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Electric Vehicle Infrastructure and Interconnection Working Group (EVIIWG)

Case 18-E-0138
Matter 24-00339

February 12, 2025

Agenda

1. DPS Staff – Level setting and review of assignment
2. DPS Staff – Review of stakeholder comments submissions
3. DPS Staff – Next steps and discussion of SAPA filing

- Use chat or raise hand functions to ask questions
- Today's recording and presentation materials will be posted on DMM and on the EVIIWG webpage
- Please email EVSE@dps.ny.gov with further questions

Level-setting

The Midpoint Order issued on 11-16-23:

- (p. 28) “The Stakeholder process shall address and advance, among other issues, transparency, the queue backlog, wait times, and application development.”
- (p.28) “Establishing a standard process for the interconnection applications may shorten, and ideally streamline, the intake of applications that are driven by electrification and the CLCPA.”
- (p. 29) “the Commission directs 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.”

Level-setting

Throughout the process:

- Seven EVIIWG meetings were held, recordings are available on the EVIIWG website and on matter number 24-00339
- The meetings consisted of stakeholder presentations and review of straw proposals modifications based on stakeholder feedback.
- The straw proposal has been on the EVIIWG webpage for parties to download and make comments and edits to.
- The straw proposal was submitted to DMM for comments.
  - Comment period ended 01-16-25.
  - Reply comment period ended 02-03-25.

Comments Received

- Environmental Defense Fund, Interstate Renewable Energy Council, and Vehicle-Grid Integration Council (Joint Comment)
- Environmental Defense Fund (EDF)
- Interstate Renewable Energy Council (IREC)
- Joint Utilities (JU)
- Vehicle-Grid Integration Council (VGIC)
- CALSTART

EDF, IREC, VGIC Joint Comment Summary

- Implementation of phased interconnection should be a standard option with new load or distribution grid upgrades.
  - Requires no operational changes and would unlock existing grid capacity.
  - Customers would accept limits on their load until upstream upgrades are completed.
- Recommends the EVIIWG address flexible interconnection
  - Identify forms acceptable to customers and capable of implementation by the utilities
  - Consider education and outreach
  - Discuss the impact on load forecasting and system planning inputs and outputs
  - Consider what reporting requirements are needed
- Requests more clarity in the Operations Innovation section particularly for supporting “Participants looking to implement load management and V1G phased deployment of chargers.”

EDF Comment Summary

- Proposal does not fully address optimization of the interconnection process, grid-beneficial charging behavior and phased interconnection as a standard option for EV charger projects.
- Lacks discussion on managed charging programs including informing customers of managed charging options early in the process of interconnection.
- Suggests the EVIIWG should provide participants with the most up-to-date versions of documents under consideration, redlines making changes clearer when reviewing updated documents, and providing dedicated time to discuss the proposals under consideration.
- Proposed removing language regarding mandated timelines mindset, EAMs, and administrative budgets.

IREC Comment Summary

- Proposal doesn't fully define a standardized process.
  - A common set of procedures and requirements should be adopted by each utility that would have the ability to make additions based on unique technical circumstances.
  - Proposes that utilities track and report on end-to-end timelines.
- Proposal should provide a clearer process to connect EV infrastructure loads
  - Section 1.3 "This sub-section details operational innovations that have been identified and implemented by some of the members of the Joint Utilities, and each Utility may consider for implementation on an as-needed basis".
  - Section 4.2 - the JU says it will define whether and how to accept project scope changes rather than clearly stating the common practice to follow.
- Recommends incorporating mandated timelines for interconnection.
  - Refers to California statewide energization timelines adopted in September 2024 and highlights efforts in other states.

IREC Comment Summary Continued

- Current draft omits provisions that are necessary to streamline the interconnection process including:
  - Phased Interconnection
  - Simplified or Expedited Review
  - Information Sharing After Utility Review
  - Project Modifications
  - Dispute Resolution
- Suggests that the EVIIWG incorporate major needed changes to the Proposal and then continue the working group into a stage II to address additional issues.
- Recommends changes to the structure of the EVIIWG.

VGIC Comment Summary

- Recommends development of a flexible interconnection framework with a static import limit option and a dynamic import limit option:
  - Static Import Limit: Includes both single-value import limits and multi-value import schedules (i.e., static seasonal peak/off-peak values), allowing EV charging stations that would trigger upstream upgrades the opportunity to begin operations sooner.
    - Can be implemented as firm limits (strict service limits) or non-firm limits (penalties for exceeding the limit).
  - Dynamic Import Limits: Allows EVSE to operate flexibly within capacity constraints that vary based on real-time grid conditions.
- Recommends improving data portals, the customer engagement process, and establishing data reporting requirements to aid and improve the flexible interconnection process.

Joint Utilities' Comment and Reply Summary

- Initial Comments:
  - The Joint Utilities are supportive of the current draft Proposal and emphasizes that they have worked closely with DPS Staff and stakeholders in developing the draft Proposal.
  - The current draft Proposal is reflective of the input of the Joint Utilities, customers, and stakeholders after the proposal revision process and the 7 EVIIWG meetings convened in 2024.
- Reply Comments:
  - States that stakeholder comments largely introduce topics that are out-of-scope in the context of the queue management, notwithstanding the potential merits of some of the topics.
  - Utilities maintain dispute resolution process for customers requesting load. Con Edison's was included as an example: p.19, footnote 34.
  - Customers are provided with project milestones through a portal: Section 2.4, p. 11.
  - States that the Proposal guidelines are currently followed with each Utility implementing them individually. Notes the practices in the Innovations section (1.3) were necessitated by Con Edison's number of simultaneous projects, relative to other utility programs.

CALSTART Reply Comment Summary

- Proposal should:
  - Define a standardized process across utilities.
  - Include phased service connections as standard option for EV projects.
  - Direct utilities to communicate to customers how certain bridging solutions would impact a projects timeline and cost.
- Agrees with removing “mandated timelines shift focus away from the Participant experience and toward a compliance mindset” and references to EAMs from the Proposal.
- Developing specific timelines may be beyond the scope of the Proposal, proposes that the EVIIWG be broadened to focus on setting and accelerating energization timelines.
- Lessons can be taken from California’s experience including completing certain steps of the energization process parallel rather than sequentially.
- Working groups act as a better venue than written comments for reaching consensus and fleshing out specifics.

Comment recommendations outside Proposal scope

- Flexible Interconnection
- Energization Tracking Tool
- Phased Interconnection
- EAM (i.e., Transportation Interconnection Timeliness)
- Dynamic import

Requires Commission determination

Staff's Position

- Comments have identified some bigger issues that are beyond the scope of the current EVIIWG but are important topics that may need attention.
- One major difference in opinion seems to be what the queue management document was supposed to address.
- To clarify document scope and address comments, the document will be SAPA'd for further comments and Commission direction.
  - Staff is open to adding specific questions to be SAPA'd, e.g. should the scope of the EVIIWG be broadened, and if yes, how?
- The totality of the work done by the EVIIWG including the draft proposal and the comments submitted will be reviewed by the Commission.