

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**Docket No. DE 19-057**

**Public Service Company of New Hampshire d/b/a Eversource Energy**

**Notice of Intent to File Rate Schedules**

**MOTION OF STAFF TO REMOVE THE ELECTRIC VEHICLE PROPOSAL FROM  
EVERSOURCE'S REQUEST FOR INCREASED DISTRIBUTION REVENUE**

Pursuant to New Hampshire Code Admin. Rules Puc 203.7, Staff hereby moves the Commission to remove the electric vehicle proposal contained in the testimony of Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource) and direct interested intervenors and Charge Point to offer their comments on matters relating to electric vehicle charging rates and/or infrastructure in IR 20-004 and any subsequent related proceedings that may follow.

In support of this Motion, Staff states as follows:

1. On May 28, 2019, Eversource filed a Notice of Intent to File Rate Schedules, along with supporting testimony and related exhibits and attachments.
2. The testimony of William J. Quinlan provided an overview of the proposals Eversource made in connection with Eversource's request for increased distribution revenue.
3. In his testimony, Mr. Quinlan discussed Eversource's interest in advancing "clean energy innovation" in New Hampshire. *See*, Testimony of Mr. Quinlan, at Bates page 53, beginning line 18.
4. As part of this effort, Mr. Quinlan said that the Company is "exploring options for a public-private partnership to develop an electric vehicle ('EV') fast charging corridor for New Hampshire in coordination with the state EV Commission. Through this project, PSNH would

invest approximately \$2 million of base capital to construct distribution facilities, primarily service drops, to energize a series of EV fast chargers”. *Id.* at Bates page 53, lines 3 -7.

5. These statements are repeated in the testimony of Joseph A. Purington and Lee G. Lajoie at Bates page 394, lines 16-20.

6. The testimony of Edward Davis on proposed rates and tariffs did not include any reference to the EV chargers mention by Messrs. Quinlin, Purington and Lajoie.

7. The Commission issued a secretarial letter on June 28, 2019, which established a procedural schedule for this docket.

8. The letter provided that parties could issue a second set of discovery on Eversource through October 11, 2019.

9. The schedule further provided that responses to all data requests received by October 11 are due on October 25, 2019.

10. Staff timely submitted data requests to Eversource. With respect to the EV proposal that is briefly addressed in the Company’s filing, Staff asked, among other things, that the Company identify where, in the testimony or attachments, Eversource included the capital investment and any other costs associated with the EV charging equipment. Staff Data Request 13-012.

11. Eversource provided a response to that Data Request on October 24, 2019. The data request response is attached to this motion

12. In its response, Eversource said that the step adjustments are based on forecasted capital expenditures, and that the calculations included in the filing are for illustrative purposes. Eversource said that the EV expenditures would be “part of the many base capital investments in the upcoming five years.” See attached Data Request Response at c. Eversource noted that the

amount of investment in the “make-ready” EV charging facilities is not broken out and “is included with the other base capital investments.”

13. Staff is conducting a comprehensive review of Eversource’s request for a permanent rate increase, the first such proceeding initiated by the Company within 10 years. Eversource is requesting an increase of approximately \$70 million in distribution rates. The Company is requesting the authorization to use distribution revenue adjustment mechanisms to recover millions of additional dollars in capital investment, and is also requesting approval of a multi-year rate proposal and distribution revenue adjustment mechanism to facilitate investment of approximately \$135 million a year through 2023. *See*, Testimony of Mr. Purington and Lajoie, at Bates page 420, Lines 18-20.

14. Moreover, as required by RSA 378:6 , the Commission must conclude its investigation within one year of the date of the filing, at the end of May 2020.

15. Because Eversource included a few sentences about its non-specific EV make-ready charging investment, several parties have intervened in this docket to advocate for design of a tariff and other cost recovery related to EV charging, generally. The Department of Environmental Services intervened in this docket for the sole purpose of addressing EV rate design. Currently, ChargePoint filed a pending motion to intervene in this docket for the same purpose. In addition, a portion of the testimony of Clean Energy New Hampshire, and approved intervenor, also addresses the issue of EV.

16. The Commission recently opened a docket, IR 20-004, for the purpose of receiving public comment on the appropriate rate design standard for EV charging, and the merits of implementing time-of-day rates in place for residential and commercial customers who operate electric vehicles. *See* Order of Notice in IR 20-004 at page 2.

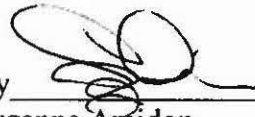
17. Staff believes that, given the limited period of time allowed for review of the distribution rate case, and the opening of Docket No. IR 20-004, the Commission should order that Eversource remove the EV proposal from this \$70 million rate case and direct the interested intervenors and Charge Point to offer their comments in IR 20-004 and any subsequent related proceedings that may follow.

18. Staff is concerned that, absent such order, technical sessions, settlement discussions, and hearing time will be diverted from the consideration of the merits of Eversource's \$70 million distribution revenue increase, to be used to consider an issue that may or may not lead to EV investment by Eversource.

19. Staff discussed this motion with the Office of Consumer Advocate who expressed support for the removal of EV issues from this rate case. Staff contacted Eversource. Eversource takes no position on this motion.

**WHEREFORE**, Staff respectfully requests that the Commission issue an order removing the EV issue from this distribution revenue review, and direct intervenors to participate in Docket No. IR 20-004 if they remain interested in EV charging rates.

Respectfully Submitted

By   
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New Hampshire Public Utilities Commission

Date: February 5, 2020