

September 3, 2021

VIA ELECTRONIC FILING

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

RE: NSTAR Electric Company, d/b/a Eversource Energy; Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, D.P.U. 21-90, D.P.U. 21-91

Dear Secretary Marini:

Natural Resources Defense Council, Sierra Club, and Union of Concerned Scientists (collectively “Clean Energy Parties”) and Zeco Systems, Inc. d/b/a Greenlots, respectfully submit the following comments on the proposed procedural schedules for D.P.U. 21-90 and D.P.U. 21-91 circulated on August 31, 2021 by the Department of Public Utilities (“DPU”). The DPU’s proposed schedules include two phases, with Phase I addressing the electric vehicle (“EV”) charging infrastructure programs and cost recovery proposals and Phase II addressing the demand charge alternative proposals. Select parties have submitted comments requesting that this order be reversed, and that the demand charge alternative proposals be addressed first, with the EV charging infrastructure programs to follow. The Distribution Companies have raised concerns that the phasing of their ongoing EV infrastructure programs could be interrupted should such a reversal be adopted. The undersigned parties request that the Department adopt a procedural schedule that examines the two phases concurrently, as originally envisioned by the Attorney General’s Office in their proposed schedule submitted to the Department on August 23, 2021 and reproduced below, in order to efficiently and expeditiously address both phases of this docket.

The undersigned urge that a concurrent approach would ensure both phases could be addressed in a timely manner, allowing the Distribution Companies to continue their EV infrastructure programs without interruption and allowing a demand charge alternative to be implemented in the near-term to alleviate a recognized barrier to the deployment of EV charging infrastructure. Consideration of these phases concurrently would not be overly burdensome and would result in a more efficient and expeditious process. Further, such an approach would serve to address the concerns various parties have raised about the potential ordering of the phases.

The undersigned recommend the following procedural schedule for the proceedings, as originally proposed by the Attorney General’s Office:

DATE	PROCEDURAL STEP
September 14, 2021	Public Hearing
October 29, 2021	Deadline for Intervenors to File Notice of Intent to Sponsor Witnesses
December 10, 2021	Intervenor Testimony Due
December 22, 2021	Deadline for Discovery Requests to Companies
January 5, 2022	Deadline for Discovery Requests to Intervenors
January 12, 2022	Companies' Responses to Discovery Due
January 19, 2022	Intervenors' Responses to Discovery Due
January 26, 2022	Companies' Rebuttal Testimony Due
February 4, 2022	Deadline to Issue Discovery on Rebuttal Testimony
February 16, 2022	Responses to Rebuttal Discovery Due & Deadline to Request Evidentiary Hearing;
February 25, 2022	Intervenor Sur-Rebuttal Testimony Due
March 10-11, 2022	Evidentiary Hearings (if necessary)
March 24, 2022	Intervenors' Initial Briefs Due
April 7, 2022	Companies' Initial Briefs Due
April 21, 2022	Intervenors' Reply Briefs Due
April 25, 2022	Companies' Reply Briefs Due
End of June 2022	Anticipated Order

Respectfully submitted,

GREENLOTS

By its attorney,

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NATURAL RESOURCES DEFENSE COUNCIL
SIERRA CLUB
UNION OF CONCERNED SCIENTISTS

By their counsel,

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cc: Hearing Officer, Scott Seigal
Service Lists D.P.U. 21-90, D.P.U. 21-91