GREEN ENERGY CONSUMERS ALLIANCE

Hearing Officer Scott Seigal
Massachusetts Department of Public Utilities
1 South Station, 3rd floor
Boston, MA 02110

February 18, 2026

RE: DPU 25-188, Petition of NSTAR Electric Company d/b/a Eversource Energy for Approval of its Phase III Electric Vehicle Charging Infrastructure Program

DPU 25-189, Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, for Approval of its Phase IV Electric Vehicle Charging Infrastructure Program

Dear Hearing Officer Seigal;

Green Energy Consumers Alliance[1] is a Massachusetts-based nonprofit organization working to empower consumers and communities to speed a just transition to a zero-carbon future. We achieve our mission through green energy education, programming, and climate advocacy. Since 2016, we have run a consumer-facing electric vehicle (EV) education program called Drive Green, through which we have interacted with thousands of drivers across Massachusetts and helped them make the switch to EVs. We have intervened in past dockets before the Department of Public Utilities (DPU), including DPU 21-90 and 21-91, and we participate in the work of the Electric Vehicle Infrastructure Coordinating Council (EVICC). In addition, our Executive Director serves on the Grid Modernization Advisory Council (GMAC), and we closely follow the work of the Department of Energy Resources (DOER) and the Massachusetts Clean Energy Center (MassCEC) on topics such as grid modernization, load management, rate design, and grid services. Our experience on all these fronts informs the following comments regarding DPU 25-188 and DPU 25-189.

1. **Utility EV programs are still needed and appropriate to advance vehicle electrification and to promote energy affordability in Massachusetts. They are a critical tool to meeting the Commonwealth's greenhouse gas (GHG) reduction mandate.**

The Commonwealth has a statutory obligation to reduce economy-wide greenhouse gas (GHG) emissions 50% by 2030 and 85% by 2050. Transportation is the largest sector source[2] of GHG emissions and the state's climate plans, including the most recent Clean Energy and Climate Plan for 2025 and 2030 (CEPC), make it clear that electrifying transportation is a key strategy to reducing emissions in this

[1] Website available at www.greenenergyconsumers.org.
[2] Executive Office of Energy & Environmental Affairs, "Massachusetts Clean Energy and Climate Metrics," accessed February 6, 2026, available at: www.mass.gov/info-details/massachusetts-clean-energy-and-climate-metrics

sector. In fact, the CECP states that to meet our 2030 GHG reduction requirement, 900,000 of the over five million vehicles on the road in Massachusetts must be electric by 2030.[3]

Increasing the adoption of EVs not only reduces state GHG emissions but also benefits the Commonwealth economically. Refueling with electricity rather than imported fossil fuels keeps more dollars within our region, drivers' savings on fuel and maintenance can be invested in local economies in other ways, and increased EV adoption can exert a downward pressure on rates for all electricity ratepayers (not just those who drive electric). In fact, Synapse Energy Economics has found that revenue collected from EVs charging in Massachusetts from 2011 through 2021 exceeded the costs of serving them by $71.2 million, exerting a downward pressure on rates.[4] The same was found to be true in California, which has a much higher penetration rate for EVs than the Commonwealth.[5]

Increasing access to EV charging is a key strategy for increasing EV adoption, and utility-run programs continue to have a large role to play in this arena. EVICC's *Second Assessment,* released in August 2025, found that 71% of all public Level 2 ports and 43% of all public DC Fast Charging ports in Massachusetts received some level of state or federal funding.[6] Eversource and National Grid programs contributed to 40% of public Level 2 and 29% of public DC ports in the state.[7] With the disappearance of the federal Alternative Fuel Vehicle Refueling Property Credit later this year, it's clear that utility-run programs are still needed to advance vehicle electrification and its environmental and economic benefits in the Commonwealth.

2. **The proposed changes to the commercial segment are appropriate, but state agencies should participate in or review the grading of DC applications.**

Generally, we are glad to see the changes proposed by the utilities to programs offered in the commercial segment. Simplifying incentives to two tiers, using scoring criteria to identify the highest impact DC applications, tracking progress through set milestones and adjusting incentives as needed, eliminating overlap with the Massachusetts Electric Vehicle Incentive Program (MassEVIP), and requiring some amount of cost share will all serve to make the commercial segment offerings more effective. We also particularly appreciate that the utility offerings are fully aligned in terms of eligibility requirements and amounts, as that consistency will make it much easier to market the offerings to fleets, workplaces, multi-unit dwellings (MUDs), and public sites.

.[3] Executive Office of Energy and Environmental Affairs, *Massachusetts Clean Energy and Climate Plan for 2025 and 2030*, June 30, 2022, p. 31, available at: www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download

[4] Synapse Energy Economics, *EVs Are Driving Rates Down For All Consumers*, June 2024, p. 13, available at: www.synapse-energy.com/sites/default/files/EV%20All%20State%20List%20PDF_0.pdf

[5] Ibid.

[6] Massachusetts Electric Vehicle Infrastructure Coordinating Council, *Second Assessment to the General Court*, August 2025, p. 6, available at: www.mass.gov/doc/complete-second-assessment-of-the-electric-vehicle-infrastructure-coordinating-council/download

[7] Ibid.

In this segment, we urge the Department to require the utilities to confer with EVICC when grading DC applications. EVICC, through its work on its required assessments and the Section 103 process, is very familiar with the gaps in charging infrastructure throughout the Commonwealth and may have valuable input to determine which proposed DC stations would be most needed.

3. **In the residential segment, both utilities should offer Standard and Enhanced incentives and should align in eligibility requirements and incentive amounts.**

When utility offerings are not aligned, it becomes more complicated for Massachusetts residents to understand what they may be eligible for and to take advantage of key incentives. For example, under the proposed programs, a household in Billerica would be eligible for National Grid's Standard incentive, but an identical household in neighboring Bedford would not be eligible for any incentive unless they meet the requirements of the Eversource's "Enhanced" program. And if those two neighbors compared notes, they would find that what it means to be eligible for the "Enhanced" incentive differs by utility, as does the incentive cap. This inconsistency introduces an unnecessary stumbling block for consumers and needlessly complicates the work of marketing these incentives to Massachusetts residents. We urge the Department to require both utilities to offer Standard and Enhanced incentives and align eligibility requirements and incentive caps.

Additionally, in the residential segment, we urge the Department to investigate a discrepancy between the two utility proposals. Eversource is targeting the deployment of 73 MW of charging in the residential segment with a budget of $44 million,[8] which comes to $600,000 per MW. National Grid, meanwhile, is targeting the deployment of 99 MW with a budget of $42.3 million,[9] which comes to $430,000 per MW. How does Eversource justify its higher costs?

Similarly, Eversource's "supporting resources" budget of $32.2 million represents 20% of its total budget,[10] while National Grid's "supporting resources" budget of $25.8 million represents 13% of its total budget.[11] How does Eversource justify its comparatively higher supporting budget?

4. **The utilities' managed charging programs must be more ambitious in scale, compensate participants based on the value they provide to the grid, including the value of reduced emissions relating to lower gasoline consumption, plan for active managed charging, and be consistent across utility territories.**

Study after study demonstrates that managing EV charging load is both one of the most cost-effective measures of managing load and a mechanism that reduces costs for *all* ratepayers. State policy documents have long called for comprehensive managed charging programs as well.

[8] DPU 25-188 Exhibit ES-EVPP-1 p. 13
[9] DPU 25-189 Exhibit NG-EVPP-1 p. 11.
[10] DPU 25-188 Exhibit ES-EVPP-1 p. 13.
[11] DPU 25-189 Exhibit NG-EVPP-1 p. 11.

- In 2020, the *Technical Report of the Massachusetts 2050 Decarbonization Roadmap Study* concluded that "vehicle charging provides the bulk of flexible load capability."[12]

- The CECP states that "encouraging charging during off-peak periods will be critically important" and that "while the major electric distribution companies in Massachusetts have developed active demand response programs that help encourage customers to manage their charging, these programs remain small and underutilized."[13]

- The Office of Energy Transformation's (OET's) Energy Transformation Advisory Board's "Decarbonizing the Peak" working group noted "flexible charging incentives... as a strategy to flatten load profiles and reduce stress on the grid during high-demand periods."[14]

- EVICC's *Second Assessment* highlights that managed charging can "[enable] rate reductions.... mitigate peak impacts and avoid costly grid upgrades,"[15] as well as "[reduce] the costs associated with EV ownership, thus incentivizing EV adoption."[16] It directs DOER and the EDCs to "explore additional, innovative rate designs, novel incentive structures, and customer engagement strategies, such as active managed charging or campaigns to increase participation rates in existing managed charging programs, to *maximize the practical potential of managed charging to avoid grid upgrades and minimize related costs*"[17] (emphasis added).

- Most recently, DOER's draft *Peak Potential* study identifies managed charging as a "high-potential, no-regrets strategy,"[18] specifically one that "merits immediate deployment at scale."[19] It finds EVs to represent the "single biggest source of load flexibility in each study year,"[20] calculating a peak load reduction capacity of 0.3 GW by 2030 and states "Massachusetts must

[12] Executive Office of Energy & Environmental Affairs, *Technical Report of the Massachusetts 2050 Decarbonization Roadmap Study,* December 2020, p. 51, available here: www.mass.gov/doc/energy-pathways-for-deep-decarbonization-report/download

[13] Executive Office of Energy and Environmental Affairs, *Massachusetts Clean Energy and Climate Plan for 2025 and 2030*, June 30, 2022, p. 43, available at: www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download

[14] Energy+Environmental Economics, *Decarbonizing the Peak Focus Area Working Group Summary of Working Group Status Prepared for the Office of Energy Transformation,* June 2025, p. 12, available here: www.mass.gov/doc/summary-of-working-group-status-decarbonizing-the-peak-focus-area-working-group/download

[15] Massachusetts Electric Vehicle Infrastructure Coordinating Council, *Second Assessment to the General Court*, August 2025, p. 104, available at: www.mass.gov/doc/complete-second-assessment-of-the-electric-vehicle-infrastructure-coordinating-council/download

[16] Ibid, p. 105.

[17] Ibid, p. 158.

[18] Massachusetts Department of Energy Resources, *Peak Potential: Reducing energy costs and empowering consumers with load management and virtual power plants*, December 2025, p. 16, available here: www.mass.gov/doc/doer-peak-potential-report-and-policy-recommendations/download

[19] Ibid, p. 40.

[20] Ibid, p. 16.

rapidly scale its EV load management programs."[21] DOER goes on to stress that *active* EV load management is needed to "maximize benefits and minimize impacts on the distribution system."[22] Regarding program design, it states that "programs and rates should pay customers based on the value they provide for the grid, regardless of the technology used."[23]

From these studies and state reports, we find the utility managed charging programs lacking in four key areas that we urge the Department to address.

Scale

Both the EVICC *Second Assessment* and DOER's draft *Peak Potential* report stress that managed charging programs must be quickly brought to scale in order to maximize the benefits of avoided grid upgrades and peak costs. However, National Grid's and Eversource's proposals lack ambition.

By 2030, the utilities predict that, if the Department of Public Utilities approves their new EV proposals as written, 75,500 EVs will be enrolled in managed charging programs across the Commonwealth (64,000 from National Grid[24] plus 11,500 from Eversource[25]). That's equal to about 8% of the 900,000 EVs we need on the road by 2030 according to the CECP. Even if the Commonwealth only hits half its goal and reaches 450,000 EVs by 2030, 75,500 enrolled EVs represents only 16% of the fleet. By way of comparison, National Grid in its proposal aims to enroll 20% of the passenger EVs in its territory by 2030.[26]

Figure 21 of *Evaluating Load Management Strategies for a Net Zero Grid in Massachusetts* (the technical report accompanying DOER's *Peak Potential* draft study) shows a charger load shape with a per-vehicle draw of somewhere between 1 and 2 kW for light-duty vehicles.[27] Assuming a load reduction potential of 1 to 2 kW per enrolled vehicle and 75,000 enrolled vehicles, it follows that the proposed programs will results in somewhere between 75 and 150 MW of flexible load by 2030, half or less than half of the feasible potential of 300 MW identified in the draft *Peak Potential* study.

In terms of scale, we find Eversource's proposal more lacking than National Grid's. Eversource is expecting to enroll 11,500 EVs, 82% fewer than National Grid's 64,000. This discrepancy is particularly striking, given that both National Grid and Eversource have roughly 1.4 million residential households in their service territories.[28] Eversource's budget for managed charging, $4.4 million, is 81% lower than

[21] Ibid, p. 17.
[22] Ibid, p. 24.
[23] Ibid, p. 34.
[24] DPU 25-189 Exhibit NG-EVPP-1, p. 80.
[25] DPU 25-188 Exhibit ES-EVPP-1, p. 13.
[26] DPU 25-189 Exhibit NG-EVPP-1 p. 91.
[27] Energy+Environmental Economics, *Evaluating Load Management Strategies for a Net Zero Grid in Massachusetts,* December 2025, p. 67, available at: www.mass.gov/doc/e3-technical-potential-of-load-management-study-report/download
[28] Department of Energy Resources, "Electric Customer Choice Data Q2 2025", available here: www.mass.gov/info-details/electric-gas-customer-choice-data.

National Grid's $23.6 million. Whereas National Grid's managed charging budget represents 12% of its overall budget, Eversource's is only 3% of its overall budget.[29]

Pay for Value

DOER's draft *Peak Potential* study stresses that load management programs should compensate participants based on the value they provide to the grid. However, National Grid and Eversource both fail to substantiate how their suggested incentive amounts are based on benefits provided to the grid.

Eversource simply states "initially, Eversource will offer a $50 enrollment incentive and $10 per month incentive for successful participation in the Managed Charging offering. Eversource will revisit the incentive level annually in coordination with National Grid and EV industry stakeholders as the market develops".[30] National Grid explains "the Company's proposed $15 and $5 per customer per month incentives are designed to approximately reflect the value of system peak load reduction, distribution peak load reduction, and energy supply cost reductions, all relative to the Company's unmanaged EV charging baseline."[31] But neither utility explains how they calculated the benefits to the grid and incorporated them into the program incentive.

Based on our analysis, a monthly incentive of $5 to $15 seems too low to consider transmission, distribution, capacity, and energy benefits, not to mention avoided GHG emissions.

A simple example explains why: according to the EPA, a 2025 Chevrolet Equinox EV requires 31 kWh to drive 100 miles.[32] An Equinox EV driving 12,000 miles a year would drive 1,000 miles a month, therefore using 310 kWh/month. That Equinox enrolled in the National Grid off-peak charging rebate would earn $15.50 in a summer month, assuming it did all of its charging off peak, which is roughly equivalent to the $15 it would earn in National Grid's new proposed managed charging program.

However, National Grid originally calculated the value of its current off-peak charging rebate ($0.05/kWh in the summer and $0.03/kWh in the winter) based only on the relative peak- and off-peak *energy* and *capacity* costs, based on ISO-NE data from 2016 and 2017.[33] In other words, the calculation of the off-peak charging rebate does *not* include all the benefits to the grid of off-peak charging (it excludes transmission and distribution benefits, for example, as well as avoided GHG emissions). Therefore, it seems unlikely that the $15/month incentive fully pays customers "based on the value they provide to the grid" as DOER recommends.

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[29] DPU 25-188 Exhibit ES-EVPP-1 p. 13.
DPU 25-189 Exhibit NG-EVPP-1 p. 11.

[30] DPU 25-188 Exhibit ES-EVPP-1 p. 68.

[31] DPU 25-189 Exhibit NG-EVPP-1 p. 87.

[32] Environmental Protection Agency, "Fuel Economy of Electric Vehicles," accessed February 6, 2026, available here: www.fueleconomy.gov/feg/PowerSearch.do?action=Cars&vtype=Electric&srchtyp=evSelect&rowLimit=50&sortBy=Comb&year1=2025&year2=2026&make=Chevrolet&mclass&range=&drive=

[33] DPU 18-150 Information Request CEP 1-2

As a result, we urge the DPU to demand that the utilities determine the compensation rate for their managed charging program based on the value participants provide to the grid and reduced GHG (and with data more recent than 2016/2017) – avoided transmission costs, avoided distribution costs, and avoided energy and capacity costs – *especially* since both utilities are planning to capture Clean Peak Standard credits for the participants enrolled in their managed charging programs. Customers should be able to access both system-level and distribution-level value streams where benefits are incremental. We also urge the Department to investigate the reasoning behind separately structured programs for residential vs commercial customers.

Active vs Passive Management

DOER stresses in its report that while passive EV load management addresses system/bulk needs, *active* demand management is key to maximizing distribution-system-level benefits. A recent study corroborates the value of active managed charging, finding that active EV managed charging can reduce annual electric system costs by 30% relative to passive EV managed charging, and that active managed charging can more than double a distribution system's EV hosting capacity.[34]

Eversource is proposing an active managed charging program only for enrollees of its passive managed charging program who consistently fail to charge only in off-peak periods.[35] National Grid proposes the flexibility to offer occasional bonuses, including for potentially "trialing... active managed charging technology",[36] but stresses that vendor choices for active managed charging are limited.

Both utilities propose instead to address distribution-system-level issues via different peak periods; National Grid proposes a specific "use case" for this purpose, while Eversource suggests "customers in areas with local peaks that differ from the system peak *may* be provided with an alternative peak period that matches their local needs" (emphasis added).[37]

Given DOER's emphasis on active management, we encourage the DPU to press the utilities for more details as to the relative costs and benefits of managing a passive vs active program, and what events or results would trigger them to shift in favor of active charging.

Relatedly, we believe that customers should be able to be rewarded for providing system-level services *and* distribution-level services if curtailing charging at any particular time provides distinct value in both spheres. We encourage the DPU to investigate the question of stacking these incentives to maximize value.

Consistency

We maintain that having different EV program offerings across our two largest utilities introduces an

[34] The Brattle Group, *Demonstrating the Full Value of Managed Electric Vehicle Charging*, January 2026, available here: www.brattle.com/wp-content/uploads/2026/01/Demonstrating-the-Full-Value-of-Managed-Electric-Vehicle-Charging-1.pdf

[35] DPU 25-188 Exhibit ES-EVPP-1 p. 67.

[36] DPU 25-180 Exhibit NG-EVPP-1 p. 87.

[37] DPU 25-188 Exhibit ES-EVPP-1 p. 67.

unnecessary hurdle in accelerating EV adoption in the Commonwealth. As EVICC identified, managed charging programs lower the operating costs of EVs and stand to incentivize more people to make the switch from gas cars to EVs. Again, per the CECP, we need 900,000 EVs on the road in the Commonwealth by 2030, and we need every tool in the toolbox to make that happen. Advocates of EVs – and dealerships selling them – will have a much easier time explaining the benefits of EVs and encouraging adoption if offerings are consistent across utilities. We urge the Department to request that the utilities converge on one uniform approach.

5. **Both utilities should support vehicle-to-grid integration.**

Eversource and National Grid take different tacks when it comes to vehicle-to-grid (V2G) integration. Eversource suggests it plans to propose a V2G offering through the Grid Services Compensation Fund, while National Grid proposes to offer (a) the "Enhanced" rebate to residential customers installing a V2G-capable system, and (b) an additional $10,000 incentive for bidirectional DC Fast Chargers installed by fleet customers, requiring all V2G installations to participate in ConnectedSolutions. For the sake of consistency, and because DOER's draft *Peak Potential* study found that "V2X more than doubles the peak load reduction from each vehicle" and that the investment is "cost-effective for customers today,"[38] we urge the Department to call on Eversource to offer a similar program to that of National Grid. If V2G efforts are split across different programs and timelines, reports and evaluations will go to different parties at different times, making it harder for the Department and other state agencies to determine what is effective and what is needed to accelerate the market.

6. **Finally, maintain a focus on transparency and timely reporting.**

We appreciate the utilities' proposal to maintain a public dashboard for stakeholders to track progress across program offerings. We maintain that such transparency, coupled with annual reports, are key to building trust among stakeholders and creating opportunities for course-correction as needed.

Thank you again for this opportunity to provide public comment on these important new proposals. The outcomes of dockets DPU 25-188 and DPU 25-189 are critical to the Commonwealth's GHG reduction and energy affordability priorities.

Sincerely,

Anna Vanderspek
Electric Vehicle Program Director

[38] Massachusetts Department of Energy Resources, *Peak Potential: Reducing energy costs and empowering consumers with load management and virtual power plants*, December 2025, p. 17, available here: www.mass.gov/doc/doer-peak-potential-report-and-policy-recommendations/download

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