

THE STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

JOINT TESTIMONY OF
DENNIS E. MOORE, BRIAN J. RICE AND MICHAEL R. GOLDMAN

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY

SEPERATELY-METERED ELECTRIC VEHICLE TIME-OF-USE RATE AND LOAD
MANAGEMENT PROPOSALS

Docket No. DE 20-170

1 **Q. Mr. Moore, please state your name, business address and position.**

2 A. My name is Dennis Moore, I work at 107 Selden Street in Berlin, Connecticut. I am the
3 Director of IT Enterprise Business Solutions at Eversource Energy Service Company.

4 **Q. Have you previously testified before the Commission?**

5 A. No, I have not.

6 **Q. Please describe your educational background and professional experience.**

7 A. I have a Bachelor of Science degree in Mathematics from the University of Connecticut.
8 I have worked at Eversource Energy for 22 years developing, implementing and

1 maintaining enterprise business solutions. Prior to that I worked as a Manager of
2 Resource Planning and Economic Analysis at Yankee Gas Services Company.

3 **Q. Mr. Rice, please state your name, business address and position.**

4 A. My name is Brian J. Rice. My business address is 247 Station Drive, Westwood, MA
5 02090. My position is Manger, Regulatory Projects at Eversource Energy Service
6 Company and in that position I provide service to the operating companies of parent
7 company Eversource Energy, including the Public Service Company of New Hampshire
8 d/b/a Eversource Energy (“Eversource” or “the Company”).

9 **Q. Have you previously testified before the Commission?**

10 A. Yes, in Docket No. DE 19-197, the Statewide Multiuse Online Data Platform. I have
11 also submitted testimony in several Commission dockets, including the Company’s
12 Electric Vehicle (“EV”) make-ready infrastructure proposal filed in Docket DE 19-057. I
13 have also testified before the Massachusetts Department of Public Utilities and
14 Connecticut Public Utilities Regulatory Authority in several proceedings related to utility
15 program design, revenue requirements and cost recovery.

16 **Q. Please describe your educational background and professional experience.**

17 A. I earned a Bachelor of Science degree in Industrial Economics from Union College and
18 received a Master of Business Administration degree with a concentration in corporate
19 finance from the Boston College Carroll Graduate School of Management. I’ve held
20 positions in different functions at Eversource Energy since 2011. My present

1 responsibilities include managing analysis and projects in support of enterprise-wide
2 regulatory initiatives across Eversource Energy's operating businesses. Prior to joining
3 Eversource Energy I held consulting positions covering various segments of the energy
4 and utility industries.

5 **Q. Mr. Goldman, please state your name, business address and position.**

6 A. My name is Michael R. Goldman. My business address is 247 Station Drive, Westwood,
7 MA 02090. My position is Director, Energy Efficiency Regulatory, Planning, and
8 Evaluation at Eversource Energy Service Company and in that position I provide service
9 to the operating companies of Eversource Energy including the Company.

10 **Q. Have you previously testified before the Commission?**

11 A. Yes. I submitted testimony in DE 17-136, the Electric and Gas Utilities' 2018-2020
12 Statewide Energy Efficiency Plan. My testimony was focused on emerging program
13 offerings and demand response programs. I have also testified before the Massachusetts
14 Department of Public Utilities and Connecticut Public Utilities Regulatory Authority in
15 several proceedings related to utility program design, emerging program design, and
16 demand response programs.

17 **Q. Please describe your educational background and professional experience.**

18 A. I earned a Bachelor of Arts degree from the University of Wisconsin-Madison and a
19 Master of Arts degree from the Johns Hopkins University with specializations in
20 international finance and energy policy. From 2008-2010, I was an Energy Business
21 Analyst at the consulting firm of PowerAdvocate focusing on large capital-intensive

1 utility construction projects. From 2010-2012, I was a strategy and operations consultant
2 within Deloitte Consulting's Energy and Resources practice area, focusing on energy
3 issues for federal clients. I joined NSTAR in 2012, where I have served in roles of
4 increasing responsibility, including Senior Analyst, Supervisor, Manager, and now
5 Director. Within my roles at Eversource Energy, I have been responsible for energy
6 efficiency planning and evaluation matters across Eversource Energy's three-state
7 footprint. I have also been responsible for designing and setting the strategic direction for
8 innovative programs that impact multiple parts of the Company, such as demand
9 response initiatives. I have produced over 30 publications and have been featured as a
10 panelist at conferences in the areas of energy efficiency, demand response, distributed
11 energy resources and innovative energy technologies.

12 **Q. What is the purpose of this testimony?**

13 A. The purpose of our testimony is to describe how the Company would implement new
14 time-of-use ("TOU") rates for electric vehicle ("EV") charging as well as load
15 management options for EV customers. Eversource is filing these proposals pursuant
16 Order No. 26,394 issued by the Commission in Docket No. IR 20-004. The design of
17 potential EV TOU rates is presented separately in the testimony of Edward A. Davis.
18 Eversource is pleased to have this opportunity to propose solutions to further serve
19 customers who are expected to be increasingly driving and charging EVs in the coming
20 years. Our testimony will explain why a near-term launch of an EV managed charging
21 initiative is recommended over separately-metered EV TOU rates as a starting point for
22 what is expected to be an ongoing evolution and expansion of customer options as EV

1 adoption grows and technological advances continue. Load management offers an
2 opportunity for the Company to offer financial incentives for EV customers to optimize
3 load which are similar to what may be sought through offering a separately-metered TOU
4 rate. However, load management can provide incentives to the relatively small number
5 of current EV customers without making large fixed investments to modify enterprise IT
6 systems that support billing, data management and related functions. Load management
7 is also a much more flexible approach to optimizing load which may better enable the
8 Company to adapt to changing and localized system conditions that could emerge in the
9 early stages of EV adoption across the Company's service territory.

10 **Q. How is your testimony organized?**

11 A. Our testimony begins with a summary of the relevant guidance issued by the Commission
12 in Docket No. IR 20-004 which informed the Company's development of TOU rate and
13 load management options. We then discuss the technical requirements, anticipated costs
14 and business considerations of offering EV TOU rates to customers in the near term. We
15 explain how a recommended load management program would provide similar benefits
16 to EV customers at lower overall cost and risk, and finally conclude with discussion on
17 the recovery of costs for offering the EV customer options addressed in this testimony.

18 **I. RATE DESIGN STANDARDS FOR EV CHARGING**

19 **Q. Please summarize the Commission's guidance which informed the Company's**
20 **development of TOU rate and load management options.**

21 A. The Commission made several determinations in Order No. 26,394 which guided the
22 Company's development of EV proposals. The Commission ordered that the current

1 docket be opened for it to consider utility-specific EV TOU rate proposals for separately-
2 metered residential and small commercial customers as well as high-demand draw
3 commercial applications. Separately-metered residential EV rates were directed, among
4 other criteria, to incorporate time-varying energy supply, transmission, and distribution
5 components; have three periods (e.g., off peak, mid-peak, and peak); and be seasonally
6 differentiated. The Commission's guidelines were generally consistent with the rate
7 designed and approved for the purposes of Liberty's Battery storage pilot, and later
8 adopted for Liberty's separately-metered EV TOU Rate¹. The Commission also found
9 that load management offerings may provide near-term ratepayer benefits without
10 installation of metering infrastructure and other associated upgrades. (Order No. 26,394
11 at 8). For that reason, it found that load management techniques may be an appropriate
12 strategy for EV rate design.

13 **Q. Are there other criteria which guided the Company's development of EV customer**
14 **options?**

15 A. Yes. The Company was also guided by the goals enumerated in SB 575 which originally
16 directed the Commission to determine the appropriateness of rate design standards for EV
17 charging. SB 575 advised that the determination of EV rate designs include
18 consideration of whether such rates would encourage energy conservation, optimal and
19 efficient use of facilities and resources by an electric company, and equitable rates for
20 electric consumers. The Company expects that load management approaches
21 recommended for near-term implementation will advance these legislative goals.

¹ Liberty Utilities (Granite State Electric) Corp., Order No. 26,376 at 9 (June 30, 2020).

1 **II. EV TOU RATE IMPLEMENTATION**

2 **Q. Please summarize the EV TOU rate structure identified by the Company to be**
3 **consistent with Commission guidance.**

4 A. The EV TOU rate structure is described in more detail in the accompanying testimony of
5 Edward A. Davis. Consistent with the guidance issued by the Commission in Docket No.
6 IR 20-004 the Company has developed, and evaluated the implementation of, an EV
7 TOU rate that has three periods (e.g. off-peak, mid-peak and peak) for energy supply,
8 transmission and distribution components. This rate is for residential and small business
9 customers; the high-demand draw rate developed by Eversource was filed to and being
10 evaluated separately in Docket No. DE 21-078.

11 **Q. Does the Company currently bill rates similar to what is contemplated for EV**
12 **charging?**

13 A. No. Eversource has offered distribution and transmission time-of-day rates to residential
14 New Hampshire customers for many years, but they include only two usage periods (peak
15 and off-peak). The Company also does not presently bill TOU periods for varying
16 Energy Service rates.

17 **Q. What metering equipment would be required to collect necessary billing data?**

18 A. Enrollment in a separately-metered EV TOU rate would require installation of a separate
19 utility service and meter at a customer's premises. The EV-only meter would require
20 interval data capabilities to produce the necessary billing determinants for the proposed
21 rate and cellular communication capabilities to transmit data. The Company estimates
22 the installed cost of the necessary utility meter to be approximately \$500. A customer

1 would also likely incur additional costs for a licensed electrician to install wiring and a
2 meter socket for the new service. These customer costs would vary, but could be several
3 hundred to over a thousand dollars.

4 **Q. Did the Company consider if it were feasible to use alternative sources of EV**
5 **charging data instead of requiring an additional meter?**

6 A. Yes. Eversource presented an outline of criteria to Commission Staff and participants at
7 a technical session in this docket that the Company would need to assess to determine if it
8 were readily feasible to use alternative sources of EV charging data. Eversource noted
9 that ITRON MV90xi is the Company's system of record for receiving and managing
10 interval data. Efficient implementation of a separately-metered EV TOU rate would
11 require alternative data sources, such as customer-owned electric vehicle supply
12 equipment ("EVSE") have a Translation Interface Module ("TIM") to tell MV90xi how
13 to read the meter type correctly. The TIM would also need to be installed in MV90xi and
14 tested with the data source. Eversource directly confirmed with ITRON that such
15 capabilities to enable interval data communication from current EVSE to MV90xi are not
16 presently available.

17 Manual processes would be required for data collection and billing separately-metered
18 EV TOU rates with data that cannot be received by MV90xi. There are also additional
19 factors that would likely prevent the Company from replicating the quality, accuracy and
20 security of billing data from utility-owned metering with alternative third-party devices.
21 Prior to relying on alternative data sources, the Company would seek to confirm, at a
22 minimum, that it had unrestricted access to equipment to ensure its integrity through

1 periodic testing and verification according to established protocols; have copies of all
2 software and firmware that could have an effect on accuracy; and confirm equipment has
3 suitable tampering protections.

4 Eversource has determined that it is not readily feasible for alternative data sources to be
5 used in place of utility metering for billing purposes at this time, but remains committed
6 to exploring all opportunities to effectively utilize third-party device capabilities to serve
7 customers. The Company's load management proposal discussed later in this testimony
8 is consistent with this goal and the Company will continue to explore other opportunities
9 that may emerge with advances in technology and systems.

10 **Q. Would the Company need to modify existing billing and other IT systems in order**
11 **to bill a three-period rate for EV charging?**

12 A. Yes. Making the separately-metered EV TOU rate available to all customers would
13 impact a number of the Company's enterprise systems and processes. Modifications
14 would be required to MV90xi, the meter tracking system, the process for billing
15 determinant files sent to the billing system, the C2 billing system, bill print and
16 EDI. MV90xi, the meter tracking system and associated billing determinant process will
17 require system changes for a new meter type and additional billing determinants. This
18 new and more complex TOU rate would need to be built in the C2 billing system and the
19 ability to differentiate and bill the supply cost for both internal and external supply would
20 have to be developed. The EDI files sent to suppliers would require enhancements as
21 would the bill format and print process. Extensive testing to all impacted systems and
22 areas including metering, billing, print and load service would be needed.

1 **Q. What is the estimated cost and lead time for necessary system modifications?**

2 A. Eversource estimates it would need to invest approximately \$9 million in modifications
3 to existing enterprise systems to make the proposed EV TOU rate available to customers.
4 Completion of anticipated work could also require a lead time of up to 30 months
5 following the Commission's approval of a separately-metered EV TOU rate. These
6 estimates are the result of an internal review of the proposed rates and consultation with
7 Eversource's IT subject matter experts on the scope of changes required to implement the
8 program.

9 **Q. Are there additional business considerations associated with implementation of an**
10 **EV TOU rate?**

11 A. Yes, there are several. First, the estimated costs for system modifications represent fixed
12 costs that would be entirely incurred by the Company prior to making EV TOU rate
13 options available to customers. If few customers ultimately chose to enroll in the new
14 TOU rate the expenditures in system modifications could end up as a sunk cost that
15 provides little customer benefit. Eversource expects the level and volume of customer
16 interest in various EV rate options will grow with EV adoption, but notes that the EV
17 market is still in very early stages and EV customers that might be interested in a
18 separately metered EV TOU rate at this time represent a very small portion of the
19 Company's customer base. The Company has also not determined that the level of
20 savings that an individual residential EV customer could achieve through a separately-
21 metered rate would be sufficient to encourage large numbers of customers to enroll. As
22 indicated in the testimony of Mr. Davis, a typical residential customer that charges one

1 EV at home entirely during off-peak periods would likely realize very minimal savings
2 by enrolling in a potential EV-only TOU rate. Given that customers would need to incur
3 additional cost for wiring a separately-metered service to achieve savings through the
4 TOU rate it's possible that enrollment in that rate could be modest.

5 Second, implementation of a three-period TOU rate would require the Company to make
6 expenditures to modify billing and data management systems that may have limited
7 future useful lives. While the Company does not yet have a specific timeline for retiring
8 current systems, Eversource Energy is engaged in several activities across multiple
9 jurisdictions that could lead to replacement of enterprise systems. As part of the
10 Settlement Agreement on Permanent Distribution Rates approved by the Commission in
11 Docket No. 19-057 the Company has agreed to assess the feasibility of deploying
12 advanced metering functionality in New Hampshire. This assessment is expected to
13 build upon work performed by Eversource Energy to prepare an Advanced Metering
14 Infrastructure Business Case and Implementation Plan filed with the Connecticut Public
15 Utilities Regulatory Authority in Docket No. 17-12-03RE02. The Massachusetts
16 Department of Public Utilities has also directed Eversource Energy to prepare a strategic
17 proposal to achieve advanced metering functionality through a full-scale deployment of
18 AMI and required that such a plan address associated back-office support systems². The
19 current progress toward evaluating and developing new metering, billing and data
20 management solutions across all of Eversource Energy's operating companies suggest it
21 is likely not reasonable to assume that investment in current enterprise systems would

² D.P.U. 20-69-A, May 21, 2021 pgs. 33-34.

1 provide benefits to customers over an extended time period. However, the eventual
2 deployment of new enterprise systems would also likely position the Company to more
3 efficiently support more rate options for EV customers in the future; creating
4 opportunities to build upon effective near-term approaches.

5 Lastly, the Company expects that the core objectives for EV rate design enumerated in
6 SB 575 can be effectively advanced at this time through alternative and currently
7 available approaches at much lower cost. We discuss the opportunities for optimizing
8 load through load management further in this testimony, but also note that Eversource's
9 existing rate R-OTOD, Residential Time-of-Day Service is an available option for
10 customers who may seek a time-differentiated rate for predominantly off-peak EV
11 charging. The Company is separately filing proposed amendments to this rate pursuant
12 the Docket No. DE 19-057 settlement agreement that may further enhance its suitability
13 for EV customers and alignment with SB 575.

14 **III. LOAD MANAGEMENT PROPOSAL**

15 **Q. Please summarize the Company's Load Management Proposal**

16 A. A detailed proposal for an EV managed charging initiative is included as Attachment
17 MRG-1 to this testimony. Eversource's proposal leverages existing demand management
18 capabilities and builds upon successful demand response programs that have been
19 implemented in Massachusetts and Connecticut. The proposed program would provide
20 annual cash incentives of up to \$150 to customers that agree to allow the Company and
21 its EV charging partners to directly control EV charging activity through networked
22 EVSE. Through direct load control, the burden to avoid charging during peak periods

1 would be taken off customers and they would receive a financial benefit similar to, but
2 likely greater than, what may be sought through a separately-metered TOU rate.

3 **Q. What are the estimated costs of the EV managed charging initiative**

4 A. In addition to the incentives provided to customers, which the Company estimates could
5 total \$450,000 over five years, the Company anticipates it could incur approximately
6 \$500,000-\$900,000 in additional costs to administer the program over five years. The
7 Company believes that an additional \$200,000 for evaluation, measurement and
8 verification (“EM&V”) activities may be appropriate but is not included in any budgetary
9 estimates at this time.

10 **Q. Please summarize the administrative costs the Company anticipates would be**
11 **incurred to run the program**

12 A. The Company would expect to incur administrative costs for customer acquisition,
13 program enrollment, marketing, vendor management, platform management, OEM
14 partner management, reporting, performance calculation, and customer settlement. A
15 more detailed description of costs are included in Attachment MRG-1. Eversource
16 Energy has typically recommended that EM&V costs be included in budgets for similar
17 load management programs conducted as part of energy efficiency programs in
18 Massachusetts and Connecticut. However, the Company would also find it reasonable to
19 defer EM&V activity at this time to the extent the program is largely deployed as an
20 alternative to separately-metered EV TOU rates.

1 **Q. Does the proposed EV managed charging initiative have potential advantages over**
2 **separately-metered EV TOU rates?**

3 A. Yes. The Company believes a managed charging initiative could have a number of near-
4 term advantages with respect to customer experience, flexibility and cost. EV customers
5 with existing networked EVSE would likely be able to enroll in the program without the
6 need to install any additional equipment. As discussed previously, the Company has
7 confirmed that existing data management systems would not support opportunities for
8 customers to enroll in EV-only TOU rates without the installation of additional utility-
9 owned metering. Load management approaches are much more suited to utilizing third-
10 party device capabilities to serve customers. Proposed incentives will be paid based on
11 whether the Company is retaining the ability to curtail charging during certain time
12 periods. It is a binary condition: the vehicle is either charging or it is not. The program
13 and development of incentives is not reliant on measuring actual energy consumption.
14 Relying on the charger to tell the Company if the vehicle is charging is exponentially
15 simpler than relying on equipment to measure energy consumption accurately enough to
16 be used for billing purposes. This program would pay off-bill incentives as a non-tariff
17 program, in line with how energy efficiency programs are currently offered.

18 Load management also provides much greater flexibility for the Company to optimize
19 charging activity based on changing distribution system conditions and localized system
20 conditions. A TOU rate would uniformly encourage EV customers to all charge during
21 the same period across the entire distribution system. Revising TOU periods within a
22 commission-approved rate structure can also be an administratively-burdensome and

1 time-consuming process. Such an inflexible solution is not well suited to addressing
2 some of the anticipated challenges that may emerge as EV adoption grows. As discussed
3 in Attachment MRG-1, utilities face several risks as the demand for EVs grow, including
4 substation and transformer impacts, peak load increases, and timer peaks. There are
5 strategies the Company can deploy to mitigate these risks as part of a demand
6 management program, such as throttling and scheduling, that would be difficult to
7 replicate through a rate solution.

8 Lastly, the near-term cost of offering effective load management incentives to customers
9 is both lower and entails less risk. Implementing a load management program would not
10 require the Company to make significant fixed investments to enhance system
11 capabilities that could be sunk if customers did not enroll. Eversource would largely be
12 using existing enterprise system capabilities and resources that are already in place, or
13 will be in place, to support successful demand management programs across all of
14 Eversource Energy's operating companies. A substantial portion of the estimated
15 administrative expenses represent the cost of these resources that would be appropriately
16 allocated to New Hampshire program budgets based on Eversource Energy's existing
17 cost allocation policies. In the event that enrollment in a New Hampshire EV load
18 management did not materialize or was outpaced by the scale of demand management
19 activities of other operating companies then allocated costs would be adjusted
20 accordingly. New Hampshire customers would not be responsible for supporting the
21 ongoing costs of Eversource Energy's demand management capabilities if comparatively
22 few New Hampshire EV customers participated in the proposed program. Other

1 administrative costs which are more directly associated with New Hampshire activities
2 are also largely variable based on the number of customers that enroll. Because of these
3 factors, the proposed managed charging initiative would be launched with a much lower
4 fixed cost commitment than would be required to implement a separately-metered EV
5 TOU rate.

6 **Q. Will the proposed EV managed charging initiative inform development of future EV**
7 **customer options?**

8 A. Yes. Eversource expects it would gather information and gain insights in the course of
9 running the proposed EV managed charging program that could contribute to the success
10 of future EV customer offerings. Customer enrollment data would help the Company
11 better understand which of its customers are acquiring EVs, where they are located in the
12 Company's service territory and what equipment they are using for EV charging. Event
13 participation and charging session data collected in the course of running the program
14 would also allow the Company to better understand when customers are charging, the
15 potential impacts that charging may have on the electric power system and the
16 opportunities for charging activity to be shifted to reduce system impacts.

17 **IV. COST RECOVERY**

18 **Q. How does the Company propose to recover the anticipated costs of providing new**
19 **rate options to EV customers?**

20 A. Eversource appreciates the opportunity that the Commission has created with this docket
21 to provide EV customers with financial incentives to optimize load. Eversource Energy

1 has already implemented or proposed EV programs to further serve customers in
2 Massachusetts and Connecticut and would like to make similar options available to New
3 Hampshire EV customers as well. However, making these programs available to
4 customers in the near-term would require the Company to incur incremental costs that are
5 outside the normal course of the Company's current business or, in the case of separately-
6 metered TOU rates, require significant new investment to implement.

7 All of the anticipated costs for the recommended managed charging initiative would
8 likely be considered customer assistance expenses and included within operations and
9 maintenance ("O&M") costs for the Company. The anticipated costs to provide load
10 management incentives to customers have traditionally been included in energy
11 efficiency program budgets in other jurisdictions and recovered through separate rate
12 mechanisms for funding energy efficiency activities. The System Benefits Charge
13 ("SBC") is the mechanism for recovery of energy efficiency program costs in New
14 Hampshire, but the Company does not propose to recover costs for near-term
15 implementation of the managed charging initiative through the SBC at this time. Given
16 that the managed charging initiative can be offered at lower cost than other alternatives,
17 the Company requests only that it be allowed to defer incremental costs for the program
18 to a regulatory asset to be amortized following its next base rate proceeding. Eversource
19 would likely eliminate EM&V activities for the managed charging initiative in order to
20 contain costs under the proposed recovery framework, however, as discussed previously.

21 The Company does not recommend near-term implementation of a separately-metered
22 EV-only TOU rate with existing systems, as the costs it would incur to do so would be

1 significantly greater than what is expected to launch the proposed managed charging
2 initiative. If the Commission were to order the Company to implement the proposed
3 separately-metered EV TOU rate or a similar rate, the Company would respectfully
4 request it also provide the opportunity for associated incremental costs to be recovered
5 through the Company's Regulatory Reconciliation Adjustment or a comparable
6 reconciling mechanism.

7 **Q. Would the Company seek to recover costs of offering EV TOU rates to customers in**
8 **the future through the same mechanism?**

9 A. Not necessarily. Eversource expects that there will be more opportunities to offer
10 different rate options to EV customers in the future as part of more comprehensive
11 updates to the Company's enterprise billing and data management systems. While no
12 such updates are presently planned for near-term implementation, the Company has
13 identified a number of parallel activities in multiple jurisdictions earlier in this testimony
14 that are likely to lead to updates of enterprise systems. Such updates would be more
15 likely to be undertaken in the normal course of the Company's enterprise operations, or
16 through a more broad-based investment initiative, and appropriately recovered through a
17 different rate mechanism.

18 **IV. CONCLUSION**

19 **Q. Please summarize the Company's recommended approach for serving EV**
20 **customers in the near-term.**

21 A. Eversource applauds the Commission for thoughtfully considering EV rate design
22 standards in Docket No. IR 20-004 and subsequently directing New Hampshire utilities

1 to file EV rate proposals. The Company looks forward to effectively serving customers
2 that will be charging EVs in increasing numbers. Rate design standards that promote
3 optimal and efficient use of facilities and resources by an electric company, and equitable
4 rates for electric consumers, will be critical as the transportation sector of New
5 Hampshire and the surrounding region becomes increasingly electrified. Based on a
6 thorough assessment of the Company's current enterprise systems, Eversource proposes
7 that the near-term launch of an EV managed charging initiative is the most cost-effective
8 starting point for what is expected to be an ongoing evolution and expansion of EV
9 customer options as adoption grows and technological advances continue. Eversource
10 expects that future comprehensive updates to the Company's billing, data management
11 and other enterprise systems will likely expand the rate options it can provide to all
12 customers, including those with EVs. However, the modification of current enterprise
13 systems for the narrow purpose of offering EV TOU rates is not recommended. The
14 estimated costs of such modifications are significant and there is a meaningful risk that
15 commensurate customer benefits would not be realized.

16 **Q. Does this conclude your testimony?**

17 **A.** Yes. It does.