STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

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

STRAW PROPOSAL FOR STREAMLINED QUEUE MANAGEMENT IN ELECTRIC VEHICLE MAKE-READY PROGRAM AND OTHER PROGRAMS

Introduction

Consolidated Edison Company of New York ("Con Edison") submits this straw proposal ("Proposal") in accordance with the New York Public Service Commission's (PSC) recent orders[1] related to programs that provide incentives to electric vehicle (EV) charging stations to offset the cost of bringing power from the grid to the EV chargers. In the 2023 Order,[2] the PSC directed 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 Electric Vehicle Infrastructure Interconnection Working Group (EVIIWG)." This Proposal shares best practices and lessons learned for the EVIIWG and the New York Joint Utilities (JU)[3] to facilitate a supportive process for Make-Ready applicants from first contact with the Utility to EV station energization.[4] The EVIIWG's consideration of this Proposal can facilitate meeting the more ambitious Make-Ready Program (MRP) targets outlined in the 2023 Order on-time and (if necessary) managing application surges or waitlist situations that may arise as incentives become exhausted.

Con Edison proposes a queue management approach consisting of four methods informed by five guiding principles, outlined in Table 1:

[1] July 16, 2020 *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs* ("2020 Order"), July 14, 2022 *Order Approving Modifications to Make-Ready Program* ("2022 Order"), and November 16, 2023 *Order Approving Midpoint Review Whitepaper's Recommendations with Modifications* ("2023 Order").
[2] 2023 Order, p. 29
[3] The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York (Con Edison), New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid (Grid), Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation.
[4] The program flow is laid out in the Appendix.

Table 1. Queue Management Methods Underpinned by Cross-cutting Principles for Continuous Improvement

Methods for Streamlining Queue Management: 1. Operations measures 2. Participant informational tools for pre-engagement, planning, and project management 3. Participant communication strategies 4. Utility enterprise alignment				
Guiding Principle #1: Speed to goal	**Guiding Principle #2: Flexibility and innovation**	**Guiding Principle #3: Fair process**	**Guiding Principle #4: Participant experience**	**Guiding Principle #5: Transparency**
The importance of moving projects through the program process expeditiously to reach MRP targets and help achieve New York's clean transportation goals.	Space for innovation and flexible solutions are often in parties' best interests; avoidance of rigidity that could lead to a compliance mindset where performance converges to the lowest common denominator.	A positive experience with the MRP can support the Participant's current projects, while encouraging the Participant to develop additional projects through the MRP.[5]	Building trust across stakeholders and improving MRP engagement and commitment.	Providing Participants and other stakeholders information to understand the MRP processes and allowing Participants to plan their business decisions accordingly.

This Proposal outlines best practices for effective queue management that worked for EV station projects in Con Edison's service area and that can assist with queue management of EV station projects across New York State by applying the methods and guiding principles in Table 1. In developing this Proposal, Con Edison draws on its experience during the first three-and-a-half years of the Make-Ready Program where, as of early March 2024,[6] 7,166 Level 2 (L2) charging plugs and 305 DC Fast Charging (DCFC)

[5] This is particularly important as many other states in the region and across the country provide similar Program incentives. The objective is to focus EV charging station developers on New York State.

[6] Data provided as of March 8, 2024 for the Con Edison service area, where data includes some plugs that are operational but are not considered "completed," meaning they have not completed the full program closeout process. The Con Edison Make Ready plug incentive budget was $233 million, as authorized by the 2020 Order. Of this amount, 25% has been spent on completed L2 and DCFC projects and 30% is committed to L2 and DCFC projects under construction or awaiting closeout.

plugs were installed and a robust queue of 3,800 L2 and 428 DCFC plugs were under construction.[7] This Proposal also reflects the queue management strategies Con Edison developed after Con Edison received a high volume of incentive project applications in a short period in late 2021, leading to a waitlist environment.[8] During this period, Con Edison gathered feedback from Make-Ready Program participants and other stakeholders; this feedback is also reflected in this Proposal.

Definitions

Disadvantaged Community: Communities that bear burdens of negative public-health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high concentrations of low- and moderate-income households, ECL § 75-0101(5). This definition was adopted by the Climate Justice Working Group (CJWG) on March 27, 2023. An updated map reflecting the CJWG's final definition of Disadvantaged Community is available online.[9]

Participant: An entity, including its subsidiary or affiliate, that applies for and/or receives the incentives available through the Make-Ready Program. This includes:

- **Developer**: an entity responsible for designing, constructing, and commissioning an EV charger site. This entity may also be responsible for owning, managing, and operating the chargers. Developers tend to take on multiple plug deployment projects at once, constituting a portfolio of projects.
- **Equipment Owner**: the entity that purchases and owns or controls the EV charging equipment once it is installed.
- **Site Host**: the electric account owner of the site on which the EV charging equipment is installed. The Site Host may or may not be the Equipment Owner.
- **Customer**: an entity taking service from Con Edison.

[7] Pacific Gas and Electric's three-and-a-half year Pilot (from January 2018 through June 2021) funded incentives for L2 make-ready infrastructure, with approximately 4,500 L2 plugs installed with a budget of $130 million.
[8] At that time, project application volume increased by over 10 times within a few weeks, from 17 applications per week to 172 applications per week. This increase strained internal resources and led to a waitlist for enhanced incentives for L2 plugs benefitting disadvantaged communities. After assessing its pipeline and listening to Participant feedback, Con Edison developed several strategies to manage its queue and moved through a backlog of approximately 20,000 plugs throughout 2022, clearing the waitlist by Q1 of 2023 by moving some projects forward in the process and cancelling others.
[9] https://data.ny.gov/Energy-Environment/Final-Disadvantaged-Communities-DAC-2023/2e6c-s6fp/about_data

Program Agreement: a contract in the Make-Ready Program where the Participant agrees to the service connection layout, the initial incentive offer, and other terms provided by the Utility, before the Participant starts construction.

Program Team: utility employees involved in managing the administration of Make-Ready Program incentives, including prospective Participant outreach, evaluation of a project's eligibility, and shepherding the project from application to incentive payout.

Service Determination Teams: the technical Utility teams that conduct the analysis to determine whether the service to a site is sufficient to serve the Participant's requested capacity expansion; if insufficient, the Service Determination Team outlines the scope of work for utility grid upgrades to serve the new load.

Utility: single member utility of the JU.

1.0 Operations measures

The strategies in this section promote fairness and transparency, fostering a predictable Participant experience.

1.1 Incentive eligibility review and service determination review initiation

The incentive eligibility review is the first step after an application for EV Make-Ready incentives is submitted. Before conducting any technical or engineering review, the Utility determines if the project is eligible for incentives. After incentive eligibility review, the Program Team sends a project to the Service Determination Team.

1.1.1 Determine sequencing of incentive eligibility review. Weigh factors like date of application, policy priorities, and other operational factors in reviewing incentive eligibility, emphasizing transparency and fairness. One common operational approach is to review completed and submitted applications for incentive eligibility on a first-come, first-served basis.

1.1.2 Move projects forward in batches to manage the queue in a high-volume application period.[10] A batched project review may improve efficiency during the incentive review process. For example, reviewing incentive eligibility for a

[10] The terms *batching* or *batches* are derived from industrial engineering's definition of various production systems. See "Production Systems." *Britannica Money*. Accessed March 6, 2024. Available at https://www.britannica.com/money/assembly-line

large group (or a batch) of projects enables the engineering pre-requisite documents across all batched projects to be submitted to the Service Determination Team at the same time, starting the service review. Each Utility should consult with their internal departments to determine the appropriate volume of projects per batch, based on internal resources available, so that batched projects can be submitted for service determination together.

This approach has been successful since batching keeps the workload manageable for both the Program and Service Determination Teams. The Program Team can consider collective milestones across many projects because all batched projects are at a similar stage (see Appendix for a flow diagram of stages), and the Service Determination Team can focus on one step of the process – the service review – for many projects during a review sprint.

1.1.3 The Program Team should determine a prioritization strategy for sending applications to the Service Determination team (after incentive eligibility review). For example, if the Utility needs to prioritize speed, then the Program Team can prioritize batching and sending projects that are "shovel-ready" (i.e., ready to start construction) to the Service Determination Team. Focusing on the priority will improve throughput to goal, while still maintaining fairness and transparency.

1.2 Innovations

1.2.1 Use Utility- and Participant-initiated temporary pauses, putting projects "on hold," in the service determination queue management system. Rather than using a process that specifies cancelling a project not ready to move forward, allow for a project to be put "on hold" until the Participant is ready to proceed.[11] This flexible approach allows projects to pause temporarily if they cannot move forward due to situations like the Participant needing to secure financing or permitting or to finalize an agreement with the site host. The "on hold" status allows the Utility to allocate resources to projects ready to move forward. This approach avoids canceling the project, which can create work for both the Participant and the Utility to reinitiate the application process if/when the project

[11] A pause connotes that originally estimated Utility-dependent and Participant-dependent timelines require revising.

resumes. Note that an "on hold" status is considered temporary and, after a specified timeframe, "on hold" projects are considered for cancellation as described below.

1.2.2 Establish a "cancellation" policy to underscore fairness. Cancellation may apply (a) to projects that have remained in the "on hold" category beyond a defined timeframe, (b) when a Participant remains non-responsive past a defined timeframe, (c) when the Participant decides to not move forward or (d) when a committed project has not been completed after a period of time defined in the Program Agreement**.** For example, if Participant-side construction is not completed within one year following the full signing and acceptance of the Program Agreement, and if the Participant and the Utility cannot come to a mutually agreeable revised completion date, then the Utility may cancel the project.

1.2.3 Identify areas of flexibility across a Participant's full portfolio: queue management processes should maintain flexibility for the Utility to identify places where it can accommodate Participants' needs and preferences. For example, Con Edison helps Participants, including developers, evaluate projects within their portfolio and offers flexibility to prioritize projects based on Participant-communicated shovel-readiness, as long as the projects are part of the same batch (See section 1.1.2). This flexible approach improves the Participant experience and promotes speed with no detriment to fairness, as this prioritization is contained within a single Participant's portfolio. This approach is possible because there is not an overly prescriptive statewide process, which would limit this flexibility.

1.2.4 Establish a pace that matches Participants' needs as much as possible, within safety parameters and in partnership with Service Determination Teams. Matching Participants' pace can promote innovation for a positive Participant experience; in contrast, mandated timelines shift focus away from innovation in the Participant experience and toward a compliance mindset.

As an example of innovation, Con Edison uses an internal tool to expedite service determinations for load requests that meet certain criteria. This tool, known as an auto-rule, allows simpler projects to go through an automated service determination. Projects that are auto-ruled as service adequate (e.g., no

grid upgrades are required) can immediately progress to the next step without a full engineering review, giving engineering groups more time to work on complex projects. The Company is exploring how auto-rule can be expanded to include a wider breadth of project types.

1.3 Data management

1.3.1 Robust and transparent records and project platforms. Save and standardize documentation of Participant correspondence and share changes in project status with Participants. Good record keeping supports future program review and helps the Program Team communicate to a Participant what stage their project is in and whether a project is waiting on Participant-provided materials; transparent record keeping also allows Utility teams and Participants to work from the same information in managing the project.

2.0 Participant informational tools for pre-engagement, planning, and project management

The strategies in this section emphasize the guiding principles of speed to goal, transparency, and a positive Participant experience. Some of these strategies build on services offered across all JU members, including advisory service and hosting capacity maps.

2.1 Expand fleet advisory services to all MRP Participants, which helps reduce churn and timelines. The 2020 Order directed utilities to provide fleet advisory services. Con Edison developed several pre-application services to support site identification and application preparation available to all active and potential Participants. First, the Program Team supports Participants as they prepare the required documents for their application for service determination. Second, the Program Team completes site assessments, which provide a preliminary review of the grid capacity at the site before application documents are prepared and the full service determination is completed. The site assessments – and their review with Participants – are valuable for 1) helping Participants determine if a site is viable before significant Participant and Utility

resources have been invested in the project and 2) educating the Participant on the service determination process to improve the Participant Experience and speed to goal.[12]

2.2 Build self-service tools that help prepare the Participant for productive conversations with Program Team or advisory services, thereby increasing the speed and transparency with which Participants move through the incentive application and interconnection process. A hosting capacity map[13] and an EV charging rate calculator[14] help the Participant plan for their projects; they are most effective if reviewed with a member of the Program Team. Additionally, a publicly available list of required documents, with clear guidance on what constitutes an acceptable document, helps the Participant prepare to move through the application and MRP process quickly. The Joint Utilities may align around common documents.[15]

2.3 Improve application logic for clarity and efficiency. For example, develop application logic that automatically prevents submission of an application for service determination without all required documents.

2.4 Develop a Participant portal where Participants can view project status: Well-designed program platforms allow the Participant transparency in project history, status, open items, and next steps. A platform can help make transparent to the Participant in whether the Utility or Participant is the "owner" of each stage, and what's required to move projects forward to the next step.

2.5 Publish a flow diagram showing the end-to-end program process and indicate which steps are owned by the Participant versus Utility. This promotes transparency and Participant experience. See a sample flow diagram in Appendix A.

[12] Alliance for Transportation Electrification (ATE) writes, "One of the most critical aspects of the infrastructure development process is what happens before potential charging station developers file a new service application, which is the package of information the utility requires to determine and design the facilities necessary to provide the customer with the requested power." Source: *Energizing EV Charging Stations Issue Brief.* March 2024. "ATE Interconnection Task Force, Issue Brief 4," p.2.

[13] Con Edison's current hosting capacity maps are available at https://www.coned.com/en/business-partners/hosting-capacity

[14] Con Edison's EV charging rate calculator is available at https://charging.coned.com/

[15] Con Edison's requirement are found at Con Edison Make-Ready Program Contractor Program Documents and Tools. Accessed February 16, 2024. Available at https://www.coned.com/en/our-energy-future/electric-vehicles/power-ready-program/contractor-resources/program-documents-tools

3.0 Participant communication strategies

The strategies in this section typically deliver a positive Participant experience and provide transparency.

3.1 **Publish remaining incentive funds.** Con Edison and all JU members publish a refreshed budget and plug tracker on an informational website,[16] giving Participants a transparent view into the remaining incentive budget so they can make business decisions accordingly.

3.2 **Hold webinars for program updates.** In webinars, share MRP updates, including eligibility requirements, process improvements, and the status of remaining incentive funds. Participants are also interested in policy and regulatory updates. Webinars can be especially helpful for Participants new to the MRP and provides scheduled time for Participants to ask questions.

3.3 **Communicate a timeline range for estimated completion of utility-side upgrades (as applicable) after the Participant receives the service determination.** Emphasize that the timeline estimate is specific to the individual project and the scope studied in the service determination, as construction timelines vary based on project complexity and any modifications made by the Participant throughout the process may extend the deadline.

3.4 **Highlight and explain deadlines for Participant-dependencies in the timeline** (i.e., where Participants must provide information or take action)**.** If a participant misses a deadline, resources can be diverted from projects that are ready to meet deadlines. The deadlines should also include a defined, unpublished grace period for Participant deadlines and consider removing the grace period in waitlist scenarios**.**

4.0 Utility-enterprise alignment

The strategies in this section focus on speed to reaching the plug goal and flexibility. Enterprise alignment supports efficient program process and service determination innovation. The service determination step follows incentive eligibility review. During this step, the Utility determines whether the service to a site is sufficient to serve the Participant's requested capacity expansion.

[1616] Joint Utilities of New York. " EV Make-Ready Program: Plug and Budget Tracker."Accessed March 6, 2024." Available https://jointutilitiesofny.org/ev/make-ready.

If not, the service determination will produce an engineering analysis of the scope of utility-side work and upgrades required to serve the new load.

4.1 Define if, when, and how to accept project scope changes that impact service determination. Because these changes – such as higher or lower capacity EV chargers, changing the number of chargers, or moving the service point of entry – require new engineering analysis, Utilities should have a plan for such changes. For example, weigh the pros and cons of implementing policies for scope changes. Participants can be required to (1) complete a new service determination but their incentive application may remain valid or (2) submit a new incentive application and go through another service determination. Policies should balance efficiency for the Participant and Utility teams, while encouraging Participants to move forward with service determination only once the project scope is finalized. A flexible and non-prescriptive approach to queue management is essential for allowing accommodation of changes midstream, while keeping fairness top of mind and projects moving forward.[17]

4.2 Forecast for internal teams. The Program Team should estimate the volume of cases across various stages of the pipeline for internal stakeholders like Service Determination Teams (supported by batching discussed in Section 1.1.2). If batch size is determined through collaboration with Service Determination Teams, factoring in resources available, then the Program Team can forecast a transparent ceiling of expected inflow to Service Determination Teams.

4.3 Positive performance incentives drive innovation, enterprise alignment, and commitment, along with transparency. Earning Adjustment Mechanisms (EAMs) promote an innovative mindset to drive towards excellence, rather than a compliance mindset seeking to meet the lowest common denominator, and they encourage utility-wide collaboration and alignment across the end-to-end program process**.**

For example, the Make-Ready Program Share the Savings EAM[18] and the Con Edison Transportation Interconnection Timeline EAM[19] create transparency into Company plug

[17] For example, currently Con Edison permits a Participant to request a project scope change once per project without submitting a new incentive application and must submit revised documents for a new service determination within 30 days of requesting a service change.

[18] Incentivizes utilities to prioritize plug deployment and cost containment to reach plug targets within allotted budgets expeditiously. 2023 Order, *Appendix E.*

[19] Encourages the Utility to interconnect EV charging stations in timeframes that are shorter than historical baselines. Case 22-E-0064, Proceeding on Motion of the Commission as to the Rates, Charges, Rules and

target and interconnection performance,[20] respectively; EAM performance is filed publicly in the relevant proceedings. Stakeholders have supported performance incentives, paired with ambitious targets, to drive innovation to shorten timelines.[21]

Conclusion

This Proposal includes a wide range of best practices that the EVIIWG can review, discuss, and consider. Effective queue management -- and ultimately clean transportation progress -- stems from the right best practices, utility incentives (e.g., EAMs), and transparency across stakeholders.

Dated March 15, 2024.

Respectfully submitted,

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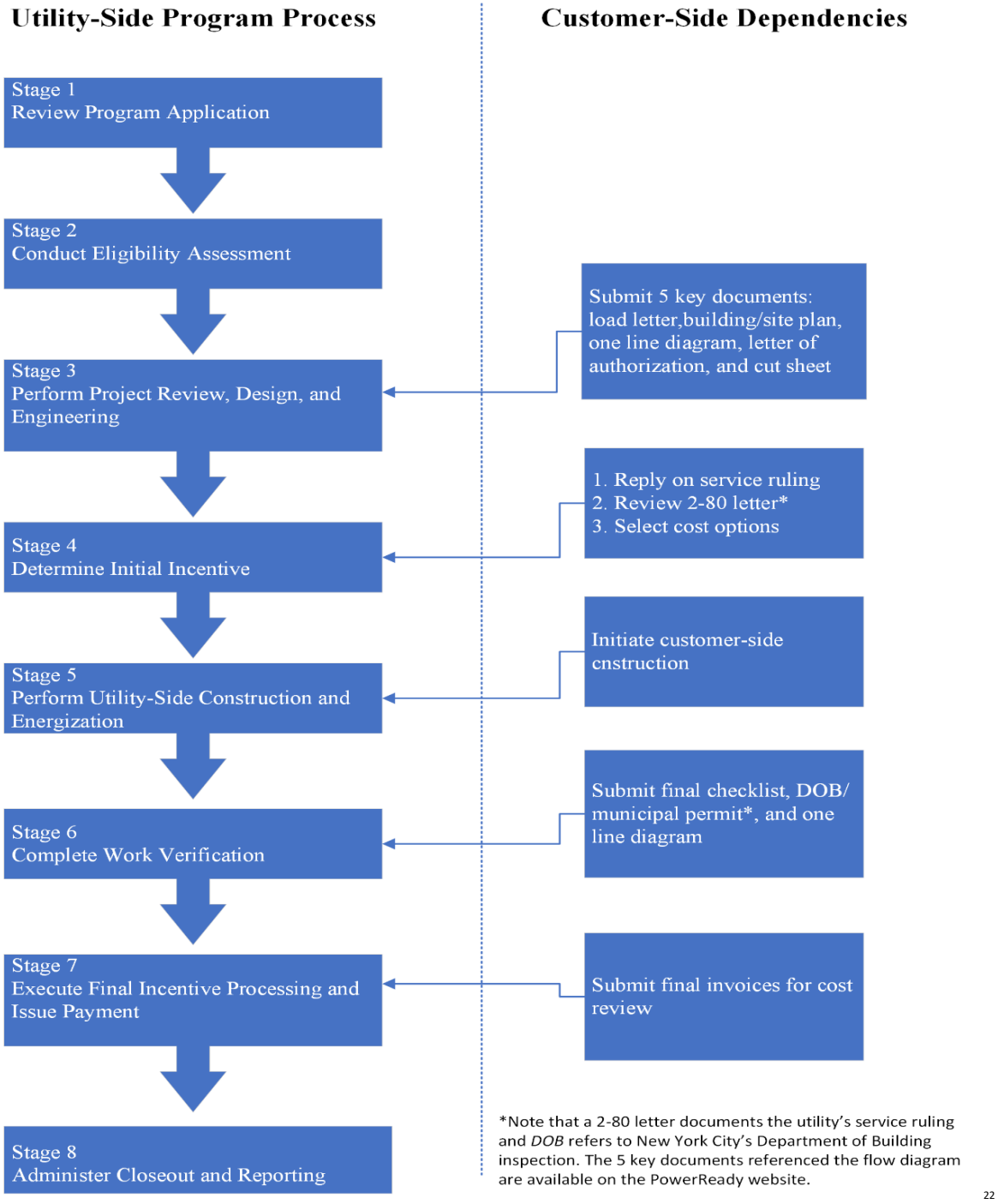
Regulations of Consolidated Edison Company of New York, Inc. for Electric Service, *Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plans with Additional Requirements, Appendix 22* pp. 14-18.

[20] The baseline for the Interconnection EAM is a weighted average of timelines for various types of utility work, recognizing that timelines vary by work type.

[21] Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, *Comments on Midpoint Review and Recommendation Whitepaper ("Whitepaper"),* Alliance for Transportation Electrification Comments , Available at https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={50062188-0000-C81A-A58D-5630C61C79BE} (May 15, 2023). *Whitepaper,* ACE NY and Advanced Energy United Comments, Available at https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={F0142188-0000-C235-ACBC-DB6A9A5291FF} (May 15, 2023).

Appendix

Appendix A. Incentive and Interconnection Flow Diagram, Con Edison



[22] Con Edison. "PowerReady Contractor Program Documents and Tools." Accessed March 6, 2024. Available at https://www.coned.com/en/our-energy-future/electric-vehicles/power-ready-program/contractor-resources/program-documents-tools