STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of Electric Vehicle Supply Equipment and Infrastructure Proceeding	))	Case 18-E-0138

IMPLEMENTATION PLAN OF ORANGE AND ROCKLAND UTILITIES, INC. FOR A LIGHT-DUTY ELECTRIC VEHICLE CHARGING INFRASTRUCTURE MAKE-READY PROGRAM

October 19, 2026
Pearl River, New York

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I. Introduction and Summary

On July 16, 2020, the New York State Public Service Commission (the Commission) issued its *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs* (Make-Ready Order or 2020 Order), as modified.[1] On November 16, 2023, the Commission issued revisions to the Make-Ready Order.[2] The 2023 Order authorized a budget of $49.5 million to facilitate the make-ready of 1,546 Level 2 (L2) and 340 Direct Current Fast Charger (DCFC) charging plugs in Orange and Rockland Utilities, Inc.'s (O&R or the Company) service territory through 2025.

Pursuant to the March 23, 2026 *Order Denying Petition and Making Other Findings* (2026 Petition Order),[3] the L2 portion of the Make Ready Program was permanently closed to applications effective April 22, 2026. The 2026 Petition Order also directed the temporary pause of the DCFC portion effective April 22, 2026. The DCFC portion may be re-opened only upon each utility's achievement of the data compliance rate of 90%, and subsequent approval by Department of Public Service (DPS) Staff. The Commission designated J3400 charging connectors as non-proprietary for applications submitted after September 18, 2026 and confirmed public accessibility criteria in its J3400 Order.[4] O&R submits this Implementation Plan in accordance with the J3400 Order.[5]

The Company is committed to facilitating clean transportation in its service area as part of its Clean Energy Commitment and looks forward to expanding the availability of charging infrastructure to electric vehicle (EV) drivers within O&R's service territory. Electrification of transportation is a key tenant of the State's clean energy goals, including the Climate Leadership and Community Protection Act's target to reduce greenhouse gas emissions by 60 percent of 1990 levels by 2040. Making more charging infrastructure available to drivers supports this goal by reducing range anxiety and removing barriers to EV adoption.

This Implementation Plan details O&R's updated company-specific plans, processes and procedures to implement the Make-Ready Program within its service territory including plans, eligibility criteria, incentive levels, outreach and education, and anticipated program costs. In addition, the Implementation Plan details the Company's implementation of a Fleet Assessment Service for light-, medium- and heavy-duty fleets.

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[1] Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure* (EVSE & I Proceeding), Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs, July 16, 2020, and Order Approving Modifications to Make-Ready Program, July 14, 2022 (2022 Order).
[2] EVSE & I Proceeding, Order Approving Midpoint Review Whitepaper's Recommendations with Modifications, November 16, 2023 (2023 Order)
[3] EVSE & I Proceeding
[4] EVSE & I Proceeding, Order Classifying J3400 Charging Connector as Non-Proprietary, and Making Other Findings, September 18, 2026 (J3400 Order)
[5] EVSE&I Proceeding, Order Providing Clarification on Make-Ready Program, June 12, 2026 (Clarification Order)

This implementation plan is structured into discrete sections:

- Section II presents a program overview and general eligibility criteria.
- Section III addresses the implementation of O&R's Make-Ready Program.
- Section IV describes the Company's planned outreach and education activities.
- Section V reviews the fleet assessment service.
- Section VI provides implementation timelines for the revised Make-Ready Program
- Section VII describes anticipated program costs, third-party support, and administrative needs.

While this implementation plan provides details regarding the implementation of O&R's Make-Ready Program, additional detail for program participants and interested parties is available through the Company's Participant Guide[6] as well as through updated information on the Company's Make-Ready Program website.

II. Make-Ready Program Overview and Eligibility Criteria

The objective of the Make-Ready Program is to "support the development of electric infrastructure and equipment necessary to accommodate an increased deployment of EVs within New York State by reducing the upfront costs of building charging stations for light-duty EVs." This program will offset certain infrastructure costs associated with preparing a site for EV charger installation for light-duty EVs in O&R's service territory by providing an incentive to qualifying projects. Per the 2026 Petition Order, as of April 22, 2026, no applications will be accepted for the L2 and DCFC components of the program. After that time, applications previously submitted and not yet paid will continue to be processed as set forth in this implementation plan. Applications to the DCFC component of the program that will be accepted after that component re-opens will be processed subject to a new set of procedures as set forth in this implementation plan.

A. Definitions

The following definitions are applicable to the Make-Ready Program:

- Acquired: Plug(s) and/or project(s) that have passed the field verification step signifying the project has been completed.

- Application: A request for participation in the Make-Ready Program that is submitted by a participant through the Company's online application portal. An application is considered complete once submitted.

[6] O&R Participant Guide can be found at POWERREADY Electric Vehicle Program | Orange & Rockland

- Approved Contractor: A contractor/developer/installer who has met the Joint Utilities'[7] approval criteria to install EV charging infrastructure incentivized through the EV Make-Ready Program and whose customers (*i.e.,* Participants or site hosts) have maintained compliance with the Data Reporting Threshold, defined below. "Contractor" includes "developer" or "installer".

- Connector: A physical component of electric vehicle supply equipment (EVSE) that provides the interface through which electric power is delivered from the charging station to an electric vehicle; typically corresponding to the plug interface used for charging.

- Committed: A project that signs a program agreement (*i.e.,* a contract) with O&R for a make-ready project and associated incentives.

- Curbside Charging: On-street public parking that is associated with a designated EV charging parking space with a framework in place to prevent non-charging vehicles from blocking access to the charger.

- Data Reporting Threshold: The minimum data reporting threshold of ninety percent (90%) for monthly station session and outage data. This threshold, calculated as the Compliance Rate in Section D, will be used to assess eligibility for returning Participants, as well as the Approved Contractor and Eligible NSP lists. (See Section D below for the Data Reporting Threshold formula).

- Disadvantaged Community (DAC): 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). The Climate Justice Working Group (CJWG) adopted final criteria to identify DACs in the State on March 27, 2023. The DAC map can be accessed at: https://climate.ny.gov/Resources/Disadvantaged-Communities-Criteria.

- Electric Vehicle Charger (EV Charger): A device that supplies electrical power to recharge the battery of an electric vehicle or plug-in hybrid vehicle. For clarity, replacement or upgrade of existing charging equipment at an existing location does not constitute a "New EV Charger" unless otherwise specified.

- Electric Vehicle Supply Equipment (EVSE): The electrical conductors, connectors,

[7] The Joint Utilities include Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York state Electric & Gas Corporation, O&R, and Rochester Gas and Electric Corporation.

control devices, and associated hardware that provide electric power from the electric grid to an EV for the purpose of charging. EVSE includes L2 chargers and DCFCs and encompasses both the physical charging equipment and, where applicable, related communications and control components used to manage charging sessions and collect data.

- Multi-unit Dwelling (MUD): A multi-unit residential building with five or more dwelling units.

- Network Service Provider (NSP): Business entity that provides centralized networking, communications, and data services for charging equipment connected across an Internet-enabled network. The NSP is responsible for collecting, hosting, and transmitting session, outage, and uptime data associated with networked charging stations. The NSP may own and operate the charging station, or the NSP may sell its services to the charging station operator or Participant.

- Non-proprietary plug type: A connector that uses an open, industry-standard protocol and is not limited to charging vehicles of a single manufacturer. For project applications submitted after September 18, 2026, qualifying non-proprietary connector types include J1772, CCS, CHAdeMO, and SAE J3400, as applicable to the project and charging level.

- Original Equipment Manufacturer (OEM): A producer of parts or equipment used in another company's branded product.

- Participant: An entity that applies for and receives incentives through the Make-Ready Program and signs the Program Agreement. A Participant may qualify as one or more of the entities listed below for an individual project. The entities eligible to be a participant include:

    - Customer: An entity taking service from O&R.

    - Developer: An entity for designing, constructing, and commissioning an EV charger site. This entity may also be responsible for owning, managing, and operating the chargers. Developer is used interchangeably with Contractor within this document.

    - Equipment Owner: The entity that purchases and owns the EV charging equipment once it is installed.

    - Operator: The entity responsible for the day-to-day operation and management of one or more electric vehicle charging stations, including ensuring station availability and functionality for users.

    - 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.

- Plug: A connector that physically links an electric vehicle to a power source for battery charging that is capable of simultaneous use with any collocated ports on the same station.

- Port: A connector that physically links an electric vehicle to a power source for battery charging. Port is used interchangeably with "plug" in Make-Ready Orders.

- Program Agreement: A signed legal document governing participation in the Make-Ready program that outlines scope, roles, project timeline, cost responsibilities, compliance, reporting, and incentive for the make-ready infrastructure.

- Proprietary EV charging plug: A connector design that is owned, controlled, or licensed by a specific manufacturer or entity, and is not fully governed by an open, consensus-based industry standard.

- Publicly Accessible Site: A charging site that: (1) is accessible to members of the public during the site's operating hours without an access fee, except for charging located in municipal paid parking lots; (2) hosts at least as many non-proprietary plugs as proprietary plugs, with an equal or greater number of non-proprietary plugs where applicable; and (3) permits any vehicle compliant with the applicable plug standard to initiate a charging session. A site is not publicly accessible if access or charging initiation is limited to a subset of otherwise compatible vehicles or users through payment, authentication, OEM/network, contractual, technological, or other restrictions.

- Station: A charging station is a physical device that has 1 or 2 ports and is identified by a serial number.

B. Eligible Equipment or Infrastructure

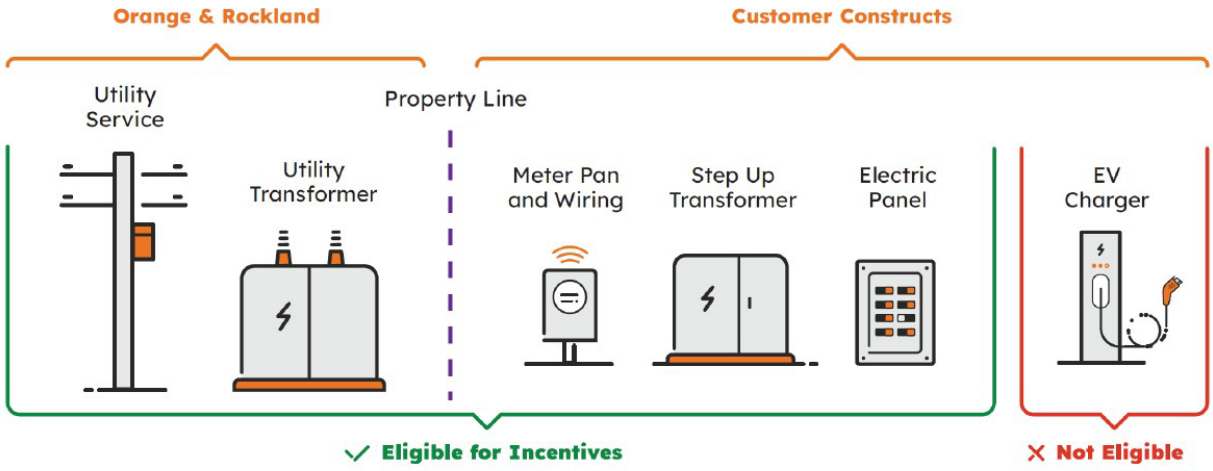
There are two categories of make-ready infrastructure eligible for incentives under the Make-Ready Program:

1. **Utility-side Make-Ready Infrastructure:** Utility electric infrastructure needed to connect and serve a new EV charger. This may include traditional distribution infrastructure that will be owned by O&R, such as step-down transformers, overhead service lines, and utility meters.

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.

Figure 1. Eligible Equipment or Infrastructure



Utility-Side Infrastructure	Customer-Side Infrastructure		Non-Eligible Infrastructure	
• This may include traditional distribution infrastructure that will be owned by O&R, such as stepdown transformers, overhead service lines, and utility meters • Customers may be required to pay for grid upgrades in excess of O&R's design requirements	• Panel • Conduit • Trenching • Design • Permitting	• Step Up Transformers • Wiring • Customer Switchgear	• Signs • Bollard • Network • Maintenance	• Pedestal • Charging Station • Network Equipment • Station Installation

All Customer-side make-ready infrastructure must be installed by Approved Contractors in order to be eligible for incentives under this Make-Ready Program. Additional infrastructure may be eligible for incentives as part of future-proofing (see Section III. B. for details).

Additional costs to future-proof a site may also be approved as part of this eligible infrastructure. All EV supply equipment must be installed by utility-approved contractors in order to be eligible for the incentives available through this EV Make-Ready Program. Equipment associated with the EV charger itself, such as the actual EV chargers (including bidirectional chargers), power blocks, modules, mounting hardware, co-located distributed generation, or networking fees, are ineligible for incentives under the EV Make-Ready Program.

C. Eligibility Criteria and Incentives

A project must satisfy the following criteria in order to receive an incentive through the Make-

Ready Program:

1. **Approved Application:** Prospective participants must submit an application on the Company's online application portal via the O&R website detailing the proposed EV charging project. O&R will review, evaluate, and as appropriate, approve applications. The Company ceased accepting new applications for L2 projects and paused new applications for DCFC projects as of April 22, 2026. Once the DCFC component of the Make Ready Program re-opens, prospective participants must meet the Data Reporting Threshold to submit an application as well as use an Approved Contractor and Eligible NSP. (*See* Section D below).

2. **Project Eligibility:** A signed program agreement must be in place prior to the construction start date.

3. **Participant Eligibility**: After the DCFC program re-opens, the Joint Utilities will manage a private list of eligible and non-eligible Participants (Participant List) to be shared across the companies. Prospective participants that apply to the DCFC program once it is re-opened must be considered eligible on this list. The Joint Utilities will share data specific to Participants and other applicable parties as needed in order to calculate the data reporting rate.

    a. Requirements

        - Participants in the Make-Ready Program must meet the 90% Data Reporting Threshold for their total aggregated DCFC stations across the Joint Utilities to remain in compliance and to submit new applications to the Program. A new Participant in the State is not required to demonstrate data reporting compliance until it has a completed project.

    b. Cure Process

        - If a Participant falls below the 90% Data Reporting Threshold, the Joint Utilities will contact the Participant who will be given a 45-day warning period to rectify the situation. If after the 45-day warning period, the Participant's data compliance rate is below 90% across the Joint Utilities, the Participant will be marked as ineligible on the Participant List. Compliance is measured across the Joint Utilities, meaning all the charger-months associated with that Participant are summed across all the Joint Utilities.

    c. Reinstatement Process

        - A Participant that has been marked as ineligible on the Participant List must achieve compliance with the Data Reporting Threshold and be in good standing for all of their total aggregated stations across the Joint Utilities before O&R commits any new applications from the Participant. If a Participant is deemed ineligible to participate due to non-compliance with

data reporting, the Participant will have to achieve compliance before becoming eligible again.

4. **Eligible Network Service Provider (NSP):** After the DCFC program re-opens, the Joint Utilities will implement the following process to review NSP performance and maintain an up-to-date, publicly available list of Eligible NSPs. (Eligible NSP List). Applications to the DCFC program after that program re-opens must include an eligible NSP from the Eligible NSP List. The Eligible NSP List will be published at www.jointutilitiesofny.org. The Joint Utilities will share data specific to NSPs as needed in order to calculate the data reporting rate.

    a. Requirements
        - NSPs must meet the 90% Data Reporting Threshold for their total aggregated DCFC stations across the Joint Utilities to remain on the public Eligible NSP List. NSPs that previously participated in the Make Ready Program will be added to the Eligible NSP list based on their historical performance.
        - Inclusion on the DCFC Eligible NSP List is based on an NSP meeting the minimum data reporting rate across all DCFC station-months for all DCFC stations across the Joint Utilities.
        - New NSPs that want to participate in the Make-Ready Program will be required to, at a minimum, apply to the Joint Utilities, providing written acknowledgment of the criteria for maintaining eligibility.

    b. Cure Process
        - The Joint Utilities will regularly monitor compliance status for NSPs. If an NSP falls below the 90% Data Reporting Threshold, the Joint Utilities will provide a 45-day warning to the NSP. Upon notice, the NSP will have 45 days to show that its stations are in compliance with the 90% threshold. If after the 45 days the NSP cannot meet the 90% Data Reporting Threshold, it will be removed from the Eligible NSP list. If an NSP falls off a third time, the NSP will no longer be included in the Eligible NSP List.

    c. Reinstatement Process
        - If an NSP is removed from the eligible list for falling below the minimum Data Reporting Threshold, the NSP will be placed on ineligible administrative hold that bars the NSP from being a party to new applications to the Make-Ready Program until the NSP complies with the required Data Reporting Threshold.
        - Once an NSP has again achieved compliance with the data reporting requirement, the NSP will be held to an additional 90-day administrative hold from date of compliance before it is added back to the Eligible NSP List.

Safeguards

If an error by the Joint Utilities is identified during the review of the Participant, NSP, or Approved Contractor data, the error is remedied and the Participant, NSP, or Approved Contractor exceeds the 90% threshold, then the Participant, NSP, or Approved Contractor will be reinstated immediately

5. **Approved Contractor:** After the DCFC program re-opens, all Make-Ready applications must include an Approved Contractor. In addition, the chosen contractor must be an Approved Contractor at the time that project funds are committed. The Joint Utilities website[8] includes a list of Approved Contractors available for the Make Ready Program and an application form for contractors that wish to become an Approved Contractor. The Joint Utilities will share data specific to Contractors and other applicable parties as needed in order to calculate the data reporting rate.

    a. Requirements
        - The information required to be initially added to the list of contractors includes self-certification that the contractor is registered to do business within New York and that the contractor has all appropriate licenses and certifications that are needed for all jobs in the area(s) where it performs work. The contractor is asked to indicate the areas of New York State in which it plans to perform make-ready work and must confirm as part of its Approved Contractor list application its understanding of the Make-Ready Program's 90% Data Reporting Threshold requirement. Contractors' applications will be approved or denied within one month of the application submittal.
        - Inclusion on the DCFC Approved Contractor list after the DCFC program re-opens is based on an Approved Contractor meeting the minimum data reporting rate across all DCFC station-months for all DCFC stations across the Joint Utilities.
        - Contractors who have previously participated in the Program must remain in good standing with their total aggregated stations across the Joint Utilities meeting the 90% data compliance rate. Contractors new to the State do not need to submit historical data from outside the State.

    b. Cure Process
        - If at any time a participating Approved Contractor falls below the 90% Data Reporting Threshold, the contractor will be notified by the Joint Utilities and given a 45-day warning period to rectify the situation to remain on the Approved Contractors list. If after 45 days the contractor is still below the 90% threshold, it will be removed from the Approved Contractors list.

    c. Reinstatement Process

[8] www.jointutilitiesofny.org

- If a Contractor is removed from the list for non-compliance with data reporting, the Contractor must achieve compliance before being added back to the Approved Contractor List.
- The Joint Utilities shall have the ability to remove contractors from the qualifying list for either: (a) falling out of standing with the non-data reporting qualification criterion/criteria established by the Joint Utilities, or (b) performance concerns and/or customer complaints.
- Contractors who fall out of standing based on one or more qualifying criterion/criteria and subsequently correct that deficiency shall be reinstated upon demonstration of compliance and without an administrative hold.
- O&R may place a contractor on probation due to customer complaints or failure to satisfy performance or participation standards in the Program Agreement. Failure to take corrective action and/or the continuance of customer complaints will result in the suspension of the contractor's ability to contract with Participants in the Program. O&R may reinstate a contractor upon a reasonable demonstration of the contractor's actions to address and mitigate recurrence of customer complaints, and/or to resolve identified performance or participation deficiencies.

6. **Station Maturity:** Construction of the EV charging station must have commenced after July 16, 2020.

7. **Locational Capacity:** EV charging stations must follow capacity guidelines which include:

    a. All charging stations (L2 and DCFC) must have a minimum of two plugs. However, the number of two-plug stations that can receive incentives through the Make-Ready Program is limited to no more than 25 percent of the target number of plugs (193 for L2 and 42 for DCFC) within the O&R service territory.

    b. DCFC stations with more than ten plugs and/or demand in excess of 3MW will only be allowed to participate in the Make-Ready Program if development of the site does not cause O&R to incur new business costs greater than the cost that would be incurred to develop a site with a maximum demand of 3MW.

    c. The number of DCFC plugs at locations in excess of ten plugs cannot exceed 50 percent (*i.e.,* 170 DCFC plugs) of O&R's target number of plugs as established in the EV Make-Ready Order.

8. **Contact Information:** All chargers in the EV Make-Ready Program must display easily identifiable and up-to-date contact information for the EV service provider on each

charger.

D. Data Reporting Requirements

Participants must agree to provide five years of charger session and outage, or uptime, data to the Company. The data may be provided by the Participant's NSP or the Participant.

Data Reporting Threshold

In accordance with the Commission's 2026 Order, after the DCFC portion of the Program re-opens, Approved Contractors, NSPs, and Participants must demonstrate a minimum data reporting compliance rate of ninety percent (90%) for monthly station session and outage or uptime data for their statewide DCFC project portfolio. In order to be a party to a new DCFC program application, a Participant, Approved Contractor, or NSP must have a Data Reporting Rate of at least 90%, where the total points reported and required are aggregated across all the stations associated with that Participant, Approved Contractor, or NSP across all the Joint Utilities. Eligibility to participate in the re-opened DCFC program is based on DCFC data reporting.

For calculating compliance, a month represents a full calendar month for one station that has elapsed since January 1, 2024. The calculation for data compliance will start from the first complete month on or after January 1, 2024 that the charging station should have been reporting data. The Joint Utilities will share data specific to NSPs, Contractors, Participants and other applicable parties as needed in order to calculate the data reporting rate.

Uptime data may be provided by NSPs and Participants as a reasonable proxy for outage data where individual outage records cannot be provided. If no sessions or outages are reported in a given month, the NSP or Participant may be required to provide written confirmation to the Company that states that no sessions or outages occurred at a certain charging station and that the station remained operational and capable of transmitting data during the given reporting month.

Please refer to the Joint Utilities Data Compliance Plan for the formula to calculate the Data Reporting Rate.

Pathway to Supplement Missing Charging Station-Months Data through Additional Reporting

In accordance with the Clarification Order,[9] a compliance pathway will be available to Participants in instances where data may be lost or inaccessible for a Participant. The limitations and specifics of this allowance provide Participants a pathway to report data past the required period; this approach avoids claw-backs and loss of data that could be provided over a longer time period. Refer to the Data Compliance Plan for relevant details related to the pathway to supplement missing charging station-months data through additional reporting for Participants.

[9] EVSE&I Proceeding, Order Providing Clarification on Make-Ready Program, June 12, 2026 (Clarification Order)

Escalation Pathway for Site-Specific Issues

The site escalation path described below could apply for operational or data non-compliance reasons, pursuant to the program agreement.

- If a Participant's site is out of compliance, then the Participant is given an initial cure period.
- Failure to cure will result in removal from eligibility to submit new applications or sign new program agreements, irrespective of whether the Participant's portfolio of stations meets the required, minimum state-wide Data Compliance Rate. Removal of a Participant from eligibility is temporary until site non-compliance is resolved through the process described here.
- Where applicable, ongoing non-compliance will result in an offer to pursue the pathway to supplement missing charging station-month data through additional reporting, described in the Data Compliance Plan.
- Failure to reply, cure as applicable, or pursue the pathway described above will result in a claw-back demand and the Company will pursue appropriate legal remedies.

E. Make-Ready Incentive Levels

Participants in the EV Make-Ready Program are eligible to receive incentives covering up to the given cost of Make-Ready infrastructure based upon the criteria detailed in Tables 1. No single Participant may receive incentives for greater than 50 percent of any utility-specific Make-Ready Program incentive budget.

Table 1: O&R Make-Ready Eligibility Criteria

Incentive Level	Eligible Project Criteria
Up to 90%	• Publicly accessible L2 and DCFC projects with non-proprietary plug types. Includes municipal pay-to-park locations and free parking offered while charging. • Publicly accessible L2 and DCFC projects including proprietary plugs must have an equal number of non-proprietary plugs of an equal or greater charging capacity to the proprietary plugs. • Publicly accessible DCFC projects with non-proprietary plug types located within Disadvantaged Communities (DAC) +1. Projects with proprietary plug types must have an equal number of non-proprietary plugs of an equal or greater charging capacity to the proprietary plugs. • L2 projects located at eligible multi-unit dwellings (MUD). • L2 projects located at multi-unit dwellings (MUD) in a DAC + 0. • L2 curbside projects within or adjacent to a DAC + 0.
Up to 50%	• Non-public L2 projects, such as workplaces or MUDs with restricted access and privately owned pay-to-park lots and not located in a DAC + 0 for MUDs. • Non-public or proprietary plug DCFC projects, such as workplaces or MUDs with restricted access and privately owned pay-to-park lots. • Public and non-public DCFC projects where proprietary plugs are not co-located with an equal number or greater number of non-proprietary plugs of equal or greater charging capacity.
Table 1 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 all costs not eligible for incentives including the cost of chargers, maintenance, electricity, networkin g fees, and other operational costs. *O&R stopped offering the Up to 100% enhanced tier in February 2025 when it met its DAC budget.* *O&R ceased accepting new L2 applications as of April 22, 2026.*	

A site receiving an incentive amount contingent upon public accessibility must maintain the applicable public-accessibility criteria throughout the required five-year operating period. The Participant remains responsible for continuing compliance, including where another party performs activities affecting site access or charging initiation.

The Company will monitor the site for compliance with the Public Accessibility criteria during the five-year operational period. Please refer to the Joint Utilities of New York Amended Participant Guide[10] for compliance requirements, as well as details of the ongoing compliance and monitoring process, along with cure and enforcement actions that may be undertaken for non-compliance.

[10] Found at POWERREADY Electric Vehicle Program | Orange & Rockland

Equipment Eligibility

Electric Vehicle Supply Equipment (EVSE) Communication Standards Requirements: Sites that receive Make-Ready incentives must meet specific technical communication standards, including the International Organization for Standardization's (ISO) ISO 15118 and Open Charge Point Protocol's (OCPP) OCPP 2.0.1or newer versions. ISO 15118 -2 and -20 address network and application protocol requirements and -3 addresses the physical and data link layer.[11] ISO 15118-capable hardware ensures enough processing power is available for ISO 15118-conformant software to operate. OCPP 2.0.1 requires chargers to operate an open-source application protocol for communication between EV charging stations and centrally managed charging station networks. The effective dates that govern whether projects must use equipment conforming to these standards are below. The compliance requirements in this Implementation Plan reflect the Commission's ruling[12] on a Joint Utilities petition recommending changes to the communication standard requirements.[13]

Summary of Requirements

1. ISO 15118 hardware conformance must meet the definition specified in the Commission's petition ruling:
    a. Hardware conformance with ISO 15118-3 and
    b. Hardware capable of enabling ISO 15118 -2 or -20.
2. ISO 15118 software conformance must meet the definition specified in the Commission' petition ruling:
    a. Software conformance with ISO 15118 -2 or -20.
3. EVSE must also comply with OCPP 2.0.1 or later.

Summary of Compliance Timelines for L2 Chargers

1. EVSE installed at sites committed before June 1, 2025, are not required to comply with any communication technical standards.
2. EVSE installed at sites committed on or after June 1, 2025, must achieve conformance to all requirements described above in the section titled "Summary of Requirements."[14]

Summary of Compliance Timelines for DCFC Chargers

1. As of November 16, 2024, all new commitments for EVSE installed at sites must have equipment that can achieve ISO 15118 hardware conformance (equipment satisfies ISO 15118-3 and ISO 15118 -2 or -20).

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[11] ISO 15118 includes technical specification of the Vehicle-to-Grid Communication Interface that enable electric road vehicles to "recharge in the most economic or most energy efficient way" and allow for a convenient billing systems. Available at https://www.iso.org/obp/ui/en/#iso:std:iso:15118:-4:ed-1:v1:en

[12] EVSE & I Proceeding, Order Approving Modification to Make-Ready Program. (issued and effective September 20, 2024) (Commission's Petition Ruling).

[13] EVSE & I Proceeding, Joint Utilities' Petition Requesting Changes to Make-Ready Order Requirements Regarding Equipment Communications Standards and Medium-and Heavy-Duty Pilot Eligibility (filed March 15, 2024)

2. Projects committed on or after December 16, 2023 must have equipment that can achieve ISO 15118-2 or -20 software conformance by November 16, 2024. If the project is committed after November 16, 2024, then the project must have equipment that can achieve ISO 15118-2 or -20 software conformance immediately upon project completion.
3. Beginning on November 16, 2024, all projects must also achieve OCCP hardware conformance (equipment satisfies OCPP 2.0.1 or later).

The following table summarizes modifications to the communication standards requirements.

Table 2: Electric Vehicle Supply Equipment (EVSE) Communication Standards Requirements

	L2		**DCFC**		
	Committed before Jun 1, 2025	*Committed on or after Jun 1, 2025*	*Committed before Dec 16, 2023*	*Committed between Dec 16, 2023 and Nov 15, 2024*	*Committed on or after Nov 16, 2024*
ISO 15118 hardware conformance	No requirement	15118-3, capable of enabling 15118-2 or 15118-20	No requirement	15118-3, capable of enabling 15118-2 or 15118-20	15118-3, capable of enabling 15118-2 or 15118-20
ISO 15118 software conformance	No requirement	15118-2 or 15118-20	No requirement	15118-2 or 15118-20 by Nov 16, 2024	15118-2 or 15118-20
OCPP hardware conformance	No requirement	OCPP 2.0.1 or later	No requirement	No requirement	OCPP 2.0.1 or later

The Joint Utilities' website (https://jointutilitiesofny.org/ev/make-ready) contains information on how Participants can request that their preferred EVSE supplier attest that the EVSE meets the requirements described above. The JU will collect attestations for the requirements specified in the table above. In addition, as of December 16, 2023, O&R will only issue Program Agreements that reflect equipment whose supplier OEM is able to provide said attestations.

F. Disadvantaged Communities

Incentives of up to 100 percent of make-ready infrastructure costs may be available for EV L2 charging sites within a Disadvantaged Community and DCFC charging sites located within one mile of Disadvantaged Communities. O&R will provide this 100 percent incentive until such Make-Ready Program expenditures reach 20 percent for L2 and 25 percent for DCFC of the Company's authorized incentive budget, after which the Company will continue to support development within Disadvantaged Communities at the standard applicable 90 or 50 percent incentive levels. Sites eligible for the 100 percent incentive include:

1. Publicly accessible DCFC sites utilizing non-proprietary plugs, located within one mile of Disadvantaged Communities.

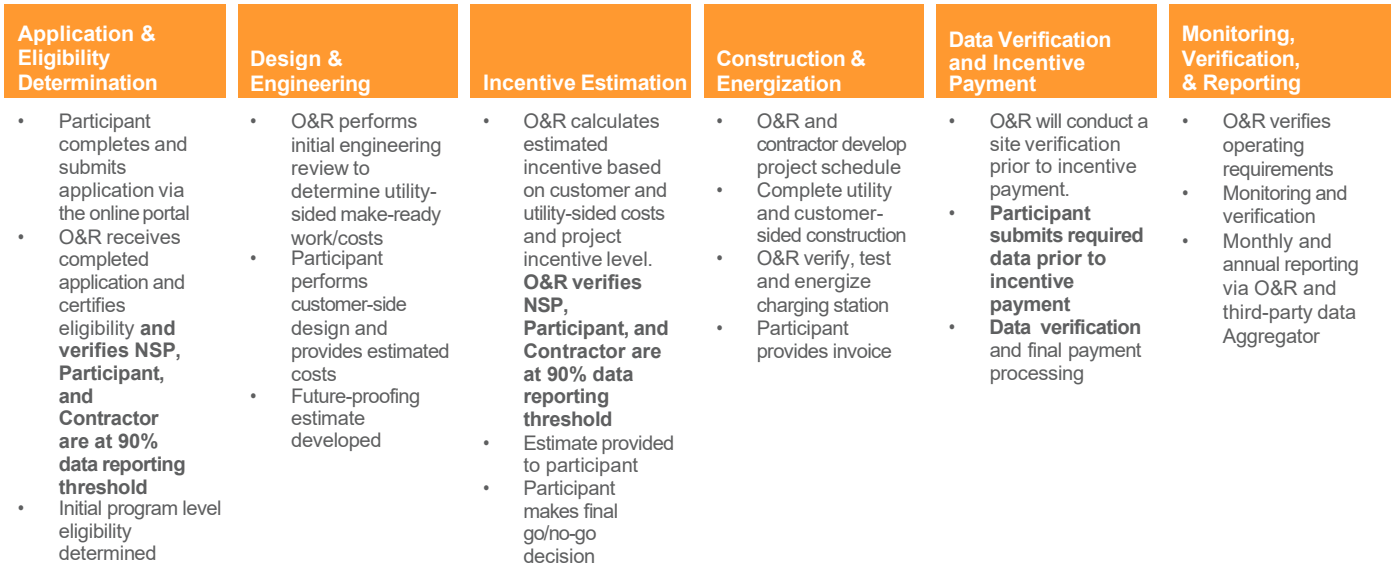
2. L2 sites located in multi-unit dwellings within Disadvantaged Communities.

Please note the Company met the DAC expenditure percentage in February 2025. In addition, the Company ceased accepting applications for L2 projects as of April 22, 2026 pursuant to the 2026 Petition Order.

III. Make-Ready Program Implementation

In order to implement the updated Make-Ready Program, O&R will leverage existing business processes and systems to the degree possible. Generally, these processes fall into six project phases: 1) Application & Eligibility Determination, 2) Design & Engineering, 3) Incentive Estimation, 4) Construction & Energization, 5) Data Verification and Incentive Payment, and 6) Monitoring, Verification & Reporting.

Figure 2. O&R Make-Ready Program*



***Bold** represents new steps required in the 2026 Petition Order that will apply to applicants to the DCFC program when it re-opens.

A. Application Review & Eligibility Determination

Entities wishing to participate in the Make-Ready Program will be required to apply for the program via the Company's online application portal. Information regarding the portal, the application process, program eligibility and incentives, Eligible NSP, and other program information may be found on O&R's Make-Ready Program landing page.

In a re-opened DCFC program, only prospective participants that are eligible on the Participant List can submit an application. The application must include an Eligible NSP and Approved Contractor to be eligible.[15] Participants, contractors, and NSPs are eligible if they meet the 90 % Data Reporting Threshold. (See Section II.D above.)

[15] 2026 Petition Order pp. 11-12

O&R will confirm that the NSP is on the eligible list at the time of application submission. At any point throughout the project, if the project's selected NSP is removed from the eligible NSP list, the Company will notify the Participant.

To apply for the program, Participants will be required to submit the following information via the online portal:

- The Participant's name and contact information;
- A description of the project, including the number of plugs, charging output and plug type of each, location, whether demand management software or hardware will be used, whether the EVSE will be bi-directional (at present or in the future) or exclusively load, and any co-located distributed generation or energy storage;
- Site plan, proof of site control, one-line diagram, and anticipated project load;
- Future-proofing needs and site expansion plans (see below);
- Name of Approved Contractor for Customer-side work (see Section II.C. above);
- **For applications submitted after the DCFC program re-opens**
    - **Name of Eligible NSP is required for DCFC (see Section II.C above).**
    - **Confirmation that the proposed DCFC equipment will be networked and capable of transmitting required session and outage or uptime data via the identified NSP.**

Once an application is received, O&R will assign a project identification number and confirm the required information is provided. O&R will review the application to determine program eligibility, including requesting and receiving from the Participant, as required, additional information or answers to any questions. For applications received after the DCFC program re-opens, O&R will also verify that the NSP, Participant, and Contractor are complying with the 90% Data Reporting Threshold. Once O&R completes the initial review, the Company will engage with the Participant to align expectations. If the eligibility criteria are met, O&R will notify the Participant of the appropriate incentive level which will be applied to the project and update the status in the application portal accordingly.

In the event that an application is incomplete, or an application is determined ineligible, the Company will explain the deficiency or deficiencies to the Participant and allow the Participant to resubmit.

B. Design and Engineering

Once an application for new service has been submitted to the New Business group, O&R will perform an initial analysis leveraging its existing business processes for new service interconnections. The Company's New Business team will schedule and conduct a site review for internal stakeholders and the Participant to discuss the Point of Interconnection (POI). Once the POI is finalized, the New Business team will document the POI and a design job will be created in the Company's Work Management System (WMS) and transmitted to the Design Engineering organization.

Design Engineering will analyze the application to determine whether service upgrades will be necessary to support the station. If service upgrades are required, a cost estimate will be developed and provided to the Participant for review. If the Participant has chosen to future-proof the project, Design Engineering will provide a cost estimate for the future-proofing work in addition to the baseline cost.

During this time, the Participant will work with the Approved Contractor to develop an estimate of customer-side project costs. The estimate for the customer-side costs will be provided to the New Business team when ready. If the total estimated costs of the project exceed the average per-plug installed cost across the Company's service territory, the Company will work with the Participant to evaluate alternative project designs that may reduce estimated project costs. If unable to reduce project costs below 10% of the average per-plug installed cost, O&R may approve the project at a lower incentive level or decline the project.

Future-proofing

In accordance with the Make-Ready Order, O&R will offer participants the opportunity to future-proof sites in order to accommodate future growth at a site at minimal incremental cost. Participants will be required to determine whether they wish to request future-proofing of their site during the application process, meaning both to the Make-Ready Program for incentives and the New Business department for new or increased service. Participants will not be allowed to request future-proofing after a new business application for new or increased service has been accepted. Participants that request future-proofing work must specify their plans for future expansion of the site, including additional plugs, additional power needs, additional parking spots on-site, additional land, and any other relevant information that may be used to assess the feasibility and cost of future-proofing the site.

As part of the Design and Construction stage discussed above, the Company will work with the Participant to determine the feasibility of the future-proofing plans from a grid and site perspective. During the review, O&R will determine whether the site can accommodate additional Make-Ready infrastructure. The evaluation of the proposed future-proofing work may include various factors such as:

- **Plans for expansion**: Is future-proofing needed based on the Developer's plans to install additional plugs or upgrades to a higher kW unit in the future?

- **Expansion feasibility**: Can the site accommodate the identified additional make-ready infrastructure and, if relevant, additional parking spots or higher kW charging equipment?

For each site, future-proofing costs covered by the Program will be limited to no more than 10 percent of the project's make-ready costs. For costs not covered by the O&R incentive, the Participant will be required to pay the excess costs. In this instance, the Company will only conduct any utility-side future-proofing work after securing funding from the Participant.

C. Incentive Estimation

Once a project's design engineering and cost estimates are final, including being accepted by all parties, the participant will submit final costs including all eligible customer-sided costs to O&R via the online portal. O&R will then calculate the estimated incentive taking into account estimated customer- and utility-sided costs (if available) and the project's incentive level based on its location, plug-type, accessibility, and remaining program budget. The future-proofing estimate will be included in the overall incentive estimate calculation up to the limits described above. For projects participating in the re-opened DCFC program, O&R will also verify that the NSP, Participant, and Contractor are complying with the 90% Data Reporting Threshold. The estimated incentive will be provided to the Participant in the Program Agreement. The participant will be required to make a final decision whether to proceed with the project. If the Participant elects to proceed with the project, the Participant will be required to sign the Program Agreement, agreeing to the site design, service connection layout, incentive offering, and other terms before the Approved Contractor is released to begin construction.

D. Construction & Energization

A signed Program Agreement is required prior to starting construction. The customer will provide an estimated start and completion date that will be included in the signed Program Agreement. Once the Program Agreement is signed, the Participant and O&R's New Business Department will coordinate the development of a construction schedule that accommodates both customer-sided and utility-sided work. Once customer-sided work is complete, the Participant will notify O&R. O&R will complete utility-side work and energize the EV charging project.

The Participant shall provide all invoices itemizing costs incurred by the Approved Contractor as part of the customer-sided construction. O&R will validate the invoices. Program Participants and Approved Contractors are responsible for keeping customer-sided costs within budget. O&R will not be responsible for costs in excess of agreed budgets.
Once costs are validated, Participants will be paid directly via check or ACH payment.
The Participant shall be responsible for all costs in excess of the original estimate provided by the Participant's contractor. If costs incurred are lower than the estimate, O&R will not pay an incentive for costs not incurred.

E. Data Verification and Incentive Payment

Prior to payment, O&R will conduct a site verification to confirm that the make-ready installation and charging station facilities (*e.g.,* number of plugs, public accessibility) match the project submittals and approved incentive parameters, and that the project is ready to transmit data.

Before O&R issues final payment for any DCFC project for which a Participant applied to the DCFC program after it re-opened, the Participant must demonstrate successful data submission for each charger and at least one session per charger. The project will not be considered closed, and final payment will not be issued, until:

- At least one charging session has been recorded for each charger; and
- One month with utilization and outage data[16] has been provided for each charger. (This requirement is also outlined in the Data Compliance Plan.)
- Written confirmation that no sessions or outages occurred and that the charging station was capable of reporting sessions and outages will be required if no sessions or outages occur.

F. Monitoring, Verification & Reporting

The Make-Ready Order requires each project to meet minimum operating requirements and to be monitored and reported on to inform the Commission on the effectiveness of the program. The following operational and reporting requirements are required of program participants to remain in good standing.

Operating Requirements

Participants in O&R's Make-Ready Program will be required to adhere to operational requirements as specified in the Make-Ready Order. Operational requirements include:

- DCFC plugs must be operational 95 percent of the time annually.
- DCFC charging stations must be operational 99 percent of the time annually, with a minimum of half of the plugs considered to be "up" at all times.
- All charging stations in the EV Program must operate for a minimum of five years, and ownership of EV charging stations may change, or stations may be upgraded during the five-year term, as long as the number of plugs and the capacity of the station does not decrease, and the site continues to meet all performance and reporting obligations of the Program.
- All chargers in the EV Make-Ready Program must display easily identifiable, up-to-date contact information for the EV charging service provider.

Reporting Requirements

Participants agree to provide O&R with the necessary data regarding the installation and use of the EV charging equipment to facilitate necessary tracking of the Program's overall operation and effectiveness on a monthly basis. Details on the reporting requirements can be found in the Joint Utilities of New York Electric Vehicle Infrastructure Data Compliance Plan. This data includes:

- Program Participation: (Provided by O&R)
  - Reporting year;

[16] One month with uptime data may also be accepted in lieu of the outage data.

- Site ID;
- Census Tract;
- Is the site located in a geographic Disadvantaged Community;
- Percent of service applications that have matured into operating stations;
- Number of station owners participating;
- Number of sites for which incentives were issued;
- Number of plugs installed;
- Aggregated kW Nameplate Capacity;
- Infrastructure costs (broken out by customer and company infrastructure, allocated by make-ready costs and new business costs);
- Incentive levels a site received (up-to-50, 90, or 100 percent); and
- 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?

- Plug and charging session data, including: (Provided by Participant)
  - Number of sessions daily;
  - Start and stop times of each charge;
  - Amount of time each vehicle is plugged in per session;
  - Peak kW per charging site (aggregated monthly per site; including site capacity, charger nameplate capacity, and peak kW load management adjustment);
  - Annual aggregated kWh per charging site;
  - Annual aggregated percent utilization per site;
  - Annual aggregated hours charging;
  - Plug outage information (the number and duration of outages, differentiated by expected outage and unexpected outages); and
  - Uptime information, if outage is not available.

The Company requires a written confirmation from an NSP or Participant when session or outage data, if uptime is not provided, is absent for any calendar month. This written confirmation confirms that the absence of session data indicates that no charging sessions occurred during the applicable month and/or that the absence of outage data indicates that no outages occurred during the applicable month, and that the charging station remained operational and capable of transmitting data during that month.

All data subject to the reporting requirements identified in this section will be provided to the Joint Utilities. Once the DCFC program re-opens, new applicants will be required to provide data on a monthly basis. In addition to the reporting requirements outlined above, Participants applying after the DCFC program reopens must comply with all the requirements outlined as Participant Requirements in "Section 7: Reporting Requirements" of the Joint Utilities Participant Guide.

Ongoing Obligations for Participants in the Re-opened DCFC Program

When a Participant's NSP is removed from the eligible NSP list after the project is complete and final payment is received, the Participant will be notified but will not be required to change NSPs. Instead, the Participant will be reminded of its data reporting requirements and will continue to be subject to the Participant-specific Data Reporting Threshold (90%). In some cases, to maintain compliance, the

Participant may have to submit data directly to the Joint Utilities or its data contractor. A Participant that elects to provide data directly must do so within 30 days, beginning after the month of the change. During this period, the stations will be flagged in datasets maintained by the Joint Utilities and its data contractor; these stations and station charger months will not contribute to any calculations on data completeness.

In addition to the requirements outlined above, all Participants are subject to the following ongoing obligations:

- The Participant shall ensure that O&R has sufficient access to the Site to complete inspections necessary to verify completion and operation of the Project in accordance with the requirements of the Program.
- All chargers must remain capable of generating real-time session and outage or uptime reports, which could be provided to the Joint Utilities via export or report dashboard.
- Participants are responsible for providing new serial number(s) to O&R for any changes to installed equipment (*e.g.,* charger replacement) within 30 days of the change occurring. Participants must indicate which serial numbers were decommissioned and replaced with new equipment, and when these changes occurred.
- When a Participant activates a new NSP, the Participant must inform O&R promptly. Upon acknowledgement by O&R, the Participant and the new NSP must provide the required data within 30 days, beginning after the month of the change. During this period, the stations will be flagged in datasets maintained by the Joint Utilities and its data contractor; these stations and station charger months will not contribute to any calculations on data completeness.

Applicable to All Participants and Projects

Consistent with the orders, program participants that fail to provide the required data will not be eligible for new Make-Ready Program incentives and may be subject to either claw back of the make-ready payments received or revocation of service so that the station can be operated by an alternate market participant.

The Joint Utilities will publish a publicly accessible tracker that monitors both the committed 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 https://jointutilitiesofny.org/ev/make-ready.

G. Micromobility

The Micromobility Program has a separate Implementation Plan in effect as of February 2, 2024. This Micromobility Implementation Plan reviews key elements of the Micromobility Program, including eligibility criteria, incentive levels, program implementation processes, education and outreach plans, and program budget. The plan can be found on the O&R website at oru.com/micromobility.

IV. Outreach and Education

To maximize participation in the program, the Company's outreach and education plan will focus on identifying potential participants and priority sites for EVSE development. New outreach and education efforts will discontinue until the DCFC program re-opens.

A. Target Participants

A primary component of the Company's outreach and education plan will be to identify key stakeholders and participants for targeted outreach. The Company will consider re-establishing relationships with the following types of entities when the DCFC program re-opens:

- EVSE Developers
- EV Dealers
- Fleet Customers
- Commercial Customers
- Real Estate Developers

B. Prioritization

The Company's outreach and education efforts will promote the development of charging infrastructure where it is most cost-effective and provides the most benefit to O&R's customers. O&R will execute targeted outreach efforts by leveraging the suitability criteria developed in the Make-Ready Order.

O&R will continue to coordinate with the Joint Utilities, DPS Staff, and other stakeholders to define LMI areas and DAC for inclusion as strategic locations. O&R will then apply that criteria to the Company's territory to identify eligible locations and will leverage the existing hosting capacity maps to advise potential program Participants with information on where these areas exist.

C. Marketing and Communications Tools and Mechanisms

Based on the DCFC program re-opening, the Company will develop targeted marketing materials and tools to inform and engage stakeholders. In addition to the Company's Make-Ready Program website, the Company will promote the use of its load serving capacity maps and EV webpages to educate potential customers and program participants about the benefits of hosting EV charging stations and areas with lower cost of development. The Company will continue to develop marketing and communications materials for use across multiple

communications channels tailored to each type of target participant or potential customer.

V. Fleet Assessment Service

As part of the Make-Ready Program, O&R offers a Fleet Assessment Service to light-, medium- and heavy-duty vehicle fleets in its service territory to assist them in their transition to EVs. Initially the service will concentrate on providing site feasibility and rate analyses to assist fleets in understanding the transition and operating costs of switching to electric vehicles. A description of these services is below.

Site Assessment

The site feasibility analysis is based on the maximum power draw of an electrified fleet to determine if the local distribution system can accommodate that increased load. The site feasibility analysis includes all planned utility work on the distribution system both nearby and on the infrastructure serving the existing depot, to find cost-saving synergies that may exist. If the site feasibility analysis is positive, O&R offers the customer a rate analysis, working to understand the maximum costs fleet electrification may incur and how to implement best practices and managed charging to mitigate these costs.

Rate Analysis

The rate analysis is tailored to each depot location so that the fleet manager can understand all rate options available, as well as a reasonably certain range of costs they may expect based on their charging behavior.

As part of its Fleet Assessment Service, O&R will conduct a customer satisfaction survey to gather input from participating fleets. The survey asks questions such as whether the participants found the analysis useful, how likely they are to electrify their fleets in the near- and long-term, what the biggest barriers to fleet electrification are, and what additional services may be provided by the Company to support fleet electrification, among others. The results of the survey will be used to inform the development of future Fleet Assessment Services.

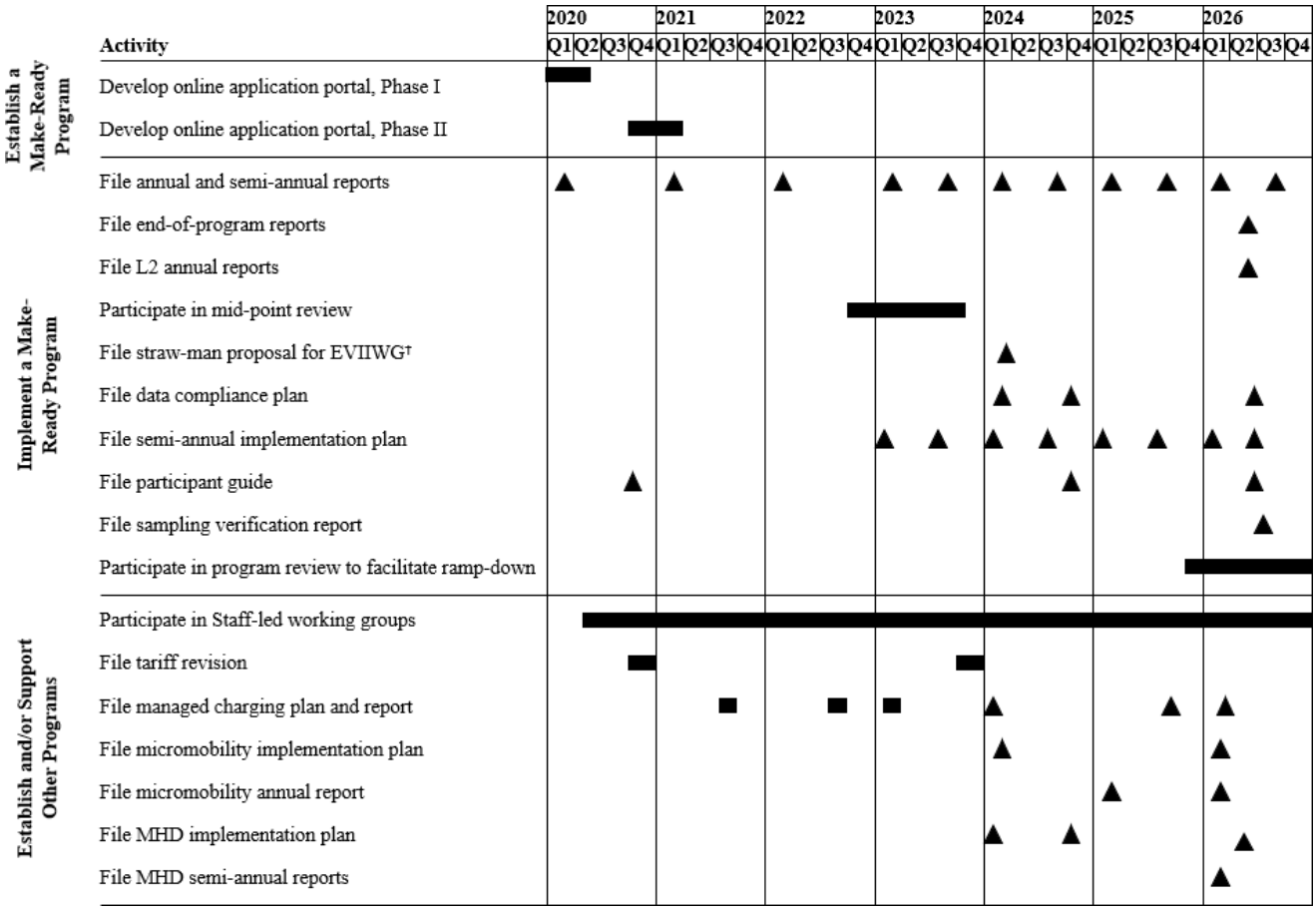
Application

The application for Fleet Assessment Services can be found at Fleet Owners and Operators | Orange & Rockland.

VI. Implementation Timeline

The Company's primary focus in implementing the revised Make-Ready Program is the development of the processes and tools needed to begin accepting and vetting program applications to facilitate participants wishing to participate in the program as soon as possible. Subsequent Company efforts will focus on streamlining Company processes to continue to improve the customer experience and further expedite the administration of program incentives.

Figure 3. O&R Make-Ready Program Implementation Timeline



VII. Program Costs, Third-Party Support and Administrative Needs

O&R's overall Make-Ready budget is established at $49.5 million set by the Make-Ready Order, including incentive and implementation costs. Table 3 outlines the Company's budget allocation for the duration of the Make-Ready Program.

Table 3: O&R Make-Ready Program Budget

Program	O&R
DCFC Make-Ready	$22,514,669
L2 Make- Ready	$17,708,845
Future-Proofing (8% of MR)	$3,217,881
Admin & Fleet Assessment Services	$6,033,527
Total	$49,474,922

Table 4 lists budget categories and their definitions as directed by the Midpoint Review Order for the expenditure of the $6.03 million budget authorized for administration and implementation of the Program and the Fleet Assessment Service. Table 5 includes forecasted costs for the eight categories for the duration of the program.

Table 4: Budget Category Definitions

Category	Definition
Education and Outreach	All program marketing costs associated with outreach to site hosts, developers, and other stakeholders through methods such as educational video content, bill inserts, giveaways, newsletters, social media, events, press releases, informational websites, direct mail, and advertisements for possible site hosts, and FAQs, webinars, and other resources about the application process for developers.
Information Technology Requirements	Costs associated with technology tools needed to support the program's operation, including maintaining online resources such as the application portals for incentives.
Data Collection and Management	Costs associated with collection and analysis of required program data, such as contracting with a consultant to manage data collection, aggregation, and anonymization to meet the requirements of the annual and bi-annual reports.
Fleet Assessment	Costs associated with fleet assessment services administered by the utility, excluding service staff as that is under service staffing. Examples of costs included technology and data management tools and vendors supporting fleet assessment.
Service Staffing	Costs of staffing for the program, including all employee costs and including cost of some employee contractors (i.e., those who are hired for multiple functions of the program and thus do not clearly fall into other expense categories).
Vendor Costs	Third-party vendor services retained for functions that do not fall into other expense categories.
General Implementation Costs	All other non-vendor costs that do not fall into other expense categories.

Evaluation	Costs associated with completing required program evaluation, including contracting with a third-party evaluation service, creating, distributing, and analyzing participant surveys and creating end-of-program report.

Of O&R's total program budget, $6.03 million is allocated to administration and fleet assessment services. O&R's implementation budget is allocated as follows:

Table 5: O&R Make-Ready Implementation Budget ($000's)

Budget Components	**Forecasted**
Education and Outreach	~ 7% - ~ 9%
Information Technology Requirements	~ 7% - ~ 12%
Data Collection and Management	~ 2% - ~ 4%
Fleet Assessment	~ 5% - ~ 7%
Service Staffing	~ 70% - ~ 75%
Vendor Costs	~ 1%
General Implementation Costs	~ 1%
Evaluation	~ 1%

As discussed in the original Order, utilities' existing processes and procedures for providing service to the EVSE sector will not be sufficient to meet the goals of the Make-Ready Program. In order to meet the increased needs of the revised Make-Ready Program, O&R added additional full-time staff to the Company's E-Mobility team.

O&R incurs IT costs associated with the Company's front-end portal which is used to process Make-Ready Program applications and, over time, integrate with other internal platforms to automate back-end activities required to streamline application processing. Costs include configuration, ongoing subscription payments, future integration costs, set-up costs and monthly fees associated with a third-party platform which the Company uses to pay incentives and track program performance.

Appendix – Implementation Plan Revision Tracker

Version	Filing Date	Change Description	Change Location	Reasoning
MRP IP Revision April 12, 2024	4/12/2024	Added wording explaining contractor approval or denial within one month of application submittal	Contractor Approval Process, pg. 8	DPS Staff request
MRP IP Revision April 12, 2024	4/12/2024	Add link to online plug and budget tracker	Reporting Requirements, pg. 14	DPS Staff request
MRP IP Revision April 12, 2024	4/12/2024	Create more robust implementation timeline	Implementation Timeline, pg. 18	DPS Staff request
MRP IP Revision April 12, 2024	4/12/2024	Revised future-proofing budget from $1,801,174 to $3,217,881 along with total budget	Program Costs, Third-Party Support and Administrative Needs, pg. 19	MRP Errata Notice, Issued February 15, 2024.
MRP IP Revision July 12, 2024	7/12/2024	Add a note explaining the November 16, 2024 enforcement date for ISO 15118 software and OCCP 2.0.1 hardware requirement is canceled until the Public Service Commission rules on the formal petition the Joint Utilities filed in March 2024.	Equipment Eligibility, pg. 7	To reflect the latest change affecting program implementation
MRP IP Revision July 12, 2024	7/12/2024	Added a footnote referencing the Data Reporting Compliance Plan filed with the Public Service Commission	Reporting Requirements, pg. 14	To reflect the latest update to the PowerReady program
MRP IP Revision July 12, 2024	7/12/2024	Added a table that lists the eight administrative budget reporting categories and their definitions. In addition, added a separate table that lists the actual and forecasted costs for calendar year 2024.	Program Costs, Third-Party Support and Administrative Needs, pg. 21-22	2023 Midpoint Order Directive
MRP IP Revision October 18, 2024	10/18/2024	Added new language regarding the updated communication standards.	Equipment Eligibility, pg. 7-9	2024 JU MRP Petition Order Regarding Electric Vehicle Supply Equipment and Infrastructure
MRP IP Revision January 12, 2026	1/12/2026	Added new language explaining that a project must have a signed program agreement prior to construction start to be considered eligible.	Eligibility Criteria and Incentives, pg. 5	2025 Declaratory Ruling On Eligibility For Make-Ready Program Incentives

MRP IP Revision January 12, 2026	1/12/2026	Added new language explaining that a project must have a signed program agreement prior to construction start	Construction & Energization, pg. 14	2025 Declaratory Ruling On Eligibility For Make-Ready Program Incentives
MRP IP Revision July 13, 2026	7/13/2026	Added language to reflect the 2026 Petition Order and Clarification Order directives which include, permanent discontinuance of L2 applications, the pause in DCFC applications, the re-opening of the DCFC program, enhanced data compliance framework, and related implementation requirements.	Overview and Eligibility Criteria pg. 3, Definitions pg. 3, Eligibility Criteria and Incentives pg. 6, Equipment Eligibility pg. 13 Monitoring, Verification & Reporting pg. 20	2026 Petition Order and Clarification Order Directives
MRP IP Revision October 19, 2026	10/19/2026	Updated definition of non-proprietary plug/connector and confirmed public accessibility requirements to reflect J3400 Order.	Introduction and Summary pg. 2, Definitions pg. 5-6, Public Accessibility Compliance and Make Ready Eligibility pg. 14	J3400 Order