

**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

SURREBUTTAL TESTIMONY OF

Caroline Palmer and Thanh Nguyen

On behalf of

THE OFFICE OF THE ATTORNEY GENERAL

May 27, 2025

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1 **I. INTRODUCTION**

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

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

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

8 **Q. Did you previously submit testimony in this proceeding?**

9 A. Yes, we submitted joint Direct Testimony on April 4, 2025. Our qualifications and
10 background are further described in our Direct Testimony.

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

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

13 **Q. What is the purpose of your testimony?**

14 A. Our surrebuttal testimony addresses the rebuttal testimonies submitted on April 25, 2025,
15 by the electric distribution companies (“EDCs”): NSTAR Electric Company, doing
16 business as Eversource Energy (“Eversource”); Massachusetts Electric Company and
17 Nantucket Electric Company, doing business as National Grid (“National Grid”); and
18 Fitchburg Gas & Electric Light Company, doing business as Unitil (“Unitil”). While we
19 respond to limited topics that we believe warrant further discussion, our silence on the
20 remaining topics does not indicate agreement.

1 **II. ALL EDCs: RESIDENTIAL MANAGED CHARGING PROGRAM BENEFIT-**
2 **COST ANALYSIS (“BCA”)**

3 **Q. How do the EDCs respond to your recommendation that the Companies conduct**
4 **BCAs for their residential managed charging programs before requesting program**
5 **extensions beyond 2026?**

6 A. The Companies argue that a BCA would not be useful because it would fail to capture or
7 would under-represent several benefits of the programs at this early stage of electric vehicle
8 (“EV”) adoption, namely the benefits associated with (1) lessons learned about managed
9 charging potential and (2) positively influencing customer mindset regarding managing EV
10 load.¹ Additionally, National Grid states that it will consider different program designs or
11 enhancements as part of a future managed charging program proposal, making a BCA for
12 its current program irrelevant.²

13 **Q. Would you like to clarify your recommendation related to BCAs?**

14 A. Yes. First, our recommendation is for the Companies to conduct *forward-looking* BCAs
15 when proposing any managed charging programs that would be offered to customers
16 beyond 2026. If the Companies seek approval to extend the same program design, then
17 data from the current programs can help inform the Companies’ inputs and assumptions in
18 the BCA, such as those related to customer enrollment and load reductions. To the extent
19 a company proposes program modifications or a program design that is different from its

¹ Eversource, D.P.U. 24-195, Exh. ES-EV-MTM-REBUTTAL-1, at 13; National Grid, D.P.U. 24-196, Exh. NG-EV-MTM-REBUTTAL-1, at 11; Unitil, D.P.U. 24-197, Exh. FGE-CCTP-REBUTTAL-1, at 7.

² National Grid, D.P.U. 24-196, Exh. NG-EV-MTM-REBUTTAL-1, at 10–11.

1 existing program design, the BCA should reflect the new program structure, and the
2 company should explain how the new program design or modifications improve upon the
3 previous program.

4 Second, while we recommend that the Companies conduct BCAs for future residential
5 managed charging program proposals, the BCA results need not be the sole consideration
6 when evaluating the Companies' proposals. The benefits the Companies list in their
7 rebuttal testimonies are important and should be discussed as part of any managed charging
8 program proposal, along with the BCA results. Thus, the EDCs should provide quantitative
9 and qualitative information as part of any managed charging program proposal to clearly
10 identify and discuss these types of non-monetized benefits, in addition to the monetized
11 costs and benefits in the BCAs, to enable a comprehensive evaluation of the proposed
12 program's benefits and costs. In certain circumstances, a proposed program with a benefit-
13 cost ratio of less than 1.0 could be appropriate to implement if the program is expected to
14 provide net benefits to customers based on consideration of both monetized and non-
15 monetized benefits.

16 **Q. What are the benefits of conducting BCAs for the Companies' managed charging**
17 **programs?**

18 A. BCAs will help promote transparency regarding the costs and benefits of any proposed
19 managed charging programs, enabling the EDCs, the Department, and stakeholders to
20 determine how the monetary benefits of any load reductions and/or load shifts compare to
21 program costs. If program costs are higher than monetized benefits, the Department will

1 be able to determine whether non-monetized benefits (e.g., enabling utilities and customers
2 to gain experience with managed charging) are worth the ratepayer costs associated with
3 program implementation. Additionally, BCAs will allow the EDCs to examine ways to
4 improve the cost-effectiveness of the program if BCA results are not favorable, such as by
5 adjusting enrollment or incentive levels, pursuing different program designs, or seeking
6 lower-cost vendors.

7 **III. NATIONAL GRID: BUDGET SHIFTING AND INCREMENTAL PUBLIC &**
8 **WORKPLACE (“P&W”) BUDGET**

9 **Q. How does National Grid respond to your concerns about the Company’s proposed**
10 **budget shifting and incremental budget increase?**

11 A. National Grid states that if its proposed budget shifting and incremental budget increase
12 for the P&W segment are not approved, ratepayer funding for potential EV Program
13 participants would effectively be paused until 2026, which National Grid claims “would
14 be detrimental to the progress towards reaching the Commonwealth’s goals and could deter
15 customers’ electrification plans and have longer-term negative impacts on market
16 development after the end of the EV Program period.”³

17 **Q. Do you agree with the Company’s characterization of the potential impacts resulting**
18 **from the depletion of approved program funds?**

19 A. No. National Grid’s concerns about potential market disruption are exaggerated. With
20 regards to the gap in its EV Program offerings between 2021 and when the Phase III

³ *National Grid*, D.P.U. 24-196, Exh. NG-EV-MTM-REBUTTAL-1, at 13–14 (citation omitted).

1 program began in 2023, National Grid claims that the gap “stalled the market’s
2 momentum” and “resulted in a longer ramp up period for the EV Program.”⁴ However,
3 National Grid still exhausted the current EV Program budget two years before the end of
4 the program term.⁵ The Company does not offer any evidence to substantiate its claim that
5 the lack of additional funds for P&W incentives, beyond what the Department authorized
6 in D.P.U. 21-91,⁶ would be detrimental to the Commonwealth’s EV adoption goals.

7 It is also important to note that the goals of National Grid’s EV Program are not the same
8 as the state’s EV adoption goals. Rather, National Grid’s program was designed to meet a
9 portion of the anticipated EV charging needs in National Grid’s service territory, informed
10 by the EVI-Pro Lite tool.⁷ The P&W program has already far exceeded its Direct Current
11 Fast Charging deployment target in this respect. In contrast to National Grid, while
12 Eversource also depleted its P&W segment budget (of \$109.1 million),⁸ Eversource does
13 not propose any additional budget shifting or incremental budget increase, stating that “the
14 approved budget was allocated to projects [Eversource] believes will meet the charging

⁴ *National Grid*, D.P.U. 24-196, Exh. NG-EV-MTM-1, at 53. The Phase II program did not include any make-ready incentives.

⁵ *National Grid*, D.P.U. 24-196, Exh. NG-EV-MTM-1, at 53.

⁶ *Eversource, National Grid, and Unitil*, D.P.U. 21-90/-91/-92, Order, at 100, 168 (Dec. 30, 2022)

⁷ *Id.* at 124; *National Grid*, D.P.U. 21-91, Exh. NG-EVPP-1, at 25.

⁸ *Eversource, National Grid, and Unitil*, D.P.U. 21-90/-91/-92, Order, at 168.

1 needs of EV drivers in its service territory through 2026.”⁹ National Grid does not provide
2 any supporting information demonstrating why its situation is different than that of
3 Eversource.

4 **IV. EVERSOURCE: BIDIRECTIONAL CHARGER INCENTIVE PILOT**

5 **Q. How does Eversource respond to your recommendation that the Company’s proposed**
6 **Bidirectional Charger Incentive Pilot be rejected?**

7 A. Eversource argues that the rejection of the pilot would “result in a significant timeline loss
8 for the advancement of [vehicle-to-grid (‘V2G’)] technology and therefore would delay
9 any lessons learned.”¹⁰ Eversource also states that it plans to leverage lessons learned from
10 the pilot, including information about fleet schedules and charging behaviors, to inform the
11 design of a V2G grid services program in the future and intends to require customers to
12 participate in such program when one becomes available.¹¹

13 **Q. Are there other ways for the Company to gather information to inform the design of**
14 **a future V2G grid services program?**

15 A. Yes. The Company already has offerings and proposed offerings targeted at school buses
16 and other fleet types that can be leveraged to collect information on fleet schedules and
17 charging behaviors, including: (1) its existing Fleet Assessment Services program; (2) its
18 existing Medium-Duty and Heavy-Duty (“MDHD”) Environmental Justice Community

⁹ *Eversource*, D.P.U. 24-195, Exh. DOER 1-3.

¹⁰ *Eversource*, D.P.U. 24-195, Exh. ES-EV-MTM-REBUTTAL-1, at 9.

¹¹ *Id.*

1 Fleet Electrification Pilot; and (3) the proposed MDHD Fleet Electrification Pilot.¹²
2 Additionally, the Massachusetts Clean Energy Center (“MassCEC”)—which receives
3 significant ratepayer funding from other charges on the electric bill¹³—is already funding
4 Vehicle-to-Everything (“V2X”) Demonstration Projects, soliciting participation from a
5 range of vehicle classes and use cases, including residential, commercial (which includes
6 not-for-profits and municipalities), and school district participants.¹⁴ The MassCEC V2X
7 Demonstration Projects initiative will, among other activities, provide funding for
8 equipment purchases and installations, collect data, and develop a public-facing V2X
9 guidebook.¹⁵ We expect that these MassCEC’s projects will produce relevant lessons

¹² *Eversource*, D.P.U. 24-195, Exh. ES-EV-MTM-1, at 6, 7, 10, 20–28.

¹³ MassCEC will receive \$24 million from ratepayers for the 2025 fiscal year through the 2025-27 Energy Efficiency Three-Year Plan, as well as additional funds through the system benefit charge of \$0.0005 per kilowatt hour, collected from electric customers. “On October 25, 2024, the Department approved MassCEC’s requests for the Program Administrators to jointly transfer \$24 million in funds for fiscal year 2025 (starting July 1, 2024). Massachusetts Clean Energy Center, D.P.U. 24-159, at 1-2 (2024).” D.P.U. 24-140 through -149, Order, at 264 n.198 (Feb. 28, 2025); see M.G.L. c. 25, §19(d) (stating that the Department shall direct the electric and gas distribution companies and municipal aggregators to jointly transfer not less than \$12 million to MassCEC), see also c. 23J, §9 (establishing the Massachusetts Renewable Energy Trust Fund), c. 25, §20 (stating that the Department shall require a mandatory charge of 0.5 mill per kilowatt-hour to all electricity customers to support the development and promotion of renewable energy projects and that all revenues shall be deposited into the Massachusetts Renewable Energy Trust Fund).

¹⁴ MassCEC, Vehicle-to-Everything Demonstration Projects, available at: <https://www.masscec.com/masscec-focus/clean-transportation/electric-vehicle-charging-infrastructure/vehicle-to-everything-demonstration>.

¹⁵ Electric Vehicle Infrastructure Coordinating Council Meeting, Slide Deck, at 24 (Apr. 2, 2025) (MassCEC presentation), available at: <https://www.mass.gov/doc/evicc-meeting-deck-april-2-2025/download>.

1 learned that Eversource will be able to leverage to design a V2G grid services program in
2 its service territory. Eversource's proposed pilot would be duplicative with the MassCEC
3 Demonstration Project and would not provide incremental benefits to ratepayers.

4 **V. CONCLUSION**

5 **Q. Does this conclude your testimony?**

6 **A.** Yes.