

May 11, 2020

*by electronic mail*

Debra A. Howland, Executive Director  
N.H. Public Utilities Commission  
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Concord, NH 03301  
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**Re: Docket No. IR 20-004 (Investigation into Rate Design Standards for Electric Vehicle Charging Stations and Electric Vehicle Time of Day Rates)**

Dear Ms. Howland:

Conservation Law Foundation (“CLF”) appreciates the opportunity to participate in the above-referenced docket regarding rate design standards for electric vehicle (“EV”) charging stations and EV time-of-day rates. CLF previously filed written comments in this docket on February 20, 2020. CLF now incorporates and builds off those comments in response to the April 3, 2020 recommendations of the Public Utilities Commission staff (“Recommendation”).

**The Commission Should Require Submission of Proposed Demand Charge Alternatives**

SB 575-FN required the Commission to consider the appropriateness of demand charges in the context of EV charging stations. In its previous comment letter, CLF expressed concern that traditional demand charges can deter investment in DC fast chargers and referred the Commission to a resource listing examples of demand charge alternatives. CLF was not alone in its focus on demand charges as an obstacle to widespread transportation electrification; the Recommendation states that “[m]any commenters identified existing demand charges as creating a barrier for direct current fast charge (DCFC) deployment.” Recommendation at 14.

As some commenters noted, demand charges do serve a historic cost-recovery purpose (though whether strict application of cost causation in this context appropriately values the public interest in a robust charging network is another question meriting further exploration). But rate design possibilities are hardly limited to “demand charges” or “no demand charges” – rather, this docket has surfaced numerous feasible, creative alternatives that balance the public interest in DCFC

deployment with the need to recover utility costs. *See, e.g.*, CLF Comment (Feb. 20, 2020) at 1 n1; *see also* Recommendation at 14.

CLF supports staff’s recommendation that the Commission require Eversource to file for review the results of analysis relating to rate design alternatives conducted by its affiliates. *See* Recommendation at 16. However, CLF encourages staff to go further than recommending only guidance that “utilities should explore alternatives.” *Id.* at 15, 16. A full exploration of demand charge alternatives should be *mandatory*. Currently, staff recommends that the Commission “open an adjudicative proceeding and direct each electric utility to file within 120 days . . . (2) an electric vehicle time of use rate proposal for separately metered high demand draw commercial customer applications that may incorporate DCFC or clustered level 2 chargers.” *Id.* at 17. CLF suggests that staff expand the scope of this recommended adjudication to require utilities to include in their filings approaches to demand charges that accommodate their cost recovery needs while removing obstacles to greater distribution of DCFC. Demand charges are not severable from other DCFC rate issues. In the interest of efficiency and practicality, the Commission should evaluate these interconnected rate design topics in a single adjudicatory proceeding.

**The Commission Should Require Utilities to Propose Other Load Management Techniques**

SB 575-FN also required the Commission to consider the appropriateness of load management techniques in its investigation of rate design standards for EV charging stations. CLF previously emphasized the importance of managing EV charging load. *See* CLF Comment (Feb. 20, 2020) at 2. CLF agrees with staff’s assessment that “[i]deally, TOU rates would serve as a floor for encouraging customer behavior modifications related to electric vehicle charging, supplemented by other load management techniques.” Recommendation at 12. As such, CLF urges staff to make a stronger recommendation to the Commission. Rather than simply issuing guidance that “load management techniques may be an appropriate strategy for EV rate design,” the Commission should require utilities to submit proposed load management offerings in conjunction with the time of use rate proposals that would be subject to adjudication. *See id.* at 17. This would be consistent with staff’s acknowledgement that “Eversource and Unitil have suggested they are poised to offer electric vehicle load management strategies to their customers, based on a model developed in Massachusetts, as early as January 2021.” *Id.* at 12. In the interest of efficiency and advancing the public interest in beneficial electrification of the transportation sector, the Commission should consider these proposals at the same time that it reviews proposed time of use rates, particularly as staff recognize “a clear preference for delivery of such [load management] offerings in conjunction with TOU rate offerings.” *Id.*

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CLF appreciates the opportunity to participate in this investigatory docket, including the opportunity to submit these comments.

Respectfully submitted,

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Tom Irwin  
V.P. and CLF New Hampshire Director

*/s/ Emily K. Green*

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Emily K. Green  
Senior Attorney

Cc: IR 20-004 Service List (*via* electronic mail)