

July 31, 2020

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

**RE:** Docket No. IR 20-004 Investigation into Rate Design Standards for Electric Vehicle Charging Stations and Electric Vehicle Time of Day Rates; Eversource response to Unitil comments on 3<sup>rd</sup> party meters

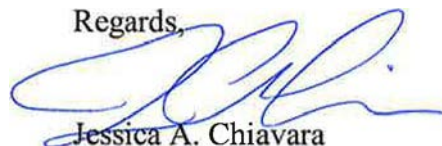
Commissioners and Director Howland:

Public Service Company of New Hampshire, d/b/a Eversource Energy (“Eversource”) submits these comments primarily to express support for the detailed comments of Unitil Energy Systems, Inc. (“Unitil”) in its July 24<sup>th</sup>, 2020 submission to this Commission recommending amendments to the Commission’s own Puc 300 rules if the Commission were to consider non-utility owned metering as a means of advancing electric vehicle (“EV”) policy in New Hampshire. Eversource commends Unitil’s comments for demonstrating the detail and complexity that must be addressed prior to introducing data sources other than utility-owned meters into the integrated data and billing systems of the Distribution Companies. The control of and responsibility for metering lies at the core of the utility’s public obligation and this Commission’s mission statement of ensuring adequate, safe and reliable service at just and reasonable rates. The Puc 300 rules acknowledge the importance of metering by covering all stages of the product cycle: from manufacture to installation to maintenance, security, and billing. Both the operation of meters and the data they produce must be held to rigorous scrutiny to ensure the provision of just and reasonable rates.

The detailed recommendations offered by Unitil should be incorporated into all further assessment of possible technological approaches to serving EV customers. Eversource continues to find that the details and complexities associated with use of alternative data sources to support advanced TOU rate structures require considerable additional evaluation. Any specific guidance on the use of such data sources or mandates to complete studies within prescribed timeframes are premature at this time.

Eversource appreciates the opportunity to further engage in the policy discussion being enabled by this docket.

Regards,



Jessica A. Chiavara  
Counsel, Eversource Energy

CC: Docket service list