

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

ELECTRIC DISTRIBUTION UTILITIES

Electric Vehicle Time of Use Rates

Docket No. DE 20-170

REPLY COMMENTS ON ELECTRIC VEHICLE TIME OF USE RATES AND
FEASIBILITY ASSESSMENT BY PUBLIC SERVICE COMPANY OF NEW
HAMPSHIRE D/B/A EVERSOURCE ENERGY

INTRODUCTION

On December 9, 2020 the New Hampshire Public Utilities Commission (“Commission”) received comments in Docket No. DE 20-170 regarding the development of electric vehicle (“EV”) time of use (“TOU”) rate proposals and assessment of metering alternatives for EV charging activity. Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) filed comments presenting considerations for rate design, business case analysis and alternative metering concepts that it expects to address in a filing to the Commission by April 30, 2021. Comments were also submitted by Unitil Energy Systems (“Unitil”), ChargePoint, Inc. (“ChargePoint”) and jointly by Clean Energy New Hampshire, Conservation Law Foundation, the NH Department of Environmental Services, the City of Lebanon, and the Office of the Consumer Advocate (“the Joint Stakeholders”).

Eversource appreciates the comments from all stakeholders and will take them under consideration as it develops EV TOU rate proposals for consideration by the Commission. The comments from all participants demonstrate there are multiple goals and objectives that are appropriate to consider and balance in the development of EV rate offerings as well as a range of approaches that have been successfully implemented to support EV customers.

Goals & Objectives

The principal goals for consideration of EV TOU rate standards pursuant to RSA 236:133 were to encourage energy conservation, optimal and efficient use of facilities and resources by an electric company, and equitable rates for electric consumers. Eversource intends to develop EV TOU proposals responsive to these principal goals. The Company also appreciates recommendations provided by stakeholders remain largely, though not exclusively, associated with these principal goals.

The Joint Stakeholders seek rate design mechanisms which lower energy costs for EV customers and shift utilization of the electric power system by EV customers to off-peak hours. The Joint Stakeholders recommend that these primary objectives be advanced by expeditious implementation of a three-part rate with a minimum 3:1 price differential between peak and off-peak periods (Joint Stakeholders at 3). The permanent EV rates of Liberty Utilities were favorably cited as an example of rate design which the Joint Stakeholders expect would incentivize customers and encourage them to move charging away from peak demand periods (Joint Stakeholders at 4).

ChargePoint similarly cites the Liberty Utilities EV TOU rate as a potential model to consider while also noting there are many other models for residential EV rate design to consider from outside of New Hampshire (ChargePoint at 7-8). ChargePoint advocates for well-designed EV TOU rates that advance a number of objectives foundational to New Hampshire energy policy and restructuring that include reducing costs, encouraging optimal and efficient use of resources and equitable rates for consumers (ChargePoint at 3).

The Company expects future filings will reflect full consideration of existing models for separately metered EV TOU rates such as those of Liberty Utilities as well as the Commission's guidance. In addition to considering example rate structures, the Company also expects it will assess the level to which customers may enroll and modify charging activity based, in part, on the level of net savings achievable through such structures.

Eversource also expects that continued consideration of a range of approaches to serving EV customers will ensure that the most effective strategies for expeditiously advancing the principal goals for EV rate mechanisms are identified. The Company cautions that it's possible separately metered three-part TOU rates may not always encourage the greatest or most valuable aggregate shift in charging behavior among all EV customers or provide them the largest achievable net cost savings. ChargePoint appropriately recognizes that a suite of rate offerings tailored for different customer types may be appropriate (ChargePoint at 6) and demonstrates that utilities across the country are exploring a variety of approaches to serving EV customers (ChargePoint at 11-12, 18).

Alternative Metering Feasibility Concept

The Company will continue to explore opportunities to support EV customers through the use of embedded Electric Vehicle Supply Equipment ("EVSE") capabilities and avoid the costs associated with additional utility metering. The Company appreciates the perspectives and examples provided by commenters on potential approaches to utilizing new technologies but notes a broad range of approaches to using alternative metering are included across the comments.

The Joint Stakeholders favorably cite Consolidated Edison Company's SmartCharge New York program (Joint Stakeholders at 7); Eversource also finds the program to be a good example of how embedded device capabilities can be reasonably used to serve EV customers. However, the

SmartCharge New York program does not utilize embedded device capabilities to bill a three-part rate which is recommended by the Joint Stakeholders and reflected in Commission guidance. The charging data collected through the ConEd program is used to determine incentive payments which are disbursed via PayPal or Amazon gift codes.¹ It is not an example of submetering within the scope of utility metering and billing operations and does not indicate embedded EVSE capabilities are a feasible alternative to utility metering. To the contrary, it underscores prior Eversource comments in Docket No. IR 20-004 that incentive programs which may effectively utilize third-party device capabilities are critically different from the TOU rate structures contemplated in this proceeding and the prior investigation. The Company fully supports the exploration of potential incentive designs that utilize embedded EVSE capabilities, but it remains important in the context of rate design to draw a distinction between the methodologies and technologies necessary to calculate usage for billing purposes and methodologies used for calculating incentives that do not impact a customer's bill.

ChargePoint cites helpful examples of how embedded EVSE capabilities have been used by Baltimore Gas & Electric, Xcel Energy and San Diego Gas & Electric. Specifically, Chargepoint highlights the importance of customer eligibility requirements and rigorous screening criteria for EV chargers. Such requirements are essential to help address challenges associated with quality, consistency, completeness and security of data communicated to utility systems. ChargePoint ultimately includes a reasonable recommendation that utilities propose near-term pilot programs that employ embedded metering (ChargePoint at 18-21).

A wide range of approaches to use embedded EVSE capabilities have been suggested by participants in this docket. The Company appreciates the perspectives that have been shared and will consider them as they apply to the Commission's guidance with respect to assessment of alternative metering concepts. The Company expects to recommend next steps for alternative technological approaches it finds most appropriate for the near-term advancement of the principal goals of EV rate design in New Hampshire.

Procedural Considerations

Several participants offered perspective on the most suitable proceedings for the Commission to consider EV TOU rate proposals. Unitil expressed an intention to present EV TOU rates within a general rate case filing it expects to make prior April 30, 2021 (Unitil at 1). ChargePoint expressly did not object to utilities filing EV TOU rate proposals as part of general rate cases subject to the interests of resolving issues of general applicability in a consistent manner (ChargePoint at 4). However, the Joint Stakeholders recommended that EV TOU rate proposals be filed by utilities in Docket No. DE 20-170 and expressed concern that the costs and timelines associated with rate case proceedings could be prejudicial to the participation of entities primarily interested in only EV TOU rate proposals (Joint Stakeholders at 3).

¹<https://www.fleetcarma.com/smartchargenewyork/faq/>, retrieved 1/4/2021

Having recently completed a general rate case in Docket No. DE 19-057 Eversource is not in a position to file EV TOU rate proposals as part of a general rate case prior to April 30, 2021. However, the Company has agreed to file proposals for public EV charging infrastructure and an associated demand charge alternative for such facilities within four months of the Commission's December 15, 2020 decision in Docket No. DE 19-057. Given that both the timing and applicability of the Company's rate case settlement and the Commission requirements in this docket are closely aligned, the Company expects it would be administratively efficient to address them consistently with a comprehensive filing. A consolidated filing will address a full range of EV-related proposals and would not present the barriers associated with rate case participation highlighted by the Joint Stakeholders; it is therefore a procedural path the Company plans to explore further.