



February 18, 2026

Peter A. Ray
Secretary
Massachusetts Department of Public Utilities
One South Station
Boston, MA 02110

Subject: D.P.U. 25-189 and 25-181

Dear Mr. Ray:

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

Respectfully,

A handwritten signature in black ink, appearing to read 'Elizabeth Turnbull'.

Elizabeth Turnbull
Director, Policy and Regulatory Affairs

A handwritten signature in black ink, appearing to read '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 ELECTRIFICATION

Introduction

The Alliance for Transportation Electrification (ATE) is pleased to submit the following comments supporting National Grid's Phase IV Electric Vehicle (EV) Program Petition¹ and EV Supply Equipment (EVSE) Plan Proposal². ATE finds that National Grid's proposed program changes and 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.

General Comments

In general, ATE finds that National Grid's Phase IV programs align with evolving utility program design best practices, while maintaining the Commonwealth's leadership in EV

¹ D.P.U. 25-189

² D.P.U. 25-181

program support. As utilities across the country file the next iteration of EV programs and plans, ATE has identified several trends, all of which are reflected in National Grid's filing:

- Simplified program designs, enrollment processes, and incentive structures;
- Increasingly sophisticated approaches to managed charging, particularly in the residential sector;
- Continued focus on underserved or environmental justice communities, and
- Flexible program design, to accommodate evolving customer business models and reduce interdependence with federal- and/or state-level incentives and programs.

These trends demonstrate that utilities like National Grid are focused on customer responsiveness, administrative efficiency, and ratepayer affordability, while remaining committed to supporting transportation electrification.

Commercial Program

ATE appreciates the changes that National Grid proposes to its commercial charging programs. As evidenced in the recently approved Phase III Mid-Term Modification Filing³, National Grid has a history of adapting its commercial program design to continually streamline its program offerings and ease barriers to enrollment.

Specific program changes that ATE supports include simplified project incentives and distinct tiers of support. Relying on evidence from its prior program evaluations of the complexity of the current (Phase III) program, National Grid proposes instead to offer a single incentive to cover eligible costs, with the amount based on a combination of charging capacity and tier level (standard or enhanced). ATE anticipates that this change will make communicating and working with customers easier, easing administrative complexities and improving customer experience. Further, National Grid's use of standard and enhanced tier support levels reflects best practice in the industry, to more equitably make the benefits of transportation electrification available to all types of customers.

For publicly accessible DCFC, National Grid proposes an innovative application period approach, wherein projects will compete head-to-head for incentive support, using transparent criteria, to ensure that the winning projects are most likely to serve the interests of the Commonwealth and its residents. While this approach introduces some administrative burden, ATE anticipates that it is likely to meet National Grid's goals of enabling DCFC ports in a cost-efficient way and avoid the oversubscription challenges that the commercial program faced in Phase III. And we are encouraged by the fact that

³ D.P.U. 24-196

National Grid has worked closely with Eversource on this program design, which Eversource has successfully deployed in its Connecticut service area.

Residential Program

ATE notes the strategic approach that National Grid takes to address the varied needs of multi-unit dwelling (MUD) customers, such as the use of standard and enhanced tier incentive levels and turnkey delivery model. Staffing for this challenging segment is key, and ATE notes the addition of an incremental FTE to manage MUD programs. The MUD segment continues to encounter numerous obstacles for deploying EV charging at these sites—and the Commonwealth has a disproportionately larger number of residents living in MUDs than other states, making it even more important for EDCs to offer tailored, well-supported programs to address this segment.

ATE also supports the tethering of 1-4 unit residential incentives to enrollment in a managed charging program or time-varying rate. This is an emerging best practice among utilities, with most utilities phasing out standalone (no strings attached) rebates for home chargers unless the customer is income-qualified.

Managed Charging Program

ATE appreciates National Grid's approach to managed charging, and particularly the introduction of use case-based customer cohorts to address system peaks, distribution peaks, or other alternative use cases that may come up during the course of the program. As managed charging programs evolve beyond event-based demand response models, it is important for utilities to test various use cases and establish value across the cost-avoidance stack. ATE also notes that National Grid intends to measure and control EV charging across a variety of mechanisms, including vehicle telematics, networked EVSE, or AMI-enabled solutions. This type of "all of the above" program design casts the widest possible net to attract and enroll customers with a variety of vehicle and charger types, and strengthens the equitability of managed charging programs as a result. And this program design also grants National Grid the flexibility to deploy its managed charging program carefully and evolve its approach based on lessons learned.

External Coordination

National Grid has coordinated well and widely both with other regulated utilities and with public agencies, fostering consistency with the Commonwealth's public policy goals. ATE appreciates that National Grid relied heavily on some of the analysis in the EVICC Second Assessment, particularly in developing the commercial program, to help identify projects that are eligible for the enhanced incentive tier as well as help assess publicly accessible

DCFC applications. National Grid also worked with the Massachusetts Department of Environmental Protection to clearly identify projects that will be eligible for MassEVIP support versus those that will be eligible for utility program support. This is a common-sense approach that will align each program to the best-fit customers and reduce application and contracting timelines and complexities for customers.

Right-of-Way and Pole Charging

ATE supports National Grid's proposal⁴ to include right-of-way (ROW) and pole-mounted chargers in the commercial charging program, rather than carve out and design a separate utility program for utility pole charging. This approach continues to keep program offerings streamlined and consistent, and leverages the existing administrative infrastructure of the commercial program to address these alternative charging types.

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 see the proposed evolution of National Grid's programs as evidence of the current programs' successes, as well as the company's continued focus on customer needs. We find that National Grid has clearly articulated the need for its proposed Phase IV programs, and has honed its proposal with customer and stakeholder feedback, coordination with external parties, and analysis from third-party program evaluations. We encourage the Department of Public Utilities to expeditiously approve the Phase IV programs and the inclusion of ROW and pole charging in the commercial charging program.

⁴ D.P.U. 25-181