CENTRAL HUDSON ELECTRIC VEHICLE LIGHT-DUTY MAKE-READY PROGRAM

Implementation Plan

Version 4

January 2024

Contents

1. VERSION HISTORY and DESCRIPTION of REVISIONS:

Date Filed	Version	Topic	Description of Change	Section/Page in Implementation Plan
September 2020	1	Not Applicable (NA) as first Implementation Plan	NA	NA
June 2023	2	Disadvantaged Community	Updates to reflect the final definition of Disadvantaged Communities that was adopted by the Climate Justice Working Group (CJWG) on March 27, 2023.	Section 3, Page 4
August 2023	3	Eligibility Clarification	Added incentive criteria table	Section 4, Page 6
January 2024	4	Midpoint Order	Update program terms to include Midpoint Order changes	Sections 2, 3, 4, 5, and 7

2. BACKGROUND

Electrifying transportation offers numerous benefits for customers and communities, including increased efficiency, improved sustainability, energy security, and the opportunity to relieve rate pressure in an environment of low sales growth. According to the New York State Department of Environmental Conservation, the transportation sector accounts for 40% of the State's greenhouse gas emissions. Therefore, to meet the State's clean energy goals, the transportation sector must be part of the solution. To this end, the New York State Public Service Commission ("PSC" or "Commission") commenced a proceeding, Case 18-E-0138, to consider the role of electric utilities in providing electric transportation infrastructure and rate design.

Electric vehicle adoption is expected to grow as more stakeholders support the industry transformation and battery costs decline. Studies have shown that a major barrier to electric vehicle adoption is "range anxiety." A recent study by the Union of Concerned Scientists found that the single biggest concern for those who are considering purchase of an electric vehicle is that there are too few public charging stations where respondents traveled.

The electric vehicle charging equipment market is a classic example that warrants public investment and

the involvement of regulated utilities. Facilitating investment in charging infrastructure, including private and public ownership and operation of charging stations, is an appropriate and necessary activity for utilities and is reliant on integration to their existing infrastructure.

On July 16, 2020, the PSC issued its Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs ("Make-Ready Order")[1] that aims to address electric vehicle ("EV") charging infrastructure investment through carefully structured collaboration and incentives across each of the Joint Utilities of New York[2]. As part of the Make-Ready Order, the Commission directed Department of Public Service ("DPS") Staff to commence a formal Midpoint Review of the make-ready program. On November 16, 2023, the Commission issued its Order Approving Midpoint Review Whitepaper's Recommendations with Modifications ("Midpoint Order")[3].

This document details Central Hudson Gas & Electric Corporation's ("Central Hudson" or the "Company") implementation of the Company's EV light-duty make-ready program (Make-Ready Program" or "Program"), including program modifications as a result of the Midpoint Order.

2.1. PROGRAM OVERVIEW

The Central Hudson EV Make-Ready Program includes incentive offerings designed to reduce the cost of preparing sites to install EV chargers for light-duty vehicles across Central Hudson's service territory. The incentives are intended to increase public access to EV charging stations and are contingent upon certain eligibility criteria.

The Program offers incentives for make-ready costs of 2,037 Level 2 chargers and 416 direct current fast chargers ("DCFC") across Central Hudson's territory. The Central Hudson EV Light-Duty Make-Ready Program is offering $44,897,460 in incentive funding and will accept applications until program port goals are met, or until the available incentive funding has been allocated, whichever comes first. Additional information about the Program, including lists of qualified contractors and the amount of funding remaining in the Program can be found on Central Hudson's website: https://www.cenhud.com/electricvehicles/.

Public and private (both for-profit and not-for-profit) entities may participate in the Program. Central Hudson provides customer incentive payments upon completion of the installation of make-ready equipment. Developers, site-owners, and charging station managers (collectively, the customers) may apply for project incentive funds through Central Hudson's website.

[1] Case 18-E-0138, Proceeding on the Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs (issued July 16, 2020).

[2] The Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), New York State Electric & Gas Corporation (NYSEG), Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas & Electric Corporation (RG&E).

[3] Case 18-E-0138, Proceeding on the Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, Order Approving Midpoint Review Whitepaper's Recommendations with Modifications (issued November 16, 2023).

In addition to make-ready incentives, the Program includes an enhanced Fleet Assessment Service ("FAS"). Fleet managers, including public and private entities, can participate in a free, detailed assessment of the costs and opportunities associated with fleet electrification. This service is available for light-, medium-, and heavy-duty vehicle fleets. Customers can apply for this service through the Joint Utilities' website.[4]

2.2. PROGRAM CONTACTS

All questions related to the EV Light-Duty Make-Ready Program and FAS should be directed to the Central Hudson EV Make-Ready Program email.

EV Make-Ready Program Email: EVMakeReadyCH@ICF.com

In addition, Central Hudson has a program Ombudsman to address program or policy issues related to the implementation of the Program. Their contact information is below:

Michael Valentino
mavalentino@cenhud.com
(845) 486-5452

3. DEFINITIONS

Affordable Multi-Unit Dwelling: Buildings that have regulatory agreements with a housing agency or in which at least 25% of the units are, or are expected to be, occupied by households earning not more than 80% of Area Median Income or State Median Income, whichever is greater.

Approved Contractor: A contractor who has met the Joint Utilities' approval criteria to install EV charging infrastructure incentivized through the EV Make-Ready Program.

Central Hudson Light-Duty Make-Ready Program: The Program that provides one-time incentives up to 100% of the costs for electrical infrastructure required to install electric vehicle (EV) charging stations within Central Hudson's service territory.

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).

Electric vehicle (EV): A four-wheel light-duty vehicle capable of highway speeds that is powered fully or in part by an electric motor and is rechargeable from an external connection to an off-board electrical source.

Equipment owner: The entity that purchases the make-ready equipment and is subsequently responsible for its maintenance. The equipment owner is also the recipient of the incentive payment and can be either the utility or the customer.

[4] Joint Utilities. "Electric Vehicles: EV Make-Ready Program." https://jointutilitiesofny.org/utility-specific-pages/electric-vehicles/

Fleet: Any set of commercially or institutionally owned or leased vehicles used for commercial, industrial or institutional purposes.

Future proofing: The installation of additional or scalable capacity equipment and infrastructure to support the future expansion of an EV charging station and installation of additional charging ports.

Heavy-duty vehicles: Any vehicle with a gross vehicle weight rating (GVWR) over 26,000 lbs. These vehicles require Class B commercial driving licenses or other specialized permitting to operate.

Installer: The entity that installs the equipment. The Installer may or may not be the same as the equipment owner.

ISO 15118: An international standard vehicle-to-grid-charging interface that was updated in 2019 and began to see implementation in 2021. Features of ISO 15118 include the bidirectional charging standard and Plug & Charge features. Plug & Charge feature uses asymmetric cryptography to automatically establish a secure connection to receive energy and data from compatible charging stations.

Low-to-moderate income community (LMI): A community or area defined by the average household wealth being less than or equal to 80% of the state or regional median income (whichever is higher).

Light-duty vehicles: Any small commercial vehicles including passenger cars, vans, and other Class 1 and 2 vehicles (those with a GVWR of 0 lbs. to 10,000 lbs.).

Make-ready equipment: Any utility-owned infrastructure and equipment involved in providing electric services, extensions, or upgrades needed to support the installation of EV infrastructure in excess of standard new business allowances and any customer-owned equipment from the point of interconnection up to (but not including) the charging equipment.

Multi-unit dwelling: Any dwelling which is either rented, leased, let or hired out, to be occupied, or is occupied as the residence or home of 5 or more independent units.

Medium-duty vehicles: Mid-sized vehicles including passenger and cargo vehicles, trucks and equipment in Class 3 through 6 (those with a GVWR of 10,001 lbs. to 26,000 lbs.).

Multi-unit dwellings: Any dwelling which is either rented, leased, let or hired out, to be occupied, or is occupied as the residence or home of 5 or more independent units.

OCPP: The Open Charge Point Protocol (OCPP) is an application protocol for communication between EV charging stations and a charging station network.

Participant: An entity that applies for and receives the incentives available through the EV Make-Ready Program. This could be any entity including:

- ***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.
- ***Equipment Owner***: The entity that purchases and owns the EV charging equipment once it is installed.
- ***Site Host*:** The owner of the site on which the EV charging equipment is installed. The Site Host may or may not be the Equipment Owner.
- ***Approved Contractor*:** As defined above.

Program effective date: The date after which construction for projects under the Program can begin construction. For the Program, the effective date is July 16, 2020.

Publicly accessible: For the Program, this means allowing access without site-specific physical access restrictions, including public, fee-free parking areas and municipality-operated fee-for parking areas. It does not include private or restricted business parking or multi-unit dwelling parking.

Proprietary plug: An EV charging plug that is exclusive to certain light-duty EV makes and models. For Level 2 chargers, this is the SAE J3400 plug and for DCFCs, this is the CHAdeMO.

Non-proprietary plug: Any EV charging plug that is accepted as able to support any light-duty EV and is not proprietary or exclusive. For Level 2 chargers, this is the Society of Automotive Engineers Electric Vehicle Conductive Charger Coupler J1772 (SAE J plug). For DCFCs, this is any non-proprietary plug such as the SAE Combined Charging System (CCS).

4. ELIGIBILITY CRITERIA

Designed to facilitate development of the infrastructure needed to support additional public EV charging stations, the EV Light-Duty Make-Ready Program provides incentives for the work and equipment necessary to prepare a site to host EV charging stations. Incentives are offered for the installation of both utility-owned and customer-owned make-ready equipment. The Program's eligibility criteria are designed to encourage broad installation of EV charging infrastructure in Central Hudson's service territory while also focusing on standardized, strategic installations. Additional consideration is given to projects proposed in an environmental justice community or low-to-moderate-income community.

Utility-owned equipment includes step-down transformers, overhead service lines, utility meters, and other traditional distribution infrastructure. Customer-owned equipment includes conductors, trenching, panels for stations, and other customer-side equipment. Load management systems such as energy storage are eligible to receive incentives but must be paired exclusively with EVSE and be solely

used for EV charging and not for any other purposes, such as providing backup power to the site host. Note: the eligible equipment excludes the charging station and ports themselves.

To be eligible for incentives, all equipment must be installed by a utility-approved contractor and sited within the Central Hudson service territory. A list of approved contractors can be found on the Joint Utilities' website. See Section 4 for further program details.

4.1. GENERAL ELIGIBILITY CRITERIA

Central Hudson evaluates individual make-ready projects on five key criteria: accessibility, station maturity, plug type, future proofing costs, and location capacity. If a proposed project meets the requirements for all criteria, the project will be eligible for an incentive covering up to 90% of eligible make-ready costs. If the proposed project does not meet the criteria for accessibility or plug type, the project may be eligible for an incentive covering up to 50% of the make-ready costs Projects located within Disadvantaged Communities may receive up to 100% of eligible make-ready costs. Table 1 below outlines project criteria and incentive levels.

Table 1: LDMRP Incentive Criteria

Incentive Level	Eligible Project Criteria
Up to 100%	• Publicly available DCFC projects with standardized plug types located within Disadvantaged Communities (DAC) or Disadvantaged Community Zones, as applicable. • Publicly available DCFC projects with proprietary plug types that also include an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs located within DACs, as applicable. • L2 projects located at eligible multi-unit dwellings (MUD). • L2 curbside projects within or adjacent to a DAC.
Up to 90%	• Publicly available L2 and DCFC projects with standardized plug types. • Publicly available L2 and DCFC projects with proprietary plugs that also have an equal or greater number of standardized plugs of an equal or greater charging capacity to the proprietary plugs. • Includes municipal pay-to-park locations and free parking offered while charging.
Up to 50%	• Non-public L2 and DCFC projects, such as workplaces or MUDs with restricted access and privately owned pay-to-park lots that require payment for parking while charging. • Public and non-public L2 and DCFC projects with proprietary plugs that do not include an equal or greater number of standardized plugs of an equal or greater charging capacity to the proprietary plugs.
Table is provided for illustrative purposes. Individual utilities reserve the right to make determinations regarding incentive-level eligibility based on their best interpretation of the proposed project and available information at the time of review. Customers are responsible for charger costs, annual maintenance cost, and ongoing electricity costs.	

Accessibility: Each proposed station must be publicly accessible and accept universal forms of payment. To qualify for the maximum incentive, the proposed charging stations must be in a public parking area rather than in a private workplace or multi-unit dwelling parking area. All public chargers must post their charger to PlugShare. The parking lot may be a free parking lot or a paid municipal parking lot but must be accessible to all public customers without restriction. A proposed station situated in a private parking lot, including those in multi-unit dwellings, workplace parking and private pay-to-park lots, may qualify for the reduced 50% incentive.

To ensure maximum accessibility of charging stations to the public, stations eligible for an incentive under the Program must also be usable without requiring a paid membership in a charging station network. This holds for both proprietary and nonproprietary plugs. Networked stations that offer single per-use charging fees payable through a commonly accepted payment method such as cash, credit, or debit will satisfy this criterion. Though payment through a smartphone application is permitted, to qualify as publicly accessible for purposes of the Program, smartphone application may not be the only form of payment a station accepts.

Equipment Eligibility

- **Hardware Requirements**: Any new incentive commitment effective December 16, 2023, must be hardware capable for ISO 15118 Parts 2 and 20. Effective November 16, 2024, any new stations receiving Program incentives must also obtain hardware conformance with OCPP version 2.0.1 or later.
- **Software Requirements**: Effective November 16, 2024, stations receiving Program incentives must achieve software conformance with ISO 15118.

Signage Requirements: Make-Ready Program-funded sites must display easily identifiable, up-to-date contact information for the electric vehicle service provider on each charger.

Station Maturity: To be eligible for any incentive, the proposed station must have started construction after the issuance of the July 16, 2020, Order.

Plug Type and Capacity: Each station should offer more non-proprietary plugs and capacity than proprietary plugs and capacity. To qualify for the maximum incentive, a proposed charging station must include an equal or greater number of non-proprietary charging plugs compared to the number of proprietary plugs. The station must also include an equal or greater amount of simultaneous capacity through these non-proprietary charging plugs compared to the capacity available through proprietary plugs. Plugs must be capable of simultaneously dispensing 50 kW or more to qualify for the incentive. If a station has more proprietary plugs than non-proprietary ones or offers more simultaneous capacity through these proprietary plugs, it may still qualify for the reduced 50% incentive.

Future-Proofing Costs: The cost of installing additional capacity and infrastructure to support future station expansion can also be covered by an incentive under certain conditions. To receive an incentive, the future-proofing activities must be requested by the developer and verified with Central Hudson. These costs may include the incremental costs of installing additional or oversized conduit (including trenching and conduit to additional parking spaces), panels, transformers, transformer pads, or

increasing distribution service. Future-proofing costs up to 10% of the project's make-ready cost may be covered by an incentive. Central Hudson reserves the right to provide future proofing costs of up to 10% of the make ready costs at the Company's discretion based on the specific characteristics of a project. Future- proofing costs over not covered by the incentive costs must be covered by the developer.

Location Capacity: There is a limit on the number of small (two-plug) and large (10-plug and/or 3 megawatt [MW] or greater demand) stations that can be approved for incentives under the Program. Among the approved projects for the Program, no more than 25% of incentivized stations may include only two plugs. Additionally, no more than 50% of all plugs supported by the Program can be installed in stations with more than 10 plugs. Finally, for stations with 10 or more plugs and/or with a demand greater than 3 MW to qualify for incentives, the station must not cause Central Hudson to incur new business costs greater than those associated with a maximum site demand of 3 MW.

4.2. DISADVANTAGED COMMUNITIES CRITERIA

Central Hudson has designated 20% of its total budget for the Program for deploying make-ready projects to serve Disadvantaged Communities. For projects meeting these criteria, the participant will be eligible to receive up to 100% of eligible make-ready costs for:

- DCFC Stations: Publicly accessible non-proprietary DCFC sites within Disadvantaged Communities in the Central Hudson service territory.
- L2 Stations:
    1. Publicly accessible non-proprietary curbside L2 charging in or directly adjacent to Disadvantaged Communities. Applicants must demonstrate that each curbside charger is associated with a designated EV charging parking space, and that a framework is in place to prevent noncharging vehicles from blocking access to chargers.
    2. Multi-Unit Dwelling L2 charging meeting one of the two below criteria. Multi-Unit Dwelling plugs are allowed to be private but must be available to residents of the multi-unit dwelling and not designated for use by a single unit or individual.
        a) L2 charging at a multi-unit dwelling properties within a DAC.
        b) L2 charging at affordable multi-unit dwelling properties, regardless of proximity to DAC.

Affordable Multi-Unit Dwelling Requirements: Affordable multifamily housing properties are eligible for enhanced funds through this program. This program aligns with the statewide Affordable Multifamily Energy Efficiency Program (AMEEP) program procedures to qualify affordable multi-unit dwellings. The Program requires applicants to either submit a regulatory agreement qualifying the building as affordable housing, or to demonstrate via rent roll that 25 percent of units have a calculated household income no more than 80 percent of the Area or State Median Income, whichever is greater. There are two ways to qualify enhanced affordable housing incentives, defined in the Program Manual.

5. PROGRAM IMPLEMENTAION

The EV Light-Duty Make-Ready Program seeks to engage with site owners and developers across Central Hudson's service territory and drive the installation of make-ready equipment for EV charging infrastructure. The Program relies on targeted customer outreach and applications through the Central

Hudson website to develop a project pipeline. Subsequent application review, verification, and approval are conducted in close coordination with the site-owners and developers.

Central Hudson is responsible for managing all utility-owned installations required for each project, while the customer manages the installation of customer-owned make-ready equipment at the site. Central Hudson has construction standards to guide customers and developers in understanding the equipment and ratings necessary to develop these sites. Program funds will be distributed based on make-ready costs associated with each project upon verified completion of the installation.

The Fleet Assessment Service is available to all light-, medium- and heavy-duty fleet operators in Central Hudson's territory free of charge. Fleet managers can apply through the Joint Utilities' website or program website.

5.1. LIGHT-DUTY MAKE-READY PROGRAM

Program definition: The Central Hudson EV Light-Duty Make-Ready Program is designed to provide incentives for the development of infrastructure from the electric distribution system up to but excluding the EV charger.

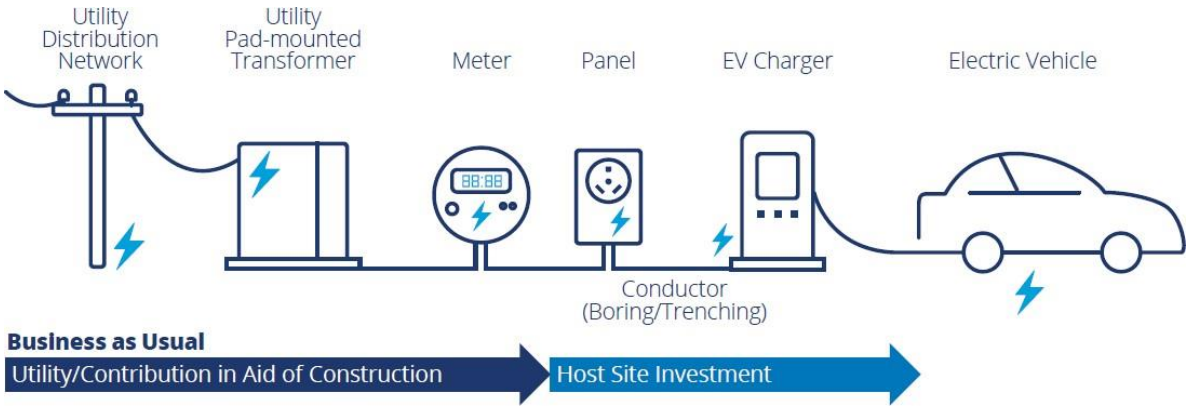
Two categories of equipment or infrastructure are eligible for incentives:

1. **Utility-side Make-Ready Infrastructure:** Utility electric infrastructure needed to connect and serve a new EV charger. This may include traditional distribution infrastructure such as step-down transformers, overhead service lines, and utility meters that will continue to be owned and operated by the utility.
2. **Customer-side Make-Ready Infrastructure:** EV equipment or infrastructure necessary to make a site ready to accept an EV charger that is owned by the charging station Developer, Equipment Owner, or Site Host. This electric infrastructure may include conductors, trenching, panels, and advanced technologies including energy storage and Automated Load Management Systems needed for the EV charging station.

For the purposes of the Program, infrastructure development also includes additional equipment used to enable expansion of EV charging infrastructure in the future, as well as load management technologies like batteries.

Figure 1 depicts typical power delivery from the distribution lines to the stepdown transformer, meter, panel, and EV charger at the site host location. Configuration may vary based on site specifics.

Figure 1. Basic Design of Charging Equipment



Source: Smart Electric Power Alliance. October 2019. *Preparing for an Electric Vehicle Future: How Utilities Can Succeed.* https://sepapower.org/resource/preparing-for-an-electric-vehicle-future-how-utilities-can-succeed/
Based on original diagram from MJB&A and Georgetown Climate Center. November 2017. *Utility Investment in Electric Vehicle Charging Infrastructure: Key Regulatory Considerations.* https://www.georgetownclimate.org/files/report/GCC-MJBA_Utility-Investment-in-EV-Charging-Infrastructure.pdf

Customer journey: Customers (including site-hosts, managers, owners, or developers) will generally begin the journey through the EV Light-Duty Make-Ready Program with targeted outreach by Central Hudson or the developer, but it could also be customer-initiated. The journey continues through the application, review, and approval process before moving on to equipment installation and inspection and finally the incentive payment.

- ***Education and Outreach*.** Central Hudson conducts targeted outreach to potential site-owners and hosts based on site capacity, Disadvantaged Community locations and other suitability criteria. This outreach includes educational video content, presentations or flyers explaining EV charging infrastructure and the benefits of offering EV charging tailored to the audience. Central Hudson also conducts outreach to EV site developers to engage their interest in participating in the Program and assisting with site development. (See section 6 for further education and outreach detail.)
- ***Application Submission*.** Interested participants can apply for the Make-Ready Program through the online application portal on the Central Hudson website. The application includes the applicant's name and contact information and a brief project description describing the proposed number of plugs, charging output, plug type, site location, demand management software and hardware, and potential bi-directional charging and discharge of the proposed station. The application also includes information on future proofing needs and expansion plans.
- ***Application Portal.*** Once an application has been submitted, customers can review the status of their application and the progress of the project through the application portal on the Central Hudson website. The portal tracks the progress of each project and provides transparency to the customer and consistent updates to the utility. In addition to the project description and details noted in the application, the portal provides information on the status of a project, including

approval, milestones, deadline dates, and responsible parties. The portal also provides details on outstanding utility requests for information and answers and the status of incentive payments and customer payments related to the make-ready project.

- ***Application Review.*** Within one month of receiving a completed application, Central Hudson reviews each application and notifies the applicant of approval or rejection based on the identified suitability criteria and overall program priorities. Following acceptance, a Central Hudson representative contacts the applicant for an initial consultation and to schedule a site visit. During the site visit, a Central Hudson representative will assess the viability of the site based on site capacity, planned utility work, and available parking spots. Virtual site assessments may be conducted for simpler sites as deemed appropriate.
- ***Application Approval and Agreement*****.** If the site is deemed eligible, Central Hudson drafts a Preliminary Incentive Disclosure based on all submitted documentation at the time of approval. The customer is informed that they can proceed with construction in accordance with all local laws and regulations and will be eligible for the preliminary incentive as long as construction is completed as detailed in their submitted documentation. The final incentive payment is subject to change based on project changes and findings during the final inspection of the site.
- ***Equipment Installation.*** Central Hudson is responsible for completing the utility-side work for the site. This involves the installation of all necessary equipment up to and including the installation of appropriate meters for data collection. In parallel, the customer works with an approved contractor to complete all necessary work on the customer side of the meter, such as installing panels, conduits, or trenching. While the installation of EV charging plugs may occur during this time, the cost of EV plugs and installation is not covered under the Program.
- ***Final inspection.*** Upon completion of all relevant make-ready work, a representative of Central Hudson completes a final site assessment to verify that the project is finalized.
- ***Incentive payment.*** Within 60 days of verifying that a project is complete, Central Hudson distributes the incentive payments as lump sums as agreed upon in the Project Agreement. A project is deemed complete when the charger is installed, all final documentation is received, and charger connectivity is confirmed.

5.2. FLEET ASSESSMENT SERVICE

Central Hudson currently offers a fleet assessment service to light-, medium-, and heavy-duty fleet operators to identify the optimal vehicles to replace in existing fleets and to estimate potential operating costs. The service helps fleet operators understand the business case for fleet electrification. As part of the Program, Central Hudson includes a detailed site and load serving capacity assessment and rate analysis.

Customer journey: The customer journey begins with an online application on the Joint Utilities' website and continues through initial discussions, site assessment, rate analysis, and final report delivery.

- ***Application.*** To start the process, a fleet manager applies for a fleet assessment through the Joint Utilities' website. This application captures basic information about the customer's fleet.
- ***Initial Consultation*****.** Upon receiving a completed application, Central Hudson will set up an initial consultation with the fleet manager. The intent of this meeting is to gather information on existing fleet characteristics, electrification goals, budget, and operating concerns to help shape the analysis. Following this initial consultation, Central Hudson will also schedule a time for an in-person or virtual site visit.
- ***Site Assessment.*** A Central Hudson representative visits with the fleet manager on location to conduct a thorough site assessment. Virtual assessments may also be conducted when deemed appropriate. The purpose of the site assessment is to identify feasibility of installing EV charging infrastructure and associated make-ready costs at the location as a threshold for continuing with the analysis. During the visit, Central Hudson identifies if the site has sufficient capacity to support the new EV charging load. They also identify necessary make-ready details including transformer locations, metering type, and potential electrical service upgrade needs. A list of key make-ready tasks for both the utility and the customer are then drawn up to complete the site assessment. Based on the findings of the site assessment, Central Hudson determines whether the site is suitable for supporting an EV fleet.
- ***Data Collection.*** If the site is suitable, Central Hudson works with the customer to gather detailed fleet data including vehicle age and replacement schedule, vehicle mileage by class, vehicle types and uses, schedules (duty cycles), parking locations, and current operating costs for conventional fuel vehicles. These data are subsequently fed into the rate analysis to enable Central Hudson to provide the customer with specific, actionable recommendations.
- ***Rate Analysis*****.** After collecting sufficient information on the fleet, Central Hudson conducts a rate analysis. This analysis accounts for different available rate options to identify the most appropriate rate structure to support the EV fleet while considering cost, character of service and other key factors. Further analysis is conducted to assess multiple fleet conversion scenarios and their impacts on up-front costs, operating costs, and emissions. Finally, Central Hudson's analysis provides recommendations for post-conversion fleet management to maximize customer savings.

- ***Final Report.*** A concise final report is delivered to the customer detailing site assessment results, projected fleet conversion costs, rate analysis outcomes, and operating costs under various scenarios.
- ***Survey.*** Following the fleet assessment, customers will receive a satisfaction survey. The survey will capture customers' impressions of the Program outcomes, their likelihood to go through with fleet electrification, their ongoing barriers and their sense of what other utility services may be useful to support their electrification. The survey will be sent to participants within 60 days of delivery of the final fleet assessment report.

6. EDUCATION AND OUTREACH PLAN

Outreach and education are central to the success of the Program. Central Hudson employs suitability criteria identified by the Joint Utilities to inform its education and outreach efforts. These criteria support the company's efforts to identify sites that are well-positioned for investment, such as those with adequate load-serving capacity, likely future EV load, and additional societal benefits.

Central Hudson primarily focuses on two core audiences to identify potential participants: 1) site hosts and 2) developers and other stakeholders, detailed in sections 6.1 and 6.2.

6.1. SITE HOST OUTREACH

Central Hudson uses its customer connections to initiate targeted education and outreach to potential site hosts, prioritizing those that meet one or more of the suitability criteria described above. Materials may include educational video content, bill inserts or flyers explaining EV charging infrastructure and the benefits that offering EV charging can provide to retailers, employers, or residents of multiunit dwellings (depending on customer type). In addition, Central Hudson regularly communicates with its customers about EVs through a range of channels, including e-newsletters, social media, events, press releases, websites, direct mail, and advertisements. Through these various outreach tactics, Central Hudson directs potential site hosts to program information on its website and the Joint Utilities website.

6.2. DEVELOPERS & STAKEHOLDER OUTREACH

The second key audience that Central Hudson's program education and outreach seeks to address are project developers and other stakeholders who populate the New York EV charging industry. Specifically, Central Hudson collaborates with the Joint Utilities to develop materials tailored to EV charging station developers (e.g., EVgo, NYPA, etc.) and public incentive administrators (e.g., NYSERDA) and interested parties (e.g., cities and municipalities, Regional Economic Development Councils, and Metropolitan Planning Organizations). For these actors, the core resource will be internal and/or consultant partner staffing resources, the Electrification Load Serving Capacity Maps described above.. By providing non-specific information on development activities underway, Central Hudson enables developers and other stakeholders to focus their energies efficiently across the region and market rather than inadvertently and redundantly pursuing projects that are preempted by another entity's work.

Central Hudson also collaborates with the Joint Utilities to conduct trade ally and developer outreach and training programs. These may include frequently-asked-questions guides, webinars about the

application process, or prerecorded videos detailing how the suitability criteria and mapping tools can be used by developers and stakeholders to recruit site hosts. Through these various entry points, Central Hudson directs charging station developers and other interested parties to program information on its website and facilitate connections between developers and potential site hosts.

6.3. ELECTRIFICATION LOAD-SERVING CAPACITY MAPS

To highlight locations likely to have adequate capacity for installation of EV infrastructure, customers can rely on our publicly accessible Electrification Load-Serving Capacity Map, which details distribution system capacity across the service territory.

In addition, Central Hudson overlays its mapping tool with the locations of Disadvantaged Communities and the one-mile radius. These strategic charging sites are locations that service a Disadvantaged Community or bring infrastructure to particularly hard-to-reach communities. Together, these maps comprise the Program tools that enable both program administrators and stakeholders to quickly and easily identify priority sites for potential make-ready investments.

Updates for this map will take place on an annual cadence.

7. PROGRAM COSTS & GOALS

The supporting program costs and associated goals for the Central Hudson Light-Duty Make-Ready program are presented below.

7.1. PROGRAM COSTS

Table 1 presents actual and expected program costs by year for DCFC and Level 2 projects, implementation and administration costs, and future proofing.

Table 2. Program Costs by Year

Year	DCFC Incentives	Level 2 Incentives	Implementation & Administration	Future Proofing	Total
2021	$0	$78,399	$381,825	$0	**$460,224**
2022	$183,097	$398,164	$709,934	$13,290	**$ 1,304,485**
2023	$245,006	$933,661	$691,125	$23,446	**$1,843,238**
2024	$12,890,192	$4,333,461	$2,000,694	$1,030,220	**$20,254,568**
2025	$19,335,288	$6,500,192	$3,001,041	$1,545,331	**$30,381,851**
Total	**$32,653,583**	**$12,243,877**	**$6,734,619**	**$2,612,287**	**$54,244,366**

Pursuant to the Midpoint Order, 15% of the Company's Make-Ready program budget is authorized as an administration budget. These costs encompass various aspects of program delivery, including: Education and Outreach, Information Technology Requirements, Data Collection and Management, Fleet Assessment Services, Service Staffing, Vendor Costs, General Implementation Cost, and Evaluation. In 2024, Central Hudson will offer a site assessment service to customers installing public L2 curbside and multiunit dwelling L2 charging at locations within DACs or at AMEEP eligible buildings.

7.2. PROGRAM GOALS

Table 3 presents the Light-Duty Make-Ready program goals by year and project type. Over the Program period, Central Hudson expects to enable the installation of 416 DCFC plugs and 2,037 L2 plugs.

Table 3. Program Goals by Year and Project Type

Year	DCFC Number	Level 2 Number
Program through 12/31/2023	29	297
2024	155	786
2025[5]	232	954
Total	**416**	**2,037**

8. REPORTING

Throughout the Program, Central Hudson will fulfill all necessary reporting requirements. First, a midterm review was conducted in 2022 by DPS Staff. The resulting Midpoint Order was aimed at identifying areas for improvement and potential changes to program guidelines. The Midpoint Order adopted several additional reporting requirements:

- Central Hudson will file an annual report no later than March 1, 2024. The annual report will include the program data outlined in the data reporting section below, as well as recommendations for program modifications as relevant based on historical data (including recommendations for changes in budget or incentive tier allocations). Central Hudson will produce quarterly and annual reports from Q1, 2021 through 2023 to review the Program's performance to date. Following the Midpoint Order, these reports were adjusted to semi-annual reports starting August 23, 2024. Semi-annual reports include all of the required data from all station owners, retroactive from the Make-Ready Program's inception.
- Staff will complete a final Program review to facilitate a smooth closing of the programs, no later than November 16, 2025.
- Central Hudson will compile an end-of-Program report within 80 days of either the plug goals being met, or program budget being depleted, whichever comes first.
- Consistent with the Orders, program participants that fail to provide the required data will not be eligible for new Make-Ready Program incentives and will either be subject to claw back of the make-ready payments received or revocation of service so that the station can be operated by an alternate market participant.[6] Additionally, the Joint Utilities will develop a preferred network list as part of a Data Reporting Compliance Plan by March 1, 2024. After March 1, 2024, networks will be given more information about how they can be added to the preferred network list, and how to maintain their status on the list. The Joint Utilities will provide participants with the preferred network list and educational materials about data collection and the consequences for failing to provide the data.
- The Joint Utilities will publish a publicly accessible tracker that monitors both the committed

[5] While the Program is scheduled to end in 2025, it will remain open until plug goals are met or until the Program budget is exhausted.
[6] 2023 Order, 9. 74.

and completed L2 and DCFC plug installations, as well as committed and completed L2 and DCFC budgets reported as separate dollar figures and by service territory and will designate, at a minimum, incentives and plug totals committed and installed to benefit Disadvantaged Communities. The tracker will be updated monthly and made available at jointutilitiesofny.org.

Program implementation data compiled by the utility includes the following participant and billing information:

Participation Information

- Reporting year
- Site ID
- Census Tract
- Site DAC Status
- The percent of applications that have been turned into complete stations
- The number of unique station owners participating in the Program
- The number of sites where incentives have been issued
- The number of plugs installed as a result of the Program
- Aggregated kW Nameplate Capacity
- The total Infrastructure costs incurred as part of the Program
- Incentive levels a site received (up-to-50, 90, or 100 percent)
- Total incentives paid per site
- Did the site receive funding from the MHD Pilot?
- Did the site receive funding from the Transit Authority Make-Ready Program?
- Does the site receive Operating Cost Relief from a Demand Charge Alternative Program?

Additional data will be compiled and delivered to the Joint Utilities and Central Hudson by station owners on a quarterly basis beginning Q1 of 2021. These data are highly granular and reflect ongoing station performance. A third-party contractor working with the Joint Utilities will anonymize the data on a quarterly basis. These data include the following plug and charge session data, as well as station financial information:

Plug and Charging Session Data

- Daily number of charging sessions
- Start and stop times of each charging session
- Charge time for each vehicle during each charging session
- Peak kW per charging session
- Total kWh discharged per charging session
- Aggregated percent utilization per site
- Aggregated hours charging
- Plug outage information (when outages occur)

Data provided by station owners to the Joint Utilities will also be made available to DPS Staff on an ongoing basis. A regular reporting cadence will be established for station owners sending this data to the Joint Utilities for data cleansing.