



George Twigg <gtwigg@necpuc.org>

Re: NECPUC Retail DR Working Group: Opportunity to Comment on Final Report

Greenfield, Brian <brian.greenfield@eversource.com>
To: NECPUC <info@necpuc.org>

Mon, Mar 30, 2026 at 1:30 PM

Thank you for the opportunity to review this report.

Eversource comments are attached. Most of them focus on our experience with winter flexibility, but I want to highlight our concern on the framing of RNS as a benefit:

- RNS rates are fully reconciling. That makes them a zero-sum game. If one ratepayer reduces their charges, those costs are not avoided - they're transferred to other ratepayers in New England. For that reason, RNS rates are not a meaningful avoided cost.
- RNS charges are allocated based on monthly peaks. Shaving *annual peaks* (i.e. during the summer) can defer infrastructure investments, whereas shaving other *monthly peaks* (i.e. during shoulder seasons) only transfers charges to other ratepayers in New England (in future years with interest). Individual states have been pursuing policies to reduce their share of RNS allocations by pushing cost allocations onto other New England states, but that zero-sum interstate competition seems inconsistent with the regional perspective of NECPUC and this report.
- Eversource suggests that benefit-cost analysis of load flexibility programs follow cost-causation principles by claiming benefits for deferred T&D investments from reducing *annual peaks* (not the subsequent rate allocation of sunk costs via *monthly peaks*).

Thank you for considering our comments, and please reach out if they raise any questions.

Best,

Brian

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From: NECPUC <info@necpuc.org>

Sent: Monday, March 9, 2026 09:06

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