



January 8, 2021

Via Electronic-Mail

Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

RE: DE 20-170, Electric Vehicle Time of Use Rates
January 8, 2021 Reply Comments of Unitil Energy Systems, Inc.

Dear Secretary Howland,

Unitil Energy Systems, Inc. (“Unitil” or the “Company”) appreciates the opportunity to provide written reply comments following the submission of initial comments pertaining to the development of utility-specific electric vehicle time of use (EV TOU) rates. These comments are limited to further supporting the Company’s plan for filing an EV program including rates and infrastructure development within an upcoming base rate case.

The Company’s base rate case filing will occur prior to the Commission’s April 30, 2021 deadline in the DE 20-170 procedural schedule for an EV TOU rate and feasibility assessment filing. Unitil’s proposal will include “low demand draw” EV TOU rates for residential and small C&I customers and a “high demand draw” rate for C&I customers that may incorporate clustered Level 2 and DCFC. The proposal will further include an assessment of alternative metering functionality and demand charge management through use of smart, managed charging electric vehicle supply equipment (EVSE) and behind the meter partnerships. The design of the proposed EV TOU rates to be filed in the Company’s base rate case will be based on guidance from Order 26,394 in IR 20-004 along with issues derived from this proceeding, DE 20-170.

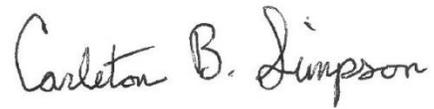
Today, the three regulated electric distribution companies are at various points in their development of EV TOU rates. Liberty Utilities received approval for a residential EV TOU charging rate in DE 19-064. Eversource Energy has agreed to file an EV infrastructure proposal, residential rate, and demand charge alternative in a separate proceeding per the approved settlement agreement in DE 19-057.¹ Given these contrasting approaches, the Company respectfully stands by its position that the filing of EV TOU rates is best handled within its upcoming base rate case. Electrification of transportation will require stakeholders to adopt comprehensive strategies that account for all elements of the market – charging infrastructure, rate design, communications technology, vehicles, etc. The Company is developing such an approach that integrates each of these elements to best serve customers and the public-at-large.

¹ Docket No. DE 20-170 Comments on Electric Vehicle Time of Use Rates and Feasibility Assessment by Public Service Company of New Hampshire D/B/A Eversource Energy, December 9, 2020 at 1-2.

The only EV charging vendor to offer initial comments in this proceeding, Chargepoint, noted that they had no objection to Unitil's plan to file EV TOU rates within the Company's upcoming general rate case as all stakeholders work to resolving issues in a consistent manner amongst the utilities.² Unitil looks forward to further engaging with stakeholders during the development of EV TOU rates, and continues to stand by the proposition that rates to be filed in the upcoming rate case will be developed in accordance with the findings in Order 26,394 and DE 20-170.

Unitil appreciates the opportunity to provide these comments regarding EV TOU charging rates and infrastructure development efforts. Please do not hesitate to contact me if you have any additional questions concerning this matter.

Sincerely,

A handwritten signature in black ink that reads "Carleton B. Simpson". The signature is written in a cursive, slightly slanted style.

Carleton B. Simpson
Attorney for Unitil Service Corp.

² Docket No. DE 20-170 Electric Vehicle Time of Use Rates, Initial Comments of Chargepoint, Inc., December 9, 2020 at 4.