



**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION
DOCKET NO. DE 20-170
June 21, 2021**

**Motion in Support of The Town of Derry Petition to Intervene
by
The New England Convenience Store & Energy Marketers Association, Inc.**

The New England Convenience Store and Energy Marketers Association (NECSEMA) is pleased to submit for the Commission’s consideration our support of the untimely Town of Derry (“Derry”) Petition to Intervene, filed on May 19, 2021, on Docket DE-21-078. NECSEMA contends that good cause has been shown by the Town of Derry to grant such an intervention at this juncture and their petition is remarkably informative to the proceedings under Docket DE-20-170.

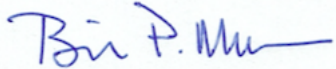
In its Petition to Intervene, Derry has provided a real-world example of the negative impacts of i) Eversource’s inconsistent rate treatment of EV infrastructure, and ii) the flat or fixed energy charges placed on non-residential EV charging facilities. Both of these impacts can discourage private investment in public EV charging facilities and, therefore, reduce EV market adaptation, particularly for consumers that will not have access to private, residential charging facilities. NECSEMA’s January 8, 2021 comments in this proceeding states that “Unitil is proposing a demand charge or a flat or fixed energy charge

for non-residential EV charging. This approach appears to greatly benefit residential charging and penalizes traditional options for EV charging at public sites.”¹

NECSEMA points to Derry’s experience with inconsistent and overburdensome rate treatment for non-residential EV charging as one example of controllable market impediments to consumer adaptation of EVs.

WHEREFORE, NECSEMA respectfully requests that the Commission approve Derry’s late-filed Petition to Intervene.

Respectfully submitted:



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¹ Response to Comments Resulting from November 9, 2020 prehearing conference and technical session by The New England Convenience Store & Energy Marketers Association, Inc. dated January 8, 2021, page 4.