Alliance for
Transportation
Electrification

April 1, 2021

Honorable Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, NY  12223-1350

Via email: secretary@dps.ny.gov


Subject:    Case No. 18-E-0138, Proceeding on Motion of the Commission Regarding Electric
            Vehicle Supply Equipment and Infrastructure

Dear Secretary Phillips:

        Enclosed for filing in the above-referenced matter please find Comments of the Alliance

for Transportation Electrification in response to the investor owned utilities' Managed Charging

Proposals filed on December 4, 2020.



                                    Respectfully submitted,

                                    *Michael I. Krauthamer*
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                                    Michael I. Krauthamer
                                    Senior Advisor
                                    Alliance for Transportation Electrification



Enclosure

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| **Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment** | **Case 18-E-0138** |

## COMMENTS OF
## THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION
## ON MANAGED CHARGING PROPOSALS

The Alliance for Transportation Electrification (ATE) hereby submits these comments in support of the Managed Charging Proposals filed by the investor owned utilities on December 4, 2020, in the above-captioned proceeding.

<u>Introduction</u>

ATE is a 501(c)(6) non-profit corporation; we engage with policymakers at the State and local government level across America to remove barriers to EV adoption and to encourage the acceleration of EV infrastructure deployment with a particular emphasis on open standards and interoperability. We consist of about 50 members that include many electric utilities, auto and bus manufacturers, EV charging infrastructure providers, and related trade associations, and we have been actively engaged in this proceeding since its inception.

<u>Discussion</u>

We observe that the various investor owned utilities are operating a number of managed charging initiatives; based on our experience with EV charging policy across the country over the past several years, we support this multi-pronged approach because there is no one-size-fits-all solution and the proposed efforts will provide the utilities and the Commission with useful and actionable information as to the benefits of each program element. We also express strong support for the use of open standards and interoperability for EV charging hardware and software

in the interest of avoiding vendor lock and supporting consumer protection, as discussed in detail below.

*Central Hudson*

Central Hudson proposes to continue two existing passive charging initiatives (a whole-house Time of Use (TOU) rate and an EV-only TOU rate) and to establish a new passive charging initiative that will reward customers with an off-peak rebate for shifting their usage to off-peak hours with a networked EV charger; charging times will be controlled solely by the customer.

The company also proposes two active charging initiatives. One is existing through a NYSERDA pilot focused on carbon intensity. The other will be new; Central Hudson states that it is assessing the viability of including active managed charging within existing Non-Wires Alternatives (NWA) initiatives. The new initiative will also require customers to subscribe to a passive initiative and consent to direct load control, and this initiative will focus (at least at first) on existing NWA program areas, which include disadvantaged communities.

*Con Edison*

Con Edison states that the company's current managed charging program, SmartCharge New York ("SCNY") influences electric vehicle EV charging behavior by rewarding EV owners with off-the-bill per vehicle incentives for charging during off-peak hours, as well as for avoiding charging during peak hours. According to Con Edison, SCNY has matured over the past several years, including increasing enrollment, expanding marketing efforts, incorporating new technologies to manage charging behavior, and expanding eligibility to include medium-duty and heavy-duty ("MDHD") EVs. As the Program evolves and as the EV market develops further, Con Edison states that it will continue to consider new technologies and approaches to managed charging.

*National Grid*

National Grid is proposing an active managed charging program that will include (1) rebates to customers to purchase networked Level 2 chargers that can participate in the managed charging program; (2) a "turnkey" installation service; and (3) an expanded online marketplace. The company is also expanding its managed charging program to include vehicle telematics-based managed charging, which is expected to increase program enrollment and reduce the program cost-per-enrolled customer. To achieve these goals, National Grid seeks authorization to leverage the embedded metering and connectivity to measure and manage customer EV charging, including an exclusion from typical metering and ANSI standards in order to bill the monthly EV Smart Plan.

*NYSEG and RG&E*

NYSEG and RG&E propose a comprehensive managed charging program for residential EV owners/operators that incorporates both passive and active features designed to encourage and optimize off-peak charging of light-duty EVs. The proposal is voluntary for participants and provides incentives that scale in relation to participation as users choose to opt-in to proposal features that require increasing levels of participant commitment. Proposal participation levels vary from basic to advanced and allow participants to commit themselves to managed charging activities they are comfortable with.

*Orange & Rockland*

Orange & Rockland states that it intends to assess opportunities to advance a passive managed charging program and to develop active managed charging offerings through the managed charging and vehicle-to-grid stakeholder working group to be organized by Department of Public Service Staff. The program will rely on influencing customer EV charging behavior through price-based management techniques – such as offering incentives – to motivate EV

owners and operators to charge their EVs during off-peak periods. The company will provide those customers who participate in the program with hardware or software-based solutions that will monitor charging behavior. According to the company, the new program will supplement and provide an alternative to the company's existing TOU rate offering.

*ATE Supports All Utility Programs*

ATE strongly supports managed charging in general, and through networks chargers in particular. ATE believes that there is no one-size-fits-all solution, and that utilities should be permitted to employ a variety of initiatives with the overall goal of shifting load away from peak times so that participants and non-participants can benefit. We also recognize the emerging nature of EV charging technology and to facilitate rapid adoption of the important and valuable capabilities we support requests such as National Grid's for an exclusion from typical metering and ANSI standards. ATE also urges the Commission to approve all requests related to customer outreach and engagement, and to recognize that appropriate cost recovery for all program elements is essential.

*The Commission Should Require Compliance With OCPP[1]*

One particular feature that ATE strongly encourages be required in all EV chargers participating in a utility program is that the hardware and software be compliant with the communication protocol known as OCPP. The Netherlands-based Open Charge Alliance coordinates the ongoing development of OCPP, and EV charging hardware and software companies can get their implementations certified as compliant by an independent testing lab

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[1] OCPP stands for "Open Charge Point Protocol." In this context, "charge point" refers to the generic term in some countries for a place, or point, at which a driver can charge their vehicle. There is no relationship to the similarly-named U.S. company.

such as DEKRA.[2]

OCPP allows chargers to operate on multiple networks. Without OCPP, a charger can be locked to a single service provider, rendering the customer captive to one vendor. With OCPP, a charger can run on any cloud network that is also OCPP compliant, which allows for greater competition in price, service, and features.

From an implementation perspective, utilities should require OCPP as a prerequisite for participation in all programs, and a list of eligible and ineligible products (hardware and cloud networks) should be listed online. Given the complexity and confusion around this topic, we point out that adherence to a particular version of OCPP is not of great importance as long as some minimum is met. We recommend at least version 1.6.

A final yet important detail about OCPP must be amplified: Some companies are compliant with OCPP from a technical perspective, meaning their hardware and/or software meets the requirements and may even be certified by an independent testing lab. But if contractual or intellectual property rights preclude consumers from actually being able to run a charger on multiple networks, then OCPP compliance has no meaning. For this reason, ATE urges the Commission to direct utilities to exclude from participation charging hardware that cannot, in practice, be ported to multiple networks. This can be achieved through a robust and thorough vendor selection process in which utilities identify hardware and service providers that meet both the technical and commercial requirements described above.

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[2] The Open Charge Alliance's website is https://www.openchargealliance.org, and DEKRA's OCPP certification webpage is https://www.dekra.com/en/ev-charging-station-and-infrastructure-testing/.

*Conclusion*

The Alliance for Transportation Electrification strongly supports the innovative managed charging initiatives put forth by the investor owned utilities, and we urge the Commission to approve the initiatives rapidly so that consumers can select the options that best fit their needs while also benefitting the grid and all other customers.

Respectfully submitted,

*Philip B. Jones*

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