

PUBLIC REDACTED

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES

**NSTAR ELECTRIC COMPANY D/B/A EVERSOURCE ENERGY; and
MASSACHUSETTS ELECTRIC COMPANY AND NANTUCKET ELECTRIC
COMPANY, EACH D/B/A NATIONAL GRID**

D.P.U. 25-188 and D.P.U. 25-189

DIRECT TESTIMONY OF

Courtney Lane and Thanh Nguyen

On behalf of

THE MASSACHUSETTS OFFICE OF THE ATTORNEY GENERAL

April 14, 2026

PUBLIC REDACTED

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	SUMMARY OF RECOMMENDATIONS	4
III.	COMMERCIAL SEGMENT.....	8
A.	Incentive Levels	9
1.	Prioritization of low-income EJCs.....	17
2.	Per-site incentive caps.....	21
3.	L2 benchmark incentive limits.....	25
4.	National Grid V2G incentives	28
B.	Program and Segment Budgets.....	29
5.	Budgets for DCFC and L2 projects	33
6.	Budget limit for Enhanced incentives.....	35
C.	Publicly Accessible DCFC Batch Applications.....	36
IV.	RESIDENTIAL SEGMENT.....	39
A.	1–4 Unit Housing.....	39
1.	Overview.....	39
2.	Residential Standard Tier incentives	45
3.	Residential Enhanced Tier incentives	48
4.	Vehicle purchase price limits.....	51
B.	Multi-Unit Dwellings (MUDs)	53
V.	MANAGED CHARGING	54
A.	Eversource Managed Charging Proposal.....	54
B.	National Grid Managed Charging Proposals	58
C.	Managed Charging Tracking Metrics	60
D.	Benefit Cost Analysis	61
VI.	RECOMMENDED BUDGET MODIFICATIONS	66
VII.	PROGRAM IMPLEMENTATION	71
A.	Supporting Resources Budget.....	71
B.	Budget Shifting	72

PUBLIC REDACTED

C.	Tracking Metrics	76
VIII.	CONCLUSION.....	77

Exhibits

Exhibit AG-CLTN-2

Exhibit AG-CLTN-3

Exhibit AG-CLTN-4

Exhibit AG-CLTN-5

I. INTRODUCTION

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

A. Lane: My name is Courtney Lane. I am a Senior Principal 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, the U.S. Department of Energy, the 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.

1 **Q.** **Please summarize your professional and educational experience.**

2 **A.** **Lane:** I have 20 years of experience in energy policy and regulation. At Synapse, I work
3 on issues related to benefit-cost analysis (“BCA”), rate and bill impacts, and review of
4 distributed energy resource and electric vehicle utility filings. Prior to working at Synapse,
5 I was employed by National Grid as the Growth Management Lead for New England where
6 I oversaw the development of customer products, services, and business models for
7 Massachusetts and Rhode Island. In previous roles at National Grid, I supported the
8 development of the Rhode Island Annual and Three-Year Energy Efficiency Plans and
9 oversaw the associated benefit-cost models. Prior to joining National Grid, I worked on
10 regulatory and state policy issues pertaining to demand-side management, retail
11 competition, net metering, and the Alternative Energy Portfolio Standard for a statewide
12 environmental advocacy organization, Citizens for Pennsylvania’s Future. Before that, I
13 worked for Northeast Energy Efficiency Partnerships, a regional non-profit that works to
14 accelerate energy efficiency.

15 I hold a Master of Arts in Environmental Policy and Planning from Tufts University and a
16 Bachelor of Arts in Environmental Geography from Colgate University. My resume is
17 attached as Exhibit AG-CLTN-2.

18 **Nguyen:** I am a Senior Associate at Synapse, where I provide research, analysis, and
19 consulting on a variety of energy and utility regulatory issues, including electrification,
20 distributed energy resources (“DER”), rate design and cost allocation, and energy equity
21 and affordability. Prior to joining Synapse, I was a Senior Analyst at Strategen Consulting,

1 where I performed similar consulting work for government and nonprofit clients in utility
2 regulatory proceedings. I graduated summa cum laude from Franklin & Marshall College
3 with a Bachelor of Arts in Environmental Studies and Economics. My resume is attached
4 as Exhibit AG-CLTN-3.

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

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

7 **Q. Have you previously testified before the Massachusetts Department of Public Utilities**
8 **(“Department”)?**

9 A. **Lane:** No, I have not.

10 **Nguyen:** Yes. I testified on behalf of the AGO in the electric vehicle (“EV”) program
11 mid-term modifications, D.P.U. 24-195 through 24-197. I also assisted the AGO in the
12 Solar Massachusetts Renewable Tariffs (“SMART”) proceeding, D.P.U. 20-145, EV
13 proceedings, D.P.U. 21-90 through D.P.U. 21-92, and National Grid’s electric base
14 distribution rate case, D.P.U. 23-150.

15 **Q. Have you testified before other state regulatory bodies?**

16 A. **Lane:** Yes. I have sponsored testimony related to utility EV programs before the Illinois
17 Commerce Commission on Commonwealth Edison’s and Ameren’s EV plans, the
18 Maryland Public Service Commission on Pepco’s EV plan and BCA and for electric school
19 bus pilot programs proposed by Potomac Edison Company and Baltimore Gas and Electric
20 Company, and the New Mexico Public Regulation Commission on Southwestern Service
21 Company’s EV plan. I have also sponsored testimony on other matters before the Nova

PUBLIC REDACTED

Eversource, National Grid
D.P.U. 25-188 and D.P.U. 25-189
Exh. AG-CLTN-1
April 14, 2026
H.O. Scott Seigal
Page 4 of 77

1 Scotia Energy Board, Pennsylvania Public Service Commission, Public Service
2 Commission of the District of Columbia, Rhode Island Public Utilities Commission, and
3 Public Service Commission of Wisconsin.

4 **Nguyen:** No. However, I have supported the development of testimony and comments
5 related to EV charging infrastructure, EV rates, and managed charging before several other
6 commissions, including the New Mexico Public Regulation Commission, Illinois
7 Commerce Commission, Maryland Public Service Commission, and New York Public
8 Service Commission. I have also supported the development of testimony on other topics
9 before the Colorado Public Utilities Commission, North Carolina Public Utilities
10 Commission, Regulatory Commission of Alaska, Connecticut Public Utilities Regulatory
11 Authority, and Maine Public Utilities Commission.

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

13 A. We address the EV Infrastructure Program (“EV Program”) filings from the electric
14 distribution companies (collectively, “EDCs” or “Companies”): NSTAR Electric
15 Company, d/b/a Eversource Energy (“Eversource”), and Massachusetts Electric Company
16 and Nantucket Electric Company, each d/b/a National Grid (“National Grid”).

17 **II. SUMMARY OF RECOMMENDATIONS**

18 **Q. Please summarize on a high level the EDCs’ proposed EV Infrastructure Programs.**

19 A. The EDCs each propose the next phase of their respective EV Programs—Phase IV for
20 National Grid and Phase III for Eversource—pursuant to the Department’s Orders in

D.P.U. 13-182-A (affirmed in D.P.U. 17-05 and D.P.U. 17-13) and D.P.U. 20-69-A, to continue supporting the deployment of EV charging infrastructure across the Commonwealth for a period of four years (2027 through 2030). Both Companies propose programs consisting of three main offerings: a Commercial Segment supporting EV charging infrastructure at public, workplace, and fleet sites; a Residential Segment supporting at-home EV charging at 1–4 unit dwellings and at multi-unit dwellings (“MUDs”); and managed charging programs incentivizing EV customers to shift load to off-peak periods.¹ Table 1 below provides an overview of the EDCs’ proposed deployment targets and budgets for each offering.²

Table 1. EDCs’ Proposed Deployment Targets and Budgets for EV Programs

	National Grid		Eversource	
Program	Deployment Target	Budget	Deployment Target	Budget
Commercial	110 MW	\$102M	93 MW	\$83M
Residential	99 MW	\$42M	73 MW	\$73M
Managed Charging	64K participants	\$24M	11.5K participants	\$4.4M
Supporting Resources		\$26M		\$34M
<i>Total</i>		<i>\$194M</i>		<i>\$166M</i>

¹ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 10; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 13.

² *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, Table 2; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, Table 2.

1 In terms of make-ready program structure, the EDCs propose to maintain the first-come,
2 first-served incentive disbursement model from the previous program phase for most
3 project types. However, the EDCs propose a new batched application process for publicly
4 accessible direct current fast chargers (“DCFC”) to smooth deployment throughout the
5 program term and target program funds towards the highest-value projects.³

6 **Q. Please summarize your recommendations.**

7 A. We recommend that the Department approve the EDCs’ proposed EV Programs, with the
8 following modifications:

9 • Commercial Segment

- 10 ○ Adopt a three-tier incentive structure for publicly accessible, workplace, fleet,
11 and MUDs projects, with the following tiers:
- 12 ■ Priority (covering up to 80 percent of eligible costs): projects in low-
13 income Environmental Justice Communities (“EJCs”) and projects
14 serving public transit or school bus fleets.
 - 15 ■ Enhanced (covering up to 60 percent of eligible costs): projects in other
16 EJCs, projects serving other public fleets, and right-of-way (“ROW”)
17 and/or pole-mounted charging projects.
 - 18 ■ Standard (covering up to 40 percent of eligible costs): all other eligible
19 projects.
- 20 ○ Adopt a per-site incentive cap of ten ports per site for Level 2 (“L2”) projects
21 and a dollar amount equivalent to ten average-capacity ports per site for DCFC
22 projects.

³ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 47–49; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 47–49.

PUBLIC REDACTED

Eversource, National Grid
D.P.U. 25-188 and D.P.U. 25-189
Exh. AG-CLTN-1
April 14, 2026
H.O. Scott Seigal
Page 7 of 77

- Calculate Benchmark Incentive Limits based on historical data from each utility's service territory.
- Reject National Grid's proposed Vehicle-to-Grid ("V2G") make-ready incentives.
- Adopt separate budgets for DCFC and L2 projects within each segment.
- Reject the EDCs' proposal to cap Enhanced incentives at the expected percentages of each segment's budget; instead, adopt dedicated budgets for the Enhanced and Priority incentive tiers.
- Calculate the deployment targets for each publicly accessible DCFC batch based on the number of charging ports instead of MW of charging capacity.
- Require publicly accessible DCFC sites to have at least 120 kW of charging capacity per port to score for the Corridor Proximity prioritization factor.
- Reduce National Grid's Commercial segment budget by 25 percent and reduce Eversource's Commercial segment budget by 50 percent.

- Residential Segment

- Reject National Grid's proposed Residential 1–4 Unit Standard incentives and the corresponding budget.
- Modify National Grid's eligibility criteria for the Enhanced tier incentive to include customers who have received a Used EV Rebate from the Massachusetts Offers Rebates for Electric Vehicle ("MOR-EV") Program.
- Remove residential V2G as an eligible customer segment for National Grid's Enhanced Residential 1–4 Unit incentives.
- Reduce National Grid's Enhanced Residential 1–4 Unit incentive to a maximum of \$2,000.
- Set vehicle purchase price limits for Residential 1–4 Unit incentives, equal to the current MOR-EV purchase price limits.
- Require Eversource to enable connected L2 outlets and receptacles to qualify for MUD incentives.

- Reduce National Grid’s Residential segment budget by 25 percent and reduce Eversource’s Residential segment budget by 50 percent.

- Managed Charging

- Require Eversource to propose a V2G compensation framework within six months of the publication date of MassCEC’s “Vehicle to Everything” (“V2X”) pilot guidebook.
- Reduce National Grid’s residential managed charging enrollment levels in Program Years 3 and 4 (2029 and 2030) to the proposed Program Year 2 levels (2028) until National Grid can conduct a more rigorous BCA with data on the realized benefits of managed charging and Clean Peak Standard revenues.
- Require the EDCs to track certain metrics related to the impacts of their managed charging programs as included in Exhibit AG-CLTN-4.
- Require the EDCs to conduct BCAs to justify future managed charging program expansions.

- Program Implementation

- Reduce National Grid’s Supporting Resources segment budget by 25 percent and reduce Eversource’s Supporting Resources segment budget by 50 percent.
- Require that the 15 percent budget-shifting cap continue to be applied to both the giving segment and the receiving segment.
- Reject the EDCs’ proposal to shift the Supporting Resources budget without limit; instead, any savings identified within the Supporting Resources beyond the 15 percent cap should be treated as savings for ratepayers on the overall program cost.
- Modify or exclude certain tracking metrics proposed by the EDCs and adopt additional tracking metrics as identified in Exhibit AG-CLTN-5.

III. COMMERCIAL SEGMENT

Q. Please summarize the Company’s current make-ready offerings for commercial EV charging customers.

1 A. Under National Grid’s Phase III EV Program and Eversource’s Phase II EV Program,
2 incentives for commercial EV charging customers were divided across two segments: the
3 Public & Workplace segment and the Fleet segment. Both segments, as well as the MUDs
4 segment, provided the following incentives:⁴

- 5 • Make-ready incentives (all customers): up to 100 percent of utility-side and
6 customer-side make-ready costs.
- 7 • Electric Vehicle Supply Equipment (“EVSE”) incentives (for publicly accessible
8 stations, public fleets, and MUDs only):
 - 9 ○ L2: Up to 100 percent of EVSE costs for low-income EJC’s, up to 75 percent
10 of EVSE costs for other EJC’s, and up to 50 percent of EVSE costs for other
11 customers.
 - 12 ○ DCFC: Up to 100 percent of EVSE costs for any EJC’s and up to 50 percent
13 of EVSE costs for other customers.

14 A. **Incentive Levels**

15 Q. **What incentive structure do the EDCs propose for commercial EV charging projects**
16 **for the next phase of the EV Programs?**

17 A. The EDCs propose to simplify commercial incentives with an all-in incentive framework
18 that covers all utility-side make-ready costs and a portion of all eligible Customer Project
19 Costs (customer-side make-ready and EVSE).⁵ The incentives are divided into a Standard

⁴ *National Grid*, D.P.U. 25-68, Exh. NG-MMJG-1, at 7–8, 10–11; *Eversource*, D.P.U. 25-51, Exh. ES-ST-1, at 12–13, 15.

⁵ Make-ready costs are the distribution infrastructure costs necessary to enable EV charging installations. Utility-side make-ready includes equipment on the utility’s side of the meter, such as utility transformers and feeders. Customer-side make-ready includes equipment on the customer’s side of the meter, up to but not including the EV charger itself, such as electrical panels,

tier, covering up to 50 percent of Customer Project Costs, and an Enhanced tier, covering up to 75 percent of Customer Project Costs.⁶ The incentive amount provided to each project is calculated as the lesser of the following two caps:⁷

- Benchmark Incentive Limit: multiplication of the Benchmark Dollars per kW (the average historical customer project costs from projects completed by August 30, 2025) by the applicable incentive percentage (50 percent for the Standard tier and 75 percent for the Enhanced tier) by the site's Available EV Charging Capacity (the maximum concurrent charging capacity available at the site).
- Actual Costs Incentive Limit: multiplication of the project's actual eligible Customer Project Costs by the applicable incentive percentage (50 percent for the Standard tier and 75 percent for the Enhanced tier).

The specific incentive limits are provided in Table 2 below (note that both EDCs are proposing to use National Grid's historical project cost data to calculate the Benchmark Dollars per kW).⁸

wiring, and conduits as well as labor costs for design, engineering, trenching, and installation. *See Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, Illustration 1.

⁶ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 43–44; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 43–44.

⁷ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 45; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 45.

⁸ *National Grid*, D.P.U. 25-18, Exh. NG-EVPP-1, at 45–46; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 45–46.

Table 2. Commercial Customer Project Incentive Limits: Lesser of Benchmark and Actual Costs

Port Type	Tier	Benchmark Incentive Limit	Actual Costs Incentive Limit
DCFC	Standard	\$550 per kW (50% of \$1,100)	50% of actual eligible customer costs
	Enhanced	\$825 per kW (75% of \$1,100)	75% of actual eligible customer costs
L2	Standard	\$705 per kW (50% of \$1,410)	50% of actual eligible customer costs
	Enhanced	\$1,057 per kW (75% of \$1,410)	75% of actual eligible customer costs

The EDCs state that they “may establish caps for the Commercial Total Project Incentive, including both project and entity caps,” and that the caps will be published and maintained in their implementation guides.⁹

Additionally, National Grid proposes a V2G incentive for fleet customers, that will provide \$10,000 for each bidirectional DCFC port enrolled in Connected Solutions.¹⁰

Q. Which customers are eligible for Standard and Enhanced incentives?

⁹ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 47; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 47. Project caps would constitute a limit on the amount of incentive payment each project (i.e., charging site) would be able to receive, while entity caps would constitute on the amount of incentive payment each charging station installer or organization would be able to receive across all their projects.

¹⁰ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 61–62.

1 A. The EDCs propose to prioritize charger deployment in EJC's as well as the priority gaps
2 identified in the Electric Vehicle Infrastructure Coordinating Council ("EVICC") Second
3 Assessment,¹¹ which includes publicly accessible DCFC along transportation corridors,
4 publicly accessible curbside charging, and medium- and heavy-duty vehicle ("MHDV")
5 fleet charging.¹² Eligibility for the Enhanced tier is summarized in Table 3 below. Projects
6 that do not meet the eligibility criteria for the Enhanced tier would be eligible for the
7 Standard tier.

¹¹ The EVICC was created pursuant to *An Act Driving Clean Energy and Offshore Wind*, St. 2022, c.179, § 81, to centralize and coordinate the Commonwealth's efforts to deploy EV charging infrastructure. The EVICC Second Assessment evaluates the Commonwealth's progress in EV charging deployment, identifies gaps in the charging network, and provide recommendations to help expand charging availability and manage the grid impacts of EV charging. *See Electric Vehicle Infrastructure Coordinating Council – Second Assessment to the General Court* ("EVICC Second Assessment"), available at: <https://www.mass.gov/doc/complete-second-assessment-of-the-electric-vehicle-infrastructure-coordinating-council/download>.

¹² *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 57; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 55.

1

Table 3. Enhanced Tier Eligibility

Project Type	L2	DCFC
Publicly Accessible	EJCs Right-of-way (“ROW”) charging Pole-mounted charging (National Grid only)	EJCs
Fleets	EJCs Public Fleets	EJCs Public Fleets
Workplaces	N/A	N/A (ineligible for DCFC incentives)
MUDs ¹³	EJCs Low-income MUDs	

2 Note: Public fleets include public transit, school buses, and government fleets; EJC fleets
3 are those with a depot in an EJC or operating more than 50 percent of the time within EJCs;
4 low-income MUDs are those with at least 50 percent of households at or below 60 percent
5 of the Area Median Income.¹⁴

6 **Q. Do the EDCs propose adjusting incentive levels throughout the program term?**

7 A. Yes. The EDCs propose adjusting the incentive levels for each project type (publicly
8 accessible, fleet, workplace, and MUDs) every six months, coinciding with the publicly
9 accessible DCFC batched application periods (discussed below) if demand materially

¹³ MUDs are covered under the Residential segment budget but have the same incentive structure as the Commercial segment.

¹⁴ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 57, 66–67; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 55–56.

1 exceeds or falls short of established Commitment Milestones (determined based on an
2 equal distribution of projected charging kW deployed across the program term) for that
3 project type. Specifically, incentive levels may be adjusted downward by five percentage
4 points if demand (in kW of Available EV Charging Capacity) is more than 120 percent of
5 the Commitment Milestone and by 10 percentage points if demand is more than 200
6 percent of the Commitment Milestone.¹⁵ National Grid also proposes adjusting incentive
7 levels upward by five percentage points if demand is less than 80 percent of the
8 Commitment Milestone. Eversource does not propose any upward adjustment.¹⁶

9 **Q. How do the EDCs propose to coordinate utility program incentives with other third-**
10 **party funding such as MassEVIP?**

11 A. The EDCs designed the proposed EV Programs to eliminate any overlap with the
12 Massachusetts Electric Vehicle Program (“MassEVIP”), the Massachusetts Department of
13 Environmental Protection’s (“MassDEP”) existing EV incentive program. MassEVIP is
14 funded by both ratepayer funds (i.e., the Climate Protection and Mitigation Expendable
15 Trust) and non-ratepayer funds (i.e., the Volkswagen Environmental Mitigation Trust), but
16 its non-ratepayer funds are fully committed.¹⁷ The EDCs will provide L2 incentives only

¹⁵ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 54; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 52–53.

¹⁶ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 54; *Eversource*, D.P.U. 25-188, Exh. AG-3-4b.

¹⁷ See *Massachusetts Electric Vehicle Incentive Program* (“MassEVIP”) *Funding Summary*, MASS. DEP’T. OF ENVTL. PROT. (2025), <https://www.mass.gov/doc/massevip-funding-summary/download>; *Electric Vehicle Mid-term Modification*, D.P.U. 24-195 through 24-197, *Order*, at 75 (Dec. 30, 2022).

1 to customers installing five or more L2 plugs as well as DCFC incentives, while MassEVIP
2 will provide L2 incentives to customers installing four or fewer L2 plugs and no DCFC
3 incentives.¹⁸ Consistent with the Department's Order in the mid-term modifications
4 dockets, customers are no longer required to apply for MassEVIP or other third-party
5 funding before applying for utility incentives, a change that the AGO supported.¹⁹
6 However, if customers do receive third-party funds, they can stack utility incentives with
7 those funds, but the EDCs will deduct any utility incentives to ensure that the combined
8 utility and third-party incentives do not exceed 100 percent of the Customer Project
9 Costs.²⁰

10 **Q. Are the EDCs' proposed changes to the commercial incentives an improvement to the**
11 **previous phase of the EV Programs?**

12 A. Generally, yes. The proposed EV Programs include several features that help simplify
13 program incentives and improve accessibility, addressing the barriers related to program
14 complexity and burdensome third-party funding requirements as identified in the EDCs'
15 program reports.²¹ Specifically, we support the transition towards a single, all-in incentive
16 that covers both customers-side make-ready and EVSE, from the separate utility-side

¹⁸ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 103; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 77.

¹⁹ *EV MTMs*, D.P.U. 24-195 through D.P.U. 24-197, Order, at 25–26, 75–76.

²⁰ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 99–100; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 74.

²¹ *National Grid*, D.P.U. 25-68, Exh. NG-MMJG-1, at 11–12; *Eversource*, D.P.U. 25-51, Exh. ES-ST-1, at 17.

1 make-ready, customer-side make-ready, and EVSE incentives available under the previous
2 phase. Limiting public and workplace incentives to only publicly accessible projects also
3 helps target program funding to sites with the greatest benefits. Additionally, we support
4 the EDCs' coordination with MassDEP's MassEVIP to ensure that utility incentives and
5 that program's incentives are distinct, eliminating customer confusion about which
6 program they are eligible for and should pursue. Finally, we support the EDCs' proposed
7 batched application process for publicly accessible DCFC. As discussed in the EDCs'
8 program reports, the unanticipated rapid pace of DCFC deployment in the previous phase
9 meant that the EDCs' program budgets were prematurely depleted and could not support
10 the deployment of L2 charging to the extent originally planned.²² The transition towards
11 a batched application process for DCFC is a necessary step towards better management of
12 program budgets between DCFC and L2 and helps even out deployment throughout the
13 program term.

14 **Q. Do you have any concerns with the EDCs' proposed incentive design?**

15 A. Yes. While the overall direction of the EDCs' incentive proposal presents an improvement
16 in program design, there are still several aspects of the design that can hamper the
17 program's ability to contribute towards cost-effectively meeting the Commonwealth's
18 charging gap and help meet the needs of low-income customers and communities, who

²² *National Grid*, D.P.U. 25-68, Exh. NG-MMJG-1, at 12; *Eversource*, D.P.U. 25-51, Exh. ES-ST-1, at 16.

face the most barriers in access to electric transportation. Specifically, we are concerned with the lack of prioritization of low-income EJC's, the absence of per-site incentive caps, potentially insufficient incentives for L2 charging, and National Grid's proposed V2G incentives. We address each of these concerns in further detail below.

1. Prioritization of low-income EJC's

Q. How does the Commonwealth define EJC's?

A. The Office of Environmental Justice & Equity under the Executive Office of Energy and Environmental Affairs designates EJC's as census block groups that meet at least one of three criteria:²³

1. Income: the block group median household income is 65 percent or less than the state median household income.
2. Minority: the block group's minority population is at least 40 percent, or the block group's minority population is at least 25 percent and the median household income of the municipality the block group is in is less than 150 percent of the state median household income.
3. Language isolation: 25 percent or more of households do not include anyone older than 14 who speaks English very well.

Q. Do the EDC's' proposed programs differentiate between EJC's that qualify based on different criteria?

²³ *Massachusetts 2020 Environmental Justice Populations*, MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS, <https://mass-eoea.maps.arcgis.com/apps/webappviewer/index.html?id=1d6f63e7762a48e5930de84ed4849212>.

1 A. No. Unlike under the previous phase of the EV Programs, which provided higher
2 incentives to EJC's that met the income criteria,²⁴ the Enhanced incentives proposed here
3 are available in census block groups that meet any of the three EJC criteria.²⁵ The only
4 differentiation is between EJC's and non-EJC's.

5 **Q. Why is it important to prioritize low-income EJC's?**

6 A. While it is well documented that EV adoption rates and access to EV charging
7 infrastructure differ based on income and race in the United States,²⁶ evidence from the
8 MOR-EV program suggests that income may have played a greater role in EV adoption in
9 Massachusetts thus far.²⁷ According to survey data from MOR-EV rebate recipients, only
10 26 percent of survey respondents between 2021 and 2024 were low- or moderate-income,

²⁴ *EV Program*, D.P.U. 21-90/D.P.U. 21-91/D.P.U. 21-92, Order, at 108 (Dec. 30, 2022).

²⁵ *National Grid*, D.P.U. 25-189, Exh. AG-2-9; *Eversource*, D.P.U. 25-188, Exh. AG-2-9.

²⁶ See, e.g., *When Might Lower-Income Drivers Benefit from Electric Vehicles? Quantifying the Economic Equity Implications of Electric Vehicle Adoption*, INTERNATIONAL COUNCIL ON CLEAN TRANSPORTATION (Feb. 2021), <https://lindseyresearch.com/wp-content/uploads/2021/12/NHTSA-2021-0053-1578-Exhibit-86-Bauer-et-al-2021.pdf>; Thomas Gifford & Edward Barbier, *The Role of Charging Infrastructure and Income on Electric Vehicle Adoption*, 211 ENERGY POL'Y 115098 (2026), <https://doi.org/10.1016/j.enpol.2026.115098>; Jiehong Lou, et al., *Income and Racial Disparity in Household Publicly Available Electric Vehicle Infrastructure Accessibility*, NAT. COMMUN., 15, 5106 (2024), <https://doi.org/10.1038/s41467-024-49481-w>; Dong-Yeon Lee, et al., *Does Electric Mobility Display Racial or Income Disparities? Quantifying Inequality in the Distribution of Electric Vehicle Adoption and Charging Infrastructure in the United States*, APPL. ENERGY 378, pt. A, 124795 (2025), <https://doi.org/10.1016/j.apenergy.2024.124795>.

²⁷ The MOR-EV program, managed by the Massachusetts Department of Energy Resources ("DOER"), provides rebates for the purchase or lease of EVs in the Commonwealth. See MOR-EV program website: <https://mor-ev.org/about>.

1 and 75 percent of survey respondents in 2024 reported income levels above the state
2 median household income of \$94,488, with 36 percent reporting annual incomes above
3 \$300,000, meaning that the vast majority of rebate recipients were high-income
4 households.²⁸ Because MOR-EV rebates include vehicle purchase price limits, this
5 program data does not include Massachusetts households purchasing higher-priced EVs,
6 who are much more likely to be high-income. Meanwhile, the MOR-EV program report
7 also shows that in 2024, approximately 55 percent of light-duty vehicle rebate recipients
8 and 72 percent of pickup truck rebate recipients identified as White or Caucasian (Hispanic
9 or Latino was a separate category),²⁹ whereas 68 percent of the state population is identified
10 as White alone, not Hispanic or Latino, in census data.³⁰ These data points suggest that
11 EV adoption in the Commonwealth is roughly aligned with its racial demographics but has
12 been disproportionately concentrated among high-income households. Because low-
13 income communities and households face greater barriers to EV adoption, additional
14 prioritization is necessary so that these populations can access the benefits of electric
15 transportation, and that the EV Programs help address rather than perpetuate existing
16 inequities.

²⁸ 2024 MOR-EV Report, MASSACHUSETTS DEPARTMENT OF ENERGY RESOURCES, at 18–19 (2025), <https://www.mass.gov/doc/2024-mor-ev-program-report/download>.

²⁹ *Id.* at 21.

³⁰ U.S. Census Bureau, *Quick Facts – Massachusetts* (last accessed April 14, 2026), <https://www.census.gov/quickfacts/fact/table/MA/>.

1 The Department previously recognized the need to prioritize low-income communities
2 when approving the previous phase of the EDCs' EV Programs, which included higher
3 incentives for low-income EJC. The Department found that "a sliding scale of incentives
4 that places a higher priority on communities that meet the Commonwealth's EJ criteria
5 based on income... is appropriate across all non-residential customer segments to support
6 participation in areas with the greatest financial barriers to EV adoption which, in turn, will
7 allow for a more equitable distribution of benefits."³¹

8 **Q. What do you recommend?**

9 A. We recommend the EDCs adjust the tiering structure by adding a third "Priority" tier to
10 cover up to 80 percent of Customer Project Costs for projects in low-income EJC as well
11 as public transit and school bus fleets, given that low-income populations tend to lack
12 access to private vehicles and therefore rely on public transit.³² The additional tier will
13 better prioritize low-income EJC. We also recommend corresponding modifications to
14 the Enhanced and Standard tier incentives to cover 60 percent and 40 percent of Customer
15 Project Costs, respectively. The specific eligibility criteria for each incentive level under
16 our proposal are presented in Table 4 below.

³¹ *EV Program*, D.P.U. 21-90/D.P.U. 21-91/D.P.U. 21-92, Order, at 108.

³² See, e.g., *Transportation Spending by Income Quintile and Vehicles Available*, BUREAU OF TRANSPORTATION STATISTICS (2023), <https://data.bts.gov/stories/s/Transportation-Cost-Burden-Transportation-Spending/v67s-yiqd/>; Seungil Yum, *Different Travel Behavior between Low-Income and High-Income Minority Groups*, *TRANSP. POLICY* 180, 104034 (2026), <https://doi.org/10.1016/j.tranpol.2026.104034>.

1

Table 4. Eligibility Criteria under Three-Tier Incentive Framework

	Priority (80%)	Enhanced (60%)	Standard (40%)
Publicly Accessible L2	Low-income EJCs	Other EJCs ROW and/or pole-mounted charging	All other
Publicly Accessible DCFC	Low-income EJCs	Other EJCs	All other
Fleet L2	Low-income EJCs; Public transit or school bus	Other EJCs; Other public fleets	All other
Fleet DCFC	Low-income EJCs; Public transit or school bus	Other EJCs; Other public fleets	All other
Workplace L2	N/A	N/A	All
MUD L2	Low-income EJCs; Low-income MUDs	Other EJCs	All other

2

2. Per-site incentive caps

3 **Q. Why are per-site incentive caps necessary?**

4 A Per-site incentive caps are necessary to ensure that the program budget supports a denser
5 EV charging network with greater geographic distribution, rather than being dominated by
6 a smaller number of large charging sites (in terms of charging capacity or number of ports)
7 at a few locations. Range anxiety, one of the most cited barriers to EV adoption, can only
8 be addressed with a greater number of charging sites along transportation routes, which
9 help ensure that drivers are more likely to be close to a charging option during their

1 travels.³³ Breadth of coverage also allows EV charging to better integrate into communities
2 and drivers' daily routines: more distributed charging availability at grocery stores, retail
3 centers, workplaces, neighborhoods, and other locations helps remove the need for special
4 trips to recharge and makes EV ownership more convenient for residents across the
5 Commonwealth.³⁴

6 The EDCs state that "in the early stages of electrification, greater availability of public EV
7 charging points can encourage adoption."³⁵ Given that EVs only accounted for
8 approximately 10.6 percent of new vehicle sales in Massachusetts in 2025,³⁶ and the state
9 is behind on its target to have 200,000 light-duty EVs on the road by the end of 2025,³⁷ the
10 state appears to only be in the early stages of EV adoption. Therefore, the EV Programs
11 should prioritize increasing the total number of EV charging sites over maximizing the
12 charging capacity or number of ports at each site.

³³ See Giuseppe Napoli, et al., *Optimal Allocation of Electric Vehicle Charging Stations in a Highway Network: Part 1. Methodology and Test Application*, 27 J. ENERGY STORAGE 101102 (2020), <https://doi.org/10.1016/j.est.2019.101102>.

³⁴ See Niklas Tilly, et al., *Systems-Based Approach to Public Electric Vehicle Supply Equipment Expansion: An International Policy Analysis*, 13 SUSTAIN. CITIES SOC. 106739 (2025), <https://doi.org/10.1016/j.scs.2025.106739>.

³⁵ *National Grid*, D.P.U. 25-189, Exh. AG-2-3; *Eversource*, D.P.U. 25-188, Exh. AG-2-3.

³⁶ *Get Connected: Electric Vehicle Quarterly Report – Fourth Quarter, 2025*, ALLIANCE FOR AUTOMOTIVE INNOVATION, (2006), <https://www.autosinnovate.org/posts/papers-reports/Get%20Connected%20EV%20Quarterly%20Report%202025%20Q4.pdf>.

³⁷ *2025 Massachusetts Climate Report Card – Clean Transportation*, MASS. EXEC. OFFICE OF ENERGY & ENVTL AFFAIRS, <https://www.mass.gov/info-details/2025-massachusetts-climate-report-card-clean-transportation>.

1 **Q. Do the EDCs currently have per-site incentive caps under their EV Programs?**

2 A. Yes. The EDCs' Public & Workplace segment EVSE incentives are capped at ten ports
3 per site for L2 and up to \$100,000 per site for DCFC (equivalent to ten 50-149 kW ports
4 or five 150+ kW ports).³⁸ National Grid's Fleet segment DCFC EVSE incentives only
5 covers up to \$400,000 per site (also equivalent to ten 50-149 kW ports or five 150+ kW
6 ports).³⁹

7 **Q. Can you provide an example of how a lack of per-site incentive caps can impact the**
8 **program budget?**

9 A. Yes. Under the previous EV Program phase, the largest DCFC projects for both EDCs had
10 ten DCFC ports.⁴⁰ While the EDCs' DCFC ports only had an average charging capacity
11 of 64.4 kW for Eversource and 75.2 kW for National Grid, some EV charging operators
12 are beginning to install DCFC in Massachusetts with up to 350 kW of charging capacity
13 per port.⁴¹ A station with ten 350-kW ports would total 3,500 kW of charging capacity,
14 corresponding to \$2,887,500 of incentives, using the EDCs' proposed Benchmark
15 Incentive Limit of \$825 per kW for the Enhanced tier. The project in this example would

³⁸ *EV Program*, D.P.U. 21-90/D.P.U. 21-91/D.P.U. 21-92, Order, at 11–12, 18–19.

³⁹ *Electric Vehicle Charging Program – Fleet*, NATIONAL GRID, https://www.nationalgridus.com/media/pdfs/bus-ways-to-save/ev/cm8214e-ev_fleet_incentive_charts.pdf.

⁴⁰ *National Grid*, D.P.U. 25-189, Exh. AG-2-2, Att. AG-2-2-2; *Eversource*, D.P.U. 25-188, Exh. AG-2-2, Att. AG-2-2.

⁴¹ *See WS Development Partners with Electrify America to Bring Hyper-Fast EV Charging Stations to its Retail Destinations*, ELECTRIFY AMERICA (2025), <https://media.electrifyamerica.com/releases/280>.

account for 12 percent of National Grid's and 19 percent of Eversource's total proposed publicly accessible DCFC budget, or 98 percent of National Grid's and 150 percent of Eversource's budget for each publicly accessible DCFC application batch (assuming 12.5 percent of the total publicly accessible DCFC budget for each batch).⁴²

Q. What do you recommend?

A. We recommend that the Department adopt per-site incentive caps to align with the incentive caps under the EDCs' previous EV Program phase. Projects installing more than the cap would still be eligible to participate in the EV Programs, but any amounts above the cap would not be eligible for incentives.

Specifically, we recommend the following per-site incentive caps:

- L2 projects: the cap should be set at ten ports per site.
- DCFC projects: the cap should be defined as a dollar amount equal to the Benchmark Incentive Limit multiplied by ten ports by the average charging capacity per port for each segment.⁴³ This method would help prevent projects with very high-capacity chargers from consuming most of the available budget.

⁴² Calculated using data from *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-4, and *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-4.

⁴³ Using the kW per port figures in *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-4, and *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-4.

1 We also recommend that the EDCs have the option to adjust these caps downwards (but
2 not upwards) by the start of their EV Programs based on anticipated demand.

3 **3. L2 benchmark incentive limits**

4 **Q. Aside from the third-party funding requirement, what other factors contributed to**
5 **the low L2 charging deployment under the previous phase of the EDCs' EV**
6 **programs?**

7 A. National Grid's Phase III Program Year 2 Evaluation Report ("Evaluation Report")
8 attributed the low L2 charging deployment to outdated cost estimates. Specifically,
9 National Grid's Phase III cost caps were "based on the average actual customer-side
10 infrastructure and EVSE costs in Phase I from 2019 to 2022," which were lower than
11 market prices by the time Phase III was implemented.⁴⁴ The evaluation also cited
12 interviews with charging station installers who stated that "incentives for Level 2 chargers
13 are too low to move projects forward."⁴⁵ While Eversource also saw low L2 charging
14 deployment relative to DCFCs, the program evaluation did not identify low L2 incentives
15 as a factor.⁴⁶ However, both EDCs propose to calculate the Benchmark Incentive Limit
16 based on National Grid's historical customer project costs.⁴⁷

⁴⁴ *National Grid*, D.P.U. 24-64, Exh. NG-MMJG-1, at 7–8.

⁴⁵ *Id.* at 92.

⁴⁶ *Eversource*, D.P.U. 25-51, Exh. ES-ST-1.

⁴⁷ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 45; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 45.

1 **Q. What are the implications of using the L2 project cost data from National Grid's**
2 **previous phase to calculate the benchmark incentive limits for the upcoming EV**
3 **Program phase?**

4 A. Since L2 incentives under National Grid's Phase III program were too low to spur robust
5 deployment, the few L2 projects that did get deployed are likely to reflect only the lower-
6 cost end of the market. This means that the Benchmark Incentive Limit proposed by the
7 EDCs is ultimately calculated based on the same outdated cost projections that held back
8 L2 deployments under National Grid's Phase III program. Therefore, L2 projects are likely
9 to come up against the Benchmark Incentive Limit much more often than the Actual Costs
10 Incentive Limit, reducing the number of L2 projects that are financially viable. This
11 problem is also likely to be exacerbated in Eversource territory, where historical L2 project
12 costs were higher than those in National Grid territory.⁴⁸ The utility-specific historical
13 customer project costs and the resulting Benchmark Incentive Limits are provided in Table
14 5 below.

⁴⁸ *Eversource*, D.P.U. 25-188, Exh. AG-1-6.

1 *Table 5. Benchmark Incentive Limits Based on Utility-Specific Historical Costs*

Port Type	Tier	National Grid	Eversource
DCFC	Standard	\$550 per kW (50% of \$1,100)	\$815 per kW (50% of \$1,630)
DCFC	Enhanced	\$825 per kW (75% of \$1,100)	\$1,223 per kW (75% of \$1,630)
L2	Standard	\$705 per kW (50% of \$1,410)	\$1,146 per kW (50% of \$2,293)
L2	Enhanced	\$1,057 per kW (75% of \$1,410)	\$1,720 per kW (75% of \$2,293)

2 **Q. What do you recommend?**

3 A. While alignment of program incentives between the Companies is generally preferred by
4 the Department,⁴⁹ each EDCs' Benchmark Incentive Limit should nonetheless be
5 calculated based on historical data from its own service territory to better reflect the
6 economics of EV charging projects in each region. This change would ensure that
7 Eversource's incentives are appropriately sized for projects in its service territory.
8 Additionally, the Department should consider further increasing National Grid's

⁴⁹ *EV Program*, D.P.U. 21-90/D.P.U. 21-91/D.P.U. 21-92, Order, at 10, which stated a preference for "the Companies to coordinate their EV proposals for consistency and uniformity across service territories to the greatest extent practicable."

Benchmark Incentive Limit for L2 projects by 20 percent to better reflect higher project costs, helping to ensure that L2 incentives are sufficient to spur deployment.

4. National Grid V2G incentives

Q. Do the proposed V2G incentives reflect the benefits of V2G exports to the grid and to ratepayers?

A. No. While National Grid will require customers receiving the V2G incentives to enroll in Connected Solutions, mere enrollment in Connected Solutions itself does not necessarily result in grid benefits. Under Connected Solutions, National Grid does not control customers' charging behavior but only provides incentives based on customers' actual performance (load reductions) during peak events.⁵⁰ It is therefore possible for a customer to receive V2G incentives under the EV Programs but fail to provide V2G exports during Connected Solutions events (for example, the vehicles may be in use during the program event window), rendering the V2G incentives worthless from a ratepayer and grid perspective. Moreover, the value of the V2G exports to the grid is already reflected and compensated for by Connected Solutions payments, meaning that National Grid's proposed V2G incentives are, by definition, above and beyond the grid benefits that can potentially be delivered by V2G.

Q. Are barriers to V2G being addressed by other efforts in Massachusetts?

⁵⁰ *Connected Solutions*, NATIONAL GRID, <https://www.nationalgridus.com/MA-Business/Energy-Saving-Programs/ConnectedSolutions>.

1 A. Yes. MassCEC is currently conducting a Vehicle-to-Everything (“V2X”) pilot project,
2 which will test bidirectional charging technology with five school bus fleets, five municipal
3 fleets, and 30 residents across the state.⁵¹ Pilot participants will be able to enroll in
4 Connected Solutions and earn compensation for grid exports under the program.⁵²
5 Following the conclusion of the pilot, MassCEC is expected to publish a guidebook
6 identifying lessons learned from the pilot as well as strategies to scale V2X deployment.⁵³

7 **Q. What do you recommend?**

8 A. We recommend that the Department reject National Grid’s proposed V2G incentives.
9 Following the publication of MassCEC’s guidebook, National Grid—as well as
10 Eversource—could develop and propose a new offering to incentivize V2G deployment,
11 considering any lessons learned and recommendations identified in the guidebook. The
12 proposal should also include a BCA to ensure transparency of grid and ratepayer impacts.

13 **B. Program and Segment Budgets**

14 **Q. Summarize the EDCs’ proposal for Commercial segment deployment targets and**
15 **budgets.**

⁵¹ *Healey-Driscoll Administration Announces Participants for Groundbreaking Vehicle-to-Everything Program*, MASS. CLEAN ENERGY CTR. (2026), <https://www.masscec.com/press/healey-driscoll-administration-announces-participants-groundbreaking-vehicle-everything>.

⁵² *Vehicle-to-Everything Demonstration Projects Program FAQ*, MASS. CLEAN ENERGY CTR. (2025), <https://www.masscec.com/sites/default/files/documents/V2X%20FAQs.pdf>.

⁵³ *Massachusetts V2X Demonstration Program Participants Selected*, THE MOBILITY HOUSE (2026), https://www.mobilityhouse.com/usa_en/knowledge-center/article/masscec-v2x-demonstration-program-participants-selected.

- A. The Commercial segment deployment targets and program budget proposed by each EDC are summarized in Table 6 and 7 below.⁵⁴

Table 6. National Grid's Proposed Deployment Targets and Program Budgets

Project Type	Ports Enabled	MW Enabled	Budget
Publicly Accessible DCFC	200	30	\$23,623,310
Publicly Accessible L2	4,167	30	\$31,109,720
Fleet DCFC	540	27	\$24,025,220
Fleet L2	1,300	13	\$14,337,316
Workplace L2	1,389	10	\$8,840,740
Total	7,596	110	\$101,936,306

Table 7. Eversource's Proposed Deployment Targets and Program Budgets

Project Type	Ports Enabled	MW Enabled	Budget
Publicly Accessible DCFC	133	20	\$15,426,200
Publicly Accessible L2	4,275	31	\$28,178,612
Fleet DCFC	283	17	\$16,911,600
Fleet L2	625	12	\$11,824,680
Workplace L2	1,833	13	\$8,840,740
Total	7,153	93	\$83,021,740

- Q. What is the EDCs' proposed approach to managing the budget between the different segments, port types, and incentive levels?

⁵⁴ *National Grid*, D.P.U. 25-189, Exhs. NG-EVPP-1, Table 6; NG-EVPP-4; *Eversource*, D.P.U. 25-188, Exhs. ES-EVPP-1, Table 6; ES-EVPP-4.

A. The EDCs state that they will “fund Enhanced incentives only up to the [percentages of the program budget] proposed for each project type, after which customers will receive the Standard incentive.”⁵⁵ Otherwise, the EDCs do not propose separate budgets for L2 versus DCFC projects. The expected percentages of Enhanced tier projects for each EDC are provided in Tables 8 and 9 below.

Table 8. National Grid Percentage of Enhanced Tier Projects

Project Type	L2	DCFC
Publicly Accessible	50%	50%
Fleets	75%	75%
Workplace	0%	N/A (ineligible for DCFC incentives)
MUDs	75%	

Table 9. Eversource Percentage of Enhanced Tier Projects

Project Type	L2	DCFC
Publicly Accessible	30%	50%
Fleets	50%	50%
Workplace	0%	N/A (ineligible for DCFC incentives)
MUDs	50%	

Q. What are your concerns with the EDCs’ proposed program sizes and budget management approach?

⁵⁵ *National Grid*, D.P.U. 25-189, Exh. AG-2-10; *Eversource*, D.P.U. 25-188, Exh. AG-2-10.

1 A. The EDCs' approach does not ensure that the programs will address the charging gap
2 identified for each project type and does not adequately ensure that program funding will
3 prioritize EJC's. We address each of these issues in further detail below. Additionally, the
4 large program budgets pose concerns about bill impacts and affordability for ratepayers.
5 We address this issue later in Section VI.

6 **Q. How do the EDCs justify their budgeting approach?**

7 A. The EDCs claim that "lessons from [the previous phase of the EV Programs] highlighted
8 the importance of maintaining budget flexibility to respond to shifting market demand."⁵⁶

9 **Q. Do you agree with this justification?**

10 A. No. While some level of adaptability to market demand can be beneficial, market demand
11 is not simply an exogenous factor that the Companies' programs are merely responding to.
12 Rather, the incentives offered under the EV Programs also help shape market demand. For
13 example, National Grid's Phase III program evaluation found that many commercial
14 customers who were considering L2 charging ended up installing DCFC, including in
15 "cases where they do not think [DCFCs] are appropriate or necessary," because the
16 available DCFC incentives were more generous than those for L2 charging.⁵⁷ Under the
17 EDCs' proposal, program spending and port deployment can differ significantly from the
18 initial targets that were calculated based on the charging gap for each project type,

⁵⁶ *National Grid*, D.P.U. 25-189, Exh. AG-2-1; *Eversource*, D.P.U. 25-188, Exh. AG-2-1.

⁵⁷ *National Grid*, D.P.U. 24-64, Exh. NG-MMJG-1, at 92.

1 rendering the sizing exercise ineffective. Program budgets and deployment targets should
2 instead be designed to guide market demand towards priority segments and project types.

3 **5. Budgets for DCFC and L2 projects**

4 **Q. Why are both DCFC and L2 charging important for EV adoption?**

5 A. DCFC and L2 charging serve distinct but equally important roles in driving EV adoption.
6 DCFC, which has a charging capacity of at least 60 kW, is critical for enabling long-
7 distance travel along highway corridors as well as supporting MHDV fleets. For light-duty
8 EV owners, DCFC stations offer a similar experience to the traditional gas station, enabling
9 them to quickly recharge during a journey and making long-distance travel with EVs
10 possible. For MHDV fleets, such as public transit and school buses, DCFC is often
11 necessary to ensure that these vehicles' large batteries can be fully charged before the next
12 operational day. Due to their high charging capacity, DCFCs cost more to install (due to
13 higher EVSE and make-ready costs) and are more expensive for drivers on a per kWh
14 basis.

15 In contrast, L2 charging operates at a slower rate, typically between 7 and 19 kWh, and is
16 best suited for locations where vehicles are parked for extended periods, such as
17 workplaces, apartment buildings, shopping centers, street parking, and public garages. L2
18 chargers at these locations allow EV owners to meet their day-to-day charging needs as
19 part of their normal routine without having to go out of their way. The lower charging
20 capacity also means that L2 charging tends to be more affordable on a per kWh basis,
21 making fueling costs for EVs more competitive against gas vehicles. A charging network

1 balanced between both kinds of charging—DCFC along transportation corridors and L2 at
2 destination and long dwell-time locations—is better positioned to support broad EV
3 adoption than if available infrastructure is skewed toward one technology.

4 **Q. What do you recommend?**

5 A. We recommend that the Department adopt separate budgets for DCFC and L2 projects to
6 ensure that deployment—funded at significant ratepayer cost—aligns with the identified
7 targets and addresses the charging gap for both project types. The separate budgets should
8 align with the proportions between the estimated DCFC and L2 budgets in Table 6 and
9 Table 7 above, subject to the budget adjustments discussed in Section VI.

10 **Q. What are the risks of not having separate DCFC and L2 budgets?**

11 A Without separate budgets, it is possible for one project type to consume most of the
12 program budget, resulting in a program that fails to address the charging gap for each
13 project type as planned. This dynamic occurred under the EDCs' previous phase of the
14 program, where National Grid approved 5.7 times the target number of public DCFC ports,
15 and Eversource approved 4.2 times the target public DCFC ports, two years before the end
16 of the program term, resulting in premature depletion of program funds.⁵⁸ At the same
17 time, National Grid only paid for, or committed to fund, less than one-tenth of the target
18 L2 ports and Eversource approved less than half of the target L2 ports. For the upcoming
19 EV Program phase, while the incentive adjustment process the EDCs propose will likely

⁵⁸ *EV MTMs*, D.P.U. 24-195 through D.P.U. 24-197, Exh. AG-CPTN-1, at 8–9.

1 prevent such extreme disparity, since incentive adjustments will only be applied
2 prospectively every six months, it is still possible for certain project types to use up large
3 portions of the program budget before incentive levels are calibrated to the appropriate
4 amount.

5 **6. Budget limit for Enhanced incentives**

6 **Q. Why is it inappropriate to limit Enhanced incentives to the EDCs' expected**
7 **percentages as shown in Table 8 and Table 9 above?**

8 A. The EDCs' proposed Enhanced incentives, as well as our proposed Priority incentives, are
9 targeted at project types and communities identified as important for the Commonwealth's
10 EV adoption goals but that are less likely to be served by the private market alone. These
11 incentive tiers are crucial to ensure that the benefits of EVs are enjoyed by communities
12 across the Commonwealth, regardless of socioeconomic status, and that EJC—especially
13 those that meet the income criteria—are not left behind in the transition towards
14 transportation electrification. Limiting the amounts that can be spent on Enhanced and
15 Priority incentives will unnecessarily cap the support for these high-priority projects and
16 communities. In contrast, the EDCs do not propose any caps on the amount of incentives
17 that can be provided to lower-priority Standard tier projects. This means that larger
18 portions than anticipated of the proposed budgets can potentially be spent in non-EJCs
19 without limit, which would be counter to the goal of ensuring equitable access to EV
20 charging infrastructure in the Commonwealth.

21 **Q. What do you recommend?**

A. We recommend that the Department reject the EDCs' proposal to cap Enhanced incentives at the expected percentages of the program budget. Instead, the Department should adopt dedicated budgets for the Enhanced and Priority tiers, which cannot be spent on Standard incentives.

C. **Publicly Accessible DCFC Batch Applications**

Q. Summarize the EDCs' proposed batch application proposals for publicly accessible DCFC projects.

A. The EDCs propose to no longer provide incentives for publicly accessible DCFC projects on a rolling first-come, first-serve basis. Instead, the EDCs will conduct seven total batched application periods for publicly accessible DCFC over the four-year program term, including one during the first program year and two per year (one every six months) during the following three years.⁵⁹ National Grid will seek to approve up to 7.5 MW of charging capacity in the first batch, and then 3.75 MW in each batch thereafter, while Eversource will target up to 5 MW in the first batch and 2.5 MW in each batch thereafter.⁶⁰ Each application will be scored out of 100 points based on five criteria and approved in rank order, provided the application meets a minimum score of 50 points. The scoring criteria are summarized in Table 10 below.⁶¹

⁵⁹ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 49; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 49.

⁶⁰ *Id.*

⁶¹ *National Grid*, D.P.U. 25-189, Exh. AG-1-8; *Eversource*, D.P.U. 25-188, Exh. AG-1-8.

1 *Table 10. Scoring Criteria for Publicly Accessible DCFC Batched Applications*

Prioritization Factor	Points	Purpose
Corridor Proximity	30	Support projects near secondary transportation corridors as identified by the EVICC Second Assessment.
Location Type	10	Support projects at venue types with high utilization potential and public benefit.
Geographic Distribution	30	Support projects in cities and towns with lower DCFC density (ports per capita).
Available Grid Capacity	15	Support projects located on feeders with available capacity.
Site Design & Amenities	15	Support projects with facilities and amenities that improve the charging experience and prioritize safety and accessibility.

2 **Q. Do you have any concerns with the EDCs' proposed publicly accessible DCFC**
3 **batched application process?**

4 A. While we generally support the EDCs' proposed transition to a batched application process
5 for publicly accessible DCFC, we have two concerns related to specific aspects of the
6 proposal: sizing each batch based on MW targets and a lack of assurance that sites along
7 corridors will have sufficient charging capacity. We discuss each of these concerns in
8 further detail below.

9 **Q. Why is it problematic to size each application batch based on MW targets?**

10 A. The EVI-Pro Lite tool that the EDCs use to size their offerings defines the charging gap in
11 terms of the number of ports, rather than charging capacity. Sizing each application batch
12 based on MW targets, coupled with the change from per port to per kW incentive limits,
13 has the potential to concentrate program funding in a few high-powered charging sites,

1 rather than ensuring an adequate number of charging ports to address the charging gap
2 across a wider geographic area.

3 **Q. What do you recommend?**

4 A. We recommend that the target deployment under each application batch be based on the
5 number of charging ports, instead of MWs of charging capacity. The number of charging
6 ports deployed under each application batch should follow the same ratios proposed by the
7 EDCs (one-fourth of ports in the first year, one-eighth of ports in each subsequent six-
8 month period for the remaining three years), subject to the overall reduction in the size of
9 the publicly accessible DCFC budget discussed above.

10 **Q. Do the EDCs' proposed scoring criteria reflect the charger types the EVICC Second**
11 **Assessment specifies as a priority for deployment along transportation corridors?**

12 A. Mostly, but not entirely. The EVICC Second Assessment specifically identified DCFC
13 ports with at least 120 kW of charging capacity along transportation corridors as a
14 priority.⁶² However, the EDCs' proposed scoring criteria do not include a mechanism to
15 encourage charging ports with this level of charging capacity. Notably, the average
16 publicly accessible DCFC port deployed under the previous EV program phase was only
17 75 kW for National Grid and 64 kW for Eversource.⁶³ Under the EDCs proposals, charging
18 ports less than 120 kW deployed near secondary transportation corridors can receive full

⁶² *EVICC Second Assessment*, at 86.

⁶³ *National Grid*, D.P.U. 25-189, Exh. AG-2-2, Att. AG-2-2-2; *Eversource*, D.P.U. 25-188, Exh. AG-2-2, Att. AG-2-2.

1 scores for the Corridor Proximity prioritization factor, even though those ports do not have
2 sufficient capacity to address the charging needs along transportation corridors as identified
3 as a priority by the EVICC Second Assessment.

4 **Q. What do you recommend?**

5 A. We recommend that the EDCs require Publicly Accessible DCFC sites to have at least 120
6 kW in charging capacity per port to score for the Corridor Proximity prioritization factor.
7 Since fast charging along transportation corridors is not the only need being met by
8 publicly accessible DCFC deployments, those with less than 120 kW per port in charging
9 capacity should still be eligible to participate in the application batches, score for other
10 prioritization factors, and receive incentives if they are selected.

11 **IV. RESIDENTIAL SEGMENT**

12 **A. 1–4 Unit Housing**

13 **1. Overview**

14 **Q. Please describe the EDCs' current Residential 1–4 unit programs.**

15 A. Under their Phase III and Phase II programs, National Grid and Eversource, respectively,
16 offer a Residential EV Charging Upgrade program and a Turnkey Installation program.
17 The Charging Upgrade programs provide rebates to residential customers to offset the cost
18 of wiring or electric panel upgrades necessary to install a L2 charger. Each EDC offers a
19 Standard (i.e., base offer) incentive of up to \$700 for single-family residences and up to
20 \$1,400 for 2–4 unit buildings. The EDCs also offer Enhanced incentives to low-income
21 customers who are either residing in EDCs or are enrolled on the R-2 discount rate. Rebates

for EVSE are reserved for customers on the R-2 discount rate. Under the Turnkey Installation program, customers in EJC's or on the R-2 discount rate receive the incentives upfront and third-party vendors complete the EVSE installation.⁶⁴

The residential Standard and Enhanced incentives for each EDC are listed in Table 11 below.

Table 11. Existing Residential EV Charging Upgrade Program Incentives⁶⁵

	Single-Family		2–4 Unit Buildings	
	Make-Ready	EVSE	Make-Ready	EVSE
National Grid				
Standard	Up to \$700		Up to \$1,400	
EJC's	Up to \$1,000		Up to \$2,000	
R-2 Discount Rate	Up to \$1,000	Up to \$700	Up to \$2,000	Up to \$700
Eversource				
Standard	Up to \$700		Up to \$1,400	
EJC's	Up to \$1,000		Up to \$2,000	
R-2 Discount Rate	Up to \$1,700		Up to \$2,700	

Q. Does National Grid propose to continue its Residential 1–4 unit offerings during Phase IV?

⁶⁴ *National Grid*, D.P.U. 24-64, Exh. NG-MMJG-1, at 9; *Eversource*, D.P.U. 25-51, Exh. ES-ST-1, at 14–15; and *EV Home Charging Rebates in Massachusetts*, EVERSOURCE, <https://www.eversource.com/residential/save-money-energy/clean-energy-options/electric-vehicles/charging-stations> (last visited Apr. 1, 2026).

⁶⁵ *Id.*

1 A. Yes. National Grid proposes to continue offering the Residential Turnkey program and
2 proposes a Residential Customer Project Incentive to cover a portion of Residential Project
3 Costs, which include “wiring for a 240-volt Level 2 charging circuit installation, electric
4 panel or load center modifications required to support new EV charging circuits, EVSE
5 purchase and installation, [Power Control System] product purchase and installation costs,
6 and V2G equipment purchase and installation costs.”⁶⁶ However, customers are ineligible
7 if a project consists solely of plug-in EVSE not requiring hardwired connections or wiring
8 work; replacement or secondary L2 EVSE installation; or customers who were supported
9 by a prior residential EV charging installation rebate.⁶⁷

10 National Grid proposes a two-tiered incentive: a Standard tier that is equal to the lesser of
11 (i) 80 percent of the Residential Project Cost or (ii) \$700 and the Enhanced tier that is the
12 lesser of (i) 80 percent of the Residential Project Cost or (ii) \$2,500.⁶⁸ The total proposed
13 budget for the residential 1–4 unit offerings is \$15.8 million over the Phase IV Program

⁶⁶ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 5. The term Power Control System (“PCS”) replaces the term Energy Management System, which refers to software- and hardware-based technologies that enable the management of a charging site’s maximum load, such as by spreading charging capacity among several charging ports or co-optimizing with other on-site load. The use of PCS allows charging sites to reduce necessary grid upgrades as well as manage demand charges. For example, a charging site with ten 150-kW ports, which would usually require a service connection sized to support 1,500 kW, can utilize PCS to limit the maximum concurrent charging capacity to 1,000 kW, thereby avoiding 500 kW’s worth of grid upgrades.

⁶⁷ *Id.* at 74.

⁶⁸ *Id.* at 73.

term, excluding supporting resources.⁶⁹ This budget assumes a total of \$3.2 million of Standard incentives and \$10.6 million of Enhanced incentives during Phase IV.⁷⁰

Q. How does National Grid’s Residential Customer Project Incentive program compare to the Phase III Residential EV Charging Upgrade program?

A. The Standard tier incentive cap is consistent with Phase III and now includes a 20 percent minimum cost share. However, based on the definition of “Residential Project Cost,” the Standard tier incentive can now be used to support EVSE purchase and installation (as long as hardwired connections or wiring work is required), PCS product purchase and installation costs, and V2G equipment purchase and installation costs.⁷¹

For the Enhanced tier, National Grid proposes to increase the incentive cap from \$2,000 to \$2,500, expand customer eligibility, and require a 20 percent minimum cost share. As shown in Table 12 below, National Grid simplifies the Enhanced tier structure by no longer differentiating between single-family and 2–4 unit buildings but expands the type of eligible customers.⁷²

⁶⁹ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-2.

⁷⁰ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-8.

⁷¹ *Id.* at 5.

⁷² *Id.* at 73–74.

1 *Table 12. National Grid Phase III and Phase IV Residential Incentives*

	Single-Family		2–4 Unit Buildings	
	Make-Ready	EVSE	Make-Ready	EVSE
Phase III				
Standard	Up to \$700		Up to \$1,400	
EJCs	Up to \$1,000		Up to \$2,000	
R-2 Discount Rate	Up to \$1,000	Up to \$700	Up to \$2,000	Up to \$700
Phase IV				
Standard	80% residential project cost Up to \$700			
EJCs	N/A		N/A	
R-2 Discount Rate	80% residential project cost Up to \$2,500		80% residential project cost Up to \$2,500	
2-4 Unit Buildings	N/A		80% residential project cost Up to \$2,500	
< 150-Amps	80% residential project cost Up to \$2,500		80% residential project cost Up to \$2,500	
V2G Installation	80% residential project cost Up to \$2,500		80% residential project cost Up to \$2,500	

2 **Q. Does Eversource propose a similar incentive structure?**

3 A. No. Eversource proposes to simplify its residential segment incentives and limit eligibility
4 to only customers who are verified as low income, have received a MOR-EV Used EV

1 Rebate,⁷³ or live in 2–4 unit housing. Eversource explains that it is no longer offering a
2 Standard residential incentive so that ratepayer-funded dollars are focused on areas with
3 the highest impact.⁷⁴ Eversource states that after examining the state of the EV market, it
4 found that “many segments of the market area likely to adopt EVs without program
5 support.”⁷⁵

6 Eversource also proposes to maintain its Phase II incentive cap of up to \$2,000 (or 80
7 percent of the costs) for a 240-volt installation, panel optimization, and PCS products
8 including PCS-supported EVSE.⁷⁶ The total budget for this incentive offering is \$10.7
9 million over the Phase III Program term.⁷⁷

10 **Q. Please summarize the EDCs’ proposed deployment targets and budgets for the**
11 **Residential 1–4 unit segment.**

12 A. The EDCs’ proposed deployment targets and budgets for the Residential 1–4 Unit segment
13 are summarized in Table 13 below.⁷⁸

⁷³ The MOR-EV Used EV Rebate is limited to customers who participate in certain income-qualifying programs such as Mass Health, Prescription Drug Assistance, Supplemental Nutrition Assistance Program, Veterans Programs and customers with incomes below certain thresholds. See *MOR-EV Applicant Guidelines*, MASS. DEP’T OF ENERGY RES. (2025), <https://www.mass.gov/doc/october-8-2025-mor-ev-program-guideline-for-applicants/download>.

⁷⁴ *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1 at 63.

⁷⁵ *Id.* at 63.

⁷⁶ *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1 at 62.

⁷⁷ *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-2.

⁷⁸ *National Grid*, D.P.U. 25-189, Exhs. NG-EVPP-1, Table 13; NG-EVPP-8; *Eversource*, D.P.U. 25-188, Exhs. ES-EVPP-1, Table 12; ES-EVPP-5.

Table 13. Residential 1–4 Unit Deployment Targets and Budgets

Utility	Ports Enabled	MW Enabled	Budget
National Grid	10,000	76	\$15,806,560
Eversource	5,338	41	\$10,675,000

Q. Do you have any concerns with the EDCs’ proposed residential incentives?

A. Yes. As we will address in more detail below, we have several concerns with National Grid’s proposal, which include: (1) continuing to offer a Standard tier incentive to non-low-income and non-EJC customers, (2) increasing the Enhanced tier incentive, and (3) providing an Enhanced tier incentive to V2G installations. We also recommend both EDCs establish an EV purchase price limit for residential incentives. We discuss the resulting changes and recommended changes to the size of the Residential budget in Section VI below.

2. Residential Standard Tier incentives

Q. What is National Grid’s justification for continuing to offer the Standard tier incentive?

A. National Grid explains that the Evaluation Report found that most Phase III participants upgraded their charging due to the availability of the Standard incentive. They also explain that the Evaluation Report indicated that 67 percent of respondents cited the availability of the incentive as a motivation for participating in the program and 64 percent stated the program’s influence on their decision to upgrade home wiring. National Grid also states

1 the importance of including moderate-income customers that are not eligible for the R-2
2 rate and residents of single-family homes.⁷⁹

3 **Q. Do you agree with National Grid’s justification?**

4 A. No. Given the energy affordability concerns facing the Commonwealth, it is important
5 that ratepayer funds be used to create outcomes that would not have otherwise occurred.
6 For example, the Evaluation Report cited by National Grid, found that almost half (47
7 percent) of respondents said they would have installed a new L2 Charger without the
8 program.⁸⁰ In addition, 83 percent of Charging Upgrade participants owned their EV prior
9 to upgrading their home wiring through the program.⁸¹ This means that the program did
10 not spur EV adoption because most participants already had EVs and relied on Level 1
11 (“L1”) charging. National Grid itself “acknowledges that L1 charging remains a cost-
12 effective, viable solution for certain applications, such as homes and workplaces and other
13 locations with long vehicle dwell times.”⁸²

14 **Q. Have other jurisdictions ended utility incentives for non-low-income customers?**

15 A. Yes. For example, in New York the Public Service Commission declined to approve a
16 proposal for a utility residential make-ready program that would have provided incentives
17 for the installation of wiring, outlet equipment, EVSE installation, and panel upgrades,

⁷⁹ *National Grid*, D.P.U. 25-189, Exh. AG-1-15.

⁸⁰ *National Grid*, D.P.U. 24-64, Exh. NG-MMJG-1, App. E, at 103–04.

⁸¹ *Id.* at 102.

⁸² *National Grid*, D.P.U. 25-189, Exh. AG-3-16.

1 stating that it “does not believe a residential make-ready program is an appropriate use of
2 ratepayer dollars... Moreover, the Commission does not believe a make-ready program
3 designed for individual residences would be a prudent use of ratepayer dollars in the light
4 of the existing and additional ratepayer investments in the transportation electrification
5 sector that more appropriately serve a wider audience.”⁸³

6 **Q. What is your recommendation for National Grid’s Standard tier incentive?**

7 A. We recommend that National Grid eliminate the Standard tier incentive, and the
8 corresponding budget amounts, from its Phase IV EV Programs. This modification will
9 create alignment with Eversource’s Phase III EV Programs, which does not offer a
10 Standard tier incentive, and will better focus ratepayer funds on the customer segments
11 requiring the most support. We find that eliminating the Standard tier incentive also better
12 aligns with the recommendations in the EVICC Second Assessment. EVICC recommends
13 that going forward, new and existing ratepayer-funded programs should focus on the
14 highest value opportunities for both light-duty passenger and fleet EVs, noting that current
15 program offerings for wiring upgrades and L2 chargers for low-income customers
16 “appropriately address barriers to adoption.”⁸⁴

⁸³ N. Y. Pub. Serv. Comm’n, Case 18-E-0138, Order Approving Midpoint Review
Whitepaper’s Recommendations with Modifications, at 92 (Nov. 16, 2023).

⁸⁴ *EVICC Second Assessment*, at 83–85.

1 We also recommend that National Grid modify its eligibility criteria for the Enhanced tier
2 incentive to include customers that have received a MOR-EV Used EV Rebate, as proposed
3 by Eversource. This modification will capture moderate-income customers that are not
4 eligible for the R-2 rate but qualify for a MOR-EV Used EV Rebate. These changes will
5 also have the benefit of bringing the Companies' EV Programs into closer alignment, as
6 prioritized by the Department.⁸⁵

7 **3. Residential Enhanced Tier incentives**

8 **Q. How does National Grid justify providing customers installing residential V2G**
9 **systems with the Enhanced tier incentive?**

10 A. National Grid explains that there has been minimal deployment of residential V2G systems
11 to date and customers installing V2G systems will face higher-than-average installation
12 costs.⁸⁶ National Grid indicates that the approximate medium cost range for a residential
13 V2G system is \$16,640.⁸⁷ National Grid explains that the Enhanced incentive will
14 encourage more installations of residential V2G; however, National Grid does not expect
15 many customers to adopt this technology during the Phase IV Program term.⁸⁸ Any

⁸⁵ *EV Program*, D.P.U. 21-90/D.P.U. 21-91/D.P.U. 21-92, Order, at 10, which states “the Department directed the Companies to coordinate their EV proposals for consistency and uniformity across service territories to the greatest extent practicable.”

⁸⁶ *National Grid*, D.P.U. 25-189, Exh. AG-2-14(c).

⁸⁷ *National Grid*, D.P.U. 25-189, Exh. AG-3-12.

⁸⁸ *National Grid*, D.P.U. 25-189, Exh. AG-2-14(c).

1 customers receiving the Enhanced tier incentive for V2G installation would be required to
2 participate in the Connected Solutions demand response program.⁸⁹

3 **Q. Do you support National Grid's proposal to provide residential V2G systems with an**
4 **Enhanced incentive?**

5 A. No. While we agree that residential V2G has the potential to create distribution system
6 and customer resilience benefits, it is premature to provide an Enhanced residential
7 incentive for this technology. First, given the expense of V2G chargers, it is reasonable to
8 assume that only higher-income customers will pursue this technology. While National
9 Grid expects only minimal interest in V2G during the Phase IV Program term, we are
10 concerned that should greater interest materialize, funding for Enhanced incentives would
11 be shifted away from customers facing the greatest financial barriers such as customers on
12 the R-2 discount rate or those facing installation complexities such as renters and those
13 residing in 2-4 unit dwellings. Additionally, as discussed in Section III, MassCEC is
14 currently conducting a V2X Pilot that will help identify specific barriers to and solutions
15 for scaling V2G deployment, including among residential customers. If National Grid and
16 the Department wish to support V2G systems, we recommend waiting for results and
17 recommendations from the MassCEC Pilot to be published before designing additional
18 incentives for V2G beyond what is already available under Connected Solutions.

19 **Q. What do you recommend?**

⁸⁹ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 75.

1 A. We recommend that National Grid remove residential V2G as an eligible customer
2 segment for the Enhanced tier incentive.

3 **Q. What is National Grid's justification for increasing the Enhanced tier incentive?**

4 A. National Grid states that it increased the Enhanced tier incentive from \$2,000 to \$2,500
5 due to the expectation that eligible customer groups such as 2–4 unit dwellings, constrained
6 electric panels, and V2G systems will face higher-than-average installation costs.⁹⁰
7 National Grid indicates that the average cost for upgrading to a 200-amp panel is \$2,500
8 to \$4,500, excluding the cost to add a new 240-volt circuit or install an L2 charger, and the
9 approximate medium cost range for a V2G system is \$16,640.⁹¹

10 National Grid further explains that the higher incentive level may cover up to 80 percent
11 of the project costs, which is similar to the Commercial and MUD Enhanced incentives
12 that cover 75 percent of project costs.⁹²

13 **Q. Do you support National Grid's proposal to increase the Enhanced tier incentive?**

14 A. No, we do not. As indicated above, we recommend that V2G systems not be eligible for
15 an Enhanced incentive. After removing those high-cost systems, it is not clear why a higher
16 Enhanced tier incentive is needed. National Grid did not provide evidence to support that
17 the Phase III \$2,000 Enhanced incentive was insufficient. The Evaluation Report found

⁹⁰ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 75.

⁹¹ *National Grid*, D.P.U. 25-189, Exh. AG-3-12.

⁹² *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 75.

1 that the EDCs' Phase III Year 2 residential programs achieved a notable (four times)
2 increase in the share of R-2 discount customer rebates over the prior year.⁹³ Similarly, no
3 evidence was provided for why the Phase III \$1,400 Standard incentive or \$2,000 Enhance
4 incentive for 2–4 unit dwellings was insufficient.

5 It is also important to consider that Eversource proposed to maintain its Phase II \$2,000
6 rebate cap for customers who are low-income verified, received a MOR-EV Used EV
7 Rebate, or live in 2–4-unit housing. Consistency across utility programs helps to avoid
8 customer and market confusion.

9 **Q. What do you recommend?**

10 A. We recommend that National Grid reduce its Enhanced tier incentive to a maximum of
11 \$2,000 to match Eversource's proposal. This modification will also allow funds to reach
12 more customers over the Phase IV Program term.

13 **4. Vehicle purchase price limits**

14 **Q. Please summarize the EDCs' proposal to establish vehicle purchase price cap to**
15 **determine eligibility for residential incentives?**

16 A. The EDCs propose to defer setting vehicle purchase price limits due to the expiration of
17 federal tax credits for new and used EV purchases. Both EDCs express their intent to align
18 with existing state or federal incentive purchase prices limits, where possible.⁹⁴ National

⁹³ *National Grid*, D.P.U. 25-68, Exh. NG-MMJG-1, App. E. at 9.

⁹⁴ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 76–77; *Eversource*, D.P.U. 25-188, Exh. AG-2-13(d).

Grid explains that DOER indicated that the MOR-EV vehicle purchase price caps may change during the Phase IV Program term as a result of the recent expiration of the federal EV tax credits and “generally suggested not aligning with the current MOR-EV program vehicle purchase price limits.”⁹⁵ National Grid further specifies that should it not be possible to align the price limit with existing state or federal price limits, they will determine a price limit by analyzing recent average vehicle sales data to set a price limit.⁹⁶

Q. Do you support the EDCs waiting to set vehicle purchase price limits?

A. No. While we understand there may be modifications to the MOR-EV program vehicle purchase price limits during National Grid’s Phase IV and Eversource’s Phase III Program terms, a price limit should be in place from the start. It is not clear at what point during the program term the MOR-EV vehicle purchase price caps may change. If the change does not occur until later in Program Year 1, or after, there is a risk that program incentives will be allocated to higher-income customers instead of those who are in the most need of financial support.

Q. What is your recommendation?

A. We recommend the EDCs set the purchase price cap to the current MOR-EV purchase price limits.

⁹⁵ *National Grid*, D.P.U. 25-189, Exh. AG-1-11(a).

⁹⁶ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 77.

B. Multi-Unit Dwellings

Q. Please summarize the EDCs' proposed incentives for MUDs.

A. The EDCs propose to provide MUDs with the same L2 Standard and Enhanced incentive levels, with the same incentive caps, as those available to Commercial projects, with MUDs located in EDCs and low-income MUDs eligible for Enhanced incentives (see Table 2 and Table 3 above). The deployment targets and budgets for MUDs are summarized in Table 14 below.⁹⁷

Table 14. MUDs Deployment Targets and Budgets

Utility	Ports Enabled	MW Enabled	Budget
National Grid	3,157	23,000	\$26,494,327
Eversource	4,861	35,000	\$33,273,450

Q. Do you have concerns with the EDCs' proposed MUD incentives and budget?

A. Yes. We are concerned that Eversource proposes to preclude connected L2 outlets and receptacles from receiving MUD incentives. We are also concerned about the size of the MUD budget and will discuss this issue in Section V below.

Q. Why should connected L2 outlets and receptacles be eligible for MUD incentives?

A. L2 outlets and receptacles are smart devices specifically designed to support EV charging, capable of tracking individual charging sessions and facilitating billing between property

⁹⁷ *National Grid*, D.P.U. 25-189, Exhs. NG-EVPP-4; NG-EVPP-7; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-4.

owners and drivers, and can be installed at lower cost than conventional EVSE.⁹⁸ However, unlike with conventional EVSE, drivers must bring their own cable to connect to the outlet and charge their EV. According to National Grid, connected L2 outlets and receptacles can help “reduce the cost to enable EV charging at MUDs and expand accessibility of EV charging to a broader range of MUDs.”⁹⁹ While National Grid proposes to make connected L2 outlets and receptacles eligible for MUD incentives, Eversource does not propose to do so.¹⁰⁰ By not proposing to do the same, Eversource may be passing on opportunities to support the Commonwealth’s EV adoption goals at lower cost.

Q. What do you recommend?

A. We recommend that the Department require Eversource to enable connected L2 outlets and receptacles to access MUD incentives.

V. MANAGED CHARGING

A. Eversource Managed Charging Proposal

Q. Please summarize Eversource’s proposed managed charging programs.

⁹⁸ See, e.g., *Level 2 Outlet*, ORANGE CHARGER, <https://www.orangecharger.com/products/level-2-outlet>.

⁹⁹ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 67.

¹⁰⁰ *Id.*; *Eversource*, D.P.U. 25-188, Exh. AG-2-12.

1 A. Eversource proposes to continue offering a passive managed charging program and an
2 active managed charging program.¹⁰¹ The passive managed charging program, Off-Peak
3 Rewards, is consistent with the design approved in the mid-term modification. Participants
4 will receive a participation incentive of \$10 per month if 90 percent of their charging that
5 month occurs outside the on-peak window (2 pm–10 pm every day).¹⁰² Eversource also
6 proposes to offer an active managed charging program, called “Scheduled Charging,”
7 where Eversource will determine the pace and timing of EV charging based on the
8 customer’s preferred charging schedule.¹⁰³ All customers that qualify are eligible to enroll
9 in either the Off-Peak Rewards program or the Schedule Charging program. However,
10 Eversource will proactively offer the Scheduled Charging program to customers who
11 consistently miss the off-peak charging target under the passive managed charging
12 program. Participants in Scheduled Charging will receive a \$10 a month incentive as long
13 as they complete at least one at-home charging session each month and cannot override the
14 schedule more than once a month. For both managed charging programs, customers will
15 be eligible for a one-time enrollment incentive of \$50 (unless they receive a Residential
16 Segment incentive) and are automatically enrolled in one of the two managed charging

¹⁰¹ Passive managed charging programs rely on customers’ behavioral changes to shift EV charging load, while active managed charging programs involves direct control by the utility or aggregator to ensure EV charging occurs at specific times. *See Managed Charging Incentive Design: Guide to Utility Program Development*, SMART ELEC. POWER ALLIANCE (2021), <https://sepapower.org/resource/managed-charging-incentive-design/>.

¹⁰² *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 67.

¹⁰³ *Id.* at 67–68.

1 programs.¹⁰⁴ The proposed budget for the two residential managed charging programs is
2 approximately \$9 million, inclusive of customer incentives and vendor implementation
3 costs.¹⁰⁵

4 Eversource also proposes to offer a Commercial Managed Charging program for EV fleets.
5 Eversource explains that fleet customers currently lack an incentive to align their charging
6 patterns to take advantage of system or local specific off-peak times.¹⁰⁶ Eversource
7 proposes to offer a 5 cent per kWh incentive to customers for charging during off-peak
8 hours from June 1 through September 30 and a 3 cent per kwh incentive during off-peak
9 hours from October 1 through May 31, to align with National Grid's fleet managed
10 charging program. The proposed budget is \$0.7 million, inclusive of customer incentives,
11 vendor implementation costs, and internal administration and IT.¹⁰⁷

12 Eversource plans to pursue monetizing Clean Peak Energy Standard credits on behalf of
13 customers participating in the residential managed charging programs and the Commercial
14 Managed Charging program to help offset program costs.¹⁰⁸

15 **Q. Does Eversource propose a compensation framework for V2G exports?**

¹⁰⁴ *Id.* at 63.

¹⁰⁵ *Id.* at 69.

¹⁰⁶ *Id.* at 70.

¹⁰⁷ *Eversource*, D.P.U. 25-188, Exh. AG-2-18.

¹⁰⁸ *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 69, 71.

1 A. No. Eversource is not proposing a V2G offering or pilot as part of its Phase III EV
2 Program. Instead, the Company states that it is “evaluating the potential to add a V2G pilot
3 site into the Connected Solutions + pilot with enhanced incentive paid as part of the Grid
4 Services Compensation Fund,” and that this site would be part of the MassCEC V2X pilots
5 and would include dispatches in the 2026 season.¹⁰⁹ Eversource also states that it will
6 monitor the results of the MassCEC V2X pilots and pilots in other jurisdictions before
7 developing, applying, and implementing a wider-scale potential V2G pilot or program.¹¹⁰

8 **Q. Do you agree with Eversource’s proposed approach to supporting V2G?**

9 A. Yes. Eversource’s participation in the MassCEC V2X pilot would help generate data and
10 lessons learned specific to Eversource’s service territory, which would be useful for the
11 development of a larger-scale V2G offering in the future.

12 **Q. Should the Department require Eversource to develop a compensation framework**
13 **for V2G?**

14 A. Yes. Unlike National Grid, which currently provides compensation for V2G exports
15 through its Connected Solutions program, Eversource does not have any offerings that
16 compensate V2G systems for the value of their grid exports. This means that customers in
17 Eversource territory do not have any incentive to adopt V2G technology, resulting in
18 Eversource missing out on the valuable grid capacity that V2G can provide. Therefore, the

¹⁰⁹ *Eversource*, D.P.U. 25-188, Exh. AG-1-10.

¹¹⁰ *Id.*

Department should require Eversource to propose a V2G compensation framework within six months of the publication date of the MassCEC V2X pilot guidebook.

B. National Grid Managed Charging Proposals

Q. Describe National Grid’s proposed managed charging programs.

A. National Grid plans to continue its Off-Peak Charging Rebate program but proposes modifications to the rebate structure. National Grid proposes to assign residential and commercial customers into two main “Use Cases”: (1) System Peak Load Reduction, to reduce EV charging loads during ISO-NE balancing authority peak times, and (2) Distribution-System Peak Load Reduction, to reduce EV load during times when substation-level or feeder-level distribution assets are constrained or involved in a non-wires alternative initiative.¹¹¹ National Grid also proposes to examine additional Use Cases related to ISO-NE supply cost forecasts and low-load/high-renewables periods. Each use case defines the target window for when customers should charge their vehicles.¹¹² Similarly to Eversource, National Grid will require customers receiving a residential incentive to participate in managed charging.¹¹³ The proposed incentive levels for National Grid’s managed charging program are include in Table 15 below.

¹¹¹ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 83.

¹¹² *Id.* at 83–84.

¹¹³ *Id.* at 75–76.

1 *Table 15. National Grid's Proposed Managed Charging Incentives*¹¹⁴

Residential		
Charging performance targets	Definition	Incentive
"Best Performance"	>= 90% in target window	\$15 per month
"Good Performance"	>= 70% in target window	\$5 per month
"Insufficient Performance"	< 70% in target window	\$0 per month
Commercial		
Oct 1 – May 31	3 cents/kWh for each kWh charged in target window	
June 1 – Sept 30	5 cents/kWh for each kWh charged in target window	

2 National Grid also indicates that it will examine its ability to enroll its managed charging
3 programs into the Clean Peak Standard to generate Clean Peak Energy Certificates during
4 the Phase IV Program term. National Grid proposes to use any resulting net revenues to
5 offset the costs of the EV programs.¹¹⁵ The proposed residential managed charging budget,
6 including implementation and vendor costs, is [REDACTED] and the commercial managed
7 charging budget, including implementation and vendor costs, is [REDACTED].¹¹⁶

8 **Q. Do you have any concerns with National Grid's proposed managed charging**
9 **programs?**

¹¹⁴ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 86.

¹¹⁵ *Id.* at 92.

¹¹⁶ *National Grid*, D.P.U. 25-189, Exhs. NG-EVPP-9; NG-EVPP-10; AG-3-15, Att. AG-3-15
CONFIDENTIAL.

1 A. Yes. We are concerned with the overall size of National Grid's residential managed
2 charging program compared to the benefits. As we will explain in more detail below,
3 National Grid's preliminary BCA is based on estimated program impacts and not verified
4 results. In addition, while National Grid plans to use revenues from the Clean Peak
5 Standard to offset the costs of the program, if they don't materialize, the program is not
6 cost-effective over the Phase IV term according to the preliminary BCA.

7 **Q. What do you recommend?**

8 A. We recommend that the residential managed charging enrollment levels in Program Years
9 3 and 4 (2029 and 2030) be held constant at Program Year 2 levels (2028) until National
10 Grid can conduct a more rigorous BCA with data on the realized benefits of managed
11 charging and Clean Peak Standard revenues. At that point in time, National Grid can use
12 the BCA results and documented Clean Peak Standard revenues to request an expansion of
13 the residential managed charging from the Department. We explain the impact of this
14 change to the budget later in Section VI.

15 **C. Managed Charging Tracking Metrics**

16 **Q. Do the EDCs propose tracking metrics for the managed charging programs?**

1 A. Yes. The EDCs propose to track metrics related to participation and the percentage of kWh
2 shifted off-peak and the percentage of charging sessions shifted off-peak resulting from
3 managed charging programs.¹¹⁷

4 **Q. Do you recommend additional tracking metrics for managed charging?**

5 A. Yes. Given the costs of the managed charging programs, it is important to track additional
6 evaluation metrics to ensure the purported benefits are realized and the programs are cost-
7 effective prior to any future expansion. We recommend that the Department require
8 Eversource and National Grid to track the set of metrics included in Exhibit AG-CLTN-4.

9 **D. Benefit Cost Analysis**

10 **Q. Did the EDCs file BCAs to support their managed charging proposals?**

11 A. Eversource indicates that it has not conducted a formal BCA for the proposed managed
12 charging program. However, in response to discovery, Eversource provides a preliminary
13 analysis comparing the costs of the program (e.g., implementation and customer
14 incentives) to the benefits associated with the deferral of new capacity and transmission
15 build out in the ISO region and the deferral of new distribution build out in Eversource's
16 service territory.¹¹⁸

¹¹⁷ *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-9; *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-13.

¹¹⁸ *Eversource*, D.P.U. 25-188, Exh. AG-2-16.

1 National Grid provides an initial estimate of the potential benefits and costs of its
2 residential managed charging program in response to discovery. National Grid explains
3 that it cannot provide the same analysis for the commercial managed charging program
4 because it does not have a baseline for commercial or fleet EV charging to estimate
5 resulting EV load shifts.¹¹⁹

6 **Q. What methodology did National Grid use to conduct the BCA?**

7 A. National Grid estimated the kW and kWh of EV load shift from different levels of
8 participant off-peak charging performance (e.g., 70 percent, 80 percent, 90 percent) for the
9 residential managed charging program compared to a baseline. National Grid then applied
10 benefit value streams associated with avoided generation capacity costs, avoided regional
11 transmission system costs, avoided primary distribution system costs, and a system
12 reliability value to each kW and kWh shifted.¹²⁰ For the costs, National Grid included the
13 total incentive costs based on number of projected participants, implementation costs and
14 vendor administration costs. National Grid calculated the benefit-cost ratio for non-
15 participants, which appears to mirror a Utility Cost Test (“UCT”) and for participants (i.e.,
16 Participant Cost Test). National Grid also conducted the BCAs with and without the net
17 revenues from the Clean Peak Standard.¹²¹

¹¹⁹ *National Grid*, D.P.U. 25-189, Exh. AG-2-22.

¹²⁰ *National Grid*, D.P.U. 25-189, Exh. AG-1-12(d), Att. AG-1-12-1.

¹²¹ *National Grid*, D.P.U. 25-189, Exh. AG-2-22.

1 **Q. What is your assessment of National Grid's BCA?**

2 A. We understand that National Grid calculated the estimated benefits of the residential
3 charging program for the purpose of developing the participant incentive levels and not
4 necessarily for the purpose of a BCA.¹²² While this is a reasonable approach to determine
5 incentive values, it does not adequately capture the design of the program. The BCA
6 approach mirrors the approach used to assess the cost-effectiveness of the Connected
7 Solutions programs, which does not adequately reflect the proposed System Peak Load
8 Reduction Use Case or more granular substation or feeder-level specific constraints. In
9 addition, the avoided capacity value of \$49.21 per kW appears to be overstated. Using the
10 Program Year 1 avoided capacity costs value for a one-year measure life from National
11 Grid's 2025-2027, we determine that the avoided capacity cost should be \$34.84 per kW.¹²³

12 While National Grid's preliminary BCA should not be used to determine whether the
13 residential managed charging program should be approved by the Department, it does
14 highlight the importance of revenues from the Clean Peak Standard. The BCA shows that
15 without the ability to reduce program costs from Clean Peak Standard revenues, the
16 residential managed charging program is [REDACTED]

17 [REDACTED].¹²⁴

¹²² *National Grid*, D.P.U. 25-189, Exh. AG-1-12(d).

¹²³ *National Grid*, D.P.U. 24-148, Exh. NG-5.

¹²⁴ *National Grid*, D.P.U. 25-189, Exh. AG-2-22, Att. AG-2-22 CONFIDENTIAL.

1 **Q. How did Eversource conduct its BCA?**

2 A. Eversource did not conduct a formal BCA. Eversource explains that no official BCA has
3 been proposed or approved for managed charging. However, Eversource sees the
4 opportunity for the development of a broader BCA framework, informed by stakeholder
5 input, that could apply to managed charging and other load management programs.¹²⁵

6 While Eversource did not conduct a formal BCA, it provides a preliminary analysis in
7 response to discovery that compares costs for program support and customer incentives to
8 the benefits of “deferral of new capacity and transmission build out in the ISO region and
9 deferral of new distribution build out in Eversource's territory.”¹²⁶ Eversource conducts
10 the analysis using a low benefit scenario and a high benefit scenario. The low benefits
11 scenario yields a BCR of 0.38 in 2026, increasing to 0.57 in 2030. The high benefits
12 scenario results in a BCR of 0.7 in 2026, increasing to 1.05 in 2030.¹²⁷ We are awaiting
13 further details and workpapers from Eversource to understand the input assumptions and
14 how the benefit streams were estimated.

15 **Q. Why is it important that the EDCs conduct and improve their BCAs for managed**
16 **charging?**

17 A. EV load shifting programs are critical to avoid the negative impacts of increased EV
18 charging load to the distribution system. Programs that shift EV charging to off-peak

¹²⁵ *Eversource*, D.P.U. 25-188, Exh. AG-2-16(a).

¹²⁶ *Id.*

¹²⁷ *Id.*

1 periods can mitigate the need for costly distribution system investments and help avoid
2 high energy prices and reduce capacity costs. However, the EDCs' proposed managed
3 charging programs are a significant investment of ratepayer funds. National Grid and
4 Eversource's combined total budget for residential and commercial managed charging is
5 \$28 million, excluding associated supporting resources over the Phase IV Program term.¹²⁸
6 When vendor fees are included, the combined total budget increases to [REDACTED].¹²⁹
7 Similarly to the requirement that the EDCs conduct BCAs for energy efficiency load
8 reduction programs, a BCA should be required for EV managed charging programs. A
9 BCA will help the EDCs and the Department make informed decisions about program
10 design and implementation. This information will also provide an important comparison
11 point to time-of use rates in the future, which can help inform which approach is the most
12 cost-effective option to modify EV charging behavior.

13 **Q. What is your recommendation?**

14 A. We recommend that the Department require the EDCs to begin tracking the realized kWh
15 and kW impacts from managed charging and conduct a BCA to justify any future
16 expansion of the programs.

¹²⁸ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-2.

¹²⁹ *Eversource*, D.P.U. 25-188, Exhs. ES-EVPP-1, at 69; AG-2-18; *National Grid*, D.P.U. 25-189, Exhs. NG-EVPP-9; NG-EVPP-10; AG-3-15, Att. AG-3-15 CONFIDENTIAL.

VI. RECOMMENDED BUDGET MODIFICATIONS

Q. What methodology did the EDCs use to size the proposed Commercial segment?

A. The EDCs use the EVI-Pro Lite and EVI Road Trip tools to estimate the publicly accessible and workplace charging infrastructure needs in 2030 to serve the number of EVs on the road identified in the EDCs' electric load forecasts.¹³⁰ The EDCs then propose to meet different portions of the identified need for each project type, as summarized in Table 16 below.¹³¹

Table 16. Percentages of 2030 Commercial Charging Need to be Met by Proposed Programs

Project Type	National Grid	Eversource
Publicly Accessible DCFC	21%	58%
Publicly Accessible L2	33%	71%
Workplace L2	16%	40%
Fleet L2 and DCFC	13%	3.5x Phase II target

¹³⁰ The EVI-Pro Lite and EVI-Road Trip tools, available from the U.S. Department of Energy, are used to estimate public and workplace charging infrastructure needs to support a specific number of EVs. These tools are commonly used to calculate the size of utility EV charging infrastructure programs. See N. Y. Pub. Serv. Comm'n, Case 18-E-0138, Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs, at 21–27 (2020), <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={6238DD07-3974-4C4E-9201-3E339E311916}&DocTitle=Order%20Establishing%20Electric%20Vehicle%20Infrastructure%20Make-Ready%20Program%20and%20Other%20Programs>; and Conn. Pub. Utils. Regulatory Auth., Docket No. 17-12-03RE04, Decision 8 (Jul. 14, 2021), [https://www.dpuc.state.ct.us/2nddockcurr.nsf/8e6fc37a54110e3e852576190052b64d/eb6c28c81c508b208525875200799494/\\$FILE/171203RE04-071421.pdf](https://www.dpuc.state.ct.us/2nddockcurr.nsf/8e6fc37a54110e3e852576190052b64d/eb6c28c81c508b208525875200799494/$FILE/171203RE04-071421.pdf).

¹³¹ *National Grid*, D.P.U. 25-189, Exh. AG-1-5; *Eversource*, D.P.U. 25-188, Exh. AG-1-4.

1 The EDCs state that the high deployment targets for publicly accessible L2 ports are due
2 to the larger charging gap compared to publicly accessible DCFC, while the low workplace
3 L2 port targets reflect that project type's low priority as identified by the EVICC Second
4 Assessment.¹³²

5 For Fleet L2 and DCFC projects, National Grid proposes to enable approximately 13
6 percent of the estimated market need identified in its 2030 electric load forecast, based on
7 the approximate percentage of vehicles charging at their depot, approximate percentage of
8 vehicles with positive total cost of ownership, and expected development timelines.¹³³

9 Eversource did not calculate a forecasted market need but simply sized its Fleet L2 and
10 DCFC programs to enable approximately 3.5 times the charging funded in its Phase II EV
11 Program, reflecting an expected ramp in adoption.¹³⁴

12 **Q. How did the EDCs determine the size of the budget for the Residential segment?**

13 A. For MUDs, National Grid used the same methodology it used to size the Commercial
14 segment budgets, targeting 50 percent of the charging gap identified by the EVI-Pro Lite
15 tool.¹³⁵ It is unclear how Eversource determined the size of its MUD budget.

¹³² *Id.*

¹³³ *National Grid*, D.P.U. 25-189, Exh. AG-1-5.

¹³⁴ *Eversource*, D.P.U. 25-188, Exh. AG-1-4.

¹³⁵ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-7.

For Residential 1–4 Unit, Eversource sized its program to meet 3.5 percent of the forecasted incremental EV adoption in its service territory each year, based on the historical uptake of incentives from the Company’s Phase II residential offering.¹³⁶ National Grid did not provide an explanation for its proposed Residential 1–4 Unit segment size.¹³⁷

Q. Are the EDCs’ program sizing methodology based on rigorous analysis?

A. No. While the EDCs used the EVI-Pro Lite and EVI Road Trip tools to estimate the total need for most segments, the specific percentages of the need the EDCs propose to meet are ultimately arbitrary. In response to discovery, the EDCs state that they “sized the commercial program based on [their] assessment of support needed to enable priorities identified in the [EVICC] Second Assessment, while acknowledging that the [utility programs] alone could not affordably meet the total EV charging need.”¹³⁸ Eversource’s proposed budgets for the Fleet and MUD segments and National Grid’s proposed budget for the Residential 1–4 Unit segment are not based on any determination of need.

Q. Why is it important to manage the total budget of the proposed EV Programs?

A. Even though National Grid’s proposed Phase IV budget and Eversource’s proposed Phase III budget are lower than those under the EDCs’ respective Phase III and Phase II programs, the proposed investments still represent a significant cost to ratepayers, totaling \$360

¹³⁶ *Eversource*, D.P.U. 25-188, Exhs. ES-EVPP-1, at 64; ES-EVPP-5.

¹³⁷ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 78.

¹³⁸ *National Grid*, D.P.U. 25-189, Exh. AG-1-5; *Eversource*, D.P.U. 25-188, Exh. AG-1-4.

1 million between the two programs, of which \$185 million is directed to the Commercial
2 segment (see Table 1, Table 6, and Table 7 above).¹³⁹ The Companies' proposed programs
3 will lead to rate and bill increases for all ratepayers.¹⁴⁰ Notably, Eversource proposes to
4 meet a much greater percentage of the identified commercial segment charging need and
5 to deploy more MUD charging compared to National Grid (see Table 14 and Table 16
6 above), resulting in greater monthly bill impacts (an average of \$2.52 per month for
7 Eversource customers compared to \$1.41 for National Grid customers).¹⁴¹ Because low-
8 income households spend a larger portion of their income on utility bills than higher-
9 income households,¹⁴² any bill increases will disproportionately impact low-income
10 ratepayers, who are also less likely to adopt EVs and benefit from the charging
11 infrastructure deployed under the EV Programs in the near term. Careful management of
12 program spending is paramount especially when ratepayers are already burdened by
13 affordability challenges.

14 **Q. What do you recommend?**

¹³⁹ National Grid's proposed Phase IV budget is \$194 million, compared to a Phase III budget of \$206 million (*National Grid*, D.P.U. 25-189, Exh NG-EVPP-1, Table 4), while Eversource's proposed Phase III budget is \$166 million, compared to a Phase II budget of \$188 million (*Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, Table 4).

¹⁴⁰ *National Grid*, D.P.U. 25-189, Exh. NG-CRP-3; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-10.

¹⁴¹ *Id.*

¹⁴² *Data Update: City Energy Burdens*, AM. COUNCIL FOR AN ENERGY-EFFICIENT ECON. (2024), https://www.aceee.org/sites/default/files/pdfs/data_update_-_city_energy_burdens_0.pdf.

A. We recommend downward adjustments to the EDCs' Commercial and Residential program budgets by 25 percent for National Grid and 50 percent for Eversource. We recommend a greater decrease for Eversource to bring its resulting bill impacts closer to those of National Grid. The resulting budgets are presented in Table 17 below.¹⁴³

Table 17. Adjusted Commercial and Residential Segment Budgets

Segment	National Grid		Eversource	
	Original	Adjusted	Original	Adjusted
Publicly Accessible	\$54,733,030	\$41,049,773	\$43,604,812	\$21,802,406
Workplace	\$8,840,740	\$6,630,555	\$10,680,648	\$5,340,324
Fleet	\$38,362,536	\$28,771,902	\$28,736,280	\$14,368,140
MUD	\$26,494,327	\$19,870,745	\$33,273,450	\$16,636,725
Residential 1–4 Unit	\$15,806,560	\$9,462,000*	\$10,675,000	\$5,337,500

* 25 percent reduction applied after the removal of Standard tier incentive budget, as discussed in Section IV.A.ii.

Q. Do you have any recommended changes to the EDCs' managed charging budgets?

A. As indicated in the previous section, we recommend that National Grid reduce its Program Years 3 and 4 (2029 and 2030) planned enrollments in the residential charging program to equal the planned enrollment for Program Year 2 levels (2028) until National Grid can conduct a more rigorous BCA with data on the realized benefits of managed charging and

¹⁴³ Calculated using data from *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-2, and *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-2.

Clean Peak Standard revenues. The result of this modification is an estimated reduction of [REDACTED], inclusive of vendor implementation costs.¹⁴⁴

We do not have concerns with Eversource's managed charging program budgets and National Grid's commercial managed charging budget at the present time. As explained in the prior section, without time-varying rates in place, the managed charging programs are the only available tool to mitigate the negative impacts of increased charging load on the distribution system. However, we are concerned that the EDCs have not conducted adequate BCAs and the results of their preliminary analyses show that programs may not be cost-effective without Clean Peak Standard revenues.

For these reasons, once time-varying rates are in effect and the EDCs have more data on the realized benefits of managed charging and Clean Peak Standard revenues, the Department should reassess the managed charging programs and require modifications as needed to right size the program and incentives as needed to provide the most cost-effective benefits to ratepayers and the distribution system.

VII. PROGRAM IMPLEMENTATION

A. Supporting Resources Budget

Q. Summarize the EDCs' proposed Supporting Resources budgets.

¹⁴⁴ Calculated based on *National Grid*, D.P.U. 25-189, Exhs. AG-3-15, Att. AG-3-15 CONFIDENTIAL; NG-EVPP-9.

1 A. National Grid proposes a Supporting Resources budget of \$25.8 million, which accounts
2 for approximately 13 percent of the total Phase IV Program budget of \$193.7 million, while
3 Eversource proposes a Supporting Resources budget of \$34.2 million, which accounts for
4 approximately 21 percent of the total Phase IV Program budget of \$165.6 million.¹⁴⁵
5 However, Eversource's Supporting Resources budget includes marketing costs, while
6 National Grid's does not. Including marketing costs adds another \$5.8 million to National
7 Grid's Supporting Resources budget, totaling \$31.6 million, or about 16 percent of the total
8 program budget.¹⁴⁶

9 **Q. Do you recommend any adjustments to the EDCs' proposed Supporting Resources**
10 **budgets?**

11 A. Yes. We recommend downward adjustments to the EDCs' proposed Supporting Resources
12 budgets, consistent with our recommendation to reduce the size of the EDCs' Commercial
13 segment as discussed in Section VI above. The adjusted Supporting Resources budgets
14 should still account for the same percentages of the adjusted total program budgets.

15 **B. Budget Shifting**

16 **Q. What are the rules related to budget shifting under the current EV Programs?**

¹⁴⁵ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, Table 13; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, Table 13.

¹⁴⁶ Including \$3.4 million in marketing costs for the Commercial and MUD segments (*National Grid*, D.P.U. 25-189, Exh. NG-EVPP-4), \$1.75 million for the 1–4 Unit Residential segment (*National Grid*, D.P.U. 25-189, Exh. NG-EVPP-8) and approximately \$660,000 for the Residential Managed Charging program (*National Grid*, D.P.U. 25-189, Exh. NG-EVPP-9).

1 A. Under the current EV Programs, the EDCs are allowed to move program funding between
2 program segments in response to EV market trends and customer demand, by up to 15
3 percent of each program segment's budget.¹⁴⁷ The EDCs state that they have applied the
4 15 percent cap to both the decrease in the giving segment's budget and the increase in the
5 receiving segment's budget.¹⁴⁸

6 **Q. Summarize the EDCs' proposal for budget shifting.**

7 A. The EDCs propose to apply the 15 percent cap on budget shifting only to decreases in the
8 giving segment's budget, but not to increases in the receiving segment's budget.¹⁴⁹ The
9 EDCs also propose that the 15 percent cap not apply to the Supporting Resources segment
10 budget. Instead, the EDCs propose to be able to shift the Supporting Resources budget
11 without limit if savings are identified.¹⁵⁰

12 **Q. Should the EDCs apply the 15 percent budget-shifting cap only to decreases in the**
13 **giving segment's budget?**

14 A. No. The EDCs have not provided sufficient justification for why the 15 percent budget-
15 shifting cap should only be applied to the giving segment's budget. Under the EDCs'
16 proposed programs, segment-level budgets are substantially different from one another,

¹⁴⁷ *EV Program*, D.P.U. 21-90/D.P.U. 21-91/D.P.U. 21-92, Order, at 129–30.

¹⁴⁸ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 104–05; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 79.

¹⁴⁹ *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 105; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 79.

¹⁵⁰ *Id.*

1 reflecting different levels of priority and need. Shifting 15 percent from a larger giving
2 budget to a smaller receiving budget would result in a much higher percentage increase for
3 a smaller receiving budget, leading to a significant deviation from the original smaller
4 budget. If applied as proposed, a low-priority segment, such as workplace L2, could receive
5 large sums of additional funding.

6 **Q. What do you recommend?**

7 A. We recommend that the 15 percent budget-shifting cap continue to be applied to both the
8 giving segment's budget and the receiving segment's budget.

9 **Q. Should the EDCs be able to shift the Supporting Resources budget without limit?**

10 A. No. The EDCs have not provided sufficient justification for why the Supporting Resources
11 budget should be allowed to be shifted without limit to other program segments.

12 **Q. What do you recommend?**

13 A. We recommend that the Department reject the EDCs' proposal to be able to shift the
14 Supporting Resources budget without limit. The Supporting Resources budget should be
15 subject to the same 15 percent cap on budget shifting like other program segments and any
16 savings identified within the Supporting Resources beyond the 15 percent budget-shifting
17 cap should be treated as savings for ratepayers on the overall program cost.

18 **Q. Do you have any other concerns with the Supporting Resources budget?**

19 A. Yes. We do not support the EDCs' choice to include vendor-based implementation costs
20 in the Supporting Resources budget instead of allocating those costs to the associated

1 segment (i.e. Commercial, Residential, Managed Charging). Due to this change, it is
2 difficult to understand the total cost of each segment and how those costs change over time.
3 It is also not possible to examine how the Other Supporting Resources budget has changed
4 compared to the prior phase.

5 While we understand that some vendor-based implementation costs may support more than
6 one program, it is clearly possible to allocate the costs across segments as was done in the
7 prior phase and is still currently done for marketing costs by National Grid.

8 In addition, for some programs like managed charging, the EDCs have estimates of the
9 required vendor fees. However, only Eversource includes these costs within Exhibit ES-
10 EVPP-6. National Grid only provided the vendor costs for the residential and commercial
11 managed charging programs in a confidential discovery response. This is problematic
12 because when vendor costs are added to the residential managed charging budget, the total
13 budget required to support this program over the Phase IV term increases from \$15.8
14 million to [REDACTED].¹⁵¹ While National Grid's managed charging vendor costs are
15 included in the Supporting Resources budget, that approach fails to show the true cost of
16 implementing the programs.

17 **Q. What is your recommendation?**

¹⁵¹ *National Grid*, D.P.U. 25-189, Exhs. NG-EVPP-9; AG-3-15, Att. AG-3-15
CONFIDENTIAL.

1 A. We recommend that the Department require the EDCs to make a compliance filing at the
2 conclusion of this proceeding that contains revised versions of Exhibits EVPP-4 through
3 EVPP-10 that include the vendor costs and vendor per customer costs associated with each
4 program or offering. This will enhance transparency, better allowing the Department and
5 intervenors to understand the total costs of each program and how administrative,
6 marketing, and vendor costs change over time and how those costs compare to the total
7 incentives going to customers under each program segment.

8 **C. Tracking Metrics**

9 **Q. What metrics do the EDCs propose to track to support the evaluation of the EV**
10 **programs?**

11 A. The EDCs propose to keep, remove, or revise the metrics from the previous phase of their
12 EV Programs, as well as to add new metrics to reflect the updated program design.¹⁵²

13 **Q. How do you respond to the EDCs' proposals for tracking metrics?**

14 A. While we support many of the EDCs' proposed tracking metrics, we provide
15 recommendations for either modifying or excluding those metrics as set forth in Exhibit
16 AG-CLTN-5. Within the exhibit we also propose additional tracking metrics for
17 Commercial Priority Level rebates and residential incentives.

¹⁵² *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-13; *Eversource*, D.P.U. 25-188, Exh. ES-EVPP-9.

1 **VIII. CONCLUSION**

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

3 **A. Yes.**