding DACs, which the Company claims has allowed the DAC incentive to largely be expended thus far in locations that do not support DACs. This change in eligibility should improve the ability of the incentive to serve DACs and fulfill the incentive’s intended purpose. We also support the Company’s request to add new funds to the DAC incentive rather than transfer funds from other elements within the make-ready program. Reducing

¹ AEE is a national business association representing leading companies in the advanced energy industry. AEE supports a broad portfolio of technologies, products, and services that enhance U.S. competitiveness and economic growth through an efficient, high-performing energy system that is clean, secure, and affordable.

² ACE NY’s mission is to promote the use of clean, renewable electricity technologies and energy efficiency in New York State, in order to increase energy diversity and security, boost economic development, improve public health, and reduce air pollution.

funding to non-DAC areas will cause challenges for EV charging developers as they plan for new stations and will reduce the predictability of these programs.

We support Con Edison's proposal to remove the mid-program spending cap for Level 2 chargers that limits spending over the first three years of the program to 60% of available funds. Currently, the Company faces the prospect of needing to stop and then restart its Level 2 program, creating administrative barriers and inefficiencies for both Con Edison and charging developers. Also, if there is sufficient demand and willingness to install Level 2 chargers now, it does not make sense to limit their deployment. Doing so only delays the benefit they can provide to EV drivers. It is not clear what purpose the mid-program cap serves.

Lastly, we do not object to raising the single-site plug cap limit from 10 to 30 and removing the limit on the percentage of the budget that can be used for incentives to stations with more than 10 plugs. We are concerned that a greater clustering of plugs can limit the geographic cover of charging stations. However, this clustering also comes with efficiencies of scale, which may allow more plugs to be deployed. For this reason, we raise no objection to the increase in the cap limit.

AEE and ACE NY commend Con Edison for taking proactive steps to ensure the effective functioning of their make-ready programs and recommend that the New York Public Service Commission approve their petition.