

September 14, 2021

Scott Seigal
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: DPU Dockets 21-90 (*Phase II Electric Vehicle Infrastructure Program and Electric Vehicle Demand Charge Alternative Proposals*), 21-91 (*Phase III Electric Vehicle Market Development Program and Electric Vehicle Demand Charge Alternative Proposal*), and 21-92 (*Electric Vehicle Infrastructure Program, Electric Vehicle Demand Charge Alternative Proposal, and Residential Electric Vehicle Time-of-Use Rate Proposal*)

Dear Mr. Seigal:

Acadia Center appreciates the opportunity to provide written comments on the Department of Public Utilities' ("Department") dockets 21-90, 21-91, and 21-92. Each electric distribution company (EDC) filed electric vehicle charging infrastructure proposals and demand charge alternative proposals in response to an order in D.P.U. docket 20-69, Phase II. Acadia Center is a non-profit research and advocacy organization committed to advancing the clean energy future and is deeply committed to accelerating the deployment of electric vehicles (EV).

Acadia Center is pleased to see the plans that each EDC has developed and looks forward to working with key stakeholders to accelerate the role that utilities can play in expanding electric vehicle charging infrastructure in the Commonwealth. Acadia Center respectfully offers several recommendations:

- **Performance metrics and incentives.** All utilities should include robust performance metrics to track the achievement of key objectives. Eversource should evaluate whether to include a performance incentive mechanism (PIM) to maximize the abatement of Particulate Matter (PM) 2.5 emissions, in line with the PIMs that National Grid proposed.
- **Fleet offerings.** The utilities should provide more detail on the expected break down of funding for public vs. private fleets, with an emphasis on using ratepayer funds to electrify public fleets.
- **Environmental justice.** National Grid should provide the same full rebate for electric vehicle supply equipment (EVSE) that Eversource proposes, and Eversource should adopt a school bus rebate program in line with National Grid's proposal.
- **Demand charge alternatives.** Acadia Center appreciates the development of demand charge alternative proposals, recognizing that demand charges for EV direct current fast charging (DCFC) charging are counterproductive and remove incentives for EV charging. The EDCs should include performance metrics to track whether customer savings actually materialize under the alternative proposals. Each EDC should also offer robust time-varying rates with sufficiently narrow on-peak windows and a high on-peak to off-peak ratio in order to effectively incentivize off-peak EV charging.

Performance Metrics

Each utility proposes a set of statewide and company-specific performance metrics to track the success of their EV charging infrastructure programs. There are several differences between the proposed performance metrics for each EDC, and customers would benefit from greater alignment between the proposals. For instance, National Grid includes several “program implementation” metrics that Eversource does not propose, including “total number of fleet assessments completed” and “total number of electric school buses enabled.” Until’s only program implementation metric is “total number of residential EV charging customers enrolled on the EV TOU rate.” Unlike National Grid and Eversource, Unutil does not include metrics for “residential charger rebates distributed,” “residential make-ready rebates distributed,” or “total number of participants in the Workforce Development and Electrician trainings.”

In addition to tracking metrics, National Grid is proposing two performance incentive mechanisms:

- **Cost Containment**, which seeks to minimize ratepayer costs per L2 and DCFC charging ports, and
- **Clean Fleet, Clean Air**, which seeks to maximize abatement of PM2.5 emissions enabled by National Grid’s Fleet Make-Ready program.

Eversource is only proposing a Cost Containment PIM. Customers would benefit from more information about why a PIM tracking PM2.5 emissions abatement is not included in Eversource’s proposal.

Fleet Offerings

National Grid and Eversource both note that they will endeavor to ensure that there is an “equitable distribution” of funding support within their fleet-related programs and that private fleets do not receive an “unbalanced portion” of the fleet make-ready funds.¹ Utilities can play a key role in supporting the growth of EV charging infrastructure for public fleets, and National Grid and Eversource have recognized stakeholder concerns about the amount of financing support for private fleets. However, both utilities should provide more information about what an “equitable distribution” of funds actually means, and what specifically an “unbalanced portion” refers to. The Department should also ensure that the equitable distribution of funds that it approves favors public fleet charging at a significantly higher proportion than private fleets.

Environmental Justice

Eversource and National Grid offer a variety of similar laudable incentives and unique offerings for environmental justice communities (EJCs). The EDCs’ plans should help to support residential charging for customer segments that are not currently well-served by private industry, including multi-family, environmental justice communities, and low-income customers.

There are a number of notable differences between the utilities’ proposals. For public and workplace, residential, and fleet support, both Eversource and National Grid offer to cover 100% of make-ready costs for EVSE. However, while Eversource provides a full rebate, National Grid only provides up to a \$4,000 rebate for EVSE. National Grid should

¹ Exhibit NG-EVPP-1, Page 80 and Exhibit ES-KB-1, Page 68

provide the same full rebate for EVSE in EJCs. Acadia Center urges the Department to continue to shape the make-ready and EVSE rebate programs to provide most of the funding to multi-family, public, and public fleet offerings, as potential areas where the commercial market has failed to reach the deployment targets we need for the electrified future.

Additionally, National Grid proposes to install company-owned pole-mounted EVSE in at least five EJCs, but not own them long-term. This avoids the potential distortion of competitive market that would ordinarily result from a utility owning EVSE. In addition, pole-mounted EVSE is a resource that can enable on-street charging in a way that is scalable, and this is a good offering to be piloted. Eversource is not proposing pole-mounted EVSE. Eversource should develop a plan relative to pole-mounted EVSE, similar to the one proposed by National Grid.

The offerings for fleet services are where the two utilities vary most significantly. Eversource intends to offer 100% make-ready costs and EVSE rebate for medium-duty and heavy-duty (MD-HD) fleets, including school buses, community transport services, and last-mile delivery fleets, that serve EJCs. However, this program is not fully fleshed out and is currently a pilot program, with a budget of only \$3 million. Eversource suggests that this pilot will allow for the electrification of 120 MD-HD vehicles. National Grid's offering is significantly more robust. National Grid proposes to offer 300 EJC school bus incremental cost rebates of roughly \$175,000 per bus. National Grid's EJC school bus budget is \$52.5 million, significantly higher than Eversource's \$3 million budget for its entire EJC MD-HD fleet electrification pilot program. Eversource should improve upon its EJC offering by offering a more robust bus rebate program.

Unitil makes minimal mention of EJCs. The utility lists "program financial support provided to stations in environmental justice communities" under its statewide performance metrics (which were agreed upon with National Grid and Eversource). It also states that one of the goals of its Workforce Development initiative is to foster participation from EJCs. Unitil should identify more specific incentives and programs for EJCs to increase EV adoption in those communities and create an offering for make-ready infrastructure for buses and community transport services in EJCs.

Demand Charge Alternative Proposals

As required by the 2021 Transportation Act, each EDC has proposed a demand charge alternative to facilitate faster charging for EVs. Traditional demand-based rates tend to penalize DCFC charging and do not support equitable access to charging services. In its August 7, 2020 comments in DPU Docket 20-69, Acadia Center recommended:

- Using higher volumetric pricing either instead of or alongside demand charges, which can provide more certainty for operators of charging stations where utilization is low.
- A monthly bill credit measured using a percentage of the nameplate demand of a charging station located behind a commercial customer's metered service.
- "Rate limiters," which set a limit of a certain cents/kWh value for the average cost equivalent of a customer's demand charges.

The EDCs' demand charge alternative proposals, which set energy- and demand-based rates based on four load factor brackets, should help to meet the objectives of Acadia Center's first recommendation. By minimizing demand-based

rates for low usage charging sites, the EDCs' demand charge alternative proposals should help to reduce barriers to equitable charging access and encourage higher EV charger utilization.

National Grid's revised General Service Time-of-Use G-3 ("Rate G-3"), which is designed for large commercial and industrial customers with demand greater than 200kW, also includes peak hours for the distribution component from 8am-9pm Monday-Friday. In addition, Unitil is proposing a residential time-of-use rate to encourage off-peak EV charging, including a 3-1 on-peak to off-peak ratio. Unitil is proposing peak times of 10am-10pm Monday-Friday. Both of these peak windows may be too large to make a meaningful difference in charging behavior. In order to support the adoption of EVs and to help optimize charging times, each EDC should offer robust time-varying rates. Indeed, Eversource itself notes that "fuel savings are maximized when at-home charging under time-of-use rates is maximized."²

In addition, each EDC should include performance metrics to track whether customer savings actually materialize under the demand charge alternative proposals

Conclusion

Thank you for the opportunity to submit written comments. Acadia Center looks forward to continuing to work with stakeholders throughout these proceedings.

Sincerely,

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² Exhibit ES-KB-1, Page 52, footnote 61.