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July 14, 2021

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: Petition of Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid for Approval of Phase III Electric Vehicle Market Development Program – D.P.U. 21-91

Dear Secretary Marini:

On behalf of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid (“Company” or “National Grid”), enclosed for filing is National Grid’s testimony and exhibits in support of its proposed Phase III Electric Vehicle Market Development Program (“Phase III Program”). The Phase III Program is submitted in accordance with the directives of the Department of Public Utilities (“Department”) in D.P.U. 20-69-A. In addition, the Program’s Demand Charge Alternative Rate Structure is submitted in accordance with Section 29 of Chapter 383 of the Acts of 2020 (the “Transportation Act”).

The Company’s Phase III Program builds upon the Company’s first two Electric Vehicle Market Development Programs by providing offerings to meet the diverse transportation needs of all the Company’s customers, building the infrastructure required to support statewide EV adoption, and helping to enable the Commonwealth’s broader transition to a clean transportation future. The Company is proposing to run the Phase III Program for a period of four years¹, with a total budget of approximately \$277.76 million. As proposed, the Phase III Program consists of the following offerings:

- a. **Public and Workplace Segment:** provides financial support for Electric Vehicle Supply Equipment (“EVSE”) installations at public sites and workplaces, including pole-mounted Level 2 chargers, and a Direct Current Fast Charging commitment in environmental justice communities;
- b. **Residential Segment:** provides programmatic and financial support for EVSE and at-home charging enablement at:

¹ The four-year Program timetable is consistent with the Company’s proposed four-year Grid Modernization Plan timetable, in part for ease of regulatory review.

- i. properties with 1-4-units; and
 - ii. multi-unit dwellings with five or more units;
- c. **Fleet Segment:** provides financial support for EVSE installations, fleet electrification advisory services and tools, off-peak charging options, and support for electric school bus purchases; and
- d. **Other Offerings**
- i. **Expansion of the Company's Off-Peak Rebate** approved in D.P.U. 18-150² for residential and fleet customers.
 - ii. **Workforce Development and Electrician Training** to support the EV workforce of the future, including new workforce entrants and incumbent workers.
 - iii. **Demand Charge Alternative Rate Structure** for commercial customers with a sliding scale of demand charges and volumetric charges, in accordance with the requirements of the Transportation Act.
 - iv. **Transformer Surcharge Waiver** to reflect the expense paid by the Phase III Program make-ready offerings, and reduce G-1 customers' bills.

Consistent with the Department's directives in D.P.U. 20-69-A, the Company has coordinated extensively with the other Massachusetts electric distribution companies, NSTAR Electric Company d/b/a Eversource Energy and Fitchburg Gas and Electric Light Company d/b/a Unital (together with the Company, the "EDCs"), during the development of the Phase III Program. As a result of that coordination, the EDCs are proposing a substantially similar limited term alternative rate offering in compliance with the Transportation Act. The EDCs have also aligned significantly on the core Public and Workplace and Residential EVSE infrastructure incentive offerings and are jointly proposing a Workforce Development and Electrician Training offering.³ Based on its experience with the first two phases of the Electric Vehicle Market Development Programs and the specific needs within its service territory, the Company is also proposing unique offerings for DCFC make-ready incentives for proprietary networks, utility-owned pole mounted chargers, expanded Fleet Segment offerings with support for electric school bus purchases, and an expansion of the Company's Off-Peak Rebate Program.

In support of the Company's Phase III Program proposal, the Company is submitting direct pre-filed testimony and exhibits of the following panels:

1. **Electric Vehicle Program Panel – Rishi Sondhi, Julia Gold, and Jake Navarro. Exhibits NG-EVPP-1 through NG-EVPP-12.**

² Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid, D.P.U. 18-150, at 383-397 (2019).

³ As this is Unital's first phase of EV program, Unital's EVSE incentive offerings are structured differently than those proposed by the Company and Eversource.

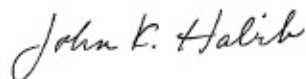
The Electric Vehicle Program Panel's testimony describes the offerings of the Phase III Program, discusses the need for each offering and the benefits to customers and the Commonwealth, demonstrates that the proposal complies with the directives of D.P.U. 20-69-A and the Department's relevant standards of review, and sponsors supporting exhibits with information about the Phase III Program scale and budget.

2. **Demand Charge Alternative Panel** – Sharon S. Daly, Thomas Chorman, Scott M. McCabe, and Theresa M. Burns.
Exhibits NG-DCA-1 through NG-DCA-4.
The Demand Charge Alternative Panel's testimony describes the Company's proposal for a limited term rate offering, consisting of revisions to two of the Company's general service tariffs, and associated pricing that would be applicable to separately metered EV charging sites, in compliance with the Transportation Act and the Department's directives in D.P.U. 20-69-A.
3. **Cost Recovery Panel** – Mindy Rosen and Stephanie Briggs.
Exhibits NG-CRP-1 through NG-CRP-3.
The Cost Recovery Panel's testimony describes the cost recovery proposal for costs associated with the Company's proposed Phase III Program.
4. **Direct Testimony of Jared E. Goldfarb – Exhibit NG-JG.**
Mr. Goldfarb is the Director, New England Financial Planning and Analysis, Massachusetts, for National Grid. Mr. Goldfarb's testimony describes how the Company proposes to finance the proposed Phase III Program.

Also enclosed with this filing are notices of appearance of counsel for the Company of John K. Habib and Bonnie Raffetto.

Thank you for your attention to this matter. Please contact me if you have any questions.

Sincerely,



John K. Habib, Esq.

Enclosures

cc: Jonathan Goldberg, Department of Public Utilities
Scott Seigal, Department of Public Utilities
Nathan Forster, Office of the Attorney General
Elizabeth Anderson, Office of the Attorney General

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

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Electric Vehicle Market Development)	
Program)	

APPEARANCE OF COUNSEL

In the above-entitled proceeding, I hereby appear for and on behalf of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid.

/s/ Bonnie Crowley Raffetto
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Dated: July 14, 2021

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

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APPEARANCE OF COUNSEL

In the above-entitled proceeding, I hereby appear for and on behalf of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid.

John K. Habib

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