ALLIANCE FOR AUTOMOTIVE INNOVATION

December 8, 2025

Hon. Michelle L. Phillips
Secretary, New York State Public Service Commission (NYPSC)
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

Comments on Technical Standards Working Group Report
Addressing Electric Vehicle Supply Equipment and Telematics Accuracy

Dear Secretary Phillips,

The Alliance for Automotive Innovation (Auto Innovators), is pleased to offer these comments in response to the Sept. 10 2025 Notice Soliciting Comments on the Technical Standards Working Group Report (TSWG Report).

Auto Innovators represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to maintain U.S. competitiveness in cutting-edge automotive technology. Representing approximately 5 percent of the country's GDP, responsible for supporting nearly 10 million jobs, and driving $1 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector.

General Comments on the TSWG Report

Auto Innovators greatly appreciates New York's leadership in deploying managed charging and offering electric vehicle (EV) drivers various technology pathways to participate in

utility programs. As the first Commission to authorize mass market managed charging programs, the NYPSC has seized the pole position in the utility industry's nationwide effort to realize the grid benefits of flexible charging. The NYPSC has further distinguished itself and the Joint Utilities (JU)[1] through the order and implementation of innovative programs to manage EV load while promoting inclusivity by allowing EV drivers to participate via various technologies, such as using vehicle telematics and, further, directing the JU to investigate submetering options.[2]

Auto Innovators applauds the Commission for authorizing the TSWG to assess the use of various technologies, including vehicle and EVSE telematics, to meter EV charging load. The telematics systems now available on the majority of EVs offer a low-cost solution to manage and submeter charging load. This is because no additional equipment— utility- or customer-owned— is needed beyond the intelligence and communications capabilities already integrated into the vehicle. Leveraging these capabilities can reduce the cost of implementing EV rates and managed charging programs by eliminating the need for drivers to purchase networked EVSE or dedicated utility meters for EVs.

Enhancing the economics of EV rates and managed charging programs will help drive down costs for utilities and help programs reach mass-market scale. *Auto Innovators believes that this is a critical component to realize the full potential of EVs as grid resources that put downward pressure on electricity rates for all utility customers*.[3]

Auto Innovators recognizes that, at present, many utilities and regulators do not regard data from OEM's telematics systems as sufficiently reliable to calculate customer bills. Telematics, and the battery management and onboard diagnostic systems from which charge session data are derived were not necessarily designed to produce interval kWh

[1] The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.
[2] NYPSC, *Order Approving Managed Charging Programs with Modifications*, Issued and Effective July 14, 2022, pp. 24-28.
[3] See Alliance for Automotive Innovation, Vehicle Grid Integration: The Convergence of the Automotive and Electric Power Industries, July 2024, available at https://www.autosinnovate.org/posts/papers-reports/VGI%20White%20Paper_2024.pdf.

data. However, with clarity about utilities' and regulators' data requirements, OEMs can implement vehicle software, hardware and communications capabilities that will consistently deliver "revenue grade" interval data. Our responses to Questions 1 and 2 below describe the role the NYPSC can play in helping to develop and promote widespread adoption of data integrity standards and best practices.

In 2025, Auto Innovators launched a collaboration between utilities and OEMs to develop and pursue shared goals to advance vehicle grid integration. It began with a series of forums and workshops that included both large and small, investor and publicly owned utilities from across the country. Utilities and OEMs alike cited affordability—of both transportation and electricity—as priorities. Utility participants generally stressed that inexpensive load management and submetering solutions are needed to ensure that mass market rates/programs will be cost-effective and several cited telematics as a potential means to lower costs. Utilities urged OEMs to improve accuracy and standardize data from their telematics systems, while OEMs encouraged utilities to standardize their requirements for data elements, formatting and handling procedures.

Auto Innovators intends to continue this collaboration in 2026, focusing on two areas. The first is to define specifications for a telematics data integrity standard to be developed by the Society of Automotive Engineers (SAE). The standard would include, but not be limited to, the accuracy of interval kWh measurements derived from charge session data. The second area of focus is developing a set of voluntary telematics best practices for utilities and OEMs, which would address issues such as chain of custody, cybersecurity and customer privacy. This initiative aligns with the TSWG's suggestions regarding "benchmarking with other states."[4] Auto Innovators urges the NYPSC and its Staff to lend its perspective to this process to ensure that these best practices fully address utility regulators' concerns about the customer experience.

Auto Innovators recommends that the Commission encourage the JU to continue offering a variety of VGI rates and programs. EV drivers differ in their ability and willingness to

[4] TSWG Report, p. 12

participate in EV rates and provide grid services, and charging-related features differ across makes and models of EVs. With norms and expectations around charging behavior still in the formative stage, it is critical to offer rates and programs that spotlight the savings that drivers can realize from charging in a manner that benefits the grid (and other utility customers).

Auto Innovators also encourages New York to move toward on-bill compensation for both rates and programs. Some OEMs and vendors are developing or working to integrate EVs into Home Energy Management Systems (HEMS), which necessitates treating them similarly to other DERs at the customer premise. Similarly, bidirectionally equipped vehicles can be integrated with other devices at the customer premises.

Finally, we urge the Commission to complement the insights gleaned from the EPRI and TSWG reports by fully extracting lessons learned from program implementation. The EPRI analysis was based upon only a handful of EVs, but thousands of EVs are participating in the NY IOUs' programs via telematics. The Commission should ensure that learnings are extracted from this field experience and used to inform program design and RFP specifications for the next round of utility offerings. In the next round of utility rates and programs, the JU should also fully leverage opportunities to learn from the field, for example by deploying utility meters at some customer premises and conducting process evaluations to determine sources of data errors.

Comments on the Staff Proposal

Within the TSWG Report, Staff proposed five options to account for and mitigate accuracy concerns with participation in the JU managed charging programs. As recognized by Staff, each of the approaches has its pros and cons. While Auto Innovators would like to see the JU move beyond the *status quo*, we support Staff's Option #5 as the appropriate approach for the managed charging programs in the near-term. Option #5 would maintain the broad methods of participation available today, meaning that the greatest population of EV drivers remain eligible for enrollment in the utility programs. Maintaining the *status quo*

does not limit or distract from efforts to improve on data accuracy and the creation of standards, an effort that must be pursued simultaneously at a national level. As outlined by Staff, Options #1and 4 could have unintended consequences such as providing an incentive that may be too low to achieve the desired behavior, may create inequities among customers, create additional expenses, and introduce administrative complexity. These limitations could result in a step backward, and if adopted, Auto Innovators urges the Commission, its Staff, and the JU to consider options to mitigate these concerns

We encourage the Commission to use the next program cycle to quantify the tradeoffs arising from implementing telematics based submetering. This could be accomplished by equipping a sample of households within the participant population with utility grade load research meters. The sample could be designed to include customers participating via different technologies including telematics and EVSE.

Responses to Specific Questions Posed by Staff

Standards Development

1. *What role could the New York Public Service Commission or New York utilities have to play in the development of an EV telematics accuracy standard?*

Auto Innovators agrees that it is necessary to develop a data integrity standard for data derived from EV telematics systems. The standard should include, but not be limited to, the accuracy of kWh interval load data. As the standard would apply to hardware and software embedded in vehicles, the Society of Automotive Engineers (SAE) is the appropriate standards body to develop it. SAE is also the right organization to develop testing protocols to validate compliance with the accuracy standard. In 2026, Auto Innovators' members plan to work with utility representatives to develop specifications to seed the standard development process. EPRI's work supporting the TSWG yielded valuable insights, and as such, Auto Innovators is seeking EPRI's continued engagement in this effort.

Auto Innovators urges the Commission to encourage its Staff to support development of these standards. To ensure that the accuracy standard will be "used and useful" to calculate incentive payments and customer bills, it is vital that the standard development process include the perspective of utility regulators. It will also be critical to draw upon insights from the TSWG and factor in lessons learned from the NY utilities' experience using telematics in the managed charging programs. The Commission could consider directing the JU to designate representatives to the standards development process. Further, the Commission should also ensure that the TSWG continues to operate, to allow for collaboration between Staff, the JU, and interested stakeholders. The TSWG could, for example, serve as a forum to share information and coordinate with the relevant standards bodies.

2. *What role could the Public Service Commission play in the widespread adoption of accuracy standards for EV telematics and EVSE?*

The Commission has an essential role in the adoption of accuracy standards for EV telematics and EVSE. As stated above, the Commission can directly participate and/or direct its Staff and the JU to participate in the standards development process. The Commission should direct its Staff to host technical conferences as these standards mature and are finalized.

Data Opacity & Accuracy

3. *What specific actions could the utilities, or other parties, take to reduce data opacity concerns in EV managed charging programs?*

Auto Innovators understands that by "data opacity" the TSWG Report may refer to differences in methods and/or lack of disclosure about how different OEMs adjust raw telematics data to account for missed or mismeasured loads. We urge the Commission not to mandate specific adjustment methods or require extensive, potentially public, disclosure of proprietary algorithms. The focus in the interim of an SAE standard should be on the accuracy of each OEM's approach relative to an appropriate benchmark. Utility

RFPs for program administration could require vendors to account specifically how they address known issues (without disclosing trade secrets), as described in the reports by EPRI and Staff. As noted above, embedding a sample of households equipped with utility load research meters within the population of vehicles participating via telematics could provide additional insights.

4. *What specific actions could utilities, or other parties, take to improve the accuracy of the devices or services used in EV managed charging programs?*

The Commission can take immediate action toward this end. The recently approved *Joint Utilities' Petition to Extend the Managed Charging Programs*[5] alludes to technology challenges the utilities have encountered in working with vendors.[6] Auto Innovators is aware that some of these challenges arise from differences in the approaches vendors use to access telematics data. Our members believe that vendors who have automaker-approved telematics integrations provide the best charging controls and data quality (including accuracy), as well as safeguards against privacy and cybersecurity risks. This ensures that utilities are using the highest quality, and most reliable, telematics data and that they do so in a way that ensures consistent a customer experience across program participants. By working with vendors that have official integrations with automakers, utilities can tap into their brand and expertise to improve enrollment and assure a positive experience for participating drivers. Auto Innovators recommends that the Commission direct that the JUs' future RFPs for aggregator services ask vendors if they have official OEM integrations backed by commercial contracts and require them to factor their responses into bid evaluation. It also be appropriate for the JU to maintain a list of authorized OEM/aggregator partnerships.

[5] Case 18-E-0138, *Joint Utilities Petition to Extend the Managed Charging Programs (Petition),* submitted April 9, 2025, p.4.

[6] Ibid.

Looking out over a longer time horizon, Auto Innovators recommends that the Commission encourage the JU to continue their participation in the ongoing collaboration effort with OEMs and other utilities to adopt best practices for telematics data, as described above in our General Comments.

Programmatic Options

5. *Are there other program designs beyond those mentioned in the TSWG Report that could mitigate the impact of inaccurate readings while effectively engaging all driver types, including rideshare drivers?*

The commission should consider whether the inaccuracies represented in the EPRI testing are relevant to the incentivization and grid management goals of the EV rates/programs. Some of the inaccuracies represented in the EPRI testing relate to home wiring and energy transfer device losses or energy use not directly tied to electric miles driven. Determining if this energy use should be included under the general home meter electricity rate or the EV charging rate/program, changes the perspective on the relative accuracy of the telematics data. Accuracy is then compared to the desired intent rather than to the existing utility meter. The whole value of sub-metering is to capture a specific portion of the energy use, and that energy use may not be measured equivalently at the utility meter. The point of intended electricity measurement will be important to define for development of the SAE standard(s). Measurement at the vehicle charge inlet, for instance, may be more accurately measured by both the EVSE and vehicle telematics than the utility meter since the utility meter does not have direct access to the measurement location.

6. *Should accuracy in active managed charging programs be addressed differently than in passive managed charging programs?*

There are differences between active and passive managed charging programs. In an active managed charging program, the utility or a third-party (such as an OEM or

aggregator) manages when the EV charges subject to dynamic specified parameters. In a passive managed charging program, the driver controls when the EV charges, generally in response to static incentives or price signals during a defined off-peak time window. While these programs have distinct characteristics, accuracy of the JU programs should not, in the near-term, be addressed differently. As standards develop and mature, New York's programs should align accordingly. Implementation of varying accuracy "standards" in the interim could lead to confusion, especially if a singular accuracy standard is ultimately established.

Thank you for the opportunity to submit our comments. We look forward to continued collaboration to advance these shared goals.

Sincerely,

/s/Cory Bullis

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