

New York Power Authority

Selected Management and Operations Practices

Report 2020-S-38 | February 2022

OFFICE OF THE NEW YORK STATE COMPTROLLER

Thomas P. DiNapoli, State Comptroller

Division of State Government Accountability



Audit Highlights

Objectives

To determine whether the New York Power Authority's (NYPA) electric vehicle initiatives and programs placed the Charge NY and Charge NY 2.0 charging stations in locations where the intent of these programs could be achieved. We also determined whether NYPA's EVolve NY program met its initial project goals by the end of 2019. The audit covered the period from January 2013 through May 2021.

About the Program

According to NYPA officials, they started projects related to electric vehicle (EV) charging as early as 2011. The Charge NY program, unveiled during the 2013 State of the State Address, sought to get more EVs on the road by raising awareness of the technology and making more EV charging stations—up to 3,000 public and workplace stations—available statewide within the following 5 years. Charge NY 2.0 built on the original program, aiming to encourage and support EV adoption by increasing the number of charging stations statewide to at least 10,000 EV public charging stations by the end of 2021.

In 2018, with the goal of making a larger impact on the State's energy policy to produce better outcomes for the people of New York State, NYPA announced a new \$250 million EV expansion initiative, EVolve NY. Through this key initiative, NYPA's focus was on installing high-speed EV chargers in "key places along major highways and at the airports" and investing \$250 million through 2025 on infrastructure and to raise awareness of the benefits of EVs.

Key Findings

We determined that NYPA:

- Did not place the Charge NY and Charge NY 2.0 charging stations in locations that supported the programs' intentions. For example, NYPA placed public charging ports in only 32 of the 62 counties in the State. We also noted that counties with a high number of EVs have relatively few public charging ports. For example, Suffolk County has the highest number of registered EVs—7,916 or almost 17% of the total EVs registered in the State—but has only three public charging ports, or 1.1% of the 277 public charging ports placed throughout the State. This equates to only one public charging port for every 2,639 EVs.
- Did not review and analyze usage data for charger placement or use outreach efforts to encourage EV charger installation by its customers.
- Did not complete any of the planned projects for phase 1 of the EVolve NY program by its deadline of the end of 2019. For instance, NYPA did not install any of the planned 200 high-speed chargers by the deadline, and as of March 5, 2021 had installed only 29 EVolve chargers at seven locations. We determined that the installation of EV high-speed chargers is as much as 2 years behind schedule.

Key Recommendations

- Develop a formal process for evaluating new initiatives or programs that includes the expected results and performance measures that will be used to determine the accomplishments within a specified time frame.

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- Develop a formal marketing strategy to increase awareness of the features of and educate motorists on the benefits of owning EVs.
 - Incorporate into its current EV program an analysis of usage data and a discussion of the data with NYPA customers in an effort to promote the installation of additional EV units.
 - Work with its customer base to roll out EV charging stations. Encourage/direct State agencies, public authorities, and local governments to install additional charging ports to demonstrate to motorists that facilities to charge EVs in a shorter period are available.



**Office of the New York State Comptroller
Division of State Government Accountability**

February 4, 2022

John R. Koelmel
Chair, Board of Trustees
New York Power Authority
123 Main Street
White Plains, NY 10601-3104

Dear Mr. Koelmel:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage their resources efficiently and effectively. By so doing, it provides accountability for the tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is a report of our audit entitled *Selected Management and Operations Practices*. This audit was performed pursuant to the State Comptroller's authority under Article X, Section 5 of the State Constitution; Section 2803 of the Public Authorities Law; and Chapter 469 of the Laws of 1989.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

Division of State Government Accountability

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Glossary of Terms

Term	Description	Identifier
AC	Alternating current	<i>Key Term</i>
Board	NYPA's Board of Trustees	<i>Key Term</i>
DC	Direct current	<i>Key Term</i>
DCFC	Direct current fast charger	<i>Key Term</i>
DMV	Department of Motor Vehicles	<i>Agency</i>
EDPP	NYPA's Economic Development Power Programs, including ReCharge NY, Western New York, Expansion Power, Replacement Power, and Preservation Power	<i>Key Term</i>
EV	Electric vehicle	<i>Key Term</i>
Level 1	120-volt AC electric vehicle charger	<i>Key Term</i>
Level 2	240-volt AC electric vehicle charger	<i>Key Term</i>
Level 3	480-volt AC electric vehicle charger	<i>Key Term</i>
NYPA	New York Power Authority	<i>Auditee</i>
NYSERDA	New York State Energy Research and Development Authority	<i>Agency</i>
Port	A connection on an EV charger capable of charging one vehicle	<i>Key Term</i>
RFID	Radio Frequency Identification	<i>Key Term</i>
RNY	ReCharge NY	<i>Program</i>
SENY	NYPA's government customers located in southeastern New York	<i>Key Term</i>

Background

The New York Power Authority (NYPA) is a public authority created in 1931 by Title 1 of Article 5 of the Public Authorities Law.

NYPA's mission through December 8, 2020 was to provide clean, low-cost, and reliable energy consistent with its commitment to the environment and safety, while promoting economic and job development, energy efficiency, renewables, and innovation for the benefit of its customers and all New Yorkers. As of December 9, 2020, its mission statement is: "Lead the transition to a carbon-free, economically vibrant New York through customer partnerships, innovative energy solutions, and the responsible supply of affordable, clean, and reliable electricity."

NYPA, whose operations are overseen by the Board of Trustees (Board), is a fiscally independent public corporation that principally operates on revenue received from the sale of electricity. Chapter 469 of the Laws of 1989 requires the State Comptroller to audit NYPA's management and operations at least once every 5 years.

NYPA is authorized by the Power Authority Act to help provide a continuous and adequate supply of dependable electricity to the people of the State. It generates, transmits, and sells electricity principally at wholesale. NYPA's primary customers are municipal and investor-owned utilities, rural electric cooperatives, high load factor industries and other businesses located throughout New York State, various public corporations located in southeastern New York (SENY) within the metropolitan area of New York City, and certain out-of-state customers.

According to NYPA officials, they started projects related to electric vehicle (EV) charging as early as 2011. During the 2013 State of the State Address, the Charge NY program was unveiled, with the goal to increase sales of EVs by 40,000 over the following 5 years and encourage the State to create a statewide network of up to 3,000 public and workplace charging stations. At the time, the State had about 800 parking spaces for EVs. Charge NY is a collaboration among the New York State Energy Research and Development Authority (NYSERDA), NYPA, and the Department of Environmental Conservation.

On September 24, 2013, NYPA trustees authorized up to \$2 million of a requested \$15 million for the Charge NY program to be spent for the installation of EV charging stations at State and local government sites, a pilot deployment of state-of-the-art rapid chargers, and public education and research programs related to EVs and their interactions with the electric grid.

Charge NY 2.0, a successor to Charge NY and announced in 2018, built on the original initiative with a target of 10,000 public EV charging stations by 2021.

In 2018, the NYPA's executive management announced a new \$250 million EV expansion initiative – EVolve NY – a program that focused on the installation of high-speed chargers. This program, administered by NYPA, also sought to create private sector partnerships through 2025 to aggressively accelerate the adoption of EVs throughout the State. As part of the first phase of investment, NYPA's plan was to continue building the direct current (DC) fast charger (DCFC) "backbone" in the

State. Specifically, NYPA will work with public and private partners to place DCFCs in strategic locations that will drive market adoption of EVs and test business models.

EV chargers come in three different capacities:

- Level 1 chargers come with the vehicle and can be plugged into a regular electric outlet (120-volt) and will charge a battery at a rate of 5.8 miles per hour.
- Level 2 chargers, constituting the majority of Charge NY chargers installed, use 240-volt alternating current (AC) power (the equivalent of a clothes dryer) and can charge a battery at a rate of 60 miles per hour. The average cost of this equipment installed is approximately \$12,034 per charging port.
- Level 3 chargers (DCFC) use a 480-volt power support (are usually limited to commercial use either in commercial fast charging stations or fleet operations). Some of the chargers installed under Charge NY are DCFC chargers, costing approximately \$80,257 per charging port installed.

EVOlve NY locations include multiple DCFC chargers and associated equipment. The EVOlve NY charger installations are comprehensive Level 3 installations, including both electric distribution equipment and chargers. Based on a sample of invoices, the average cost is \$166,700 per charging port.

As of September 22, 2020, NYPA’s inventory of charging stations from Charge NY and EVOlve NY includes a total of 140 charging station locations and 499 ports, as shown in Table 1.

Table 1 – NYPA’s Inventory of Charging Stations From Charge NY and EVOlve NY as of September 22, 2020*

Charging Type	In Service as of 2018		In Service 2019–9/22/2020		Total In-Service		In Construction as of 9/22/2020		Totals	
	Charging Station Locations	Ports	Charging Station Locations	Ports	Charging Station Locations	Ports	Charging Station Locations	Ports	Charging Station Locations	Ports
Charge NY, Including 2.0										
Level 2	61	183	39	210	100	393	13	38	113	431
Level 3 (DCFC)	4	4	4	7	8	11	10	17	18	28
Transportation Authorities	0	0	1	4	1	4	2	11	3	15
Totals	65	187	44	221	109	408	25	66	134	474
EVOlve NY	0	0	1	4	1	4	5	21	6	25
Totals	65	187	45	225	110	412	30	87	140	499

*Source: NYPA as of September 22, 2020

Audit Findings and Recommendations

NYPA did not place the Charge NY and Charge NY 2.0 charging stations in the quantity and locations where the intent of these programs could be achieved. Additionally, NYPA's EVolve NY installation of EV high-speed chargers did not reach its phase 1 goals, and EVolve NY charger deployment is as much as 2 years behind schedule.

Not only are there insufficient stations to meet current EV consumer need, but the current distribution of charging stations doesn't support the phase 1 goal of placing chargers where they are needed most. Our analysis of EV charging station locations in relation to EV ownership by county revealed 30 counties with 6,189 registered EVs with no charging stations supported by NYPA (Exhibit A). We also determined that the State's 62 counties had an average of only four chargers for every 168 EVs.

NYPA did not complete any of the projects in phase 1 of EVolve NY by the end of the stated 2019 deadline. For instance, it did not install any of the planned 200 DCFCs in the State by the required date and, as of March 5, 2021, had installed only 29 EVolve NY chargers at seven locations. NYPA completed just one of the two model community programs¹ as described in its Board minutes. We were told that NYPA determined community-based programs are not its customer base. In addition, EVolve NY airport chargers have only been installed in one of the two airports planned because of development delays at one of the locations.

We also found NYPA fell short on administering/fulfilling the Charge NY initiative. Specifically, NYPA did not:

- Establish targets or goals for the Charge NY initiative.
- Install any EV chargers for a 1-year period from February 28, 2017 to February 28, 2018 or use outreach efforts to encourage EV charger installation by its customers.

We determined NYPA did not maintain an accurate inventory of EV charging stations, nor did it review and analyze usage data for charger placement—actions that could explain the inconsistent EV charging station placement and progress.

Statewide Distribution of Electric Vehicle Chargers

As of June 1, 2021, 46,608 EVs throughout the State were registered with the Department of Motor Vehicles (DMV) (see Exhibit B). As of March 5, 2021, NYPA has installed 277 public EV ports.

To determine whether NYPA placed charging ports where they are needed, we compared the number of EVs registered in the State by county as of June 1, 2021²

1 Focusing on both infrastructure and marketing within a constrained geographic area, which might be a small city or a municipal utility territory, where NYPA can combine its efforts including direct marketing efforts, social media, and quarterly calls among EV driver community, including ride and drive, test drives, and home charger installations.

2 Information on the number of EVs registered with DMV was not available on the website as of March 5, 2021. As a result, we used data as of June 1, 2021.

to the number of publicly accessible charging ports installed by NYPA under Charge NY, Charge NY 2.0 through September 2020, and EVolve NY through September 2020.

There were 221 workplace charging ports available only to NYPA employees and not the public. There were 277 NYPA public charging ports throughout 32 counties in the State (see Exhibit A). On average, there are 168 EVs for every NYPA public charging port (see Exhibit B).

We determined that NYPA has not placed EV charging ports in counties where they are needed, based on the number of registered EVs in those counties (see Exhibit B). We noted that counties with a high number of EVs have relatively few public charging ports. For example:

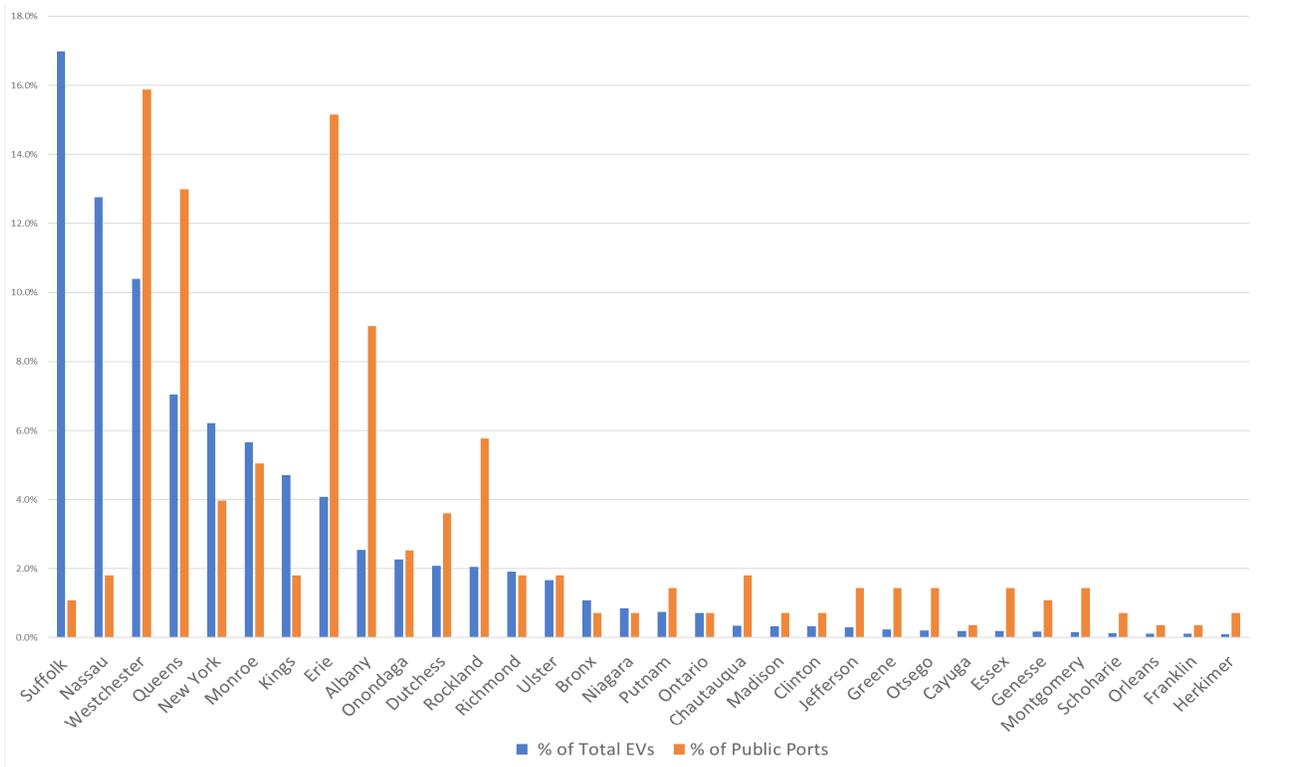
- Suffolk County has the highest number of EVs registered in a county—7,916, which represents about 17% of the total EVs registered in the State. However, NYPA has placed only three public charging ports here, or only 1.1% of the total 277 public charging ports it placed in the State. This represents one public charging port for every 2,639 EVs.
- Nassau County, with 5,947 EVs, or about 13% of the total EVs registered in the State, has only five public charging ports, or only 1.8% of the 277 public charging ports NYPA placed in the State. This represents one NYPA public charging port for every 1,189 EVs.

In contrast, some counties with a low number of EVs have a comparatively high number of NYPA public charging ports:

- Westchester County, where NYPA is based, has more NYPA public charging ports than any other county. For its 4,844 EVs, or about 10% of the total EVs registered in the State, NYPA has placed 44 public charging ports, or 15.9% of the 277 public charging ports. This represents one public charging port for every 110 EVs.
- Erie County has 1,898 EVs registered, or 4.1% of the total EVs registered in the State. However, NYPA placed 42 public charging ports here, which accounts for 15.2% of the 277 public charging ports. This represents one public charging port for every 45 EVs.

Thirty counties with 6,189 registered EVs have no NYPA-placed public charging ports.

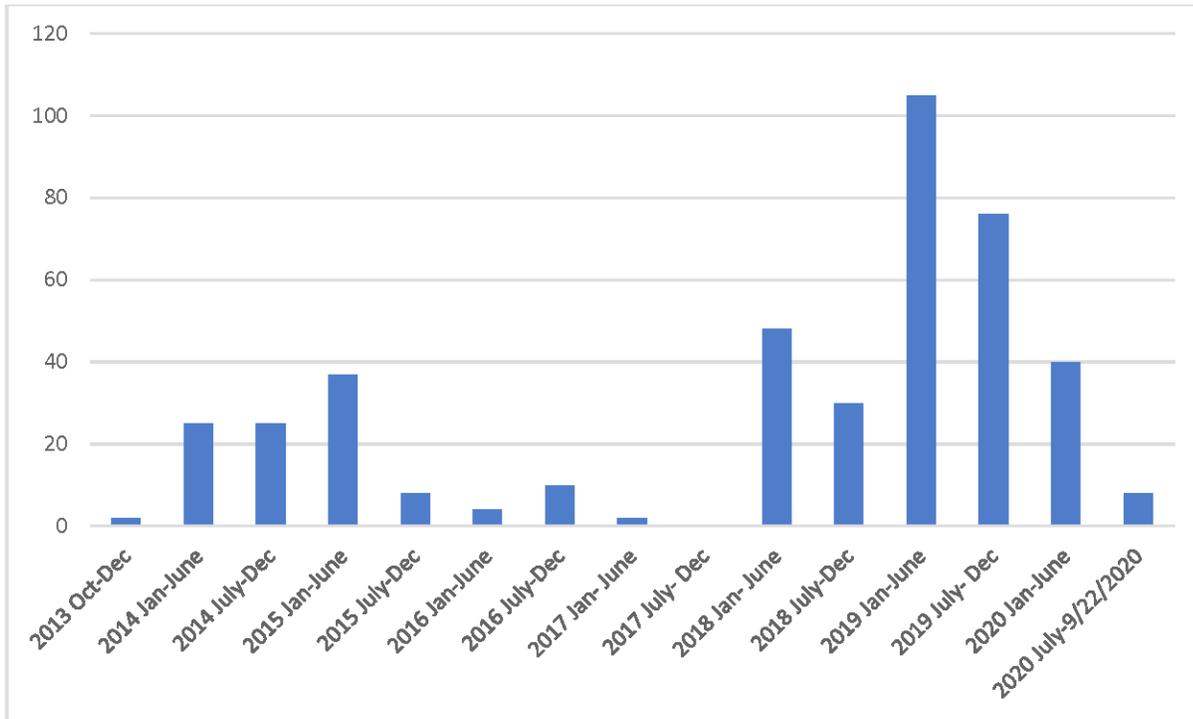
Figure 1 – Percent of Total EVs Versus Percent of Total NYPA Public Charging Ports by County



By the time the 2013 Charge NY initiative ended in 2018, NYPA had facilitated the installation of EV charging stations for a total of 191 ports (approximately 40 per year) at 67 locations. However, for the 2-year period July 2015 through June 2017, only 24 of these were put into service. Also, no EV chargers were put into service for 1 year, from February 28, 2017 to February 28, 2018. Under Charge NY 2.0, NYPA installed an additional 225 ports at 49 locations.

As shown in Figure 2, NYPA’s EV charger installation effort was inconsistent.

Figure 2 – Charging Ports Installed by 6-Month Periods as of September 22, 2020



We also found NYPA did not establish any targets or goals for the Charge NY initiative. Without a means to monitor the EV initiatives, NYPA may not be in a position to support its requests to the Board for additional funds for additional charging stations. Also, it may not be able to carry out the other parts of the September 2013 program, such as public education and research programs related to EVs. Otherwise, the initiatives may have resulted in a higher number of charging stations available to the public.

Recommendations

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 specified time frame.
2. Develop a formal marketing strategy to increase awareness of the features of EVs and educate motorists on the benefits of owning EVs.
3. Prioritize NYPA's efforts so that EV charging stations receive constant management oversight to ensure charging stations are being placed throughout the State.

Outreach

NYPA's outreach efforts to entice its other customer bases to install EV charging stations themselves were nominal and started late in the scope for Charge NY. NYPA's outreach efforts were limited to email blasts issued to 985 ReCharge NY (RNY) customers in 2018 and its RNY, Expansion Power, Replacement Power, and Preservation Power customers in April 2019. In December 2018, emails were also sent to 200 Western New York customers. As a result of this outreach, 150 EV charging stations were installed at 31 Economic Development Power Program (EDPP) sites. At 30 sites with a total of 146 EV charging stations, the customers covered the installation costs; at the remaining site, four EV charging stations were installed at no cost to the customer as part of NYPA's Charge NY Research Program.

Customer service personnel who handle NYPA's SENY government customers told us that they regularly meet with customers (including New York City and Westchester County and other government entities) and make them aware of various NYPA programs; however, they advise of availability and do not sell EV chargers to customers or encourage their participation.

NYPA's efforts were initially limited by statute to its own property and customer base. These customers include State agencies, public authorities, city and local governments, municipal power companies, and more than 800 businesses signed up for its EDPPs. Although limited by the statute, NYPA could have contacted its municipal customers regarding opportunities for placing public charging stations, such as the New York City Department of Transportation, to discuss placing them at the curbside of a public sidewalk. However, such prospects were not pursued by NYPA.

The emails NYPA provided regarding its outreach efforts to promote its Charge NY EV Charging Station Program (part of Charge NY and Charge NY 2.0) showed that NYPA conducted outreach efforts to only 40 customers (excluding EDPP customers). See Exhibit C for a breakdown of these efforts by year.

Recommendation

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

Charging Station Usage Reports

Each time an EV charger is installed by NYPA, it is registered to a charging network. Charging networks advertise the availability of the charger, provide controlled access to the charger for charging customers via their Radio Frequency Identification (RFID) card, cell phone app, or other means, and provide operational support for both the owner of the charger and the customer. As part of NYPA's agreement, each EV

charger is covered by a support agreement, which includes being associated with a charging network. The agreement also covers the first 4 years of software support/warranty for the EV unit. The network/support company also maintains a listing of each use of the charger, including the date, time, power consumed, type of vehicle, and payment if any (which anonymizes the specific customer). The usage data can be downloaded by both NYPA and the EV owner.

When asked how the usage data has been used, NYPA officials advised that, for early EV locations installed by 2016, the data was used by the Electric Power Research Institute for its data analysis and research support. Otherwise, the data was primarily used to diagnose problems with charging stations reported to NYPA either by the driving public or by the charging station owner (e.g., if the unit was reported as failing to charge certain vehicles) prior to discussing the matter with the supplier of the EV equipment. However, we did not receive any documents to support this use of the data.

NYPA officials also indicated that the data provided information as to which site locations were used regularly (urban parking garages near buildings and commuter rail stations). NYPA found that EV chargers installed in a park were not used often.

NYPA officials could not identify instances where the data was used to market EV chargers to its customers or to focus where charging stations should be installed. For example, we were advised that commuter train parking lots were one of the sites more likely to be utilized for charging; however, we found no specific instances where NYPA pursued marketing of EVs to train station owners/operators such as MTA.

We requested copies of usage data related to all of the chargers NYPA had a role in installing. NYPA provided a listing of 198 chargers and the related charging data. The usage data shows 81,661 total charges, ranging from one charge (East 149th St Parking Garage, NYC) to 2,425 charges (Village of Nyack). The earliest charge was on May 18, 2015 and the latest on December 23, 2020. The data includes 30 chargers at Metro-North Railroad stations and three chargers at Long Island Rail Road stations.

We reconciled the listing of charging station locations NYPA officials provided against the usage data report, and found the usage report did not include 23 locations with a total of 40 chargers.

We believe analysis of this data early in the program could have resulted in refining and re-invigorating marketing efforts aimed at increasing the number of EV chargers installed with NYPA's assistance. For example, 33 of the 198 chargers had fewer than 50 uses, and these locations may not have been a prudent use of equipment, which can cost approximately \$11,077 per charging port to install.

While NYPA's focus is on installing its own high-speed charging stations near highways (main corridors), there is still a need for lower-cost Level 2 charging stations at facilities controlled by NYPA customers. NYPA still has a role, under the State's Charge 2.0 program, to install additional Level 2 charging equipment for

its customers to support the planned growth in EVs. Going forward, NYPA has the opportunity to analyze the usage at its charging stations in order to encourage its customers' future installation of charging equipment. For example, Long Island Rail Road has 124 stations, but NYPA's EV chargers are only installed at one of them.

We met with NYPA officials to review records for 30 EV stations sampled. Two charger locations were for NYPA-owned stations under the EVolve NY program. For the Level 2 and DCFC chargers at customer-owned stations, NYPA had complete usage data for 14 and partial data for five. However, there was no evidence that NYPA used the data to determine if additional charging stations could be installed. At one meeting, we were advised that it was not up to NYPA to recommend additional stations based on trends in the data but, rather, the charging station owner would have to request stations be added.

Recommendations

5. Incorporate into its current EV program an analysis of usage data and a discussion of the data with NYPA customers in an effort to promote the installation of additional EV units.
6. Regularly download the usage data and maintain a complete set for all sites to provide NYPA management the information it needs to make the best decisions regarding its EV program.

Charging Station Inventory

NYPA officials provided a listing of EV charging stations and their status as of September 15, 2020. However, based on our review of additional records, we found discrepancies in the number of charging stations installed or under construction, as follows:

- One RNY Workplace EV charger location at the Huntington Hospital (Northwell) with seven dual-port chargers under construction for a total of 14 ports was not on the original listing provided by NYPA but was found on the RNY EV Chargers List on the NYPA website.
- Another RNY Workplace EV charger location, MPM Silicones, was incorrectly recorded in the NYPA EV Charging Station Installation List as having four ports in service but was correctly recorded in the RNY EV Chargers List obtained from the NYPA website as having two ports.
- Our review of NYPA purchase orders and contract listings filed with the State showed that:
 - 24 chargers for use by NYPA employees and contractors at NYPA's power plant in Astoria, Queens were installed but not on the installation list.
 - 24 EV chargers with a total of 30 ports for use by NYPA employees were installed at NYPA's White Plains office but were not on the installation list.

-
- 12 chargers that are under construction at the Blenheim-Gilboa Power Project location will be for use by NYPA employees but were not recorded on the installation list as under construction (6 chargers are planned for Blenheim-Gilboa office/warehouse employees and 6 chargers for the employee parking lot.)

These audit adjustments total 46 installed charger ports and another 26 under construction.

Without an accurate inventory, EV customers may not be aware of all charger stations available to them.

EVolve NY

On May 22, 2018, NYPA staff sought Trustee approval for an investment of \$40 million for what NYPA referred to as EVolve NY. The \$40 million was part of an overall allocation of up to \$250 million to be set aside by NYPA between May 2018 and 2025. This initial \$40 million investment was to be used for three specific EVolve NY Phase 1 projects to be completed by the end of 2019:

- DCFC Rollout – installing DCFC stations throughout certain highway corridors in the State, focusing on the major traffic corridors, initially for about 200 DCFC plugs at 150 kilowatts to make the fast-charging infrastructure much more visible to potential buyers.
- The EV model communities – marketing and installing fast chargers within a constrained geographic area, such as a small city or a municipal utility territory, so that NYPA could test what helps drive EV adoption.
- Airport Charging Hubs – placing fast chargers at the two major airports in New York City and regarding fast chargers at those airports as “ridesharing” networks. Private vehicles and Port Authority of New York and New Jersey vehicles will also use these Charging Hubs to show how EV adoption at these high-traffic areas can be driven by having these Hub stations easily available.

On April 12, 2019, NYPA’s authority under the Public Authorities Law was expanded so that it could install EVolve NY chargers at non-government locations that were not already NYPA customers. Prior to that date, NYPA did not have that authority.

NYPA’s publicly stated goals of Evolve NY (as of April 2021) are as follows:

“We’re working to make New York even better for electric vehicles by building a network of fast, affordable, and reliable public charging stations. We’re adding chargers in key places along major highways and at the airports, investing up to \$250 million through 2025 to improve the infrastructure and raise awareness of the benefits of driving electric.”

“By the end of 2021, Evolve NY will form a robust network that will enable drivers to travel all of New York State with confidence.”

We found that none of the phase 1 projects were completed by the end of 2019.

As of March 5, 2021, NYPA had installed 29 EVolve NY chargers at seven locations and one model community in Fairport; the only airport location completed was at JFK International Airport in Queens. NYPA officials advised that the LaGuardia Airport location is still being negotiated. NYPA officials told us they have spent a portion of the EVolve NY funding. Of the \$40 million allocated by the Board, NYPA had expended \$473,187 by the end of 2019 and a total of \$8,556,860 as of March 1, 2021.

NYPA planned to open 46 EV sites and install 200 DCFCs, reaching its goal during 2021. However, we estimated that it takes NYPA an average of just over 6 months to put an EVolve NY charging station in service, from issuance of a purchase order to commissioning of the station; therefore, the goal for 2021 is not likely to be met. Without an agreed-upon site location and a Host Site Agreement, NYPA cannot design or place a purchase order.

Of the 46 EV charging sites planned for 2021 (39 advance negotiations and seven early negotiations), we sampled six (three advance and three early). We found that some were not in the stage stated. For example, one municipality could not find a site to install the charger, and NYPA received pushback from another municipality that only wanted one charger. Therefore, the information regarding when NYPA will finish installing chargers planned for 2021 is not reasonably accurate.

Table 2 – Status of Six Sampled Charging Sites

Location	Negotiation Status	Status Per Audit
Freeport	Advanced	Early – discussion with village did not identify any viable space; pursuing another private entity
Albany	Advanced	Early – still in discussions, although NYPA is moving ahead with preconstruction efforts
Fishkill	Early	Early – location not interested in allocating a sufficient number of public spaces; looking for another location
Manhattan	Early	Early – working with NYC Department of Transportation to identify a site
Watkins Glen	Early	N/A – no longer viable; looking elsewhere in the State
Copiapue	Advanced	N/A – no longer viable; looking elsewhere in the State

In response to our preliminary findings, NYPA officials agreed that the goal of 200 fast chargers is not likely to be met. Given the lessons learned with developing and constructing these stations since 2018 and the impact of the COVID-19 pandemic, NYPA has revised its 2021 goal to 150 DCFCs, with the remaining 50 DCFCs expected to be deployed in 2022, ultimately reaching the 200 DCFC goal.

NYPA was supposed to establish two EV model communities. On March 2, 2021, we requested that NYPA provide us with documentation of what an EV model community should include, as well as support to document what was established. The components of a model community included testing 50 networked home chargers to see if the Wi-Fi-enabled devices can support Demand Response events. NYSERDA funded 28 public Level 2 chargers, and NYPA supported networking the Level 2s. NYPA installed a two-charger Evolve NY DCFC in a village parking lot for public use.

On March 3, 2021, NYPA officials explained what they did to find a second location for a model community on Long Island. Officials advised that they had made efforts to negotiate a model community in Freeport, but it fell through. However, they did not supply any supporting documentation for either the requirements or the accomplishments.

During a meeting on March 5, 2021, NYPA officials told us the agency is rethinking its EV model community because residential is not their normal customer base.

We inquired as to the reasons for the delays in the EVolve NY program. We were told that legislation was required to allow NYPA to contract with and make improvements in private property, where most EVolve NY locations would be installed. The legislation became effective April 12, 2019, just under 1 year after the Trustees approved the funding. Following the approval of the legislation, NYPA began to negotiate sites, and it found negotiating real estate terms with private entities was more involved (in terms of time) than had been anticipated.

Further, making electric power arrangements with power companies was difficult, as commercial power rates include a demand charge, which would make EV charging too costly. The New York State Public Service Commission addressed this by requiring the power companies to make power connections available, and also requiring NYPA to advertise each potential location to other third parties that may be interested in siting a location in the same area. NYPA must make public each location and wait 30 days before proceeding with arrangements. NYPA officials advised that so far, no one has expressed interest in putting stations at any location they have advertised.

NYPA operates the EVolve NY locations. A fee of 35 cents per kilowatt hour is charged, which NYPA advises is considered reasonable in the areas in which it operates. No fees are charged for remaining hooked up to the charger after reaching a full charge.

Marketing efforts for EVolve NY are limited. A marketing plan was under development in late 2020, but spending on marketing was decreased from \$1.5 million to \$750,000. Advertising was to be targeted. Efforts were limited to social media content, Facebook page postings, and meetings with EV community advocacy groups. We note these efforts are focused on people who already have EVs—NYPA needs to expand its coverage to those who may be considering purchasing a vehicle. Also, NYPA has not adequately marketed or publicized the benefits of driving an EV,

both in maintenance costs and in lower fuel costs. NYPA advised that some of its efforts to reach end consumers have been put off due to the COVID-19 pandemic.

Fueling a gasoline-powered car takes 5 to 10 minutes, whereas charging an EV at Level 2 could take several hours. EVolve NY chargers could reduce that to less than 30 minutes.

Recommendations

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.
8. Expand marketing efforts to improve the car driver's acceptance of EVs through increased EV awareness.
9. Structure fees so that if an EV remains after reaching a full charge, there is a cost for using the space.

Audit Scope, Objectives, and Methodology

The objectives of our audit were to determine whether NYPA's EV initiatives and programs placed the Charge NY and Charge NY 2.0 charging stations in locations where the intent of these programs could be achieved, and whether NYPA's EVolve NY program met its initial project goals by the end of 2019. The audit covered the period from January 2013 through May 2021.

To accomplish our objectives and assess the related internal controls, we interviewed NYPA management and reviewed records provided to support the installation of Charge NY 2.0 Initiative charging stations for our judgmental sample of 30 locations. These locations were selected from the 140 stations NYPA reported were installed or in construction as of September 22, 2020. We selected the locations to cover various programs, such as EDP, NYSERDA's phase 1 of a research program, Customer Energy Solutions, and RNY, and to cover several geographic areas in the State.

We also visited 18 locations judgmentally selected based on customer type (government, economic development), status (installed, in construction), and geographic location to obtain information about the charging stations and to observe when they were used and if the EV was charging. We contacted three agencies/authorities to confirm information NYPA provided for the number of charging stations installed. NYPA provided a file of usage data as of January 25, 2021. We reviewed and analyzed the data to determine which charging stations were used and how often.

Our samples were not intended to be projected to the population. We assessed the reliability of the charging station listings from NYPA's eMobility Technology and Engineering Unit and the Evolve NY information from the Evolve NY Strategy and Business Development Unit, and found them to be accurate, complete, and sufficiently reliable.

Statutory Requirements

Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article X, Section 5 of the State Constitution and Section 2803 of the Public Authorities Law. Additionally, Chapter 469 of the Laws of 1989 requires the State Comptroller to conduct an audit of NYPA's management and operations at least once every 5 years.

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State, including some duties on behalf of public authorities. For NYPA, these include operating the State's accounting system, reporting NYPA as a discrete component unit in the State's financial statements, and approving selected contracts. These duties could be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our professional judgment, these duties do not affect our ability to conduct this independent audit of NYPA's oversight and administration of selected management and operations practices.

Reporting Requirements

We provided a draft copy of this report to NYPA officials for their review and formal comment. Their comments were considered in preparing this final report and have been attached in their entirety at the end of it.

NYPA states it largely agrees with OSC's recommendations in support of improving NYPA's EV programs. It intends to grow its EV programs and continue to best use its resources in furtherance of New York's low and zero emission vehicle and greenhouse gas reduction goals. The response points out that a lot has been achieved in the past 10 years, and while the expectations set for Charge NY, Charge NY 2.0, and EVolve NY may not have been fulfilled with the expediency initially envisioned, NYPA, with its sister agencies and authorities, is well-positioned to support New York to be a leader for a cleaner future. NYPA does not agree with the approach and methodology we used to characterize the location of NYPA installed (public) charging stations. However, it does not also mention that it did not provide documents to support statements about the factors used to determine where Charge NY, Charge NY 2.0, and EVolve NY charging stations should be placed. Of the nine recommendations, NYPA agreed with four, stated it will consider one, and claimed that four relate to practices that are already in place. We maintain our position and

urge NYPA officials to revisit the recommendations related to improving support for where charging stations are installed. Our responses to certain NYPA comments are included in the report's State Comptroller's Comments.

Within 180 days after final release of this report, as required by Section 170 of the Executive Law, the Chair of New York Power Authority shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

Exhibit B

Number of EVs and NYPA Public Charging Ports in 32 Counties*

County	No. of EVs	No. of Public Charging Ports	No. of EVs per Public Charging Port
Suffolk	7,916	3	2,639
Nassau	5,947	5	1,189
Westchester	4,844	44	110
Queens	3,284	36	91
New York	2,898	11	263
Monroe	2,637	14	188
Kings	2,194	5	439
Erie	1,898	42	45
Albany	1,186	25	47
Onondaga	1,059	7	151
Dutchess	971	10	97
Rockland	959	16	60
Richmond	890	5	178
Ulster	780	5	156
Bronx	506	2	253
Niagara	398	2	199
Putnam	349	4	87
Ontario	331	2	166
Chautauqua	162	5	32
Madison	156	2	78
Clinton	155	2	78
Jefferson	137	4	34
Greene	108	4	27
Otsego	99	4	25
Cayuga	89	1	89
Essex	89	4	22
Genesee	85	3	28
Montgomery	74	4	19
Schoharie	61	2	31
Orleans	57	1	57
Franklin	55	1	55
Herkimer	45	2	23
Totals	40,419	277	

*Status as of March 2021 based on additional information from NYPA

Exhibit C

Breakdown of NYPA's Outreach Efforts

Customer Group	Number	Number With Outreach	Percent	Number of Outreach Efforts by Year								
				2011	2012	2013	2014	2015	2016	2017	2018	2019
Municipalities and rural electric cooperatives	51	13	25%	-	-	-	-	-	13	-	-	-
SENY	114	22	19%	6	-	-	-	8	14	-	-	-
Others	-	5		5	-	-	-	-	-	-	-	-
Totals	165	40		11	-	-	-	8	27	-	-	-

Agency Comments



**NY Power
Authority**

KATHY HOCHUL
Governor

JOHN R. KOELMEL
Chairman

JUSTIN E. DRISCOLL
Interim President and Chief Executive Officer

December 15, 2021

Ms. Carmen Maldonado
Office of the State Comptroller
Division of State Government Accountability
59 Maiden Lane - 21st Floor
New York, NY 10038

Dear Ms. Maldonado:

Below is the management response of New York Power Authority [NYPA] to the draft audit report [Report] (2020-S-38) entitled: *New York Power Authority – Selected Management and Operations Practices*, issued by the Office of the State Comptroller [OSC]. The OSC's Report provided conclusions and recommendations for NYPA's management and operational practices of its electric vehicle initiatives and programs, including Charge NY, Charge NY 2.0 and EVolve NY program [EV Programs].

NYPA values the work of OSC staff through the OSC's audit process to help NYPA improve the implementation of its EV Programs.

NYPA largely agrees with OCS's recommendations in support of improving NYPA's EV programs. NYPA intends to grow its EV programs and continue to best use its resources in furtherance of New York's low and zero emission vehicle and greenhouse gas reduction goals. In just ten years, NYPA's involvement in the field of electric vehicles has matured from its initial beginnings as small-scale research and development projects to its leadership role in building a public backbone of direct current fast charge [DCFC] stations in New York. While the expectations set for Charge NY, Charge NY 2.0 and EVolve NY may not have been fulfilled with the expediency initially envisioned, NYPA, with its sister agencies and authorities, is well-positioned to support New York to be a leader in adaption of EV technologies and resources for a cleaner future.

The Report concludes that "NYPA did not place the Charge NY and Charge NY 2.0 charging stations in the quantity and locations where the intent of these programs could be achieved."

At a state level, these programs focus on a total number of charging stations within New York that are available for use by the public or for employees in the workplace. NYPA has been supportive of the state's Charge NY and Charge NY 2.0 initiatives, neither of which specified a target for NYPA to meet or locations at which NYPA should install EV chargers. Rather, as noted in the Report, NYPA collaborated with other state entities to help with those initiatives to the extent it may do so under its existing statutory authority and as authorized by its Board. NYPA implemented Charge NY and Charge NY 2.0, first through its governmental customers, and then with customers under its Economic Development Power Programs [EDPP] customers. In so promoting and facilitating the installation of chargers, NYPA's customers decided how many and where the EV chargers were placed.

The Report also concludes that “NYPA’s EVolve NY installation of EV high-speed chargers did not reach its phase 1 goals and EVolve NY charger deployment is as much as 2 years behind schedule.” NYPA acknowledges that the early phase goals of EVolve NY have not been realized.

NYPA acknowledges that it set high expectations as it entered the new and developing market of DCFC stations, and many factors contributed to the delays. Some were known, like the need to have legislation enacted for implementation of its EVolve NY program. Some took longer than NYPA reasonably anticipated, such as the time to negotiate each host site agreement. And one was unexpected: the COVID-19 pandemic. Importantly, NYPA has gained knowledge, learned from its experiences in this developing area, and has been working to successfully achieve its future EVolve NY goals, which are being carried out with greater oversight and performance measurement tools.

As of December 1, 2021, NYPA has 150 chargers under host site agreements, of which more than half will be operational by the end of 2021. Regarding additional chargers, discussions are currently on-going with various site hosts. EVolve NY is on track to be the largest public DCFC network in New York by the end of 2021 (excluding Tesla Superchargers, which are proprietary).

NYPA’s response below corresponds to the specific sections and recommendations in the Report. NYPA’s response includes comments on OSC’s findings and conclusions, as well as its position on OSC’s recommendations. In many instances, NYPA already implemented processes noted in the Report to enhance NYPA’s EV programs and provide improved management oversight.

Statewide Distribution of Electric Vehicle Chargers

The OSC used a flawed approach and methodology to characterize the location of NYPA installed charging stations. As stated in the Report: “To determine whether NYPA has placed charging ports where they are needed, we compared the number of Electric Vehicles (EVs) registered in New York State by county as of June 1, 2021, to the number of publicly accessible charging ports installed by NYPA under Charge NY, Charge NY 2.0 through September 2020, and Evolve NY through September 2020.”

[Comment 1](#)

NYPA disagrees with OSC’s determination that it has not placed charging stations where they are needed.

As NYPA noted, NYPA installed chargers under the Charge NY and Charge NY 2.0 programs at locations chosen by its customers, not NYPA. Also, OSC’s comparison of EV charging locations to the DMV registration data for EVs provides a snapshot in time that does not consider NYPA customers’ decision making at the time the charging stations were installed over the past decade, and such a snapshot does not consider future EV adoption.

To the extent NYPA is the decision-maker on where charging stations can be located, that discretion exists within NYPA’s Evolve NY program. As presented to OSC through staff interviews and documentation, NYPA’s analysis for determining DCFC sites is significantly more complex than using a county-based approach of comparing registered vehicles to number of

[Comment 2](#)

NYPA-installed, publicly accessible charging ports. As explained in discussions with NYPA staff and supported by documents and other information provided during the audit process, NYPA's approach to locating chargers under EVolve NY followed a methodology that aligns with industry practices and New York State's fast charging objectives.

NYPA's analysis considers geographic, technological, and market information. NYPA's approach to determine where EV charging is needed is not directly coupled to EV registration as it is crucial to understand where cars travel (prioritizing roadways) and ensuring coverage across those higher priority roadways (by distance rather than by county), while considering where the private sector has installed publicly accessible charging stations and where it is likely to do so. As such, under the approach taken by NYPA, there is a EVolve NY station every 50 miles or so on New York's interstate parkways, and about 50% of all New Yorkers live in a ZIP code within 10 miles of an existing/planned EVolve NY station. Also, the roadways prioritized by NYPA are often used by EV drivers who travel distances where DCFC stations are beneficial. Also, absent from OSC analysis is community demographics about population density and home ownership, where EV owners are more likely to charge at home, and overall availability of public chargers, including those installed by third party charging networks.

[Comment 3](#)

In addition to not addressing geographic and market considerations, OSC's analysis does not properly account for the issue of technology. NYPA's Evolve NY program involves DC fast chargers, which serves a different need than what may be necessary at certain locations (like commuter train lots where people leave the cars for multiple hours compared to Thruway service areas where people are while travelling) or different EV segments (like Battery Electric Vehicle, Hybrid Electric Vehicle and Plug-in Hybrid Electric Vehicle, for which the type of EV charging station may be usable or not). Also, the Report does not differentiate EVs between Tesla, which has a dedicated charging network, and those that do not.

[Comment 3](#)

Accordingly, NYPA respectfully disagrees with the Report's conclusion that "Not only are there insufficient stations to meet current EV consumer need, but the current distribution of charging stations doesn't support the phase 1 goal of placing chargers where they are needed most." NYPA stands by its position that it is placing chargers where they are needed most, as determined by involved state entities (NYS Department of Transportation, Department of Environmental Conservation and NYSERDA), to meet future consumer need in areas that may otherwise be underserved by private charging station networks, specifically along identified priority roadways and across each of the 10 Regional Economic Development Councils (REDC) in the state. NYPA acknowledges that its goal of 200 chargers by the end of 2019, as specified in the Board of Trustees' memo, was not met; however, the Board's resolution authorized expenditures in support of this phase of the program through May, 2022, and NYPA continues to work toward achieving this goal.

[Comment 4](#)

Recommendations

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 specified time frame.*

NYPA will continue to follow this recommendation in its implementation of the Evolve NY program and to support New York's goal for having a statewide network of DCFC stations.

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

NYPA has a marketing strategy aimed at furthering its EV programs, which does include motorist awareness. NYPA participates in broad consumer focused events, such as the New York International Auto Show and New York State fair, which promote EV benefits as well as ties into NYPA's EV program goals. NYPA is also one of many (e.g., NYSERDA) state entities involved in promoting New York State's Zero Emission Vehicle and greenhouse gas policies, and the State's EV public policies. The focus of NYPA's marketing strategy is on the implementation of DCFC stations throughout the state to provide the state's motorists an infrastructure backbone and reduce consumers' concerns (e.g., range anxiety) about charging station availability.

3. Prioritize NYPA's efforts so that EV charging stations receive constant management oversight to ensure charging stations are being placed throughout the State.

NYPA utilizes tools to track its implementation of Evolve NY, including identification and development of charging station locations, and to provide metrics on key performance indicators that support well-informed management oversight. NYPA provided this information to OSC during the audit. NYPA remains committed to ensuring its management has timely awareness of the status of its EV programs and involvement to ensure goals are met.

Outreach

The Report's findings regarding outreach conducted by NYPA does not fully credit NYPA's outreach efforts and characterizes NYPA's outreach as limited without context for what sufficient outreach should have been. NYPA did make outreach efforts, which were documented to OSC, to its governmental customers prior to 2018. NYPA also participated in webinars with NYS DEC to promote its rebate program and NYPA's implementation services. Information about Charge NY was also available through NYSERDA and NYPA websites. The Report does not acknowledge the lack of governmental or EDPP customer interest at that time to pursue electric vehicle solution services.

[Comment 5](#)

Recommendation

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

NYPA promotes awareness of New York State's EV and EV infrastructure public policies, and the menu of resources it can provide to support implementation of EV chargers, as well as availability of other resources (such as those provided by NYSERDA). NYPA cannot direct other state or local government entities to install EV charging ports. NYPA will continue to promote awareness to its customers of opportunities for EV charging ports through services it provides, including its energy efficiency program and economic development programs.

[Comment 6](#)

Charging Station Usage Reports

NYPA acknowledges that usage reports provide important information that can be used to inform future EV charging station installation decisions. NYPA receives data for a period of time post-installation. On NYPA's DCFC, it is for the duration the DCFC station is in use. On these chargers, NYPA performs analysis to improve asset management, track KPIs, and provide information about usage and availability public. For customer-owned charging stations, NYPA typically gets access to usage data for four years. NYPA recommends customers also sign-up for four years of network support and access data as it may be valuable for the customers' post-installation decision-making. When requested by the customer, NYPA uses its ability to view the data to help provide technical support to help customers troubleshoot. While NYPA does not proactively use the data to solicit customers' installation of additional charging stations, NYPA may review usage data when consulting with customers about charging station opportunities and projects.

Recommendations

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 agrees with this recommendation to the extent that usage data should be analyzed, but the purposes of using that data may vary based on EV program type. As this recommendation addresses NYPA's engagement with its customers, NYPA believes alignment of the technology being used and the customer being served is an important part of encouraging NYPA's customers to add EV charging stations when and where needed. At the request of customers, NYPA may monitor and/or review data. NYPA may also assist the customer with data interpretation, pricing policies, downloading reports, and providing recommendations for additional EV charging station opportunities.

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

NYPA agrees with this recommendation. Up-to-date usage data is important information to further develop NYPA's EV programs and efficient use of its resources to meet the needs of NYPA and being able to provide New York State with cost-effective EV charging solutions. NYPA monitors data for its charging stations on a regular basis to maintain awareness of important information, such as system uptime, understand utilization, and other operational data.

Charging Station Inventory

NYPA is committed to accuracy in its inventory of charging stations inventory and agrees that availability of this information is important to EV users.

EVolve NY

The Report addresses the initial \$40 million investment by NYPA for its Evolve NY program, and notes that none of the three projects identified in NYPA's May 2018 Trustee item were completed by the end of 2019. NYPA acknowledges that those projects were not completed, but the NYPA Board of Trustees' authorization for the expenditures of those funds expires in May 2022 and NYPA is continuing to be expended those funds toward DCFC installation goals.

The Report reflects findings amounts expended in 2019 and amounts expended through March 1, 2021, much of which was delayed by the pandemic. However, the committed funds have significantly increased during 2021. During the audit, NYPA agreed with the OSC that the early goal of 200 DCFC chargers by the end of 2021 is not likely to be met. Given the lessons learned with developing and constructing these stations since 2018 and recovery from pandemic impacts, NYPA revised its 2021 goal to 150 DCFC chargers.

NYPA respectfully disagrees with OSC's reclassification of NYPA's DCFC host-site negotiation status on certain locations as being indicative of NYPA's likelihood of success in achieving its goal. This process is subjective: NYPA staff have insight into the status of those host-site negotiations and can make such assessments, with recognition that even advanced negotiations can sometimes be unsuccessful. NYPA is happy to report that it now has 150 DCFC under contract, meeting its 2021 goal.

[Comment 7](#)

The Report noted that NYPA planned to establish two EV model communities, but only established one, and the other did not come to fruition after negotiations with a community. The Report also noted that NYPA is rethinking its EV model community initiative. Based on lessons learned since the original plan in 2018, NYPA has made a pivot in its business strategy to make better use of its resources and to not continue to expend funding for this type of project at this time.

The Report found NYPA's "marketing efforts for Evolve NY are limited", notably relying upon a reduction in NYPA's budget for marketing, and that NYPA's advertising focused on social media and EV community advocacy groups. The Report opines that NYPA should "expand its coverage to those who may be considering purchasing a vehicle," and needs to publicize the benefits of driving electric vehicles.

The Report does not provide a basis (e.g., market reports or research) for this conclusion. NYPA's marketing efforts are timed to program implementation and charging station network availability, rather than promotional marketing directly to potential EV purchaser. However, NYPA does promote its EVolve NY program, implementation status of host sites, and current DCFC availability. NYPA promotes its DCFC charging network to a broader audience than acknowledged by OSC, including at auto shows in New York, the New York State Fair, and through the EVolve NY public webpage. While the pandemic has hampered marketing, NYPA's marketing will be increasing as charger station host site developments come to fruition and will be at pace with EV adoption in New York.

Recommendations

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 agrees with the recommendation and continues to work to further implementation of EV opportunities in accordance with NYPA's enabling statute and as authorized by its Board.

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

Please see NYPA's response to recommendation #2.

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

NYPA will consider this recommendation for potential future implementation based on space usage. NYPA EVolve NY charging stations have the technology to support this recommendation, but such an additional cost to consumers is not currently warranted based on demand.

If you have any questions, please do not hesitate to contact us.

Yours truly,

A handwritten signature in black ink, appearing to read "Justin E. Driscoll". The signature is fluid and cursive, with the first name being the most prominent.

Justin E. Driscoll
Interim President and Chief Executive Officer

State Comptroller's Comments

1. NYPA refers to our methodology for assessing where it installed charging stations as “flawed.” However, it does not also mention that it did not provide any documentation that it analyzed where the charging stations should be installed or even basic data such as the number of EVs in New York State. NYPA officials described factors it considered for the EVolve NY, which are reflected in our report.
2. Although NYPA is the decision maker for EVolve NY and mentioned that the location of EVolve NY charging stations would be based on traffic counts on corridors in the State and amenities such as restaurants, where drivers would be while the EVs were charging, it did not provide these analyses for our review.
3. NYPA’s reply cites several factors that were used to identify where charging stations would be placed, but this information was not shared with the auditors. In addition, the audit was in field work when the first EVolve NY charging station was opened in Lagrangeville, on September 22, 2020 until November 2021, and NYPA did not provide any information for even the first location during that time. We were also provided a list of other locations installed and in construction during 2021, but there was no data to support the factors used to select the locations.
4. If NYPA officials had the documents to support their position, the documents should have been provided to the auditors. We were at NYPA’s White Plains Office one or two days a week from December 2020 to November 2021 and no records were provided.
5. We accept that NYPA made outreach efforts to its customers; however, it is the extent of their effort that required improvement.
6. Although NYPA officials replied to our draft report that it promotes awareness of the EV and EV infrastructure and a menu of resources to support implementation of EV chargers, they did not provide the records for our review.
7. We did not reclassify the status of NYPA’s DCFC host site negotiations on certain locations. The report reflects information from NYPA officials.

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