



September 13, 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 Managed Charging Proposal filed by Niagara Mohawk Power Corporation d/b/a National Grid on June 4, 2021.

Respectfully submitted,

Michael I. Krauthamer

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Senior Advisor
Alliance for Transportation Electrification

Enclosure

**NEW YORK STATE
PUBLIC SERVICE COMMISSION**

**Proceeding on Motion of the Commission
Regarding Electric Vehicle Supply Equipment**

Case 18-E-0138

**COMMENTS OF
THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION
ON RESIDENTIAL ELECTRIC VEHICLE (EV)
MANAGED CHARGING PROPOSAL**

The Alliance for Transportation Electrification (ATE) hereby submits these comments in support of the Managed Charging Proposals filed by Niagara Mohawk Power Corporation d/b/a National Grid on June 4, 2021, in the above-captioned proceeding.

Introduction

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.

Discussion

We write in support of National Grid’s proposal for an electric vehicle (“EV”) active managed charging program for residential customers filed on June 4, 2021. Managed charging offers many benefits not only to the customer with an EV, but also to all customers. Managed charging is a valuable service because, while residential customers’ charging needs can be satisfied by charging during off-peak hours, simply offering whole-house time-of-use rates is insufficient.

Most residential customers are unfamiliar with the complexities of energy markets and the significant costs incurred by all customers when system capacity peaks. For this reason it is important for utilities to inform customers about opportunities to save money. Passive time-of-use rates are one option, but they offer too small a savings, are too complicated for customers to comply with, or are too rough a solution (this last issue refers to “timer peak,” a phenomenon which occurs when all devices in the territory turn on at once at the start of the off-peak period; this causes a spike that could easily be avoided because most of the loads are on only for a small portion of the off-peak period and could easily be dispersed more evenly).

We believe that because of customer inertia to do nothing, and because of the significant costs and logistical challenges of customers managing their own loads, combined with the split incentive which causes customers to not fully bear the cost of ill-timed charging, it is wholly appropriate for, if not incumbent upon, utilities to be proactive in supporting high-usage customers such as EV drivers to take actions that will benefit the system as a whole.

National Grid’s proposal is not inconsistent with load management programs that have a long and successful history in New York and beyond. Specifically, National Grid proposes to offer (1) rebates to customers to purchase Level 2 chargers that can participate in the managed charging program; (2) a “turnkey” installation service; and (3) an expanded online marketplace that EV customers can easily obtain all of the energy they need during off-peak hours.

National Grid proposes that vehicle telematics systems be acceptable substitutes for networked EVSE, and we support this feature of the program because controlling charging, regardless of the technical solution, is the goal. Other large utilities such as Baltimore Gas & Electric are employing similar capabilities, and we believe this is consistent with our general support for recognizing that EV charging is not a one-size-fits-all situation.

National Grid also 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. The embedded metering is being utilized only for splitting the consumption behind the utility meter; the utility meter will be the sole meter for total consumption. This same approach is being successfully deployed in states such as Maryland with the approval of the Public Service Commission.¹ We fully support the use of qualified behind-the-meter devices for purposes of separately measuring EV usage because total kWh will be measured by the traditional utility meter, and requiring a second utility meter for an EV is uneconomical and therefore would stand in the way of the EV driver and all utility customers benefitting from managed charging.

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.

The Online Marketplace

National Grid's proposed online marketplace is intended to serve as a key resource for customers to learn about their home charging options and to purchase EVSE and related services. The online marketplace is intended to address the knowledge gap associated with buying and installing a home charging station during the early stages of EV adoption. We believe that providing useful and actionable information is an important function that utilities can offer customers, particularly about a topic as complicated as EV charging.

¹ Case No. 9478, Order No. 88997, at 49-53 (2019).

The \$500 Infrastructure Incentive and the \$150 Enrollment Incentives for New Networked Level 2 EVSE are Reasonable

We have witnessed incentives of widely varying amounts across the country in recent years, and in our experience a total of \$650 (\$500 for infrastructure plus \$150 for enrollment) is the absolute minimum for an incentive to be effective. Installation of a 240V receptacle in a garage routinely costs more than \$1,000 when the electrical panel is in the basement or on the opposite side of the house, as is common in the northeast. Total costs exceeding \$1,500 are not unusual. Because customers are resistant to investing more money after purchasing a vehicle, we believe the incentive is necessary to spur participation in this important program.

The Proposed Mid-Program Independent Evaluation Should Be Approved

As the program progresses, the Company will track key metrics including enrollment, share of Customers enrolled using telematics and networked Level 2 chargers, retention rate, and others. The Company also plans to have an independent evaluation of the program after at least one full year of program operation, aimed at providing guidance on ways to improve the program. Given the rapid evolution of market offerings, technology, and customer sophistication, ATE believes that periodic reviews are beneficial. Such a process ensures that the utility can adapt to changing conditions. ATE therefore supports periodic reviews and encourages the Commission to act quickly when such reviews are filed so that customer can continue to benefit from lessons learned.

The EV Smart Plan is an Appealing Option and Should Be Approved

National Grid's proposed two-tier pricing plan for a fixed number of kWh is a highly appealing and cost-effective offering that should be approved. The monthly fees include not only the cost of electricity itself, but also the administrative fees, for a per-kWh price lower than

energy alone on the SC-1 rate. Perhaps the most innovative aspect of this program element is the high-mileage and low-mileage options. This is a framework that customers are well accustomed to with other consumer services such as cell phones, streaming services, and internet to name a few, and we believe the tier definitions (225 kWh for around 700 miles per month and 325 kWh for around 1,000 miles per month) are eminently reasonable.

Turnkey Installation Will Be An Effective Market Accelerator

Installation of residential EVSE is a surprisingly complicated undertaking for most homeowners. Most contractors lack the familiarity necessary to determine suitable placement of the 240V receptacle. For example, they often do not think to ask where the charging port on the vehicle will be. Another common outcome is that contractors do not take the care and pride in workmanship in a garage installation that they would take in a kitchen, which is a big mistake because EV customers will interact with their EVSE potentially multiple times per day. Poor quality installations negatively affect the overall experience. The result is customer dissatisfaction, which is entirely avoidable by a methodical approach undertaken by trained professionals. A third-party professional specializing in residential EVSE installations and given specific design, performance, and safety parameters can go a long way to improving the experience of charging an EV. For this reason we support National Grid's proposal to hire a third-party program administrator to manage this offering and develop a network of qualified EVSE installers to provide widespread geographic coverage, affordable pricing, and reliable service to customers. This service will enhance customer satisfaction and will also benefit the private market of installers by facilitating training for this important new capability.

Conclusion

All in all, ATE considers National Grid's proposal to be extremely well designed, the implementation plan is measured and reasonable, the need for marketing is compelling, and the explanation of costs are well-supported. For these reasons, the Alliance for Transportation Electrification strongly supports the innovative managed charging proposal, and we urge the Commission to approve the initiative rapidly and provide timely cost recovery through the EV Make-Ready Surcharge so that consumers can select the options that best fit their needs while also benefitting the grid and all other customers.

Respectfully submitted,

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