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

SURREBUTTAL TESTIMONY OF

Courtney Lane and Thanh Nguyen

On behalf of

THE MASSACHUSETTS OFFICE OF THE ATTORNEY GENERAL

June 5, 2026

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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.

Q. Did you previously submit testimony in this proceeding?

A. Yes, we submitted joint direct testimony on April 14, 2026. Our qualifications and background are further described in our direct testimony.

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

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

Q. What is the purpose of your testimony?

A. Our surrebuttal testimony addresses the rebuttal testimony submitted by the electric distribution companies (collectively, "EDCs" or "Companies")—NSTAR Electric Company, d/b/a Eversource Energy ("Eversource") and Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid ("National Grid"). While we respond to limited topics that we believe warrant further discussion, our silence on the remaining topics does not necessarily indicate agreement with the EDCs.

II. RESPONSE TO EDCs' REBUTTAL TESTIMONY

A. Budget Adjustments

Q. How do the EDCs respond to your recommended budget reductions?

A. The EDCs disagree with our proposed budget reductions, arguing that budget reductions would decrease the effectiveness of the electric vehicle ("EV") Infrastructure Programs ("EV Programs") and increase the ratio of administrative costs to program benefits.[1] While the EDCs initially recommended that if program budgets are reduced the EDCs should have the ability to adjust budget allocations within the Commercial Segment,[2] as discussed in further detail below, the EDCs now outline several budget adjustments to accommodate our proposed budget reductions. Additionally, the EDCs claim that the Supporting Resources budgets should not be reduced, since they include fixed costs and are not scalable in the same way as the Commercial and Residential incentive budgets.[3]

Q. How do you respond to the EDCs' arguments?

A. Our recommended budget reductions represent a balance between supporting EV charging infrastructure deployment in the Commonwealth and maintaining affordability for ratepayers during a period when increasing energy bills are posing financial challenges for

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1 Exh. JU-Rebuttal-1, at 11–12, 21–22.

2 *Id.* at 13.

3 *Id.* at 27–28.

customers.[4] The EDCs acknowledge that utility programs alone cannot affordably meet the total EV charging need in the Commonwealth.[5] In D.P.U. 25-200, an investigation into gas and electric delivery charges, the Department of Public Utilities ("Department") is examining "whether changes to current design and composition of electric… delivery rates can mitigate and manage [the recent cost increases]."[6] Our recommended budget adjustments are "consistent with the [Department's] efforts to find ways in [D.P.U. 25-200]… to contain customer costs."[7]

Q. According to the EDCs, what programmatic changes would they need to make to accommodate your recommended budget adjustments?

A. To accommodate a 50 percent budget reduction, Eversource states that it would do the following:[8]

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[4] Massachusetts is among the states with the highest residential electricity bills and highest increases in residential electricity prices in recent years. *See Retail Electricity Price Trends and Drivers: Data Update-2026 Edition*, LAWRENCE BERKELEY NAT'L LAB., at 12–13 (2026), https://emp.lbl.gov/sites/default/files/2026-03/Retail%20Price%20Trends_2026%20edition.pdf.

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

[6] *Investigation into Gas and Electric Delivery Charges and Bill Redesign*, D.P.U. 25-200, Vote and Order, at 2 (Dec. 15, 2025). That investigation was opened in response to Governor Healey's call on the Department to "review each and every charge that customers are currently paying to determine whether the charge can be eliminated, reduced, or its impact mitigated." *Investigation into Gas and Electric Delivery Charges and Bill Redesign*, D.P.U. 25-200, Order, at 3, citing Letter from Governor Maura Healey to the Department (Oct. 14, 2025), https://www.mass.gov/doc/dpu-letter/download.

[7] DPU-AG-Common-1-1, at 1 (citing *Investigation into Gas and Electric Delivery Charges and Bill Redesign*, D.P.U. 25-200, Vote and Order, at 1, 4, 12).

[8] *Eversource*, D.P.U. 25-188, Exh. DPU-5-1 & Att. DPU-5-1.

- Commercial Segment:
  - Maintain the incentive levels as proposed;
  - Maintain the proposed Publicly Accessible Direct Current Fast Charging ("DCFC") incentive budget as proposed;
  - Eliminate the Workplace incentive budget; and
  - Reduce the Public L2, Fleet DCFC, and Fleet L2 incentive budgets proportionally by approximately 54 percent.
- Residential:
  - Maintain the incentive levels as proposed;
  - Maintain the proposed Residential 1–4 Unit incentive budget as proposed; and
  - Reduce the multi-unit dwelling ("MUD") incentive budget by approximately 66 percent.
- Program Implementation:
  - Reduce the marketing budget by 50 percent;
  - Reduce vendor-based implementation costs by 50 percent for the Commercial segment and 33 percent for the Residential segment.

In contrast, National Grid states that to accommodate a 25 percent budget reduction, it would reduce the incentive budgets for all segments by approximately 26 percent, while keeping marketing costs (which are included in each segment's budget) as proposed.[9]

Q. If the Department approves your proposed budget reductions, would you support the incentive budget changes described by Eversource?

A. In part. We support the elimination of the workplace offering and budget. Given that the Workplace segment is not identified as a priority in the Electric Vehicle Infrastructure Coordinating Council – Second Assessment to the General Court ("EVICC Second

[9] *National Grid*, D.P.U. 25-189, Exh. DPU-6-1 & Att. DPU-6-1.

Assessment"), it is reasonable to redirect this funding towards other, higher priority segments.[10] However, we do not agree with Eversource's approach to maintain the Publicly Accessible DCFC and Residential 1–4 Unit budgets while allocating a greater portion of the budget reductions to the other segments (Public L2, Fleet DCFC, Fleet L2, and MUD). The EVICC Second Assessment recommends that state- and ratepayer-funded programs should "focus on the highest value opportunities for both light-duty passenger and fleet EVs."[11] For light-duty passenger EVs, the first tier of priority includes at- or near-home charging (which is covered by the Residential 1–4 Unit, MUD, Public L2, and Public DCFC segments), as well as fast charging along transportation corridors (which is covered by the Public DCFC segment), while fleet EVs are supported by the Fleet DCFC and Fleet L2 segments.[12] Thus, the incentive budgets for all segments, other than Workplace, should be prioritized equally and receive the same proportional adjustments to achieve a total budget reduction of 50 percent.

Q. How do you respond to the incentive budget changes described by National Grid?

A. We support National Grid's approach to reducing each segment's budget proportionally. However, to ensure consistency between the EDCs' programs, National Grid's Workplace segment offering should be eliminated, with the corresponding budget reallocated

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10 *See* EVICC Second Assessment, https://www.mass.gov/doc/complete-second-assessment-of-the-electric-vehicle-infrastructure-coordinating-council/download.

11 EVICC Second Assessment, at 83.

12 *Id.* at 91.

proportionally to the other segments.[13] In addition, as discussed later in Section IV, National Grid's proposed Residential 1–4 Unit Standard incentives and the corresponding budget should be eliminated.

Q. How do you respond to the program implementation budget changes described by the EDCs?

A. While National Grid claims that marketing and other Supporting Resources costs are largely fixed and would not be able to be reduced,[14] Eversource states that these costs can indeed be reduced substantially, albeit not always to the same extent as incentive budgets.[15] Such reductions to program implementation costs will help address the EDCs' concerns about the ratio between administrative costs and program benefits.

Q. Are you proposing any changes to your recommendation?

A. No. We maintain our recommendation that the Department reduce the EDCs' Commercial and Residential segment budgets by 25 percent for National Grid and 50 percent for Eversource. We recommend these particular reductions to roughly align the monthly bill impacts of both Companies' EV Programs.[16] Additionally, we recommend that the Workplace offering be eliminated for both EDCs, with the corresponding budget allocated

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[13] *See EV Program*, D.P.U. 21-90 through D.P.U. 21-92, Order, at 10 (Dec. 30, 2022) (to the extent practicable, the Companies "coordinate their EV proposals for consistency and uniformity").

[14] *National Grid*, D.P.U. 25-189, Exh. DPU-6-1.

[15] *Eversource*, D.P.U. 25-188, Exh. DPU-5-1.

[16] Exh. AG-CLTN-1, at 70 (public), & Exh. DPU-AG-Common-1-1, Att. DPU-AG-Common-1-1.

proportionally to the other segments, while segments other than Workplace should receive proportional adjustments to achieve an overall budget reduction of 25 percent and 50 percent for National Grid and Eversource, respectively. Supporting Resources budgets should be reduced to the maximum extent practicable, such as in the manner described by Eversource in Exh. DPU-5-1, while still maintaining the EDCs' ability to implement the proposed programs at the budget level described above.

B. Commercial Segment

Q. Do the EDCs agree with any of your recommendations related to their Commercial Segment?

A. Yes. The Companies agree with our recommendations to require publicly accessible DCFC sites to have at least 120 kW of charging capacity per port to be able to score for the Corridor Proximity prioritization factor as well as to adopt per-site incentive caps for some projects.[17]

1. Three-tier program structure

Q. How do the EDCs respond to your recommendation for a three-tier incentive structure?

A. National Grid and Eversource disagree with our recommendation for a three-tier incentive structure. The EDCs argue that it would complicate the program, create customer confusion, and that the differentiation between low-income ("LI") and non-LI

[17] Exh. JU-Rebuttal-1, at 5.

Environmental Justice Communities ("EJCs") under the previous phase of the EV Programs has not resulted in more projects being deployed in low-income EJCs.[18]

Q. Do you agree that the three-tier incentive structure would hinder project deployment due to its alleged complexity?

A. No. While we support the Companies' efforts to simplify program design, our recommended three-tier structure does not materially increase the complexity of the program. Compared to the previous phase of each Company's EV Program, which had separate incentives for each project component (i.e., customer-side make-ready, EV supply equipment, and networking), our recommended structure still represents an overall simplification, since a single incentive would cover all project components. For incentive administration, the only difference between our proposed three-tier structure and the EDCs' proposed two-tier structure is that the customer and/or utility will have to identify whether the project is sited within a LI EJC or a non-LI EJC (they will already have to identify whether the project is sited within an EJC or a non-EJC under each EDC's proposal). This minor adjustment is highly unlikely to complicate program implementation or administration.

Additionally, despite the complexity of the incentive structure being a challenge for some customers under each EDCs' current EV Program,[19] which include different incentive levels for projects deployed in LI and non-LI EJCs, such complexity did not hinder project

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18 *Id.* at 6.

19 *Eversource*, D.P.U. 25-188, Exh. AG-1-5; *National Grid*, D.P.U. 25-189, Exh. AG-1-6.

deployment, as evidenced by the premature depletion of the public and workplace segment budgets.[20] Any negligible additional complexity resulting from moving to a three-tier structure would be a worthwhile tradeoff to ensure that LI communities are appropriately prioritized in the Commonwealth's transportation electrification efforts.[21]

Q. Do you agree that higher incentives for LI EJCs under the previous phase were ineffective?

A. No. Table 1 below presents the percentage of ports deployed under the previous phase of the EDCs' EV Program by whether the census block is a LI EJC, non-LI EJC, or non-EJC.[22]

Table 1. Percentages of Ports Deployed in LI EJCs, non-LI EJCs, and non-EJCs under National Grid's Phase III Program and Eversource's Phase II Program

Utility	**Low-Income EJCs[23]**	**Non-Low-Income EJCs**	**Non-EJCs**
National Grid	35%	29%	35%
Eversource	16%	52%	32%

Contrary to the EDCs' claim that the different incentive levels for LI and non-LI EJCs did not result in more projects being deployed in LI EJCs, data from National Grid's Phase III

[20] *Eversource*, D.P.U. 24-195, Exh. ES-EV-MTM-1, at 36; *National Grid*, D.P.U. 24-196, Exh. NG-EV-MTM-1, at 29–30.

[21] The EVICC Second Assessment found that "low-income communities may be more price-sensitive and slower to transition to EVs" and recommends "subsidies or tiered pricing for low-income users where possible." EVICC Second Assessment, at 65.

[22] *National Grid*, D.P.U. 25-68, Exh. NG-MMJG-1, Table 4-43; *Eversource*, D.P.U. 25-51, Exh. ES-ST-3, Table 4-28.

[23] Includes census blocks that qualify by meeting only the income criteria and those that qualify by meeting the income criteria and at least one other criteria.

program shows that LI EJCs accounted for more ports deployed than non-LI EJCs.[24] While in Eversource territory fewer projects were deployed in LI EJCs compared to non-LI EJCs[25], it would be a mistake to interpret this as an argument against providing higher incentives for LI EJCs. Without differentiated incentive levels, project deployment in LI EJCs would most likely have been even lower, since those projects would have been eligible for lower incentives and therefore less likely to be financially viable. Instead, the data suggests that there should have been even greater differentiation between LI EJCs and non-LI EJCs to ensure robust deployment in LI EJCs[26].

Q. Are you proposing any changes to your recommendation?

A. No. We maintain our recommendation that the Department should adopt a three-tier incentive structure, including:

- Priority tier covering up to 80 percent of Customer Project Costs;
- Enhanced tier covering up to 60 percent of Customer Project Costs; and
- Standard tier covering up to 40 percent of Customer Project Costs.

2. Reserved funding for Priority and Enhanced incentives

Q. How do the Companies respond to your recommendation to reserve funding for Priority and Enhanced incentives?

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24 *National Grid*, D.P.U. 25-68, Exh. NG-MMJG-1, Table 4-43.

25 *Eversource*, D.P.U. 25-51, Exh. ES-ST-3, Table 4-28.

26 *See National Grid*, D.P.U. 25-68, Exh. NG-MMJG-1, Table 4-43; *Eversource*, D.P.U. 25-51, Exh. ES-ST-3, Table 4-28.

A. The Companies assert that there is no need to reserve funding for Priority and Enhanced incentives since prior program experience has shown that lower-tier projects have not outpaced or consumed the budget that would have otherwise been available to higher-tier projects.[27] Instead, the Companies state that limiting Enhanced incentives is necessary to ensure budget control and clarify, since once the Enhanced budget caps are reached, projects that meet the criteria for Enhanced incentives will still receive Standard incentives.[28]

Q. Do you agree with the EDCs that it is unnecessary to reserve funding for Priority and Enhanced incentives?

A. No. While project deployment in EJCs has been robust under the EDCs' current EV Programs, there is no guarantee future deployments will follow the same patterns. The upcoming EV Program phase will be implemented in a different EV market than the previous phase, with federal tax credits for new and used EVs having been phased out in September 2025.[29] It is also unclear how different customer segments will respond to the new incentive structure and incentive levels. Notably, the Companies' proposed commitment milestones and incentive adjustments would apply to the project types, but not the relative deployment between Standard and Enhanced (or Priority) projects. This

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27 Exh. JU-Rebuttal-1, at 8–9.

28 *Id.* at 7–8.

29 *Clean Vehicle Tax Credits*, INTERNAL REVENUE SERV., https://www.irs.gov/clean-vehicle-tax-credits (last visited May 26, 2026).

means that there is no mechanism in the Companies' proposed program structure to ensure robust project deployment in LI and non-LI and EJCs.

Q. Do you agree with the Companies that Enhanced (and Priority) incentives should be capped?

A. No. As discussed in our direct testimony, the Priority and Enhanced incentives are directed toward the highest-priority projects, which are less likely to be deployed without access to higher incentives.[30] Under the Companies' proposal, once the Priority and Enhanced budgets are exhausted, there is a possibility that these high-priority projects may not be deployed if they can only receive Standard incentives.

Q. Are you proposing any changes to your recommendation?

A. No. We maintain our recommendation that the budgets for Priority and Enhanced incentives should not be capped, and there should instead be reserved funding for the Priority and Enhanced tiers. Additionally, we recommend that the minimum funding for Priority and Enhanced incentives be set at the maximum Enhanced incentive budget proposed by the EDCs, as detailed in Table 2 below.[31]

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30 Exh. AG-CLTN-1, at 19–20 (public).

31 *See* Exh. JU-Rebuttal-1, at 8.

Table 2. Recommended Percentages of Segment Budgets Reserved for Priority and Enhanced Incentives

Project Type	National Grid	Eversource
Publicly Accessible DCFC	50%	50%
Publicly Accessible L2	50%	30%
Fleet DCFC	75%	50%
Fleet L2	75%	50%
MUD L2	75%	50%

3. Per-site incentive caps

Q. How do the EDCs respond to your recommended per-site incentive caps?

A. The EDCs propose using a dollar limit for both publicly accessible DCFC and L2 site caps. Specifically, the EDCs propose a cap of $1.5 million per site for publicly accessible DCFC (approximately equal to ten 150-kW ports at National Grid's Enhanced tier) and $125,000 per site for publicly accessible L2 (approximately equal to ten 9.4-kW ports at National Grid's Enhanced tier).[32] However, the EDCs argue that site caps should only apply to publicly accessible projects but not fleet, workplace, and MUD projects because these segments are too nascent to impose site caps and maybe better served by larger projects.[33]

Q. Are you amenable to the EDCs' proposed methodology to calculate the per-site incentive caps?

A. Yes. We agree with the proposed approach of setting the site caps for both DCFC and L2 projects at a dollar value equivalent to ten average-capacity ports. However, the dollar

32 *Id.* at 9–10.

33 *Id.* at 10–11.

value of the caps should be adjusted to reflect the incentive levels under our recommended three-tier incentive structure, as provided in Table 3 below.[34]

Table 3. Recommended Per-Site Incentive Caps for Publicly Accessible Projects

Incentive Tier	**DCFC**	**L2**
Standard (40%)	$800,000	$70,000
Enhanced (60%)	$1,100,000	$100,000
Priority (80%)	$1,500,000	$130,000

Q. Do you agree with the EDCs that per-site incentive caps should not apply to fleet, workplace, and MUD projects?

A. No. While we understand the EDCs' desire to ensure that larger projects in these segments have sufficient access to incentives, we continue to be concerned that not imposing a site cap could result in a small number of projects consuming significant portions of the program budgets. Without a site cap, fleet, workplace, and MUD projects seeking support during the later years of the program term may find budgets already depleted. To accommodate larger projects in these segments, we are amenable to higher site caps for these projects, at dollar amounts equivalent to 20 average-capacity ports. A 20-port limit is well above the average number of ports per project in the fleet, workplace,[35] and MUD segments under the previous EV Program phase, and accordingly should be sufficient to

[34] Using the same methodology proposed by the EDCs in Exh. JU-Rebuttal-1, at 10, but scaling the 75 percent customer project incentive (at $825/kW for DCFC and $1,058/kW for L2) to reflect a 40 percent, 60 percent, and 80 percent incentive level. DCFC incentives are rounded to the nearest $100,000, while L2 incentives are rounded to the nearest $10,000.

[35] As discussed in Section II.A above, to accommodate our proposed budget reductions, we recommend that the Workplace offering be eliminated.

accommodate most projects, while being lower than the largest deployed project in each segment.[36]

C. Residential Segment

Q. Do the Companies agree with any of your recommendations related to the Residential Segment?

A. The EDCs agree with our proposal to set vehicle purchase price limits for Residential 1–4 Unit incentives at the current MOR-EV[37] purchase price limits. However, the EDCs recommend setting a single purchase price limit of $55,000 based on the actual transaction price rather than the manufacturer's suggested retail price ("MSRP"), explaining that actual purchase prices may deviate from MSRPs due to discounts, incentives, or other factors.[38] Additionally, the EDCs propose the ability to either reduce the purchase price limit to manage the Residential 1–4 Unit budget, or increase the purchase price limit to reflect potential increases in average EV prices during the program term.[39] National Grid also proposes the ability to waive the purchase price limit for 2–4 unit properties where the

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[36] *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.

[37] Massachusetts Offers Rebates for Electric Vehicles ("MOR-EV") initiative is dedicated to making EVs more affordable for residents, businesses, non-profit organizations, and other entities to help achieve clean transportation goals, reduce greenhouse gas emissions, and provide more equitable access to EVs. *See MOR-EV Applicant Guidelines*, DOER (2025), https://www.mass.gov/doc/october-8-2025-mor-ev-program-guideline-for-applicants/download.

[38] Exh. JU-Rebuttal-1, at 20.

[39] *Id*.

premise does not yet have an EV, since these properties are exempt from the managed charging requirement.[40]

Q. Do you agree with the EDCs' recommendation to set a single purchase price limit of $55,000 based on the actual transaction price?

A. While we are amenable to setting a single purchase price limit, we are concerned that using the actual transaction price may introduce administrative complexity and customer confusion. MSRPs can be easily identified for each vehicle make and model. In contrast, as identified by the Companies, actual transaction prices may vary based on discounts and incentives that customers receive from dealers, state agencies, or other parties.[41] Transaction prices may also be difficult to ascertain depending on the financing structure. Since the purchase price limits for MOR-EV rebates are based on MSRPs, using actual transaction prices for utility make-ready incentives will result in a situation where the value of MOR-EV rebates would be included in the EDCs' purchase price limit, but not in MOR-EV's purchase price limit. This unnecessary inconsistency will make it challenging for customers to identify what price adjustments, if any, are included when determining the actual transaction price.

Q. Do you agree with the EDCs' proposed ability to adjust the purchase price limit during the program term?

A. Partly. We support the EDCs' ability to reduce the purchase price limit to manage the Residential 1–4 Unit offering's budget. However, we do not support the EDCs' proposal

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40 *Id*.

41 *Id.*

to potentially increase the purchase price limit. The $55,000 benchmark not only reflects the average EV transaction prices but also is the demarcation between different types of EVs—small and midsize mainstream EVs that can meet most drivers' needs typically cost $55,000 or below, while premium EVs and larger EVs (including trucks) tend to cost more than $55,000.[42] Therefore, an increase in the average EV transaction price may suggest a proliferation of premium and larger EVs, rather than higher prices across the entire EV market. Customers purchasing higher-priced EVs are more likely to be able to afford the installation of at-home charging without utility incentives.

Q. Should National Grid be able to waive the purchase price limit for 2–4 unit residential properties where the premise does not yet have an EV?

A. No. National Grid supports this recommendation by pointing out that these properties are exempt from the managed charging requirement but does not explain why exemption from the managed charging requirement should enable them to bypass the purchase price limit. There is also a risk of gaming under National Grid's proposal, where a customer who intends to purchase an EV that costs more than $55,000 may intentionally delay their vehicle purchase until after having received utility incentives for a charger installation. Notably, Eversource does not propose to do the same.

Q. What do you recommend?

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[42] *Average Cost of an Electric Car in 2025: What You'll Really Pay*, RECHARGED, https://recharged.com/articles/average-cost-of-an-electric-car (last visited May 26, 2026).

A. We recommend that the Department adopt a single purchase price limit of $55,000, based on MSRP, for customers receiving Residential 1–4 Unit incentives. The Department should allow the EDCs to *reduce* this purchase price limit to manage the offering's budget if necessary, but not to increase the purchase price limit during the program term. Additionally, the Department should reject National Grid's request to waive the purchase price limit for 2–4 unit properties where the premise does not yet have an EV.

D. Managed Charging

Q. How do the EDCs respond to your proposal for tracking metrics and benefit-cost analyses ("BCA") for their managed charging programs?

A. The Companies argue that consideration of new managed charging metrics or BCA requirements should happen in a stakeholder process after the Department issues an order on the EV Programs, similar to the stakeholder process on performance metrics for the previous EV Program phase.[43] The Companies state that it is premature to prescribe reporting metrics at this stage of program development due to a variety of reasons, including a lack of baselines for certain offerings, the fact that the upcoming Avoided Energy Supply Cost ("AESC") study will provide inputs for BCAs, and program design and implementation not being finalized.[44] Additionally, the Companies claim that our proposed metrics are not "sufficiently developed for adoption in this proceeding."[45]

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43 Exh. JU-Rebuttal-1, at 24.

44 *Id.* at 25.

45 *Id.*

Specifically, the Companies assert that Metric 3 is only relevant for National Grid's program, and that Metric 7 involves future time-varying rates ("TVRs") and "presents several methodological issues."[46]

Q. How do you respond to the EDCs' overall objections to your proposed managed charging metrics?

A. The Companies do not provide sufficient justification to delay the adoption of our proposed metrics. The EDCs argue that it is premature to establish tracking metrics, yet seemingly find it is not premature to approve tens of millions of ratepayer dollars for managed charging without any BCA or formal evaluation.

We also do not find that the lack of baselines should exempt the EDCs from tracking metrics. While baselines are important when developing performance goals or performance incentive mechanisms, they are not a prerequisite for tracking a metric. We are not recommending the development of performance goals, only that the EDCs begin to track managed charging metrics. In addition, National Grid currently offers residential and commercial managed charging programs under its Phase III EV Program,[47] and Eversource will likely have launched the residential managed charging program approved under its Phase II EV Program by the time Phase III is implemented.[48] Data from these programs and other EV offerings can be used to inform baselines. To the extent utility-specific

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46 *Id.*

47 *National Grid*, D.P.U. 25-189, Exh. NG-EVPP-1, at 80.

48 *See Eversource*, D.P.U. 25-188, Exh. ES-EVPP-1, at 66.

baselines are unavailable, managed charging program vendors can also develop baselines using charging data from similar or neighboring jurisdictions.

Regarding the fact that the EDCs are still considering different program designs and implementation details, our recommended metrics are focused on the primary objectives of managed charging, including peak load reduction and load shifting, as well as the associated costs and benefits. These metrics (except for Metric 3) are agnostic as to the specific program design and will be useful regardless of what program design the EDCs ultimately pursue.

Q. Do you agree with the EDCs' critique of Metric 3 and Metric 7?

A. No. While Metric 3 (number of participants that achieve at least 70 percent and 90 percent off-peak charging) more directly maps to National Grid's proposed program design (which includes different incentive levels for participants achieving 70 percent or 90 percent off-peak charging), tracking the same metric for Eversource's program (which only provides incentives for participants achieving 90 percent off-peak charging) can still provide useful data about participant behavior and help inform potential future program modifications.

Regarding Metric 7 (incremental kW and kWh shifted by customers also enrolled in a TVR, the EDCs do not provide any detailed critiques other than a vague claim of "methodological issues."[49] Adopting Metric 7 in this proceeding would ensure that the EDCs collect data to track this metric as soon as sufficient data from TVRs is available.

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[49] Exh. JU-Rebuttal-1, at 25.

Q. How do you respond to the EDCs' proposal to defer consideration of BCA requirements to a stakeholder process after the Department's order?

A. While we agree that a stakeholder process can be helpful to determine the specific methodologies to calculate the different benefits and costs of the EDCs' managed charging programs, the Department need not defer the requirement for the EDCs to conduct BCAs. As discussed in the AGO's direct testimony in the mid-term modifications dockets, the EDCs already perform BCAs for programs under their Energy Efficiency Plans, including for previous EV managed charging programs under the 2022-2024 Energy Efficiency Plan.[50] Additionally, Eversource already performs BCAs for its managed charging program in Connecticut using data from the avoided energy supply costs AESC study, and the Company states that this framework "could be used to investigate the impacts to non-participant ratepayers."[51]

Q. Are you proposing any changes to your recommendation?

A. No. We maintain our recommendation that the Department should adopt the managed charging tracking metrics included in Exhibit AG-CLTN-4 and should require the EDCs to conduct BCAs to justify any future expansion of managed charging programs. We are open to a stakeholder process to discuss BCA methodologies.

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50 *EV Mid-term Modification*, D.P.U. 24-195 through D.P.U. 24-197, Exh. AG-CPTN-1, at 19.

51 *Eversource*, D.P.U. 25-188, Exh. DPU-5-23.

E. Program Implementation

1. Tracking metrics

Q. Please summarize the EDCs' proposal for a different reporting template for the tracking metrics.

A. According to the EDCs, the current reporting template "is burdensome to populate and restricts analysis given the rigid column structure and the need to include both metric descriptions and numeric metric entries into the same cell within Excel."[52] The EDCs therefore requests that the Department consider revising the reporting template structure to enable more efficient data entry, better tracking of trends over time, and a wider range of analysis.[53]

Q. Do you support the EDCs' proposal for an alternative reporting structure?

A. Yes. We support the EDCs' proposal and are open to additional discussions on specific revisions to the reporting template.

Q. How do the EDCs respond to your recommended tracking metrics?

A. While the Companies agree with some of our recommended tracking metrics, they take issue with others. Specifically, the Companies maintain their initial proposal that Metric A.16 (total nameplate capacity, connected capacity, and the additional distribution service capacity installed to accommodate new EV program projects, by feeder) should be revised

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52 Exh. JU-Rebuttal-1, at 29.

53 *Id.* at 29–30.

so that the same data points are reported by project rather than by feeder.[54] The Companies argue that reporting feeder-level information is overly burdensome and that the use of this information is unclear. Additionally, the EDCs disagree with our recommendations to eliminate metrics related to their V2G proposals and to introduce metrics related to the Priority incentive tier.[55]

Q. What are the potential uses of feeder-level information under Metric A.16?

A. Feeder-level information can help identify where EV charging load is concentrated within each utility's service territory. This information can in turn help identify where EV load management programs should be targeted to help mitigate distribution peaks (such as through National Grid's proposed Distribution System Peak Load Reduction use case).

Q. What do you recommend?

A. We recommend that the Department continues to require the reporting of information under Metric A.16 at the feeder level. Whether metrics related to V2G and the Priority tier should be adopted will ultimately depend on whether the Department approves the relevant offerings.

2. Vendor costs

Q. How do the EDCs respond to your recommendation to include vendor costs and vendor per customer costs associated with each program in a compliance filing?

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54 *Id.* at 30.

55 *Id.* at 30–31.

A. The EDCs assert that this recommendation will create unnecessary administrative burden and indicate that they have already filed the prospective vendor-based administration costs confidentiality within this instant proceeding.[56]

Q. What is your response to the EDCs?

A. First, the EDCs do not address our recommendation that the EDCs allocate the vendor-based implementation costs across the programs instead of rolling them into the Supporting Resources budget. The EDCs have not explained why they cannot include this allocation in a compliance filing. Second, Eversource was able to provide the total managed charging costs, including implementation and vendor costs, which are not confidential. And National Grid did not explain why it is not able to do the same.

It should also be noted that the utilities provide Program Planning and Administration ("PP&A") expenditures, which include vendor services, in their energy efficiency plan budget tables. These projected PP&A costs are allocated across programs which enables stakeholders and the Department to understand the true costs to implement each program.[57] Given that the EDCs can allocate vendor costs across programs for energy efficiency programs, they should be able to do the same for the EV Programs.

Q. Are you proposing any changes to your recommendation?

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[56] *Id.* at 32.

[57] *2025–2027 Three-Year Energy Efficiency Plans*, D.P.U. 24-140 through D.P.U. 24-149, Exh. Eversource Energy-1. app. C (Revised) (Dec. 20, 2024).

A. No. We maintain our recommendation that the Department require the EDCs to make a compliance filing, at the conclusion of this proceeding, containing revised versions of Exhibits EVPP-4 through EVPP-10 that include the vendor costs (total and per customer) associated with each program or offering to better understand the full implementation costs of each program and how those costs change over time.

III. RESPONSE TO EVERSOURCE

A. Commercial Segment

Q. How does Eversource respond to your recommendation to calculate the Benchmark Incentive Limit based on utility-specific historical data?

A. Eversource insists that using a statewide Benchmark Incentive Limit based on National Grid's historical data is the better approach, since it is consistent with the Department's directive for consistency between the EDCs' programs and serves as a cost control mechanism.[58] Additionally, Eversource argues that since cost caps were not a factor in limiting DCFC deployments, our recommendation should not apply to DCFC projects.[59]

Q. Do you agree with Eversource's arguments?

A. Yes. We agree with Eversource that maintaining the statewide Benchmark Incentive Limit is appropriate for DCFC projects, given that the cost caps did not hinder DCFC deployments in the previous program phase. We remain concerned that the statewide Benchmark Incentive Limit will be too low to spur L2 deployments in Eversource's

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58 Exh. JU-Rebuttal-1, at 34–35.

59 *Id.*

territory. However, we recognize that the Companies' proposed commitment milestones and incentive adjustments may be sufficient to address this issue.

B. Residential Segment

Q. How does Eversource respond to your recommendation that the Company enable connected L2 outlets and receptacles to qualify for MUD incentives?

A. The Company states that it is amenable to this change but urges that a qualified product standard or definition be developed.[60]

Q. Do you support Eversource's proposal for a qualified product standard or definition?

A. Yes. A qualified product standard or definition would help ensure program consistency and streamline incentive administration. Eversource and National Grid should collaborate with the relevant stakeholders to develop the appropriate standard or definition.

C. Managed Charging

Q. Does Eversource agree with your recommendation to require the Company to propose a vehicle-to-everything ("V2X") compensation framework?

A. No. Eversource argues that any requirement for the Company to propose a V2X compensation framework "should be contingent on the Department's determination of the results of the MassCEC [Massachusetts Clean Energy Center] V2X pilot's conclusions, specifically that the installations provided distribution grid benefits and at what level, and not pre-determined in advance of those conclusions."[61]

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60 *Id.* at 37.

61 *Id.* at 38.

Q. How do you respond?

A. Whether or not V2X, including vehicle-to-grid ("V2G"), can provide grid benefits is not in dispute. For example, there is already an electric school bus fleet participating in National Grid's Connected Solutions program for several years, using V2G to provide grid services and receiving grid services compensation.[62] In 2025, the school bus fleet provided an average of 112 kW of V2G exports per demand response event and a total of 9.6 MWh over the program season.[63] The Department of Energy Resources' ("DOER") 2025 report "Evaluating Load Management Strategies for a Net Zero Grid in Massachusetts" quantified the potential electric system benefits that can be provided by V2G, including avoided energy, capacity, transmission, and distribution costs.[64] The MassCEC V2X pilot does not seek to answer the question of whether V2X can provide grid benefits, but instead is focused on developing guidance for deploying V2X projects and scaling V2X in the Commonwealth.

Therefore, the Department does not need to wait to make its own assessment of MassCEC's pilot conclusions before directing Eversource to file a proposal for a V2X compensation framework that reflects recommendations from the resulting guidebook. Once Eversource

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62 *See* Thomas Built Buses, *Beverly Massachusetts Electric School Buses Make V2G Energy Transfer History* (Nov. 19, 2021), https://thomasbuiltbuses.com/resources/articles/beverly-massachusetts-electric-school-buses-make-v2g-energy-transfer-history/.

63 *National Grid*, D.P.U. 25-189, Exh. AG-2-12.

64 *Evaluating Load Management Strategies for a Net Zero Grid in Massachusetts*, ENERGY & ENV'T ECON., fig. 11. (2025) (prepared for DOER), https://www.ethree.com/wp-content/uploads/2026/03/E3-Technical-Potential-of-Load-Management-Study-Report.pdf.

submits its filing, the Department and other stakeholders can then assess whether the Company's proposal appropriately reflects the potential benefits of V2X and lessons learned identified in the upcoming MassCEC V2X pilot guidebook.

Q. Are you proposing any changes to your recommendation?

A. No. We maintain our recommendation that the Department require Eversource to propose a V2X compensation framework within six months of the publication of the MassCEC V2X pilot guidebook.

IV. RESPONSE TO NATIONAL GRID

A. Commercial Segment

Q. How does National Grid respond to your recommendation that the Company's proposed commercial V2G incentives should be rejected?

A. National Grid states that its proposal aligns with Governor Healey's Executive Order No. 654, which promoted the use of demand-side resources such as EV load management to increase energy supply in Massachusetts, as well as with DOER's Peak Potential Report, which found that scaling EV load management, including V2X, is a no-regrets, high-potential strategy.[65] In response to our concern that customers receiving the V2G incentives may not deliver V2G exports, the Company argues that customers have an incentive to actively participate in Connected Solutions to recoup the cost of their incremental investments to enable V2G, and that customers with conflicting operational

[65] Exh. JU-Rebuttal-1, at 39–40.

schedules are unlikely to install V2G due to the inability to recover the cost of their V2G investments.[66]

Q. How do you respond to the National Grid's argument regarding alignment with Executive Order No. 654 and DOER's Peak Potential Report?

A. As discussed in Section III.C above, we recognize the potential benefits of V2X and support the scaling of this technology. However, further consideration is necessary to ensure that any incentives will appropriately reflect the magnitude of potential benefits, help address the most significant barriers to V2X deployment, and represent the most cost-effective approach for ratepayers. Just because V2X has the potential to generate certain benefits does not mean that V2X deployment must be incentivized at all costs. It is possible that the MassCEC guidebook will identify strategies other than upfront incentives as equally or more important for scaling V2X in Massachusetts. For example, MassCEC recently released an initial Vehicle-to-Everything Research Report, which identifies the ambiguity around EVs' eligibility to participate in Clean Peak Standard as a barrier that may prevent V2X projects from accessing a potential source of revenue.[67] This finding suggests that simply clarifying the eligibility of EVs and V2X to participate in the Clean Peak Standard may go a long way in making V2X projects more financially attractive and eliminate the need for National Grid's proposed V2G incentives. V2X could also be

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66 *Id.* at 41.

67 *Vehicle-to-Everything Research Report*, CONVERGE STRATEGIES AND VEHICLE-GRID INTEGRATION COUNCIL, at 14 (2026) (prepared for MassCEC), https://convergestrategies.com/wp-content/uploads/2026/03/V2X-Research-Report_MassCEC-V2X-Demonstration-Program.pdf.

supported via increased performance payments, streamlined interconnection rules, or more robust customer education and technical assistance. Adopting V2G incentives in this proceeding prior to the publication of the final MassCEC guidebook would be premature and risk locking in for several years a suboptimal strategy to support V2X.

Q. How do you respond to National Grid's argument regarding customers' self-interest in actively participating in Connected Solutions?

A. From the customer's perspective, participation in and compensation payments from Connected Solutions is not the only value stream from V2X. Bidirectional charging technology can also be used to support resiliency by providing backup power or help commercial customers manage building demand charges. While it can be expected that many customers installing V2G systems will have an incentive to actively participate in Connected Solutions, this is not a guarantee.

Q. Are you proposing any changes to your recommendation?

A. Yes. While we maintain our recommendation that the Department should reject National Grid's proposed commercial V2G incentives at this time, we recommend that the Department require both National Grid and Eversource to file proposals for policies and programs to support the deployment of V2X six months after the publication of the MassCEC V2X guidebook. The proposals should reflect lessons learned and recommendations from the guidebook and include BCAs to ensure transparency of grid and ratepayer impacts.

B. Residential Segment

Q. How does National Grid respond to your recommendation to reject the Residential 1–4 Unit Standard incentives and corresponding budget?

A. National Grid disagrees with our recommendation for several reasons. The Company states that the EVICC Second Assessment acknowledges at-home charging as a critical enabler of EV adoption and indicates wiring upgrade rebates for Level 2 charging at single-family homes may still be necessary to support at-home charging.[68]

National Grid also disagrees with our characterization of evidence from the Company's Phase III Program Year 2 Evaluation Report that the residential incentive program did not spur EV adoption because 83 percent of participants already owned EVs prior to upgrading their home wiring through the program. The Company asserts that the 83 percent statistic only indicates that customers are not installing a charger without having an EV and therefore does not provide an indication of the effectiveness or ineffectiveness of the residential incentive program.[69]

Q. Are you persuaded by National Grid's arguments in support of the Residential 1–4 Unit Standard incentive?

A. No. First, National Grid fails to address the key fact that Eversource does not propose to offer a Standard tier incentive as part of its Phase III EV Programs. Eversource proposes to restrict residential incentives to customers that are qualified as LI, have received a MOR-

68 Exh. JU-Rebuttal-1, at 43.

69 *Id.*

EV Used EV Rebate (an income-restricted program),[70] or live in 2–4-unit housing, stating that "[i]n examining the current state of the electric vehicle market, the Company determined that many segments of the market are likely to adopt EVs without program support. The Company is therefore proposing to focus program incentives on the segments that do require support in order to ensure that those customers are not left behind in the electrification transition."[71] Eversource's decision to shift incentives away from non-LI residential customers aligns with the Department's 2022 EV order, where it stated that "[a]s the Commonwealth strives to achieve its transportation electrification and decarbonization goals, our intention is to focus these ratepayer-funded EV programs on those communities with the least financial resources and that may otherwise be underserved by the competitive market."[72]

National Grid does not provide evidence for why non-LI customers in its service territory require additional financial support compared with non-LI customers residing in Eversource's service territory. Such evidence is needed to justify the difference between

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[70] 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*.

[71] Exh. ES-EVPP-1, at 62–63.

[72] *EV Program*, D.P.U. 21-90 through D.P.U. 21-92, Order, at 110.

the EDCs given the Department's directive to coordinate their "EV proposals for consistency and uniformity across service territories to the greatest extent practicable."[73]

Q. Do you agree with National Grid that the EVICC Second Assessment findings justify the need for a Residential Standard incentive?

A. No, we do not. The fact that at-home charging is important for EV adoption says nothing about whether all customers need incentives to install at-home charging or whether ratepayers should fund those incentives. Furthermore, the EVICC Second Assessment found that "EV drivers with single-family homes are likely to want a charger at home and to take this into consideration when purchasing their EV, meaning that EV chargers are more likely to be deployed at single-family homes without additional resources or financial support offered by the state or electric utilities."[74] It is also worth noting that the EVICC citation provide by National Grid states that rebates for L2 charging at single-family homes "*may* be necessary to support at-home charging,"[75] meaning it is not a foregone conclusion that rebates are required. It is also not clear to what extent the EVICC citation pertains to both LI and non-LI customers.

Q. Are you proposing any changes to your recommendation?

A. No. We maintain our recommendation that National Grid eliminate the Standard tier incentive, and the corresponding budget amounts, from its Phase IV EV Programs. We

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73 *Id.* at 10.

74 EVICC Second Assessment, at 71.

75 *Id.* (emphasis added).

continue to support the Enhanced Residential incentives for customers who are less likely to be able to afford the installation of L2 charging.

C. Managed Charging

Q. How does National Grid respond to your recommendation to limit enrollment in the residential managed charging program until a more rigorous BCA is conducted?

A. National Grid disagrees with our recommendation for several reasons. First, National Grid asserts that our proposal to limit enrollment is the same as requiring a mid-term modification because the Company would need to stop or limit the offering based on Program Year 1 or Program Year 2 results. In addition, National Grid claims that the timing of the BCA is impractical because "any evidence around benefit-cost analysis" would not be available until Program Year 3 or 4, when the Company files its Annual Report.[76] The Company indicates that the largest fixed costs occur in the first year and nearly 70 percent of the programs benefits are projected to occur during Program Years 3 and 4 due to increased enrollment.[77]

National Grid also argues that our recommendation would raise customer equity concerns, including by reducing access to bill-reduction opportunities. Specifically, National Grid claims that it would be forced to turn away interested customers who tried to sign up for the managed charging program during Program Year 3 or 4, while existing participants would continue to have access to bill savings opportunities through the program. Lastly,

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76 Exh. JU-Rebuttal-1, 47–48.

77 *Id*. at 48.

National Grid states that programs of limited scale or duration can negatively impact vendor contract pricing, which can often have discounts for a higher volume of customers.[78]

Q. Do you agree with National Grid that your recommendation forces the residential managed charging program to stop in Program Year 3?

A. No. Our recommendation would not require National Grid to stop the program or introduce any uncertainty based on the results of Program Years 1 and 2. Under our recommendation, National Grid would only be required to pause new enrollments once the projected Program Year 2 enrollment levels are met. If in Year 3, National Grid has not yet reached the projected Year 2 enrollment levels, customers can continue enrolling in the program throughout the EV Program term until that level is reached.

Q. Are you concerned that capping enrollments at Year 2 levels will negatively impact customer equity?

A. Not more than any other utility program. It is common for ratepayer-funded utility distributed energy resource ("DER") programs to have participation caps due to the level of available funding. We are not aware of a utility DER program that allows for unlimited funding and participation.

Q. What is your response to National Grid's concerns that limiting the program size or duration will negatively impact vendor costs?

A. We understand this logic, but National Grid did not present any evidence to support this claim. It is not clear whether the enrollment levels in Year 2 are small enough to create a

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78 *Id.* at 48–49.

negative impact on vendor costs. It is also important to note that we are not seeking to limit the duration of the program, we are only recommending enrollment be capped until a more rigorous BCA is conducted., after which time National Grid may have the option of increasing the enrollment cap if justified by the BCA.

Q. Are you proposing any changes to your recommendation?

A. No. We maintain our recommendation that the residential managed charging enrollment levels in Program Years 3 and 4 (2029 and 2030) be held constant at Program Year 2 levels (2028) until National Grid can conduct a more rigorous BCA. Given the fact that TVRs for EV charging may soon be developed,[79] it is important not to overcommit funding to a managed charging program that is expensive and not evaluated. With the onset of TVRs, it will be important to understand the costs and benefits of each load management strategy to right-size customer offerings.

V. RESPONSE TO DOER'S EV LOAD MANAGEMENT PROPOSAL

Q. Please summarize DOER's recommendation for EV Load Management Plans.

A. DOER recommends that the EDCs develop comprehensive EV Load Management Plans and file them annually, beginning with the 2027 EV Factor filings to help identify cost-effective strategies to mitigate the grid and ratepayer impacts of EV charging load. The EV Load Management Plans would include the following:

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79 *See Petition of DOER Requesting an Investigation into TVRs*, D.P.U. 26-62 (Apr. 8, 2026).

1. An inventory of previous, current, and planned EV load management programs, consolidating offerings under the EV Programs, Energy Efficiency Plans (such as Connected Solutions), Electric Sector Modernization Plans (such as National Grid's Flexible EV Connections Program), and Clean Peak Standard.

2. Standardized program-level and aggregated metrics on charging behavior, customer behavior, and the impacts of EV load management programs (e.g., peak reduction, load shifting, and avoided grid infrastructure upgrades), including existing metrics approved under the EV Programs and the Electric Sector Modernization Plan biannual reports.

3. Strategic roadmaps outlining how the EDCs will incorporate the impacts of EV load management programs into grid planning and load forecasting documents.[80]

Q. Do you support DOER's proposal?

A. Yes. Requiring the EDCs to file EV Load Management Plans as described by DOER would help provide a clearer view of the EDCs' EV load management offerings, enabling the Department and stakeholders to assess how different offerings impact customer enrollment and charging behavior, and to identify the most cost-effective and impactful strategies to encourage EV load management across different customer types. DOER's proposed EV Load Management Plans align well with our recommendations related to managed charging and V2G. For example, the EV Load Management Plans would allow for a more robust comparison between managed charging programs and TVRs, informed by BCAs for managed charging programs. Additionally, we recommend that the EV Load Management Plans also include V2G offerings, including compensation frameworks and other programs and policies to address barriers to V2G deployment.

[80] Exh. DOER-1, at 12–13.

Q. Has the AGO previously supported requiring the EDCs to file EV Load Management Plans?

A. Yes. In the previous EV Program dockets (D.P.U. 21-90 through D.P.U. 21-92), the AGO recommended that the Department direct the Companies to develop an EV Load Management Roadmap outlining rates and programs to encourage EV managed charging and V2G, as well as metrics to help assess the effectiveness of each rate or program.[81]

VI. CONCLUSION

Q. Please summarize your recommendations.

A. As set forth here and in our Direct Testimony,[82] we recommend that the Department approve the EDCs' proposed EV Programs, with the following modifications:

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81 *EV Program*, D.P.U. 21-90 through D.P.U. 21-92, Exh. AG-REN-2, at 61–62.

82 Exh. AG-CLTN-1, at 6–9 (public).

- Commercial Segment
  - Reduce National Grid's Commercial segment budget by 25 percent and reduce Eversource's Commercial segment budget by 50 percent.
  - Eliminate the Workplace segment and reallocate the corresponding budget proportionally to the other segments.
  - Adopt a three-tier incentive structure for publicly accessible, workplace (if the Department does not adopt our recommendation to eliminate the workplace offering), fleet, and MUD projects, with the following tiers:
    - Priority (covering up to 80 percent of eligible costs): projects in LI EJCs and projects serving public transit or school bus fleets.
    - Enhanced (covering up to 60 percent of eligible costs): projects in other EJCs, projects serving other public fleets, and right-of-way and/or pole-mounted charging projects.
    - Standard (covering up to 40 percent of eligible costs): all other eligible projects.
  - Adopt per-site incentive caps for both L2 and DCFC projects at dollar values equivalent to ten average-capacity ports per site for publicly accessible projects and 20 average-capacity ports per site for fleet, workplace (if the Department does not adopt our recommendation to eliminate the workplace offering), and MUD projects, adjusted based on the incentive tier.
  - Reject National Grid's proposed 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.
- Residential Segment
  - Reduce National Grid's Residential segment budget by 25 percent and reduce Eversource's Residential segment budget by 50 percent.
  - 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 MOR-EV Used EV Rebate.
- 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 a vehicle purchase price limit of $55,000 for Residential 1–4 Unit incentives, based on MSRP, and allow the EDCs to reduce the purchase price limit during the program term as necessary to manage the offering's budget.
- Reject the EDCs' proposal to potentially increase the purchase price limit during the program term.
- Reject National Grid's proposal to waive the purchase price limit for certain 2–4 unit properties.
- Require Eversource to enable connected L2 outlets and receptacles to qualify for MUD incentives.

- <u>Managed Charging</u>
  - Require the EDCs to propose policies and programs to support the deployment of V2X (including a V2G compensation framework for Eversource) within six months of the publication date of MassCEC's V2X pilot guidebook.
  - 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.
  - Require the EDCs to file annual EV Load Management Plans, beginning with the 2027 EV Factor filings, that include:
    - An inventory of previous, current, and planned EV load management programs.
    - Standardized program-level and aggregate metrics on charging behavior, customer behavior, and the impacts of EV load management programs.
    - Strategic roadmaps outlining how the impacts of EV load management programs are incorporated into grid planning and load forecasting documents.

- Program Implementation
  - Reduce National Grid's Supporting Resources segment budget by 25 percent and reduce Eversource's Supporting Resources segment budget by 50 percent, or to the maximum extent practicable while maintaining the EDCs' ability to implement the EV Programs.
  - 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.
  - Require the EDCs to make a compliance filing at the conclusion of this proceeding containing revised versions of Exhibits EVPP-4 through EVPP-10 with vendor costs (total and per customer) associated with each program offering.

Q. Are you withdrawing any of your recommendations from direct testimony?

A. As discussed in Section III.A above, we agree with Eversource that it is more appropriate to use a statewide Benchmark Incentive Limit for DCFC projects and are amenable to a statewide Benchmark Incentive Limit for L2 projects to maintain consistency between EDCs and between DCFC and L2 projects. Therefore, we withdraw our recommendation for utility-specific Benchmark Incentive Limits.

Q. Does this conclude your testimony?

A. Yes.