

STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION
Electric Distribution Utilities Electric Vehicle Time of Use Rates
Docket No. DE 20-170
New England Convenience Store & Energy Marketers Association, Inc.
(NECSEMA) comments on partial settlement.

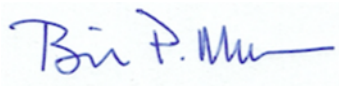
NECSEMA, as intervenor in this docket, represents convenience store and gasoline retailers, independent transportation fuel distributors, and the businesses which supply them. According to the National Association of Convenience Stores, there are almost 850 convenience stores in New Hampshire (650 of which sell motor fuels) employing over 14,000 people.

NECSEMA members own thousands of potential host locations along New England's most traveled highways and roadways; and will remain arguably the most desirable locations for hosting Direct Current Fast Chargers (DCFC). One of several barriers to private investment installing DCFC's are the resultant electric charges, charging equipment costs, and upgrades necessary to install and operate these high draw charging systems, and specifically the host location responsibility for demand charges. Users of publicly accessible charging equipment possess an inability to respond to rate design signals provided by application of Time of Use (TOU) rates.

In general, NECSEMA remains concerned with EV charging rate designs that may benefit or advantage one participant or business model over others in this emerging market, as well as consumer price transparency for fuels be it electricity and other fuels for mobility.

NECSEMA wishes to support comments made by Clean Energy New Hampshire, Conservation Law Foundation, and those provided by the Town of Derry, and joins them in objecting to the inclusion of demand charges in Commercial rates for publicly accessible charging, time varying periods, time varying components, demand charges, rate development method, and revenue neutrality.

Respectfully,



Brian P. Moran

Director Government Affairs