

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;

The undersigned members of the Zero Emission Vehicle Coalition, a broad group of environmental, transit, community, and public health organizations dedicated to accelerating the electrification of all transportation modes throughout the Commonwealth, respectfully submit the following comments regarding DPU 25-188 and DPU 25-189.

- 1. A lack of access to electric vehicle (EV) charging is still a major barrier to widespread EV adoption in Massachusetts, so utility EV programs are needed to advance electrification at the pace demanded by our Clean Energy and Climate Plan and public health.**

Massachusetts has a statutory obligation to reduce economy-wide greenhouse gas (GHG) emission 50% under 1990 levels by 2030, and to do so, we must replace 900,000 of the over five million passenger vehicles on our roads with EVs.¹ Historically, utility-run EV infrastructure programs are one of the key levers at the Commonwealth's disposal to increase access to EV charging; as of August 2025, for example, 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, with 40% of Level 2 and 29% of DC ports funded at least in part by Eversource and National Grid.² To maintain momentum, we must maintain strong utility EV programs. Such programs are in all ratepayers' interest, not just those who drive electric, because the revenue brought in by new EVs exceeds the costs of serving them. 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.³

¹ 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

² 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

³ 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

2. Utility offerings must be aligned to minimize customer confusion and maximize impact.

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. It makes it more difficult for advocates of EVs to market their benefits, or sellers of EVs to explain the possibilities of lower fuel costs or charger installation incentives. We are glad to see Eversource and National Grid align in their offerings in commercial segment, and approve of many of the proposed changes: particularly, the simplification to two tiers, the use of a scoring rubric for DC applications, tracking milestones, and eliminating overlap with Massachusetts Electric Vehicle Incentive Program (MassEVIP). We urge the Department to call on National Grid and Eversource to align on their offerings in the residential segment – specifically, to both offer Standard and Enhanced rebates with the same amounts and eligibility requirements – and in managed charging.

3. The utilities' managed charging programs must maximize cost-effective load management. To do that, the utilities must demonstrate that the proposed incentives are appropriately calibrated to incentivize load management and are tied to the benefits of shifting load off peak.

Managing EV charging is a key, cost-effective, high-impact strategy for reducing system costs through load management. In fact, DOER's recent draft *Peak Potential*:

- Finds EVs to represent the “single biggest source of load flexibility in each study year,”⁴
- Calculates a peak load reduction capacity of managed EV charging of 0.3 GW by 2030 and states “Massachusetts must rapidly scale its EV load management programs”⁵ and,
- States that “programs and rates should pay customers based on the value they provide for the grid, regardless of the technology used.”⁶

We find Eversource's and National Grid's proposals lacking. While National Grid aims to enroll 20% of the passenger EVs in its territory by 2030 (equal to 64,000 vehicles),⁷ Eversource targets only 11,500.⁸ This discrepancy is particularly striking, given that both National Grid and Eversource have roughly 1.4 million residential households in their service territories.⁹ Further, both utilities fail to substantiate how their suggested incentive amounts are calibrated to maximize cost-effective load management or how incentive amounts are related to benefits provided to the grid. At the proposed incentive amounts (\$5-\$15/month), we question whether the incentive truly is tied to the generation, capacity, distribution,

⁴ 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

⁵ *Ibid*, p. 17.

⁶ *Ibid*, p. 34.

⁷ DPU 25-189 Exhibit NG-EVPP-1, p. 80.

⁸ DPU 25-188 Exhibit ES-EVPP-1, p. 13.

⁹ Department of Energy Resources, “Electric Customer Choice Data Q2 2025,” available here: www.mass.gov/info-details/electric-gas-customer-choice-data.

and transmission benefits of shifting load off-peak, not to mention the GHG benefits. And again, the utilities propose different program structures, with different incentive amounts and different approaches to vehicle-to-grid (V2G) technology.

As a result, we urge the DPU to demand that the utilities' proposal (a) maximize the potential of load management through 2030, (b) demonstrate that the compensation rate for their managed charging programs is rationally tied to maximizing cost-effective load management and the value participants provide to the grid and reduced GHG, and align on their program offerings (including both offering a V2G incentive).

Thank you for this opportunity to provide public comment on these important new proposals.

Sincerely,

The undersigned members of the Zero Emission Vehicles Coalition

Ceres

Conservation Law Foundation

Environmental League of Massachusetts

Elders Climate Action

Green Energy Consumers Alliance

Newton EV Task Force

Sierra Club

350 Mass - Transportation Working Group