Date Filed: August 28, 2026

Witness: RUNYON, JENNIFER M
Request from: Public Utilities Regulatory Authority

Question:

Program Administrator Order No. 20 Compliance, Att. 1, pp. 63−64. For each milestone identified in the Bidirectional EV Report as a prerequisite for residential participation, identify the specific measurable criteria that the Program Administrators believe should be satisfied before recommending residential bidirectional EV eligibility.

Response:

Eversource describes the milestone achievement process below.

- **Milestone: The completion of the Bidirectional Energy IES pilot and further learnings from the MassCEC V2X Demonstration Program**

The Vehicle-to-Grid (V2G) pilots that the Company is assisting with in Connecticut with Bidirectional Energy[1] and in Massachusetts with The Mobility House will help to inform market readiness and future V2G program design, by testing new processes and rules (e.g., interconnection and metering for V2G installation), and providing more insight into Distributed Energy Resource Management System ("DERMS") capabilities (dispatch, data availability), actual V2G asset participation and load management potential, and customer receptivity.

Eversource is using these pilots to begin to learn to what extent customers are interested in allowing their vehicles to be used as a battery that provides load management by discharging energy during peak periods. The Company is also interested in learning whether current Energy Storage Solutions ("ESS") performance incentives motivate participation.

Eversource is also interested to learn if customers will be home and plugged in during Active Dispatch hours, if they will they have enough stored energy in their vehicles to deliver meaningful kilowatts of capacity during an event, if their vehicles participate in a meaningful way, and how the associated performance incentives from their participation compares to the installed cost of V2G systems. The pilots will also provide data points around early adopter profiles which could help inform marketing efforts in the future.

[1] See Docket No. 22-08-07, Innovative Energy Solutions Program Cycle 01.

In addition to these customer-focused questions, the pilots will also help to test data and dispatch, including whether an EVSE can successfully integrate into a DERMS; whether the DERMS send dispatch signals to the EV supply equipment ("EVSE"); whether the EVSE can respond and dispatch; and whether the EVSE can send dispatch data back to the DERMS (and how long it takes for this data to be made available to the PAs). It is worth noting that because EVs are not plugged in all the time, a 15-minute telemetry year round data record, as is done for permanently installed battery storage systems in the ESS program, may not be possible. The pilots will also help determine what data collection and reporting will be available and is appropriate for verifying V2G performance. Given the more nascent stage of V2G deployment by Original Equipment Manufacturers ("OEMs") and DERMs, the pilots will also indicate whether the data available comports with the ESS requirements for near-real time reporting.

The pilots will help the EDCs develop recommendations for program scaling, and whether existing programs should be modified to support V2G. Additionally, the pilots will provide directionality toward what type and cadence of reporting data is sensible and applicable.

- **Milestone: The establishment of a clear path to resolving dual-participation with Managed Charging.**

The Bidirectional Vehicle Working group report states that Eversource and the other ESS PAs "believe that, for eligible vehicles and customers, participation in both Managed Charging and ESS is important. As an example, ensuring that customers enrolled in ESS are also enrolled in the Managed Charging Advanced Tier would allow the EDCs to reduce the adverse timer peak impacts of customers seeking to charge following an ESS event." [2]

The interaction between DERMS V2G and Managed Charging remains complex, as discussed at length in Section 7.1 of the Bidirectional EV Report[3]. While most of the DERMS vendors Eversource works with explained that they have, or would be able to develop, such a solution that can provide both services, the full scope of new program set-up, services and integration costs would need to be scoped and assessed through a contract amendment or new procurement process. The potential complexities associated with two DERMS systems co-managing an asset, were raised in the Bidirectional EV Report[4]. To put it simply, the DERMS (and, likely, EVSE and/or EV vendor) technology needed to actively manage both the charging and discharging of a vehicle, needs more time to mature.

- **Milestone: Successful implementation and application of updated interconnection guidelines.**

[2] Docket No. 26-08-05, Compliance with Order No. 20 (filed July 29, 2026), Attachment 1 "Bidirectional EV Report" at 62.
[3] Id. at pp 35-38.
[4] Id. at p. 37.

On July 1, 2026, Eversource filed updated Interconnection Guidelines which enable the interconnection of bidirectional EVSE. To date, however, no EVSE has successfully reached the stage of receiving permission to operate under the new Interconnection Guidelines. Once several projects go through and complete the new interconnection process, Eversource will feel confident that this milestone is complete.

- **Milestone: Clarification on metering and other implications of participating in ESS and the applicable distributed generation policy**

Finally, as discussed in Section 7.6 of the Bidirectional EV Report, both the Bidirectional Energy and GridEdge Networks pilots have identified challenges related to metering and overall eligibility for these programs, driven by the presence of BTM distributed generation at the customer sites. This issue can sometimes be overcome by wiring a BESS so that the BESS can only charge from onsite solar. However, EVSE cannot be wired to only charge from onsite solar – the capacity of EV batteries means they must charge from the grid or at least have the ability to do so. This is an ongoing challenge that is being handled on a case-by-case basis at this time.