



# **Central Hudson EV Make-Ready**

## ***Participant Manual***

# CENTRAL HUDSON EV MAKE-READY PARTICIPANT MANUAL



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## I. Overview: Electric Vehicle Make-Ready Program

Electrifying transportation offers numerous benefits for customers and communities, including increased efficiency, improved sustainability, energy security and the opportunity to relieve rate pressure in an environment of stagnant sales growth. According to the Department of Environmental Conservation, the transportation sector accounts for 40% of New York's greenhouse gas emissions. Therefore, in order to meet the state's clean energy goals, the transportation sector must be part of the solution. To this end, the NYS Public Service Commission commenced a proceeding, Case 18-E-0138, to consider the role of electric utilities in providing electric transportation infrastructure and rate design. The result of this case was the Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs.

The goal of the Electric Vehicle Make-Ready Program (“EV Make-Ready Program”) is to support the development of electric infrastructure and equipment necessary to accommodate an increased deployment of EVs within New York by reducing the upfront costs of building charging stations for light-duty EVs. Through this program, entities seeking to install or participate in the installation of Level 2 (“L2”) and/or Direct Current Fast Charging (“DCFC”) chargers can earn incentives that will offset a large portion of, or in some cases, all infrastructure costs associated with preparing a site for EV charger installation.

The Central Hudson EV Make-Ready Program is designed to provide incentives for the development of infrastructure from the electric distribution system up to but excluding the EV charger. For the purposes of the Program, infrastructure development also includes additional equipment used to enable expansion of EV charging infrastructure in the future. Figure 1 depicts typical power delivery from the distribution lines to the stepdown transformer, meter, panel, and EV charger at the site host location. Configuration may vary based on site specifics.

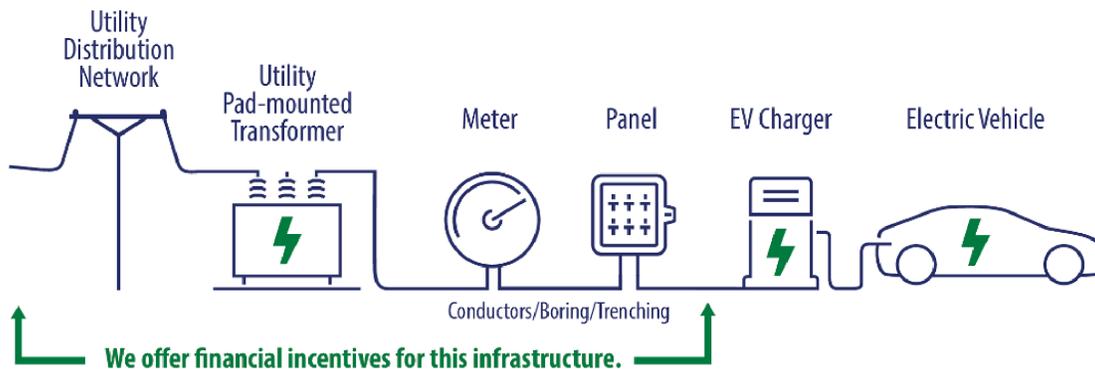


Figure 1 Potential Make-Ready Program incentive coverage on a typical EV charger project.

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The Central Hudson EV Light-Duty Make-Ready Program is offering \$21,140,800 in incentive funding and will accept applications until December 31, 2025, or until the available incentive funding has been allocated, whichever comes first. The Program seeks to offer incentives for make-ready costs of 3,204 Level 2 chargers and 69 DCFCs across Central Hudson's territory. Additional information about the Program can be found on Central Hudson's website.



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## II. Program Contacts

Central Hudson has partnered with ICF to implement the EV Make Ready program. ICF was selected through a rigorous Request for Proposal process and will be a valued partner through the life of the program.

All questions related to the EV Light-Duty Make-Ready Program and fleet assessment service should be directed to the Central Hudson EV Make-Ready Program team at [EVMakeReady@cenhud.com](mailto:EVMakeReady@cenhud.com) or [EVMakeReadyCH@ICF.com](mailto:EVMakeReadyCH@ICF.com).

In addition, Central Hudson has a program director to address program or policy issues related to the implementation of the Program. Their contact information is below:

TJ Rizzo  
trizzo@cenhud.com  
(845) 486-5265

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## III. Definitions

- **Approved contractor:** A contractor who has met the utility's approval criteria to install EV charging infrastructure incentivized through the EV Make-Ready Program.
- **Participant:** An entity that applies for and receives the incentives available through the EV Make Ready Program. This could be any entity including:
  - **Developer:** An entity responsible for designing, constructing, and commissioning an EV charger site. This entity may also be responsible for owning, managing, and operating the chargers.
  - **Equipment Owner:** The entity that purchases the make-ready equipment and is subsequently responsible for its maintenance. The equipment owner is also the recipient of the incentive payment and can be either the utility or the customer.
  - **Site Host:** The owner of the site on which the EV charging equipment is installed. The Site Host may or may not be the Equipment Owner.
  - **Customer:** An entity taking service from the utility.
  - **Approved Contractor:** As defined above.
- **Disadvantaged communities:** Includes environmental justice and low- and moderate-income communities. Central Hudson manages an [Environmental Justice web map](#) of their service territory that customers can explore in order to determine their eligibility.
- **Electric vehicle (EV):** A four-wheel light-duty vehicle capable of highway speeds that is powered fully or in part by an electric motor and is rechargeable from an external connection to an off-board electrical source.
- **Environmental Justice (EJ) community:** A community or area defined by the Joint Utilities as meeting the qualifications for an environmental justice zone.
- **Central Hudson Light-Duty Make-Ready Program:** The Program that provides incentives for the purchase and installation of equipment associated with preparing a site to install EV chargers within Central Hudson's service territory.
- **EV Make-Ready Program:** A program that provides incentives for the installation of electric infrastructure to support the deployment of L2 and DCFC light-duty EV chargers in New York State.
- **Future proofing:** The installation of additional or scalable capacity equipment and infrastructure to support the future expansion of an EV charging station and installation of additional charging ports.
- **Heavy-duty vehicles:** Large vehicles including passenger and cargo vehicles, trucks and equipment in Class 7 and above (those with a GVWR of over 26,000 lbs.)
- **Installer:** The entity that installs the equipment. The Installer may or may not be the same as the equipment owner.
- **Light-Duty vehicles:** Any small commercial vehicles including passenger cars, vans, and other Class 1 and 2 vehicles (those with a GVWR of 0 lbs. to 10,000 lbs.)

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- **Low-to-moderate income community (LMI):** A community or area defined by the average household wealth being less than or equal to 80% of the state or regional median income (whichever is higher).
- **Medium-duty vehicles:** Mid-sized vehicles including passenger and cargo vehicles, trucks and equipment in Class 3 through 6 (those with a GVWR of 10,001 lbs. to 26,000 lbs.)
- **Make-ready equipment:** Any utility-owned infrastructure and equipment involved in providing electric services, extensions, or upgrades needed to support the installation of EV infrastructure in excess of standard new business allowances and any customer-owned equipment from the point of interconnection up to (but not including) the charging equipment
- **Multiunit dwellings:** Any dwelling which is either rented, leased, let or hired out, to be occupied, or is occupied as the residence or home of 5 or more independent units.
- **Program effective date:** The date after which construction for projects under the Program can begin construction. For the Program, the effective date is July 16, 2020.
- **Publicly accessible:** For the Program, this means allowing access without site-specific physical access restrictions, including public, fee-free parking areas and municipality-operated fee-for parking areas. It does not include private or restricted business parking or multi-unit dwelling parking.
- **Universal plug:** Any EV charging plug that is accepted as able to support any light-duty EV and is not proprietary or exclusive. For Level 2 chargers, this is the Society of Automotive Engineers Electric Vehicle Conductive Charger Coupler J1772 (SAE J plug). For DCFCs, this is any non-proprietary plug such as the SAE Combined Charging System (CCS). This is often referenced to as a standard plug or standardized plug.

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## IV. Eligibility Criteria

### 1. Eligible Participants

The Participant may be (1) a Central Hudson electric account holder or customer (“Customer”) eligible to participate in the Company’s Electric Vehicle (EV) Make-Ready Program (the “Program”), or, alternatively (2) an entity responsible for designing, constructing, and commissioning an EV charger site at a Customer location (each, a “Site”), which may also include responsibility for owning, managing, and operating EV charging equipment at a Site (“Developer”), or, alternatively (3) an entity that purchases and owns or controls EV charging equipment once installed at a Site (“Equipment Owner”), or, alternatively (4) the owner or operator of a Site (“Site Host”), which may or may not be the Equipment Owner, or, alternatively (5) a contractor meeting the Company’s approval criteria to install EV charging infrastructure incentivized through the Program (“Approved Contractor”). For clarity, the Participant may be a Customer, or a Developer, or an Equipment Owner, or a Site Host, or an Approved Contractor.

The parties acknowledge and agree that ownership of EV charging stations may change or that stations may be upgraded during the term of this Agreement; provided, however, that the number of plugs and the capacity of any charging station does not decrease, and that the Participant continues to meet all current and ongoing performance and reporting obligations of the Program.

The parties understand and agree that additional projects proposed to Central Hudson by the Participant shall not propose the same or materially the same eligible services and/or equipment as approved for the Project such as would lead to more than one incentive award for the same or materially the same projects.

The Participant asserts that the Site is located within Central Hudson’s electrical service territory and receives or intends to receive electrical service from Central Hudson.

### 2. Eligible Infrastructure

Public and private (both for-profit and not-for-profit) entities may participate in the Program. Central Hudson provides customer incentive payments upon completion of the installation of make-ready equipment. Developers, site-owners, and charging station managers (collectively, the “customers”) may apply for project incentive funds through Central Hudson’s website.

The following installation types are eligible for this program:

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

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**2. Customer-Side Make-Ready Infrastructure:** EV equipment or infrastructure necessary to make a site ready to accept an EV charger that is owned by the charging station Developer, Equipment, Owner, or Site Host. This electric infrastructure may include conductors, trenching and panels needed for the EV charging stations. Note: the eligible equipment excludes the charging station and ports themselves.

**3. Future Proofing:** Up to 10% of the project's make-ready cost can be used to cover future proofing costs to the site, which can cover up-sizing wires, panels and conduit for future added capacity on both the utility and customer side of infrastructure costs.

All EV supply equipment must be installed by utility-approved contractors in order to be eligible for the incentives available through this EV Make-Ready Program. Equipment associated with the EV charger itself, such as the actual EV chargers, power blocks, modules, mounting hardware, co-located distributed generation, or energy storage material, are ineligible for incentives under the EV Make-Ready Program.

## 3. Project Requirements

Central Hudson evaluates individual make-ready projects on five key criteria: accessibility, station maturity, plug type, future proofing costs, and location capacity. There may be other factors external to a project such as total available funds. To receive incentives through the EV Make-Ready Program, a project must satisfy the following criteria:

**Approved Application:** Participants must apply to be accepted into the EV Make-Ready Program. Central Hudson will review, evaluate and, if appropriate, approve applications. Participants interested in applying to the program can do so through [the online application portal](#).

**Station Maturity:** Construction of the EV charging station must have commenced no sooner than July 16, 2020.

**Location Capacity:** EV charging stations must conform to capacity guidelines, including:

- 1) EV charging stations must have a minimum of two plugs.
- 2) DCFC sites with more than ten plugs and/or demand in excess of 2 MW will be allowed to participate in the EV Make-Ready Program under the condition that developing the site does not cause the utility to incur new business costs greater than those that would have been incurred to develop a site with a maximum demand of 2 MW.
- 3) The number of plugs at locations in excess of 10 plugs shall not exceed 50% of the target number of plugs established in the EV Make-Ready Order for each utility.

**Accessibility:** Each proposed station must be publicly accessible and accept universal forms of payment. To qualify for the maximum incentive, the proposed charging stations must be in a public parking area rather than in a private workplace or multiunit dwelling parking area. The parking lot may be a free parking lot or a paid municipal parking lot but must be accessible to all public customers without restriction. A

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proposed station situated in a private parking lot, including those in multiunit dwellings, workplace parking and private pay-to-park lots, may qualify for the reduced up to 50% incentive.



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To ensure maximum accessibility of charging stations to the public, stations eligible for an incentive under the Program must also be usable without requiring a paid membership in a charging station network. This holds for both proprietary and nonproprietary plugs. Networked stations that offer single per-use charging fees payable through a commonly accepted payment method such as cash, credit, or debit will satisfy this criterion. Though payment through a smartphone application is permitted, to qualify as publicly accessible for purposes of the Program, smartphone application may not be the only form of payment a station accepts.

**Plug Type and Capacity:** Each station should offer more universal plugs and capacity than proprietary plugs and capacity. To qualify for the maximum incentive, a proposed charging station must include an equal or greater number of universal charging plugs compared to the number of proprietary plugs. The station must also include an equal or greater amount of simultaneous capacity through these universal charging plugs compared to the capacity available through proprietary plugs.

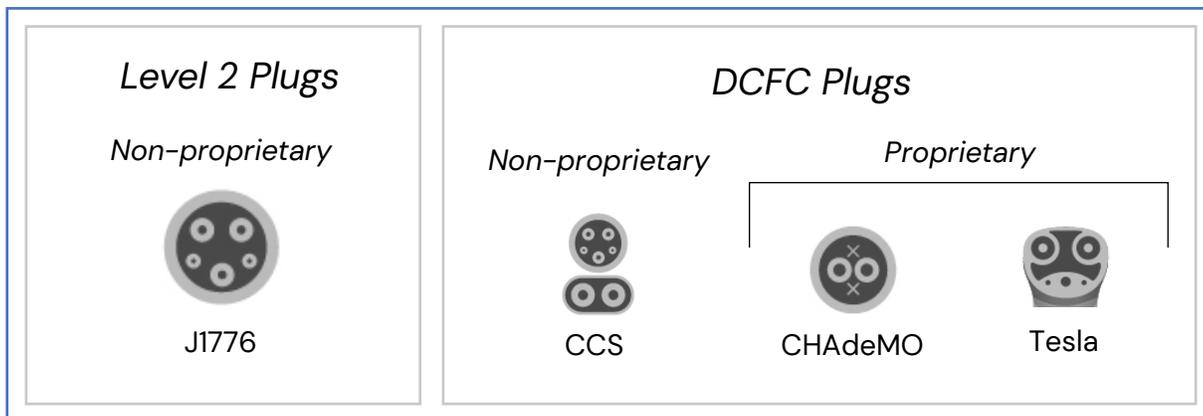


Figure 2. Proprietary and non-proprietary EV charging plugs.

DCFC plugs must be capable of simultaneously dispensing 50 kW or more to qualify for the incentive. If a station has more proprietary plugs than universal ones or offers more simultaneous capacity through these proprietary plugs, it may still qualify for the reduced up to 50% incentive.

**Future-Proofing Costs:** The cost of installing additional capacity and infrastructure to support future station expansion can also be covered by an incentive under certain conditions. To receive an incentive, the future-proofing activities must be requested by the developer and verified with Central Hudson. These costs may include the incremental costs of installing additional or oversized conduit (including trenching and conduit to additional parking spaces), panels, transformers, transformer pads, or increasing distribution service. Future-proofing costs up to 10% of the project's make-ready cost may be covered by an incentive. Central Hudson reserves the right to provide future proofing costs of up to 10% of the make ready costs at our discretion based on the specific characteristics of a project. Future-proofing costs over not covered by the incentive costs must be covered by the developer.

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**Location Capacity:** There is a limit on the number of small (two-plug) and large (10-plug and/or 2 megawatt [MW] or greater demand) stations that can be approved for incentives under the Program. Among the approved projects for the Program, no more than 25% of incentivized stations may include only two plugs. Additionally, no more than 50% of all plugs supported by the Program can be installed in stations with more than 10 plugs. Finally, for stations with 10 or more plugs and/or with a demand greater than 2 MW to qualify for incentives, the station must not cause Central Hudson to incur new business costs greater than those associated with a maximum site demand of 2 MW.

## V. Program Incentive Eligibility Levels

Participants in the Light Duty EV Make-Ready Program are eligible to receive incentives covering up to the given cost of make-ready infrastructure based upon the following criteria in Table 1. Eligibility can be further broken down based on plug output. If a proposed project meets the requirements for all criteria, the project will be eligible for an incentive covering up to 90% of eligible make-ready costs. If the proposed project does not meet the criteria for accessibility or plug type, the project may be eligible for an incentive covering up to 50% of the make-ready costs. No single participant may receive incentives for greater than 50% of any utility-specific make-ready program incentive budget.

Table 1: LDMRP Incentive Criteria

Incentive Level	Eligible Project Criteria
Up to 100%	Publicly available DCFC projects with standardized plug types located within Disadvantaged Communities.
	L2 projects at multi-unit dwellings located within Disadvantaged Communities.
Up to 90%	Publicly available L2 and DCFC projects with standardized plug types located outside of Disadvantaged Communities. Includes municipal pay-to-park and free parking locations.
	Publicly available L2 and DCFC projects including proprietary plugs must have an equal number of standardized plugs of an equal or greater charging capacity to the proprietary plugs (outside of Disadvantaged Communities).
Up to 50%	Non-public L2 and DCFC projects, such as workplaces with restricted access and privately-owned pay-to-park lots.
	Public and non-public L2 and DCFC projects consisting only of proprietary plugs.
	Public and non-public L2 and DCFC projects where proprietary plugs are not co-located with an equal number or greater number of standardized plugs of equal or greater charging capacity.

*Table is provided for illustrative purposes. Individual utilities reserve the right to make determinations regarding incentive-level eligibility based on their best interpretation of the proposed project and available information at the time of review. Customers are responsible for charger costs, annual maintenance cost, and ongoing electricity costs.*



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Central Hudson has earmarked 20% of its total budget for the Program for deploying make-ready projects in the EJC and LMI community zones. For projects in disadvantaged communities, the participant will receive up to 100 percent of eligible make-ready costs for:

1. Publicly accessible non-proprietary DCFC sites within 1 mile of disadvantaged communities in the Central Hudson service territory.
2. Level 2 sites located in multi-unit dwellings within 1 mile of disadvantaged communities in the Central Hudson service territory.

Projects developed by the New York Power Authority (“NYPA”) are eligible for two types of incentives: (i) incentives of up to \$15 million supporting the initiative to build ten fast charging locations in every Regional Economic Council (“REDC”) region by 2022; and, (ii) incentives of up to \$15 million supporting DCFC locations under NYPA’s EVolve NY program.

## VI. Application Requirements

Participants interested in applying for the EV Make-Ready Program may access the necessary application at the following application portal: [Central Hudson Gas & Electric \(programprocessing.com\)](https://www.chgas.com/programprocessing.com) or they can use the programs [printable application](#) and email that to [EVMadeReadyCH@ICF.com](mailto:EVMadeReadyCH@ICF.com).

Project applications can be completed by the site owners or the approved contractor. Before filling out an application, be prepared to provide and upload the following information:

- Project or Site Description
- Make-Ready Infrastructure Cost Information
- Documents
  - Quotes or Invoices
  - Site Plan
  - Site Satellite Image
  - Charger Specifications
  - Signed Participant Agreement / Terms & Conditions

**Participant Agreement / Terms & Conditions:** Applicants are expected to read the program Participant Agreement before submitting an application. At the bottom of the form, applicants must also read and sign the terms and conditions. These forms outline program guidelines and expectations.

### Definitions of the above documents:

- Quotes and Invoices: Copies of all estimated and final costs and billing associated with the project.
- Site Plan: Site drawing including the planned location of all chargers and relevant equipment.
- Site Satellite Image: Satellite image of the site including the planned location of all chargers and relevant equipment should include the site address as well as any adjacent main roads.

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- Charger Specifications: Specifications include estimated details on location of the charger on the site, wattage, and measurements of charger components and associated equipment. This information is provided by the manufacturer of the charger.
- Signed Participant Agreement: Signed copy of agreement to terms & conditions of project participation.

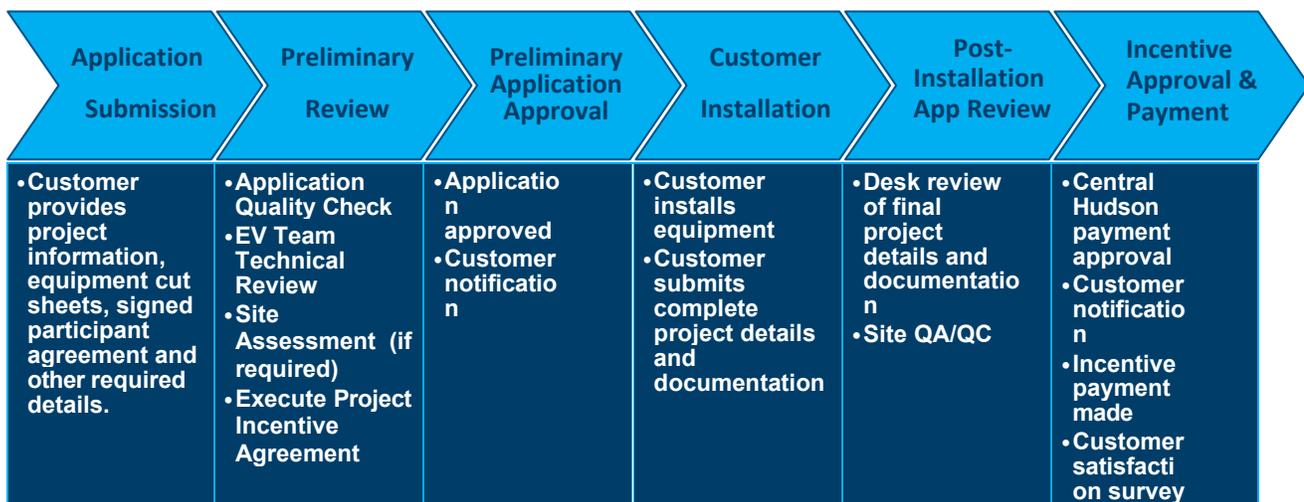
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## VII. Application Journey

The application process for the make ready program is dynamic and requires communication between the site host and the application processing team. Documentation is expected prior to application approval and should be updated post-installation. Please read Figure 3 below outlining the application process map. This process map previews the steps that participants should expect while applying for make-ready rebates.

Figure 3: Light Duty Make-Ready Application Process



**Application Submission:** Interested participants can apply for the make-ready program through the online application portal on the Central Hudson website. The application includes the applicant’s name and contact information and a brief project description describing the proposed number of plugs, charging output, plug type, site location, demand management software and hardware, and potential bi-directional charging and discharge of the proposed station. The application also includes information on future proofing needs and expansion plans. Applicants should indicate on this online form page whether they intend to pursue the DC Fast Charger Per-Plug Incentive program.

Once the initial application has been submitted, applicants are expected to upload additional required documentation as noted above in section VI Application Requirements.

**Preliminary Review:** Once an application has been submitted, it will be reviewed by the application processing team for approval. Customers can review the status of their application and the progress of the project through the application portal on the Central Hudson website. The portal tracks the progress of each project and provides transparency to the customer and consistent updates to the utility. The portal provides information on the status of a project, including approval, milestones, deadline dates, responsible parties, and incentive payments. If deemed necessary, this step can include a site visit to determine project



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suitability. Applicants are encouraged to check their portal for messages or outstanding tasks pertaining to their application.

If an application is deemed incomplete or needing verification, the application will be transitioned into an Application Flawed status and the applicant will be notified by email of the required changes to correct the flawed application.

**Preliminary Application Approval:** If the site is deemed suitable, Central Hudson drafts a Preliminary Incentive Disclosure detailing the customer-side work and utility-side work, associated incentives, and timeline for the project. The Preliminary Incentive Disclosure will only be delivered to the customer if all other required documentation and information has been provided for a project. Once the Preliminary Incentive Disclosure is received by the customer, work on the project can begin.

**Equipment Installation:** Central Hudson is responsible for completing the utility-side work for the site. This involves the installation of all necessary equipment up to and including the installation of appropriate meters for data collection (if applicable). In parallel, the customer works with an approved contractor to complete all necessary work on the customer side of the meter, such as installing panels, conduits, or trenching. While the installation of EV charging units may occur during this time, the cost of the EV charging units and installation of those units is not covered under the Program.

**Post-Installation Application Review:** Upon completion of all relevant make-ready site work, the applicant is expected to upload to their online application all finalized project documentation including:

- Final installation and contractor invoices
- Final equipment specifications
- Final site as-builts
- Future proofing documentation and invoices

Upon the submission of the final documents, a Central Hudson representative completes a final site assessment to verify that the project is deemed completed.

## Definitions of the above documents:

- **Final Invoices:** Copies of final costs and billing associated with the project.
- **Final Equipment Specs:** Specifications include final details on location of the charger on the site, wattage, and measurements of charger components and associated equipment. This information is provided by the manufacturer of the charger.
- **Final As-Builts:** Final site drawing including a site plan locating all chargers and relevant equipment. Any field required changes to the original site plan can be indicated with redlines.
- **Future Proofing Documentation:** Bill of materials for components that have been up-sized to plan for future capacity needs.

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**Incentive payment.** Within 60 days of verifying that a project is complete, Central Hudson distributes the incentive payments as a lump sum as agreed upon in the Project Agreement.

## VIII. Approved Contractors

Participants are required to use utility-approved contractors as a condition of program participation. Approved Contractors will be available on the EV Make-Ready Program web page located at each utility's website.

**Becoming an Approved Contractor:** To become an Approved Contractor for the EV Make-Ready Program, interested entities must complete and submit a Participating Contractor Application to each utility in whose territory the contractor is interested in working. The Participating Contractor Application will be available at [jointutilitiesofny.org/](http://jointutilitiesofny.org/) and at each utility's website. Each electric utility will review all applications, agreements and supporting documentation and determine if the contractor is accepted into the EV Make-Ready Program as an Approved Contractor within thirty days of receiving a completed application. The utility will notify the applicant of their application status via email. Upon acceptance, the utility will place the Approved Contractor on the list of approved contractors for potential Participants in the Program. Entities may apply to become an Approved Contractor at any time. If applicable, the Joint Utilities will provide the basis for rejecting an entity as an Approved Contractor and permit that entity to correct deficiencies in their application and re-apply. Each utility retains the right to place Participating Contractors on probation or remove them from the EV Make-Ready Program for nonperformance.

## IX. Operational Requirements

The EV Make-Ready Program requires that all sites meet a specific minimum set of performance standards, which will be tracked and reported by the Participant as part of the overall reporting requirements outlined in Section X below. These operational standards are as follows:

- DCFC plugs must be operational 95 percent of the time (annually).
- DCFC charging stations must be operational 99 percent of the time (annually), with a minimum of 50 percent of the plugs considered to be "up" at all times.
- All charging stations in the EV Make-Ready Program must operate for a minimum of five years.
- Ownership of EV charging stations may change or stations may be upgraded during the five-year term, as long as the number of plugs and the capacity of the station does not decrease, and the site continues to meet all performance and reporting obligations of the Program.

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## X. Reporting Requirements

Participants agree to provide the utility with the necessary data regarding the installation and use of the EV charging equipment to facilitate necessary tracking of the Program's overall operation and effectiveness on a quarterly basis. This data includes:

- Plug and charging session data, including:
  - the number of sessions daily;
  - start and stop times of each charge;
  - the amount of time each vehicle is plugged in per session;
  - peak kW per charging session;
  - kWh per charging session; and
  - plug outage information. Plug outage information is to include the number and duration of outages and is to be differentiated by expected outages (for maintenance) and unexpected outages.
  
- Financial information, including:
  - infrastructure and equipment costs;
  - fee structure (structure of fee to the end-use customer, i.e., cost per minute, cost per kWh, cost per session and whether the station owner is providing charging for free);
  - charging revenues derived; and
  - operating costs, which should include energy-related costs and non-energy related costs separately identified.

As soon as a third-party data vendor is onboarded into the program, a more detailed explanation of the exact data sharing process will be included in this document to aid customers.

The data sharing process will be greatly improved with a charger that is networked using one of the supported intercommunication protocols supported by the third-party data vendor. A list of accepted protocols will be listed to help participants in the choosing the best EV charging equipment to make data sharing as easy as possible.

Participants must also consent to allowing the utility to share the following information with New York State Department of Public Service Staff:

- Utility system and billing information for each EV charging station, including but not limited to:
  - 15-minute interval data;
  - load profiles for the EV charging stations for the top ten demand days of each year; and
  - utility bills. Utility bills are to be differentiated by delivery service-related costs and energy-related costs.

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All data subject to the reporting requirements identified in this section will be provided on a quarterly basis to the Joint Utilities after a third-party consultant designated by the Joint Utilities anonymizes and aggregates the data. The Participant must confirm that data can be transmitted to the third-party consultant before a station is considered operational and an incentive can be paid. Consistent with the Make-Ready Program Order, program participants that fail to provide the required data will not be eligible for new Make-Ready Program incentives and will either be subject to claw back of the make-ready payments received or revocation of service so that the station can be operated by an alternate market participant.

In addition to the data and information to be reported by or on behalf of the Participant to satisfy the requirements of the Program, the Participant shall also report promptly to Central Hudson and to the PSC any customer complaints in connection with the Program. Complaints can be submitted through the program email addresses provided below.

## XI. Program Support

For questions about the eligibility/application process, or the ongoing requirements for Program participation, please submit inquiries to the following email address: [EVMakeReady@cenhud.com](mailto:EVMakeReady@cenhud.com) or [EVMakeReadyCH@ICF.com](mailto:EVMakeReadyCH@ICF.com).