COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

NSTAR ELECTRIC COMPANY d/b/a EVERSOURCE ENERGY;

MASSACHUSETTS ELECTRIC COMPANY AND NANTUCKET ELECTRIC COMPANY, EACH d/b/a NATIONAL GRID; and

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY d/b/a UNITIL

D.P.U. 24-195 through D.P.U. 24-197

DIRECT TESTIMONY OF

Caroline Palmer and Thanh Nguyen

On behalf of

THE OFFICE OF THE ATTORNEY GENERAL

April 4, 2025

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I. INTRODUCTION

Q. Please state your name, title, and employer.

A. **Palmer:** My name is Caroline Palmer. I am a Principal Associate at Synapse Energy Economics, Inc. ("Synapse"), located at 485 Massachusetts Avenue, Suite 3, Cambridge, MA 02139.

Nguyen: My name is Thanh Nguyen. I am a Senior Associate at Synapse, located at 485 Massachusetts Avenue, Suite 3, Cambridge, MA 02139.

Q. Please describe Synapse Energy Economics, Inc.

A. Synapse is a research and consulting firm specializing in electricity and gas industry regulation, planning, and analysis. Our work covers a range of issues, including economic and technical assessments of demand-side and supply-side energy resources; energy efficiency policies and programs; integrated resource planning; electricity market modeling and assessment; renewable resource technologies and policies; and climate change strategies. Synapse works for a wide range of clients, including state attorneys general, offices of consumer advocates, public utility commissions, environmental advocates, the U.S. Environmental Protection Agency, U.S. Department of Energy, U.S. Department of Justice, the Federal Trade Commission, and the National Association of Regulatory Utility Commissioners. Synapse has over 40 professional staff with extensive experience in the electricity industry.

Q. Please summarize your professional and educational experience.

A. **Palmer:** I am a Principal Associate at Synapse, where I provide expert witness and consulting services on behalf of public interest clients in regulatory proceedings. Typically, I address matters concerning marginal and embedded cost-of-service studies, revenue allocation, advanced rate design, low-income rate design, load management, decoupling, distributed energy resource ("DER") interconnection and compensation, electric vehicle ("EV") infrastructure investments, and pilot frameworks. Prior to joining Synapse I worked at Strategen Consulting for five years performing similar work. I have submitted expert testimony in fourteen dockets across nine jurisdictions.

I was awarded a Fulbright Research Fellowship to Greece in 2019 and supported clean energy policy consulting at Meister Consultants Group (now Cadmus) before that. I hold a Master of Public Policy from the Goldman School at UC Berkeley and a Bachelor of Science from Georgetown University. I have 10 years of professional experience. My resume is attached as Exh. AG-CPTN-2.

Nguyen: I am a Senior Associate at Synapse, where I provide research, analysis, and consulting on a variety of energy and utility regulatory issues, including beneficial electrification, DER, rate design and cost allocation, and energy equity and affordability. Prior to joining Synapse, I was a Senior Analyst at Strategen Consulting, where I also performed similar consulting work for government and nonprofit clients in utility regulatory proceedings. I graduated summa cum laude from Franklin & Marshall

College in 2020 with a Bachelor of Arts in Environmental Studies and Economics. My resume is attached as Exh. AG-CPTN-3.

Q. On whose behalf are you testifying in this case?

A. We are testifying on behalf of the Massachusetts Office of the Attorney General ("AGO").

Q. Have you previously testified before the Massachusetts Department of Public Utilities?

A. **Palmer:** Yes. I testified in D.P.U. 21-90 through D.P.U. 21-92 (electric distribution companies' EV program dockets) as well as D.P.U. 23-150 (National Grid's electric rate case).

I have also assisted the AGO in D.P.U. 19-55 (Inquiry into Distributed Generation Interconnection); D.P.U. 20-75 (Investigation into DER Planning and Assignment and Recovery of Costs for the Interconnection of Distributed Generation), and 23-84/-85 (Eversource and National Grid petitions for approval to offer Optional EV Time-of-Use Rates).

Nguyen: No. However, I assisted the AGO in D.P.U. 20-145 (Solar Massachusetts Renewable Tariffs or "SMART"), D.P.U. 21-90 through D.P.U. 21-92 and D.P.U. 23-150.

Q. Have you testified before other state or provincial regulatory bodies?

A. **Palmer**: Yes. I have sponsored testimony before the Connecticut Public Utilities Regulatory Authority, New Hampshire Public Utilities Commission, Missouri Public Service Commission, New York Public Service Commission, Maine Public Utilities

Commission, Oklahoma Corporation Commission, North Carolina Utilities Commission, and Nova Scotia Utility and Review Board. I have also assisted with testimonies and regulatory analyses in numerous other jurisdictions.

Nguyen: No. However, I have supported the development of testimony before several other commissions, including the Colorado Public Utilities Commission, New Mexico Public Regulation Commission, North Carolina Public Utilities Commission, Regulatory Commission of Alaska, Connecticut Public Utilities Regulatory Authority, Illinois Commerce Commission, and Maine Public Utilities Commission.

Q. What is the purpose of your testimony?

A. We address the EV Infrastructure Program mid-term modification filings from the electric distribution companies ("EDCs"): NSTAR Electric Company, doing business as Eversource Energy ("Eversource"); Massachusetts Electric Company and Nantucket Electric Company, doing business as National Grid ("National Grid"); and Fitchburg Gas & Electric Light Company, doing business as Unitil ("Unitil").

II. ALL EDCs: THIRD-PARTY FUNDING IMPLEMENTATION

Q. Please summarize the EDCs' proposal related to third-party funding implementation.

A. The EDCs propose to modify the third-party funding rules such that: (1) any third-party funds that customers receive for Electric Vehicle Supply Equipment ("EVSE") will not be deducted from utility incentives for make-ready infrastructure or networking; (2) third-party funds for make-ready infrastructure will not be deducted from utility incentives for

EVSE or networking; and (3) third-party funds for networking will not be deducted from utility incentives for EVSE or make-ready infrastructure.[1] Customers will still be required to seek funding from state and federal funding sources, and the total funding amount (including utility and third-party funds) cannot exceed 100 percent of the total actual and eligible customer costs for: (i) make-ready infrastructure, (ii) EVSE, and (iii) networking.[2]

Q. How many projects have been cancelled due to the third-party funding requirement?

A. According to the EDCs, the current third-party funding rule has resulted in the cancellation of numerous Level 2 ("L2")[3] charging projects:

- National Grid reports that 73 L2 projects (including 53 workplace, 18 public, and two Multi-Unit Development ["MUD"]) were cancelled due to the requirement;[4]
- Eversource reports that four L2 projects (including three public and one MUD) were cancelled due to the requirement;[5] and

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1 *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 18; *Eversource,* D.P.U. 24-196, Exh. ES-EV-MTM-1, at 16; *Unitil,* D.P.U. 24-197, Exh. FGE-CCTP-1 at 10.

2 *Id.*

3 As the Department describes:

> EVSE equipment is generally divided into three types: Level I, Level II, and direct current fast chargers. Level 2 chargers rely on a 240-volt connection and are capable of fully charging most existing EVs in approximately eight hours or less depending on battery capacity. DCFC chargers use direct current and are the fastest method for charging an EV. Level 1 chargers plug directly into a standard 120-volt AC outlet and are the slowest method for charging an EV.

Electric Vehicle Program Dockets, D.P.U. 21-90 through D.P.U. 21-92, at 11 (citations omitted).

4 *National Grid,* D.P.U. 24-196, Exh. AG-1-3.

5 *Eversource,* D.P.U. 24-195, Exh. AG-1-3.

- Unitil has only received one application so far, but another customer stated they will not submit an application unless third-party funding can be stacked with utility rebates.[6]

No direct-current fast charging ("DCFC") projects have been canceled due to the third-party funding requirement.[7]

Q. Do you recommend that the Department approve the EDCs' proposed modification to the third-party funding requirement?

A. Yes. Since L2 deployment has been significantly lower than expected—as discussed in Section III—and the proposed modification to the third-party funding requirement only impacts L2 projects, the EDCs' proposal is a reasonable adjustment to try to increase L2 deployment.

III. NATIONAL GRID AND EVERSOURCE: REDUCED DCFC EVSE INCENTIVES

Q. Describe National Grid and Eversource's proposal to reduce DCFC EVSE incentives.

A. National Grid and Eversource currently offer the DCFC EVSE incentives listed in Table 1, below.[8] Each site[9] may contain multiple ports, and is subject to a total EVSE cost cap of

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[6] *Unitil,* D.P.U. 24-197, Exh. AG-1-2.

[7] *National Grid,* D.P.U. 24-196, Exh. AG-1-3; *Eversource,* D.P.U. 24-195, Exh. AG-1-3; *Unitil,* D.P.U. 24-197, Exh. AG-1-2.

[8] *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 28.

[9] A "site" is "property owned or controlled by the Site Host located within the Company's electric service territory." *Electric Vehicle Charger Site Host Agreement*, D.P.U. 20-90, Exh. ES-KB-10, at 1.

$400,000.[10]

Table 1: Current DCFC EVSE Rebate Levels for Publicly Accessible Projects

	Public DCFC ports between 50 kW and 149 kW	**Public DCFC ports 150 kW and above**
Environmental Justice Communities ("EJCs") (any criteria)	100% of cost cap Up to $40,000/port	100% of cost cap Up to $80,000
Non-EJCs	100% of cost cap Up to $40,000/port	50% of cost cap Up to $40,000/port

The EDCs propose to lower DCFC EVSE rebate levels for all segments, per Table 2, below. Make-ready incentives will remain at the current levels.[11] The EDCs, however, did not indicate whether they intend to adjust the per site cost cap to reflect the new incentive levels.

Table 2: EDCs' Proposed DCFC EVSE Rebate Levels for Publicly Accessible Projects

	Public DCFC ports between 50 kW and 149 kW	**Public DCFC ports 150 kW and above**
EJCs (any criteria)	50% of cost cap Up to $20,000/port	50% of cost cap Up to $40,000/port
Non-EJCs	No EVSE rebate offered	No EVSE rebate offered

Eversource and National Grid treat the new, lower thresholds slightly different. Eversource

[10] https://www.eversource.com/content/docs/default-source/about/ma-ev-commercial-rebates-table.pdf?sfvrsn=a0262c0d_6; https://www.nationalgridus.com/media/pdfs/bus-ways-to-save/ev/ev-infrastructure-brochure-public_workplace_ada-ma.pdf.

[11] *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 34; *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 22–23.

indicates that these new thresholds are maximums,[12] while National Grid considers them to be minimums.[13]

Q. How do National Grid and Eversource justify lowering DCFC EVSE rebates?

A. The Companies explain that customer demand for DCFCs has been significantly higher than anticipated, both relative to demand for L2 chargers and relative to initial DCFC deployment estimates. National Grid and Eversource originally sized their programs based on a 30:1 projected ratio of L2 to DCFC ports, but the Companies' current pipeline of projects is closer to 1:2.[14]

Eversource has received applications for over 2,400 DCFC ports and has approved 633 DCFC ports, compared to the 152 DCFC ports Eversource initially forecasted installing based on the target set in D.P.U. 21-90.[15] At the same time, Eversource has received applications for 5,113 L2 ports and has approved 2,839 L2 ports, compared to the forecasted 6,114 L2 ports.[16] Meanwhile, National Grid has paid for or committed to fund

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[12] "The Company is proposing flexibility to adjust DCFC EVSE incentives down to zero percent from fifty percent, and down to fifty percent from the current maximum of 100 percent[.]" *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 39.

[13] "The Company is proposing flexibility to be able to adjust DCFC EVSE incentives from zero percent up to the current maximum of 50-100 percent[.]" *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 34; *see* Exh. AG-2-2.

[14] *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1 at 29; *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 15.

[15] *Eversource*, D.P.U. 21-90, Order (Dec. 30, 2022).

[16] *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1 at 36.

1,210 DCFC ports as of December 2, 2024, compared to the target of 212 ports set in D.P.U. 21-91.[17] At the same time, National Grid has paid for or committed to fund 670 L2 ports as of December 2, 2024, compared to the forecasted 7,174 ports.[18]

Q. Have both Companies exceeded their EV Program DCFC projections?

A. Yes. Both Companies have greatly exceeded their DCFC projections. Eversource has already approved 4.2 times the initial target number of public DCFC ports,[19] while National Grid has already approved 5.7 times its initially approved number of public DCFC ports.[20]

Q. Is it appropriate to reduce incentives for public DCFCs given deployment to date?

A. Yes. Deployment has significantly exceeded the Companies' DCFC targets, and accordingly, as recognized by Eversource and National Grid, DCFC projects do not need the high level of support approved in D.P.U. 21-90 through D.P.U. 21-92. Further, both utilities have deployed significant portions of Public and Workplace ("P&W") projects in EJCs, and the proposed incentive levels still maintain differentiation between EJC and non-EJC projects.[21] Thus, reducing funding would be reasonable for both segments.

Q. Do you recommend more significant DCFC rebate reductions than the EDCs proposed?

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17 *National Grid*, D.P.U. 21-91, Order (Dec. 30, 2022).

18 *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-5 (P&W) (Rev. 1).

19 633 approved / 152 forecasted = 4.2

20 1,210 approved / 212 forecasted = 5.7

21 *National Grid,* D.P.U. 24-196, Exh. AG 1-1, Att. AG-1-1; *Eversource,* D.P.U. 24-195, Exh. AG-1-1, Att. AG 1-1.

A. Yes. Eversource and National Grid have demonstrated that the current DCFC incentive amounts provide more support for DCFC projects than is necessary for achieving their port targets. Thus, both Companies suggest a potential solution aimed at moderating that support.[22] However, given that the Companies have already vastly exceeded their intended DCFC targets for their current EV Programs, we recommend further downward DCFC EVSE rebate reductions to 25 percent of cost cap for EJCs. Moreover, the Companies lag far behind their L2 targets, which they and the Department identified when sizing their programs. Further reducing DCFC incentives helps "create a more level playing field across L2 and DCFC projects[,]"[23] as the Companies intend to do with their proposed reductions and is more likely to steer any remaining segment funds toward L2 investments through the end of the current program terms.

We also recommend that any reduction in per-port DCFC EVSE incentives accompany a proportional reduction in per-site EVSE cost cap. For EJC DCFC EVSE rebates, at our recommended 25 percent of cost cap, the proportional per-site EVSE cost cap would be $100,000. Further, we recommend treating these rebate levels as maximums (consistent with Eversource's proposal), without the flexibility to adjust them upwards as National Grid has proposed, because there is no need for higher incentives when the intended port

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[22] *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 43; *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1 at 38.

[23] *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 35; *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 40.

targets have been reached.

Q. Do the EDCs have any budget remaining to pay out these adjusted incentives?

A. It appears that the Companies' original P&W budgets are either depleted or very nearly depleted. National Grid has already paid or committed its entire approved $94,685,344 P&W offering budget, as well as almost all of its planned 10 percent budget increase, which brings its total P&W budget to $103,721,542.[24] In D.P.U. 21-90 through D.P.U. 21-92, the Department allowed the EDCs flexibility to shift spending among and between EV Program segments by up to 15 percent of a segment approved budget or 15 percent of the total approved EV Program budget.[25]

Meanwhile, Eversource estimated in its December 19, 2024, filing that through November 2024, approximately 86 percent of the P&W segment had been subscribed.[26] However, Eversource's charging rebate website notes that the public DCFC segment was "Fully Subscribed" as of October 9, 2024, while the P&W L2 segments were "Fully Subscribed" as of November 18, 2024.[27]

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24 *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-5 (P&W) (Rev. 1).

25 D.P.U. 21-90 through D.P.U. 21-92, Order, at 129–130.

26 *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 36.

27 Eversource committed to "pause approving DCFC projects until a determination on the proposal for reduced incentives is made," but that commitment would not explain closing the L2 segment as well. *See Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 43. https://www.eversource.com/content/docs/default-source/about/ma-ev-commercial-rebates-table.pdf?sfvrsn=a0262c0d_6.

It is important to note that any newly reduced DCFC EVSE incentives would only be available to customers if: (1) National Grid or Eversource increases its approved segment budget by the allowed 15 percent without exceeding the allowed shift for other segments; (2) funding becomes available for P&W projects through project cancellations and/or reconciling paid funds against committed funds;[28] or (3) the Department approves National Grid's proposed budget increase and/or greater than 15 percent segment budget shift. We discuss National Grid's proposed budget increase and budget shift in Section IV.B.

IV. NATIONAL GRID: SPECIFIC PROPOSALS

A. Off-Peak Charging Rebate Program

Q. Describe National Grid's proposed Off-Peak Charging Rebate Program changes.

A. National Grid proposes to remove the existing enrollment caps to allow unlimited participation in its Off-Peak Charging Rebate Program through the end of its EV Program in 2026.[29] The current enrollment limits are 11,000 for residential customers, and 1,000 for fleet vehicles.[30] National Grid justifies the expansion by stating that: (1) it wants to "ensure that Off-Peak Charging Rebate Program can continue to grow throughout the EV Program period;"[31] (2) its forecast indicates a strong likelihood of exceeding the current

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28 *See National Grid,* D.P.U. 24-196, Exh. AG-2-1.

29 *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 23.

30 *Id.*

31 *Id.*

program limit of 11,000 residential customers prior to the end of 2026; and (3) it can accommodate increased fleet participation within the existing budget.[32]

National Grid also proposes to extend the off-peak rebate time period to include weekends and holidays, thereby providing an incentive for off-peak charging between 9:00 p.m. to 1:00 p.m. every day.[33] National Grid asserts that the change will reduce customer confusion and encourage charging behavior that benefits the electric grid.[34] As a result of the off-peak rebate period extension, National Grid projects that participating customers will receive an annual rebate of $132 per customer, compared with the current annual rebate of $94 per customer, due to the addition of hours that are eligible for the rebate.[35]

Q. Does National Grid need a budget shift above 15 percent to implement its proposals?

A. Yes. National Grid seeks to increase its Off-Peak Charging Rebate Program budget by $5 million to meet the increased participation and associated costs, and to deliver an additional year of the program through 2026.[36] According to National Grid, extending the off-peak rebate time period to include weekends and holidays requires no budget increase above the previously estimated budget, as weekend off peak charging was already included in the

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32 *Id.* at 24. National Grid states that it has over 6,000 participating EVs in the residential program, and that it will be launching the fleet program shortly. *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 23.

33 *Id.* at 23, 25.

34 *Id.* at 25.

35 *National Grid,* D.P.U. 24-196, Exh. AG-2-5-h.

36 *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 26.

program estimate. Similarly, increased fleet participation does not require a budget increase.[37]

To effectuate this $5 million budget increase, National Grid plans to implement allowed budget shifting of $575,000 from the Residential segment, which represents 15 percent of the Off-Peak Charging Rebate Program budget and less than 1 percent of the Residential segment budget.[38] The remaining $4.4 million of the budget increase, National Grid proposes, will be achieved by shifting an additional 115 percent (above the allowed 15 percent) to the Off-Peak Charging Rebate segment from the Residential segment surplus.[39]

Q. Why is managed charging important?

A. EV charging load, especially home charging, is highly flexible and can be managed such that charging occurs outside of peak periods, thereby minimizing the contribution to peak demand. This load shifting can help avoid high energy prices, reduce capacity costs, and mitigate distribution investments, helping to ensure that the addition of EV charging load

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[37] The existing budget estimates did not exclude any EV charging taking place on weekends or holidays and the resulting rebate value aligns with the annual rebate value that has been estimated since the inception of the offering. *See National Grid*, D.P.U. 24-196, Exhs. AG-2-5-c, AG-2-5-h, AG-2-5-d.

[38] *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 47.

[39] *Id.* at 50. The initial Off-Peak Charging Rebate program budget was $3.8 million ($2.25 million for the Residential program and $1.58 million for the Fleet program, *id.* at 27, 42), so under National Grid's proposal, the new budget would be $8.8 million. *Id.* at 50. The Company explains that the Residential segment has a forecasted surplus of $7.1 million for 1-4 unit dwellings segment due to EV Program participation rates being lower than forecasted, and a surplus of $19.2 million for the multi-unit dwelling segment due to implementation challenges and lower participation than expected. *Id.* at 55.

to the grid puts downward pressure on rates by spreading fixed costs across higher volumes of sales. Rates and programs that incentivize managed charging also allow EV owners to reduce fueling costs by shifting their charging load to lower-cost off-peak periods and avoiding higher-cost on-peak charging.

On the other hand, unmanaged charging means that EV load may occur mainly during peak hours, potentially raising supply, transmission, and distribution costs and driving rate increases, which also pose a barrier to EV adoption by increasing EV fueling costs.

Q. Do you object to the proposed Off-Peak Charging Rebate Program changes?

A. We generally do not object to the proposed changes. Given that National Grid does not currently offer time-varying rates or other managed charging programs,[40] it is reasonable to extend the program through 2026. However, we do recommend reducing the proposed budget shift to align with National Grid's 2026 participation estimates, as discussed below.

We do not object to extending the off-peak period as it might reduce customer confusion and increase charging during off-peak times as National Grid claims.[41] While a shorter peak period is generally preferable for a time-of-use ("TOU") rate, the longer on-peak period is appropriate for this managed charging program since the program should also

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[40] The Department is currently considering proposed EV TOU rates in D.P.U. 23-84 and 23-85, but the proposed rates may not appeal to customers if they must procure a second meter to participate.

[41] Although weekends and holidays are technically entirely off-peak, National Grid explained why it would be challenging and costly to reflect this cost causation at this time. *See National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 25 & n.10.

incentivize participants to charge outside of hours that would be considered a "shoulder" or "mid-peak" period under a three-period TOU rate. Additionally, because managed charging participants are not charged higher rates for charging their EVs during on-peak periods, they should not receive the off-peak credit for charging during the shoulder period hours captured in the program's peak period.

Q. Could National Grid continue its proposed Off-Peak Charging Rebate Program without the proposed budget increase?

A. Not without participation limits. National Grid estimates that it cannot implement its proposed changes without a budget shift significantly over the permitted 15 percent. In fact, even without eliminating the 11,000-participant cap, National Grid would require a total budget of $4,474,000 (or an additional $2,222,000) to continue the program at forecasted participation rates through 2025 and 2026.[42] This estimated increase is almost equal to the approved residential off-peak rebate budget of $2.25 million and cannot be met with the $575,000 allowed budget shift. There are currently approximately 6,000 participants in the program, and National Grid estimates that it can enroll a total of 16,500 customers by the end of 2026, assuming the current participation rate.[43] However, National Grid's requested incremental budget of $5 million is designed to support 21,000 participants.[44]

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42 *National Grid,* D.P.U. 24-196, Exh. AG-1-6.

43 *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 23-24.

44 *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-8.

Q. Do you support National Grid's proposed incremental budget of $5 million for 21,000 Off-Peak Charging Rebate Program participants?

A. No; we do not support the proposed budget increase, which is designed for 21,000 participants. However, we do not object to: (1) increasing the participation limit to 16,500, which reflects National Grid's estimated 2026 participation level; and (2) shifting the Off-Peak Charger Rebate program budget above 15 percent to enable the 16,500 participation limit. Without adjusting administrative costs, the cost to expand the participant limit to 16,500 participants is $4.2 million, compared to National Grid's requested $5 million to accommodate 21,000 participants.[45] The incremental budget required to accommodate 16,500 participants by the end of 2026 should be lower than this level.[46]

Q. Do you recommend requiring a benefit-cost analysis ("BCA") of the program?

A. Yes. While in theory managed charging can provide benefits to ratepayers and the grid, National Grid's managed charging program also comes with costs, both for program administration (including vendor costs) and program incentives, compared to other options (e.g., TOU rates) to encourage managed charging. Assessing whether the program results in a *net* benefit to ratepayers requires comparing program benefits and costs. It is currently unclear whether the program benefits outweigh the costs. To date, the evaluations consider

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[45] *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-8. Changing Cell E12 to 16,500 results in a value of $4,215,000 in Cell F30. However, this workbook includes fixed administrative costs instead of scaling administrative costs depending on the participation level.

[46] *See National Grid,* D.P.U. 24-196, Exh. AG 1-6, which estimates lower administrative costs to continue the program at the current 11,000 cap compared to a 21,000 cap.

charging patterns, such as percentage of on-peak versus off-peak charging,[47] but the evaluations do not demonstrate that the program provides quantified benefits—such as avoided energy costs, generation capacity, and transmission and distribution capacity—that outweigh program costs. Analyzing the benefits of the program in terms of avoided energy costs and capacity costs would allow for a direct comparison to program implementation costs (both incentives and administration costs).

We recommend that the Department require National Grid to conduct a full BCA of the program after Phase III and before requesting an extension of the Off-Peak Charging Rebate beyond 2026. The BCA should enable a comprehensive evaluation of whether the program provides net benefits to ratepayers or whether it can be expected to provide net benefits to ratepayers in the long term. When conducting such BCA, National Grid should model different participation levels to assess long-term cost-effectiveness.

Q. Do utilities in other jurisdictions file similar BCAs?

A. Yes. Utilities in Maryland file full BCAs when seeking approval for their EV programs, including managed charging programs. For example, Potomac Electric Power Company and Delmarva Power & Light's recent Phase II EV Portfolio filing includes BCA results

[47] *National Grid,* D.P.U. 22-63, Exh. NG-MM-10, at 20; *National Grid,* D.P.U. 24-64, Exh. NG-MMJG-1, at 110.

for the utilities' proposed Smart Charge Management and EV TOU programs.[48] The BCA found that the proposed managed charging programs are not cost-effective at expected enrollment levels (meaning they result in net costs to ratepayers), but will become cost-effective at higher numbers of participants.[49] The same kind of analysis of National Grid's managed charging program would allow the Department to determine if the program is cost-effective or can be expected to become cost-effective in the future.

Q. Have the EDCs performed BCAs for other types of programs in Massachusetts?

A. Yes. The EDCs already perform BCAs for their energy efficiency programs.[50] National Grid and Eversource's previous EV load management programs were under the energy efficiency portfolios and were included in the utilities' 2022–2024 Energy Efficiency Plan BCAs.[51] The same methodology can be applied to National Grid's existing managed charging program.

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48 *Application of Potomac Electric Power Company and Delmarva Power and Light for Approval of the Phase II Electric Vehicle Portfolio*, Maryland Public Service Commission Case No. 9478, App. A, at 3 (filed Dec. 18, 2024). https://webpscxb.psc.state.md.us/DMS/case/9478.

49 Maryland Public Service Commission Case No. 9478, App. A, at 4–5.

50 Massachusetts Energy Efficiency Advisory Council, *Plans and Updates.* https://ma-eeac.org/plans-updates/ . National Grid, 2025-2027 Energy Efficiency Plan BC Model, https://ma-eeac.org/wp-content/uploads/2025-27_NG_Filing_Model_Electric_04.24-Excel.xlsx; Eversource, 2025-2027 Energy Efficiency Plan BC Model, https://ma-eeac.org/wp-content/uploads/2025-27-Plan-BC-Model-NSTAR-Electric-Final-for-Filing-Excel.xlsx; Unitil, 2025-2027 Energy Efficiency Plan BC Model, https://ma-eeac.org/wp-content/uploads/2025-27-Plan-BC-Model-Electric_Unitil_03.29-Final-Excel.xlsx.

51 Massachusetts Energy Efficiency Advisory Council, *Plans and Updates.* National Grid, 2022-2024 Energy Efficiency Plan BC Model (BCR Measure ID "EA2e005" and "EA2e006"),

B. Budget Shifting and Incremental P&W Segment Budget Proposals

Q. Describe National Grid's incremental P&W budget increase and budget shifting proposals.

A. National Grid proposes to increase the P&W segment budget by an additional $32 million beyond the total approved $206 million EV Program budget.[52] National Grid also proposes to shift funds within the existing approved budget but beyond 15 percent of the segment totals for two segments,[53] as follows:

- **Off-Peak Charging Rebate**: The National Grid forecasts requiring an additional $5 million[54] to operate the Off-Peak Charging Rebate with unconstrained participation through 2026, forecasting that participation could reach 13,000 customers by the end of 2025 and 21,000 customers by the end of 2026.[55] National Grid can shift $575,000 within the 15 percent budget increase, leaving $4.4 million needed, which it proposes to shift from the surplus Residential segment budget. If approved, the Off-Peak Charging Rebate would exceed the 15 percent maximum by 115 percent. The Residential segment would exceed the 15 percent maximum shift by 26 percent, including other proposed shifts.

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https://ma-eeac.org/wp-content/uploads/Exh-5-2022-2024-Plan-BC-Model-NG-Electric-4-1-22.xlsx; Eversource, 2022–2024 Energy Efficiency Plan BC Model (BCR Measure ID "EA2e005" and "EA2e006"), https://ma-eeac.org/wp-content/uploads/D.P.U.-21-125-Exhibit-NSTAR-Gas-5-Revised-4-1-22-BC-Model.xlsx.

[52] *National Grid,* D.P.U. 24-196, Exh. AG 3-2.

[53] National Grid originally also requested an additional $2.2 million for its IT and back-office systems budget to support investment in a technology system it calls Clean Energy 2.0. However, National Grid has since withdrawn its proposal to increase the IT budget by $2.2M, calling it unnecessary. *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 42; *National Grid,* D.P.U. 24-196, Exh. AG 3-2.

[54] Approximately $3.5 million for additional residential customer rebates and incentives and approximately $1.4 million for residential program administration.

[55] *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 42.

- **P&W segment**: As described in Section III, the unanticipated high customer interest in DCFCs has led to National Grid to essentially fully commit its P&W segment budget as of December 2024, well before the end of the program. National Grid forecasts a shortfall of approximately $55 million on the $150 million that it forecasts "is needed to continue the [P&W segment] through the end of the EV Program term."[56] National Grid can shift $9 million (10 percent of the P&W segment) before exceeding the 15 percent budget limit for other segments. National Grid proposes shifting $12.3 million from the surplus Residential segment budget. If approved, the P&W segment would exceed the 15 percent maximum by 7.5 percent. The Residential segment would exceed the 15 percent maximum shift by 26 percent, when you consider the other proposed shifts previously discussed.

Q. Do you support the $32 million incremental P&W budget proposal?

A. No. National Grid expects that the requested incremental budget will enable it to support additional L2 and DCFC ports.[57] For the same reasons discussed below in opposition to extra P&W segment budget shifting, we also do not support any budget increase beyond the total approved EV Program budget.

Q. Do you support National Grid's requested budget shift to support the Off-Peak Charging Rebate Program?

A. In part. Given that there are no other managed charging options available and participation in the Off-Peak Charging Rebate Program is a requirement of receiving ratepayer-funded incentives to install home chargers, it seems reasonable to shift the needed budget to allow the program to continue through 2026 and to expand the participation limit from 11,000 to

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56 *Id.* at 44-45.

57 *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 58.

16,500 participants (National Grid estimates 16,500 participants based on the current rate of enrollment).[58] Any budget shifts should only be to accommodate 16,500 participants.

Q. Do you support the P&W segment budget shift?

A. No. We do not support any budget shift to the P&W segment beyond the 15 percent allowed shift for each segment. Although National Grid warns that if the increased P&W segment budget is not approved, it could not support up to 180 L2 and 200 DCFC currently forecasted ports,[59] National Grid has already significantly exceeded its original public DCFC port projections and fallen far short on its L2 target.[60] Yet National Grid has not proposed any changes aimed specifically at ensuring progress towards this L2 target (for example, by limiting additional funding to supporting L2 chargers).

We also note that National Grid seemingly did not take the same steps Eversource took when it became apparent that the number of DCFC projects would rapidly deplete the segment budget at current incentive levels. Eversource, for its part, paused DCFC incentive approvals and intends to apply the reduced incentives to any project contracted after November 30, 2024.[61] Moreover, despite Eversource experiencing a similarly unexpected and rapid drawdown of its P&W segment budget due to high uptake for DCFC

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58 *Id.* at 24.

59 *National Grid,* D.P.U. 24-196, Exh. NG-EV-MTM-1, at 52.

60 *See* Section III of this testimony.

61 *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 42–43.

projects, Eversource does not propose to shift extra budget to P&W from other segments. Conversely, National Grid states that it "will begin applying the reduced rebates to any project that receives a Commitment Letter after the date of the Department's order."[62]

V. EVERSOURCE: SPECIFIC PROPOSALS

A. Bidirectional Charger Incentive Pilot

Q. Please summarize Eversource's Bidirectional Charger Incentive Pilot proposal.

A. Eversource proposes to launch a new program to provide incentives to cover the incremental costs of bidirectional chargers for Medium-Duty and Heavy-Duty ("MDHD") fleet customers, primarily at school bus sites, with a budget of $500,000 to support 25 bidirectional chargers.[63] According to Eversource, vehicle-to-grid ("V2G") technology can enable the batteries in school buses and other EVs to help balance the intermittency of renewable energy resources, provide peak demand shaving capabilities, and reduce energy costs associated with owning and operating EV fleets.[64]

Q. Does the proposed pilot include any requirements for customers to provide grid services using V2G technology?

A. No. The pilot does not include a requirement for participants to enroll in

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62 *National Grid,* D.P.U. 24-196, Exh. AG-2-1-b.

63 *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 31–32.

64 *Id.* at 29.

ConnectedSolutions[65] or any other grid services program. grid. However, Eversource has not designed an alternative program to support the V2G use case.[66]

Q. Does Eversource propose to test or track metrics related to V2G capabilities under the pilot?

A. No. Eversource does not provide any indication that it will test V2G capabilities or track any metrics related to how V2G affects fleets (such as fleet operations or potential revenues from V2G exports) or the grid (such as any infrastructure upgrades to accommodate bidirectional power flow or system benefits resulting from V2G exports). Even though Eversource claims that it will use information from this pilot to inform the structure of a future grid services program,[67] the only metric Eversource proposes to track are the number of rebates issued and the incremental cost of installing bidirectional charging equipment.[68]

Q. Do other V2G pilots include the use of V2G capability for grid services?

A. Yes. Eversource lists examples of V2G pilots, all of which include the utilization of V2G capabilities for grid services:

- Pacific Gas & Electric's V2X Pilot requires participants to enroll in the Emergency Load Reduction Program, which provides performance incentives for participation in

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65 Eversource explains that ConnectedSolutions is designed to reduce behind-the-meter load, not for exporting energy to the grid, and that "a different programmatic construct is necessary in order to ensure that dispatch events generate system benefits and do not cause reliability issues on the local grid." *Eversource,* D.P.U. 24-195, Exh. AG-1-6-c.

66 *Eversource,* D.P.U. 24-195, Exh. AG-1-6-e.

67 *Eversource,* D.P.U. 24-195, Exh. AG-1-6-c.

68 *Eversource,* D.P.U. 24-195, Exh. AG-1-6-f.

demand response events;[69]

- The school bus V2G project in Beverly, Massachusetts is participating in National Grid's ConnectedSolutions program;[70]
- The Massachusetts Clean Energy Center's V2X Pilot, which will deploy 100 bidirectional chargers at different types of customer sites across the state, will leverage bidirectional charging technology for backup power, self-consumption, as well as participation in ConnectedSolutions grid events;[71] and
- NV Energy's School Bus V2G Pilot, which provides a credit for energy discharged from the batteries back to the grid.[72]

Q. Is it concerning that Eversource's pilot does not test V2G capabilities?

A. Yes. V2G technology can only provide grid benefits (such as peak demand reduction) and help fleets reduce costs if it is leveraged to export energy to the grid under a program that compensates fleets for the exported energy or for allowing the utility to dispatch the batteries. Since Eversource's pilot only involves providing additional funds to cover the incremental costs of bidirectional chargers and no other activity, the deployed bidirectional chargers' V2G capabilities will not provide any benefits to the grid or for participating fleets. Additionally, the pilot will not produce useful data or lessons that can inform the

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[69] Pacific Gas & Electric, Vehicle-to-Everything (V2X) pilot program. https://www.pge.com/en/clean-energy/electric-vehicles/getting-started-with-electric-vehicles/vehicle-to-everything-v2x-pilot-programs.html.

Pacific Gas & Electric, Emergency Load Reduction Program. https://elrp.olivineinc.com/.

[70] *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 30.

[71] Martucci, Brian. *Massachusetts to deploy 100 bidirectional EV chargers in first-of-its-kind 'V2X' pilot*. UTILITY DIVE (Mar. 4, 2025). https://www.utilitydive.com/news/massachusetts-bidirectional-ev-chargers-v2g-v2x/741525/.

[72] NV Energy, Schedule No.ESB-V2G, Electric School Bus Vehicle-to-Grid Trial. https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/about-nvenergy/rates-regulatory/electric-schedules-north/ESB-V2G_Electric_North.pdf.

design of a V2G grid services program in the future. For these reasons, we do not view Eversource's proposal as a responsible use of ratepayer funds.

Q. Do you recommend that the Department reject Eversource's proposed Bidirectional Charger Incentive Pilot?

A. Yes. Nevertheless, a well-designed V2G program and compensation mechanism does have the potential to deliver the benefits that Eversource discussed. The Department should require that Eversource develop a compensation mechanism for V2G grid services, either by incorporating V2G into its existing programs (e.g., ConnectedSolutions) or creating a new program specifically for V2G. Any incentives for V2G equipment should be conditional upon participation in a grid services program.

B. Residential Managed Charging Program

Q. Please summarize Eversource's proposed Residential Managed Charging Program.

A. Eversource's proposed Residential Managed Charging Program includes both a passive managed charging component and an active managed charging component. The passive managed charging program, Off-Peak Rewards, provides participants with an enrollment incentive of $50 and a participation incentive of $10 per month if 90 percent of their charging that month occurs outside the on-peak window (1 pm-9 pm every day).[73] Eversource states that it determined the 90 percent threshold based on its experience with Eversource's residential managed charging program in Connecticut, where most customers

[73] *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 33.

routinely meet the program's 80 percent off-peak charging threshold.[74] The incentive levels and on-peak and off-peak windows are aligned with National Grid's existing residential off-peak charging program.[75]

The active managed charging component, called Scheduled Charging, will be offered as a complementary service to customers who consistently miss the off-peak charging target under the passive managed charging program.[76] Under Scheduled Charging, Eversource will control participants' charging, subject to each participant's required state of charge (whether a participant requires a complete charge, or, for example, is amenable to a partial charge) and the time at which they would like to have their EV at that state of charge. Participants are eligible for the same $10 per month participation incentive if they do not override their charging schedule and charge during on-peak hours more than twice a month.[77]

The costs to implement the proposed program are estimated at approximately $3 million for the period from early 2025 through 2026 (funded by shifting funds from the Residential segment), targeting 9,000 enrolled customers by the end of 2026.[78] Eversource states that it will encourage residential customers receiving wiring rebates to accommodate a 240-volt

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74 *Id.*

75 *Eversource,* D.P.U. 24-195, Exhs. AG-1-7-b; AG-2-1.

76 *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 33.

77 *Eversource,* D.P.U. 24-195, Exh. AG-1-7-b.

78 *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 34.

L2 charger to participate in the managed charging program if they own an EV or EVSE that allows Eversource to view their charging data.[79]

Q. Do you have concerns with the design of Eversource's proposed Residential Managed Charging Program?

A. No. As discussed in Section IV.A., managed charging is crucial to ensure that EV charging does not exacerbate peak demand and cause rate increases for ratepayers. It is beneficial for Eversource to offer a managed charging program to residential customers, given that TOU rates are not yet available. In this case, it is reasonable for Eversource to align the incentive levels as well as on-peak and off-peak periods with National Grid's managed charging program to ensure consistency across the Commonwealth. As discussed in Section IV.A., regarding National Grid's proposed modifications to its residential managed charging program, we do not object to Eversource's long on-peak period for this managed charging program, though a shorter peak period is generally preferable for a TOU rate.

Q. Do you have concerns with any aspect of Eversource's proposed Residential Managed Charging Program?

A. Yes. Customers receiving wiring and charger rebates are not required to participate in the managed charging program. Managed charging is crucial for ensuring that EV charging load is shifted to off-peak periods and does not contribute to peak demand, helping to put downward pressure on rates. Therefore, residential customers receiving ratepayer-funded incentives to install home chargers should be required to participate in managed charging.

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79 *Id.* at 33.

In addition, there is a lack of information on how Eversource will evaluate the success of the program and what metrics it will track.

Q. What are your recommendations?

A. We recommend that the Department approve Eversource's proposed Residential Managed Charging Program and require residential customers receiving wiring and charger rebates from Eversource to enroll in the managed charging program.[80] Consistent with National Grid's program, these customers should not be eligible for the $50 enrollment incentive, and customers should only be eligible for wiring and charger rebates if they have a charger or vehicle compatible with the managed charging program.[81] In addition, Eversource should encourage customers who previously received wiring and charger rebates to enroll in the new managed charging program. Lastly, the Department should require Eversource to collect and track the same data and metrics as National Grid's residential managed charging program and require Eversource to conduct a BCA for the program before extending it beyond 2026.

[80] This requirement should not apply to residential customers who already received wiring and charger rebates before the managed charging program is available.

[81] National Grid, EV Charging Upgrade Program. https://www.nationalgridus.com/electric-vehicle-hub/Programs/Massachusetts/EV-Charging-Upgrade-Program.

C. MDHD Fleet Pilot

Q. Summarize Eversource's proposed MDHD Fleet Pilot.

A. Eversource proposes a new MDHD Fleet Pilot to replace the fully subscribed MDHD EJC Fleet Pilot. Eversource states that the proposed MDHD Fleet Pilot will support EV charging infrastructure for private and publicly owned fleets, including those within and outside of EJCs.[82] Eversource's proposed incentive levels are modeled after National Grid's Fleet Program as shown in Table 3, below:[83]

Table 3. Eversource Proposed MDHD Fleet Pilot Incentive Levels

Customer Type	Utility-Side Make-Ready	Customer-Side Make-Ready	EVSE
Private	Up to 100%	Up to 100%	None
Public (non-EJC)			Up to 50%
Public (EJC)			Up to 100% (income criteria) Up to 75% (other criteria)

Further, Eversource proposes the same cost containment caps for customer-side make-ready and EVSE incentives as National Grid's Fleet Program.[84] The program is expected

82 *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 20–21.

83 *Id.* at 21.

84 *Id.* at 22.

to support approximately six additional fleets at a budget of $5 million, which requires additional funds beyond the approved EV Program budget.[85]

Q. Do you have concerns with the design of Eversource's proposed MDHD Fleet Pilot?

A. No. Eversource's program design is consistent with National Grid's Fleet Program that was approved by the Department. Mass transit vehicles (including school buses) provide clean transportation for a wide segment of the public, including those who do not own personal vehicles, and can significantly reduce carbon emissions as well as other local air pollutants by replacing diesel-fueled MDHD vehicles. The proposed MDHD Fleet Pilot ensures that the electrification of this critical segment receives continued support, contributing to meeting the Commonwealth's climate and EV adoption goals as well as improving air quality in EJCs.

Q. Do you have concerns with the MDHD Fleet Pilot's proposed funding source?

A. Yes. Eversource proposes a budget increase of $5 million beyond the approved EV Program budget for the MDHD Fleet Pilot.[86] However, Eversource has not demonstrated why an incremental budget is necessary, given that the Company is forecasting significant budget surplus for other programs. For example, the Residential segment is forecasted to have a $30.2 million surplus, of which Eversource is authorized to shift up to $7.9 million

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85 *Id.* at 26.

86 *Id*.

to other segments based on the 15 percent budget flexibility limit.[87] Accounting for the $3 million requested for the Residential Managed Charging Program, as discussed in Section V.B., $4.9 million remains that can be shifted to support the MDHD Fleet Pilot, which is approximately the same as Eversource's proposed $5 million budget.

Q. Should Eversource develop and offer a managed charging program for fleets?

A. Yes. Fleets are well-suited for rates and programs that incentivize managed charging, given that fleet vehicles tend to have more coordinated charging schedules compared to personal vehicles and potentially more advanced technical capabilities for managed charging. The larger battery capacity in MDHD EVs also means that their potential for load reductions is greater if managed appropriately, as is their potential to increase peak demand and grid costs if charging load is unmanaged. Additionally, managed charging offerings that enable fleets to reduce charging costs can help improve the total cost of ownership of EVs compared to gas or diesel vehicles, making it more financially feasible and attractive for fleets to electrify. For these reasons, Eversource should develop and offer a managed charging program for fleet vehicles.

Q. What do you recommend?

A. We recommend that the Department approve Eversource's proposed MDHD Fleet Pilot structure but reject the requested additional budget beyond the approved EV Program budget. Funding for the MDHD Fleet Pilot should be achieved under the allowed budget

87 *Eversource,* D.P.U. 24-195, Att. AG-2-5.

shifting flexibility. Additionally, the Department should require Eversource to propose a fleet managed charging program in its Phase III EV Program proposal.

VI. UNITIL: SPECIFIC PROPOSALS

A. EV TOU Rate Requirement

Q. Summarize Unitil's proposal related to the EV TOU rate requirement.

A. Unitil proposes to suspend the requirement that residential EV Program participants enroll in the EV TOU rate until Unitil can resolve the cost barrier associated with an additional meter socket.[88] According to Unitil, the $2,000 cost for an additional meter socket has been a barrier to participation, resulting in no residential participation in the EV Program or the EV TOU rate.[89]

Q. What do you recommend?

A. Given the lack of residential participation in Unitil's EV Program and EV TOU rate and the financial barrier posed by the requirement for a second meter, it is reasonable to suspend the requirement that residential EV Program participants enroll in the EV TOU rate.

B. Residential Managed Charging Program

Q. Please summarize Unitil's proposed residential managed charging program.

A. Unitil's proposed program is the same as Eversource's Off-Peak Rewards program, providing participants with an enrollment incentive of $50 and a participation incentive of

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88 *Unitil,* D.P.U. 24-197, Exh. FGE-CCTP-1, at 13.

89 *Id.* at 12–13.

$10 per month if 90 percent of their charging that month occurs outside the on-peak window (1 pm-9 pm every day).[90] The estimated total cost of the program for a three-year period is $101,000 for 100 participants, funded by the approved Residential EV Program budget.[91] Similar to Eversource, Unitil will encourage residential customers receiving wiring and charger rebates to participate in the managed charging program if they own an EV or EVSE that allows the utility to access their charging data.[92]

Q. Do you have concerns about Unitil's proposed program?

A. Yes. While managed charging is generally beneficial for the grid and for EV owners, the significant cost of Unitil's program does not justify its implementation at this time. For comparison, Eversource's $3 million budget for 9,000 customers over two years equates to a cost of $167 per customer per year,[93] while Unitil's $101,000 budget for 100 customers over three years equates to a cost of $337 per customer per year, approximately double the estimated cost of Eversource's program on a per customer per year basis.

The lower cost of Eversource's program is likely a result of the higher expected level of enrollment, which allows Eversource to spread fixed program start-up costs among a larger

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90 *Id.* at 14.

91 *Id.*

92 *Id.*

93 *Eversource,* D.P.U. 24-195, Exh. ES-EV-MTM-1, at 34.

number of participants. In contrast, the low expected enrollment for Unitil's program means that the costs per customer are significantly higher.

Q. What do you recommend?

A. We recommend that the Department reject Unitil's proposed residential managed charging program at this time. However, Unitil should continue to assess its ability to implement a managed charging program at lower cost to ratepayers and can propose such a program in the future.

C. Public Charging Program Customer Choice Pathway

Q. Please summarize Unitil's proposed Customer Choice pathway for the Public Charging Program.

A. Unitil proposes to add a Customer Choice pathway to its Public Charging Program to allow customers' contractors to conduct customer-side make-ready, similar to what the other EDCs currently offer in their EV Programs.[94] The Customer Choice pathway would provide the same incentive level as the existing turnkey pathway, under which Unitil and/or its contractors conduct both utility-side and customer-side make-ready work.[95] Additionally, Unitil proposes to allow customers to install one charger at a site instead of a minimum of two chargers, as currently required, provided the customer has a reasonable justification.[96] Unitil states that the existing requirement may disqualify smaller customers

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94 *Unitil,* D.P.U. 24-197, Exh. FGE-CCTP-1, at 17.

95 *Unitil,* D.P.U. 24-197, Exh. AG-1-4.

96 *Unitil,* D.P.U. 24-197, Exh. FGE-CCTP-1, at 17.

with budget limitations or other constraints that prevent them from being able to install two chargers.[97]

Q. What do you recommend?

A. We recommend that the Department approve Unitil's proposals related to its Public Charging Program. Given the lack of participation in Unitil's EV Program thus far, these proposals will likely encourage more charging infrastructure deployment in the Company's service territory.

VII. CONCLUSION

Q. Does this conclude your testimony?

A. Yes.

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97 *Id.* at 18.