

Comments by Helen Walker re: D.P.U. 21-90, 21-91, 21-92, Submitted 9/14/21

These comments concern the funding mechanism proposed in these dockets to pay for incentives to increase adoption of electric vehicles throughout Massachusetts.

While it may be an admirable public policy goal to increase adoption of electric vehicles through rebates for installation costs for EV charging stations and through lowered rates for EV charging, the proposed method of paying for these incentives is unjust. An increase in electricity rates to pay for these incentives acts like a consumption tax. It is well known that a consumption tax is highly regressive. The downside of a regressive tax is the impact on low-income families. Assuming that there will be adjustments to cushion the effects on statutorily low-income ratepayers, the hardship will be to those households with incomes just above the level at which assistance in paying utility bills is available. Such households are already struggling to pay electricity bills at rates which are among the highest in the nation. We are talking about making it impossible for some retirees to afford air conditioning during a heat wave so that some Tesla owners can charge their vehicles more cheaply.

To encourage the purchase of electric vehicles, Massachusetts offers rebates which presumably come out of general revenue. Collection of general revenue, which includes sales and use taxes and federal aid, does not fall as heavily on individual households as does an increase in electricity rates. **Incentives to increase adoption of electric vehicles are a matter of public policy and should be paid for out of general revenue.** These incentives should have to compete for funding with all the other worthy candidates for public funding, such as improved public transportation.

Let us remember that a significant proportion of Massachusetts households are car-free. According to www.governing.com, in 2015-2016 an average of 34.6% of households in Boston, 33.9% in Cambridge, 21.5% in Springfield and 19.5% in Worcester were car-free. Many of these ratepayers organized their lives to help combat climate change by doing without a car. What is the fairness in putting so much of the burden on these ratepayers to subsidize the electric vehicles of others? Incentives for the adoption of electric vehicles should not be paid for by an increase in the electricity rates of all customers.