Alliance for Transportation Electrification

February 10, 2025

Mark D. Marini
Secretary
Massachusetts Department of Public Utilities
One South Station
Boston, MA 02110

Subject: D.P.U. 24-196

Dear Mr. Marini:

Enclosed for filing in the above-referenced matter please find the comments of the Alliance for Transportation Electrification.

Respectfully,

Elizabeth Turnbull
Director, Policy and Regulatory Affairs

Philip B. Jones

Philip B. Jones
Executive Director

Alliance for Transportation Electrification
1326 Fifth Avenue, Suite 621
Seattle, WA 98101

COMMENTS OF

THE ALLIANCE FOR TRANSPORTATION ELECTRIFRICATION

Introduction

The Alliance for Transportation Electrification (ATE) is pleased to submit the following comments supporting the proposed National Grid's Phase III Electric Vehicle (EV) Market Development Program Mid-Term Modification Filing[1] before you. ATE finds that National Grid's proposed program changes and increased investments follow best practice in EV program design, are tailored to achieve the market transformation that National Grid and the Commonwealth of Massachusetts desire, and meet customer needs in an efficient way.

Background

ATE is a 501(c)(6) non-profit corporation established in early 2018 with the goal of promoting policies and regulatory measures to accelerate the pace of EV adoption and infrastructure. We primarily engage with policymakers at the State and local government level to remove barriers to EV adoption and to encourage the acceleration of EV infrastructure deployment with a particular emphasis on open standards and interoperability. We currently have over 60 members that include many electric utilities, auto and bus manufacturers, EV charging and service providers (EVSPs), and related trade associations and non-profit organizations. We take a "big tent" approach to advance the industry and focus not just on accelerating EV charging deployments—which necessarily requires a strong utility role—but also promoting public accessibility and open standards. We are presently involved in about 30 proceedings in the States before the PSCs, state energy offices, Legislatures, Governors, state DOTs and DEPs, and other agencies.

The Alliance's overall goals are to engage with public service commissions and other agencies to remove barriers to EV adoption by encouraging a collaborative and open approach to accelerate the deployment of EV charging infrastructure, sharing best practice across jurisdictions, supporting an appropriate utility role by complementing the private/competitive market, developing effective outreach and education measures, and promoting interoperability and open standards in all parts of the EV charging ecosystem.

Changes to EV Charging Incentive Programs

ATE supports National Grid's proposal to delink the company's program from third-party funding sources, as this will better enable the company to offer a streamlined, straightforward process for customers, easing barriers to enrollment. This transition, from netted incentives to stacked incentives, follows utility best practice around the country.

It is understandably tempting to reduce the impact on utility ratepayers by reducing utility funding when a customer has also pursued third-party funding. And ATE supports encouraging customers to leverage each funding opportunity available to them. But in ATE's experience, a complex process to deduct utility funding, instead of permitting incentives to be stacked, adds enormous financial and procedural

[1] D.P.U. 24-196

uncertainty to programs and to the process of installing EV charging, which can already be challenging for customers to navigate. Further, when third-party funding is available only for certain parts of the market (e.g., based on charger level or customer segment), as in the Commonwealth, adding complexity to one side of the ledger can create a perverse incentive for customers to default to the easier path. In fact, National Grid's own third-party program evaluations[2] have determined that this approach has contributed to project cancellations and delays for public and workplace Level 2 projects—an outcome that benefits no one.

ATE also supports National Grid's proposal to reduce incentive levels in the public DCFC program. While ATE does not normally advocate for reducing incentives, we do believe that utilities are in the best position to identify program gaps, adjust for market trends and program implementation learnings, and steer programs toward intended outcomes. National Grid has identified an oversubscription of DCFC within its programs, and has proposed to adjust incentives accordingly to make more efficient use of the program budget. ATE supports that proposal, as National Grid designed its programs to make progress toward the Commonwealth's goals around EV charging, and midstream adjustments make this progress more likely. ATE similarly supports National Grid's proposal to allow increased budget shifting among programs, including IT back-office systems, to most efficiently achieve desired outcomes, acknowledging that the utility is in the best position to determine where budget is needed—and where it isn't—to achieve program goals. And ATE supports National Grid's proposal for an incremental $34 million to fully fund the Public and Workplace Program through the end of 2026, to maintain momentum within the program until the next round of EV programs can be proposed and considered.

Changes to Managed Charging Programs

ATE also supports National Grid's proposal to eliminate the caps in its Off-Peak Charging Rebate Program and continue allowing customer enrollments through the remainder of the EV program period. As EV adoption in the Commonwealth grows over the next two years, new drivers will become part of the EV ecosystem. ATE finds it crucial that these drivers be offered the opportunity to enroll in managed charging programs such as the Off-Peak Charging Rebate *as soon as they adopt an EV*, to set grid-supportive charging habits early and create incentives for their EV acquisition. Further, under the current cap, National Grid will likely be required to pause program enrollment at least until the next EV program period, adding uncertainty and complexity for customers who may have learned about, but not yet enrolled in, the program. ATE believes that these start-stop approaches in pilots do a disservice to customers who are seeking to understand the full breadth of options available to them when they acquire an EV. National Grid offers a compelling, beneficial program to its customers, and ATE supports its expansion.

Conclusion

Overall, ATE continues its support for National Grid's EV programs in Massachusetts, which comprise a thoughtful portfolio of activity to support EV adoption across customer segments. We strongly support—as we have done in California, New York, and elsewhere—the undertaking of mid-term

[2] D.P.U. 24-64 Exh NG-MMJG-1 at 50

program reviews, which create the opportunity to adjust program design based on real-world learnings and accommodate market trends. We find that National Grid has clearly articulated the need for the program changes they propose in their Mid-Term Modification Filing, and has supported these proposals with analysis from third-party program evaluations. We encourage the Department of Public Utilities to approve these changes, and we look forward to the program results that National Grid will achieve—which we believe will be to the benefit of EV drivers, utility ratepayers, and residents throughout the Commonwealth.