



**NY Power
Authority**

KATHY HOCHUL
Governor

JOHN R. KOELMEL
Chairman

JUSTIN E. DRISCOLL
Interim President and Chief Executive Officer

August 3, 2022

Honorable Thomas P. DiNapoli
State Comptroller
Office of the New York State Comptroller
110 State Street
Albany, New York 12236

Re: Implementation Status of 2020 Selected Management and Operations Practices Audit Recommendations

Dear Mr. DiNapoli:

Attached is the New York Power Authority's status report regarding its implementation of the recommendations provided by the Office of the New York State Comptroller, Division of State Government Accountability, in its "Selected Management and Operations Practices, Report 2020-S-38."

Sincerely,

Justin E. Driscoll
Interim President and Chief Executive Officer

Encl.

**New York Power Authority's Corrective
Action Plan in response to Selected
Management and Operations Practices Office
of the State Comptroller Report 2020-S-38 e-
Mobility Programs**

The New York Power Authority (NYPA) continues to advance its e-Mobility programs to help New York State's successful transition to electric vehicles as a key component of the effort to decarbonize public and private transportation sectors in the state. NYPA has been focused on expanding New York's cross-state fast charging network as well as promoting and supporting NYPA customers' vehicle electrification projects. With expansion of NYPA's statutory authority and NYPA financial commitment to supporting expanded use of electric vehicles, NYPA's e-Mobility programs have grown and NYPA continues to strive to improve on its mission to bring more valuable products and services to its customers and the state. Many initiatives aimed at strengthening the e-Mobility programs and accelerating deployments have been in place since 2020 and the results of those efforts are now being realized. NYPA's response to Office of the New York State Comptroller's (OSC or Comptroller) audit recommendations reflects these achievements. NYPA values the constructive feedback from OSC as it continues to improve its e-Mobility programs.

As of today, NYPA has achieved the following:

- More than 100 EVolve NY chargers at 30 sites are now operational and 44 additional chargers at 7 more sites are under construction (July 2022). This represents approximately a 150% increase year-over-year in the speed of deployment of chargers between 2020 (audit period) and 2021. NYPA is on target to achieve its 2025 objectives.
- More than 480 customer-owned chargers are deployed with 107 additional ports in various stages of design, permitting or construction.
- Robust monthly Key Performance Indicators and monthly leadership reports showing actual results against forecast and goals are in place.

Following the Comptroller's report, NYPA launched the following initiatives, among others described below, to implement selected recommendations:

- Improved product management processes have been put in place and are anticipated to be formalized with policy and procedures by the end of the year.
- Hired a marketing manager to ensure a comprehensive marketing strategy is developed.
- Developed an automated tool to support the identification of suitable locations for EVolve NY sites and potentially customer-owned chargers. The early version of the tool utilizes census tract data, NYSDOT traffic data, EV registration data, corridors' onramps

and offramps, nearby EV charger proximity, local utility infrastructure capacity, and business and amenity data to rank order corridors' locations.

In addition to these changes, NYPA has taken or plans to take the actions discussed below in response to the OSC's recommendations.

Recommendation 1: Develop a formal process for evaluating new initiatives or programs that include the expected results and performance measures that will be used to determine the accomplishments within a specific timeframe.

NYPA Action 1: NYPA has implemented a robust KPI reporting, forecasting and tracking mechanism against each of e-Mobility program's goals. In addition, NYPA instituted a product and program development framework that addresses OSC's recommendation to include "the expected results and performance measures that will be used to determine the accomplishments within a specific timeframe."

Recommendation 2: Develop a formal marketing strategy to increase awareness of the features of EVs and educate motorists on the benefits of owning EVs.

NYPA Action 2: NYPA hired an e-Mobility marketing manager who is responsible for developing a formal marketing strategy to increase awareness of the features of EVs and educate motorists on the benefits of owning EVs. Consistent with the growth of the EVolve NY network, NYPA has been expanding its marketing and promotion activities to showcase the benefits electric vehicles. For example, in April 2022 NYPA funded a booth at the New York International Auto Show and with the joint staff support from NYSERDA and Department of Environmental Conservation (DEC), it promoted the work NYPA and other state agencies and authorities are doing to enhance the adoption of electric vehicles by the public. NYPA will continue to work to align and coordinate its marketing efforts with other state agencies and authorities involved in promoting public awareness and knowledge of New York's electric vehicle and infrastructure programs.

Recommendation 3: Prioritize NYPA's effort so that EV charging stations receive constant management oversight to ensure charging stations are being placed throughout the state.

NYPA Action 3: As part of its EVolve NY program, NYPA continues to prioritize travel corridors, consistent with recent Federal direction and funding for high-speed charging as outlined in the Infrastructure Investment and Jobs Act (IIJA) of 2021. Furthermore, NYPA is setting up a software tool that will formalize NYPA's process for identification of charging station locations based on NYPA's decision-making criteria and prioritization. A

periodic review of the e-Mobility program progress against goals with an internal advisory board is planned.

Recommendation 4: Work with its customer base to roll out EV charging stations. Encourage/direct State agencies, public authorities and local government to install additional charging ports to demonstrate to motorists that facilities to charge EVs in the shorter period are available.

NYPA Action 4: Regarding outreach efforts, this finding relates to emails for a past program that predated our comprehensive e-Mobility program. Today, NYPA engages with its customer base both directly and through our key account managers to promote EV and EV charging across its customer base. NYPA believes the current outreach efforts and planned efforts for various customer segments are adequate for the present time and commensurate with NYPA's resources to support such customer segments.

Recommendation 5: Incorporate into its current EV program an analysis of usage data and a discussion of the data with NYPA customers to promote the installation of additional EV units.

NYPA Action 5: Currently NYPA continues to preserve its ability to access and leverage customer usage data. Upon customers' inquiry, NYPA supports its customers in analyzing the data for insights and value-add services.

Recommendation 6: Regularly download the usage data and maintain a complete set for all sites to provide NYPA management the information to make the best decision regarding its EV program.

NYPA Action 6: NYPA had and continues to have full visibility into usage, speed of charge and other relevant data for the chargers it owns under the EVolve NY program. NYPA will evaluate the business case for developing a customer advisory service that will utilize customer-owned EV charger usage and other EV charger operating parameters to provide useful insights to its customers.

Recommendation 7: Work with NYPA's customer base to further encourage the siting of EV service equipment and to further encourage and implement EV opportunities with its customer base, including working with State and local government facilities for the siting of charging stations.

NYPA Action 7: NYPA continues to actively develop outreach programs for its customer base. For example, this year we have completed a market research study and we are drafting an outreach program to school districts to support with EV charging

infrastructure the electrification of school buses. This is consistent with the Governor's State of the State goals and recent Federal direction and funding concerning electric and low-emission school buses as outlined in the Infrastructure Investment and Jobs Act (IIJA). Furthermore, NYPA convenes many of its customers at a bi-annual CCEX event, engaging with current customers, listening to their feedback and updating them on new NYPA products and services, including EV Charging.

Recommendation 8: Expand marketing efforts to improve the car driver's acceptance of EVs through increased EV awareness.

NYPA Action 8: As the COVID pandemic workplace and public gathering restrictions lessened, NYPA resumed the promotion of EVs by staffing a booth at the New York International Auto Show. NYPA is planning multiple public outreach events to encourage EV adoption. The specific plan for these outreach events, will be included in the comprehensive marketing strategy outlined in NYPA Action #2.

Recommendation 9: Structure fees so that if an EV remains parked after reaching a full charge, there is a cost for using the space.

NYPA Action 9: As usage of the charging stations increases and queuing occurs, NYPA will revisit its pricing model and will consider the OSC proposed pricing structure. Based on current usage information, such a fee is unnecessary at this time; however, the charging station equipment is capable of supporting such a fee when that decision is made. NYPA is continuously monitoring market prices for DCFC charging services and it will update pricing based on business judgment, taking into account gasoline prices, other DCFC network pricing and the level of adoption of EV in New York State.

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