

**THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 20-170

Electric Distribution Utilities

Electric Vehicle Time of Use Rates

**CONSERVATION LAW FOUNDATION
PETITION TO INTERVENE**

Conservation Law Foundation (CLF) hereby petitions to intervene in the above-captioned proceeding in accordance with N.H. Admin. Rules, Puc 203.17 and with the standards of RSA 541-A:32. In support of its petition to intervene, CLF avers as follows:

1. CLF is a private, non-profit organization dedicated to protecting New England's environment for the benefit of all people. CLF uses the law, science, and markets to create solutions that build healthy communities, sustain a vibrant economy, and preserve natural resources, including resources affected by the generation, transmission, and distribution of electric power. Consistent with its mission to promote thriving, resilient communities, CLF advances sound clean energy policies that strengthen New England's—and New Hampshire's—economic vitality. CLF has approximately 4,800 members in New England, including over 680 members in New Hampshire.

2. In Order No. 26,394, the Public Utilities Commission (Commission) ordered that a new docket be opened to consider utility-specific electric vehicle (EV) time of use (TOU) rate proposals. Accordingly, the Commission commenced this proceeding in order to review, facilitate the development of, and adjudicate the merits of various utility-specific EV and TOU rate proposals. The filing raises several issues, including whether the EV TOU rate proposals to be

developed and filed are consistent with the rate design standards delineated in Order No. 26,394; whether these EV TOU rate design proposals are likely to result in just and reasonable electric rates, as required by RSA 374:2 and RSA 378:5, 7; and whether the EV TOU rate design proposals are consistent with the New Hampshire Energy Policy delineated in RSA 378:37.

3. CLF represents itself and the interests of its members in encouraging the increased use of EVs and deployment of EV charging stations throughout New England and the adoption of rates that facilitate both objectives. The increased use of EVs in New Hampshire will help the state reduce greenhouse gas emissions from the transportation sector—the single largest contributor of greenhouse gases—in order to address climate change and its impacts on New Hampshire’s environment, communities, and economy. Further, certain rate structures will both encourage EV use and deployment of EV charging stations while reducing the overall electricity bills and energy costs of EV users.

4. CLF has significant institutional expertise in the subjects at issue in this proceeding. CLF is participating in the Grid Modernization investigatory proceeding, Docket No. IR 15-296, the Unitil Energy Systems Petition for Approval of Proposed Time of Use Study, Docket No. DE 19-033, and the Liberty Utilities Petition to Approve Battery Storage Pilot Program, Docket No. DE 17-189, which have all investigated and considered TOU rate designs. Moreover, CLF actively participated in the Investigation of Electric Vehicle Rate Design Standards, Electric Vehicle Time of Day Rates for Residential and Commercial Customers, Docket No. IR 20-004, which directly preceded and prompted the instant docket, and which considered issues relating to (1) the relevant rate design standards regarding EV charging stations and EVs; and (2) whether it is appropriate to implement EV time of day rates for residential and commercial customers. In Docket No. IR 20-004, CLF submitted both written and verbal comments regarding EV rate design.

5. CLF has also intervened in numerous other dockets before the Commission over the past two decades, including the following Docket Nos.: DE 01-057; DE 07-064; DE 08-103; DE 08-145; DE 09-033; DE 10-160; DE 10-188; DE 10-261; DE 11-215; DE 11-250; DE 13-108; DE 13-275; DE 14-120; DE 14-238; IR 15-124; DE 16-241; DE 16-576; DE 16-693; DE 16-817; DE 17-124; DE 17-136; DG 17-152; DG 17-198; DE 19-104; and DE 20-092.

6. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. Specifically, CLF's members in New England and New Hampshire own and use EVs and will be affected by the decisions made in this docket. The adoption of EV TOU rate designs in this docket will likely have a significant impact on the use of EVs and deployment of EV charging stations over the next decade. Intervention in this proceeding will allow CLF to represent the interests of CLF members who will be directly and indirectly impacted by the EV TOU rate designs approved by the Commission.

7. As a result of CLF's expertise and experience, its intervention as a party in this proceeding is likely to elucidate important issues and facilitate an expeditious and just resolution of this proceeding. Further, CLF's intervention will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, CLF respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition to Intervene has, on this 2nd day of November 2020, been sent by email to the service list in Docket No. DE 20-170.

Respectfully submitted,

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