



July 17, 2026

VIA ELECTRONIC FILING

Honorable Michelle Phillips
Secretary
State of New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

RE: Case 18-E-0138: Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure

Dear Secretary Phillips,

The Alliance for Transportation Electrification submits for filing the attached comments, in response to the Joint Utilities' Comprehensive Managed Charging Report filed March 16, 2026 in the abovementioned docket.

Respectfully,


Philip B. Jones
Executive Director


Elizabeth Turnbull
Director, Policy and Regulatory Affairs

COMMENTS OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION

The Alliance for Transportation Electrification (“ATE”) is pleased to submit these comments in response to the Joint Utilities’ (“JU’s”) Comprehensive Managed Charging Report (“Report”) filed March 16, 2026.

Introduction

ATE is a 501(c)(6) non-profit corporation which engages with regulators and policymakers at the State and local government levels to remove barriers to EV adoption and to encourage the acceleration of EV infrastructure deployment with a particular emphasis on open standards and interoperability. ATE’s membership consists of nearly 60 industry members that include electric utilities, auto and bus manufacturers, EV charging infrastructure providers, and related trade associations and other non-governmental organizations (NGOs). We have been actively engaged in each of the New York Public Service Commission’s (“Commission’s”) various EV charging proceedings since their inception.

Managed charging is an essential component to a modern and integrated grid, and an important lever to facilitate greater grid utilization and help EVs put downward pressure on rates for all customers. ATE and our members are engaged in managed charging programs across the country, and last year our Education and Outreach Task Force developed and published a paper outlining best practices from utilities across the country in engaging customers and encouraging enrollment in managed charging programs.¹ The paper features several case studies of utility programs, including ConEdison’s managed charging program in New York.

Comments on the Joint Utilities’ Report

ATE appreciates that the Commission embraced residential managed charging in 2022 in its Order Approving Managed Charging Programs with Modifications.² In our comments preceding that Order, we supported a multi-pronged approach to managed charging among the JU, noting that there is no one-size-fits-all solution.³ In the Order, the Commission reflected this feedback and authorized each utility to design and administer its own managed charging program—and they have done so, exhibiting a wide range of program

¹ Alliance for Transportation Electrification. [Driving Participation in Managed Charging Programs](#). (August 2025)

² New York Public Utilities Commission, Case 18-E-0138. [Order Approving Managed Charging Programs with Modifications](#). (July 2022)

³ Alliance for Transportation Electrification, Case 18-E-0138. [Comments on Managed Charging Proposals](#). (April 2021)

designs. This contrasts with the approach taken in the Make-Ready Program, where the program design is the same across the state. This distinction reflects a key difference between infrastructure programs and managed charging programs; namely, that to be most beneficial, a managed charging program must be closely tailored to unique characteristics including a utility's customer base, service territory, and distribution system peak.

ATE encourages the Commission to continue this flexible and individualized approach, and consequently, we support the four recommendations made by the JU in the Report to evolve and strengthen their residential managed charging programs.

Adaptable Program Objectives and Designs

ATE supports the JU's recommendation that managed charging program objectives and designs allow for more flexibility. Today's managed charging programs in New York are largely designed to address bulk system constraints. However, managed charging can deliver many other types of benefits, including but not limited to distribution capacity, supply cost savings, renewables integration, and avoided ancillary service costs. Utilities across the country are evolving their managed charging programs beyond traditional "demand response" applications to explore these benefits, acknowledging that the full value of managed charging is composed of a complex value stack.⁴ ATE supports the JU's recommendation that they be permitted to do the same. And because the value of avoided costs is highly location-specific,⁵ we support continuing the utility-specific program design that is a hallmark of managed charging in New York.

Multiple Customer Participation Pathways

ATE also supports the JU's recommendation that each utility have the flexibility to pursue a variety of customer participation pathways for their managed charging programs, including EVSE, EV telematics, or other pathways. In our recent paper, we note this as a key enabler to drive participation in these programs:

“Maximize Eligibility for Program Participation: The technology to manage vehicle charging is evolving rapidly. OEMs are increasingly equipping their vehicles with telematics capabilities to facilitate managed charging and other data sharing and management capabilities. However, cross-platform capability is not standardized across all new EV models and was not available in most older models. These limitations can be overcome using charging system technologies that can serve as

⁴ WeaveGrid. [The Value of Managed Charging: An Illustrative Example from PJM](#). (March 5, 2026)

⁵ Smart Electric Power Alliance and Vehicle-Grid Integration Council. [Valuing Vehicle-Grid Integration Programs](#). (May 2026)

the communications medium for managed charging signals. Utilities need to engage with OEMs and EVSE vendors to identify strategies and technology solutions that allow for maximum participation in managed charging programs.”⁶

Allowing each utility to determine the right participation pathway(s) for their customers will facilitate the broadest possible participation in managed charging.

Evergreen Program Structure and Budget Flexibility

As we have noted in other comments, a start-and-stop program cadence is very challenging for customers and creates uncertainty within this nascent market. This is particularly the case for managed charging programs, which endeavor to engage the same customer over time and keep things simple to facilitate their ongoing participation. As we have in other states, we support the continuation of established managed charging programs to avoid attrition of existing customers who are actively participating. Procedurally, we think the JU makes a sensible proposal of an enduring program authorization with a three-year budget; a triennial program review; and a provision for a one-year extension.

We also support budget flexibility between cost categories, so long as the overall budget is adhered to. The JU makes a compelling case about how different platforms address data costs, and we note that these differences mean that the actual costs of programs between the utilities (or across years within the same utility) may not be directly comparable. For example, one program may seem to have higher implementation costs than another, due simply to how data costs are addressed. This emphasizes the importance of budget flexibility across cost categories, as well as nuanced evaluation of cost categories during program review.

Flexible Mechanisms for Program Modifications

Lastly, to facilitate timely changes to program design to meet customer needs and evolving market conditions, we support the JU’s proposal for a new mechanism for program modifications. The managed charging space is shifting rapidly, with vehicle manufacturers, charging companies and software vendors entering and exiting the market, forging new partnerships, and launching new joint ventures. Customers, too, are changing in their expectations—over time, and as new waves of customers adopt EVs. In this dynamic space, sclerotic program design can be a hindrance to progress and detrimental to overall program objectives.

⁶ Alliance for Transportation Electrification. [Driving Participation in Managed Charging Programs](#). (August 2025)

Commissions and utilities across the country are addressing the need for agility in multiple ways. For example, the California Public Utilities Commission offers a 3-tiered Advice Letter process. Utilities in other states implement managed charging program changes through updated tariff filings, remaining in alignment with the approved program proposal and budget. As one option, we think the JU's proposal of a 3-tiered "triage system" appropriately balances the need for agility within utility programs alongside the importance of transparency for the Commission, Department of Public Service staff ("Staff"), and stakeholders. But we also acknowledge that there may be other ways to achieve flexibility in program design, and we could support other mechanisms to achieve these ends if proposed by the Commission, Staff, or stakeholders.

Conclusion

ATE appreciates the opportunity to share these comments on the Report and contribute to the evolution of managed charging programs in New York. We are encouraged by the JU's good progress to date within these programs, and yet we agree that a few key changes could unlock additional flexibility and value for EV drivers, utility ratepayers, and the State of New York.

We also note that there is some urgency to the resolution of the issues the JU raised in the Report. While the JU's managed charging programs are not at imminent risk of fully expending their budgets or sunseting, there is an opportunity cost to delaying the changes that could meaningfully influence program effectiveness and customer satisfaction. We encourage the Commission to move with thoughtful timeliness, and we look forward to working with Staff, the JU and stakeholders to continue shaping the discussion in the future.