

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) CLOSING STATEMENT FOR THE PROCEEDINGS.

NECSEMA, intervenor in this docket, offers the following closing statement for the proceedings, which took place on January 25 and 28, 2022, as instructed by the Commission in its February 1, 2022, order. NECSEMA presents our closing statements on behalf of our membership of 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 have and continue to evaluate whether the business case for installing direct current fast chargers (DCFC) provides an acceptable return on their private investment. It is unfortunate other participants were unable to provide reliable data to demonstrate payback analysis, and actual vehicle charging economics taking place now because it is either so low or proprietary that reliable data sets do not or cannot be presented leaving only assumptions.

The costs of equipment, their installation, applicable electric rates, and any associated demand charges are known. As evidenced by the Town of Derry, demand charges can significantly impact the cost-effective and sustainable operation of Level 2 and by extension DCFC equipment provided by site hosts.

Additionally, what is also uncertain is how much will customers be willing to pay, and how many sales will occur at a host location given this emergent market. These components including demand charges, comprise the potential business case for private investment and associated risks. In a neighboring state, a NECSEMA member reviewed the business case for

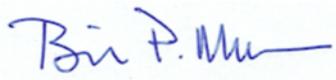
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a DCFC installation along a major highway corridor. Current vehicle capture rates for liquid fuel sales were assumed, and a starting point of 1% of these sales would be for EV fueling, to set a kw/minute charging rate based on existing demand rates and a margin. Resulting in a \$10-\$15 for a 70% charge. Scaling from 1% to 10% over the next 7 years and including incentives for the pole and 480v transformer, the estimated timeframe to break even was a remarkable 14 to 27 years.

In the coming months, the State will receive \$17 million under the Infrastructure and Investment Jobs Act to develop an EV charging network, and an opportunity to compete for \$2.5 Billion in competitive grants. An important piece of the puzzle for the sustainable operation of such a network includes encouraging private investment in this marketplace.

NECSEMA respectfully requests the Commission reject the commercial rate proposals included in the settlement agreement and adopt a commercial rate that is eliminated entirely or significantly reduces demand charges to no more than 10% of its customary rate.

Respectfully,



Brian P. Moran

Director Government Affairs