



June 15, 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
Unitil Energy Systems, Inc.'s Electric Vehicle Time of Use Rates Proposal

Dear Secretary Howland,

Unitil Energy Systems, Inc. ("Unitil" or the "Company") appreciates the opportunity to provide DE 20-170 stakeholders with a copy of the Company's electric vehicle time of use ("EV TOU") rate proposal. The proposal provided herein was submitted to the Commission on April 2, 2021 in the Company's base rate case docketed in DE 21-030. The Company has requested approval of a suite of time of use ("TOU") rates (including EV-specific rates), an EV Program infrastructure proposal, and an EV TOU Marketing, Communications, and Education ("MC&E") Plan. The EV TOU rates and infrastructure deployment efforts were developed in conformance with the principles supported by the Commission and stakeholders in IR 20-004, Order 26,394, and DE 20-170.

As stated previously in this docket, the Company believes that the most appropriate and efficient forum to litigate these proposals exists within base rate case DE 21-030.¹ Unitil recently submitted an objection to the Staff's motion to remove the Company's EV TOU rate proposals from the pending rate case to this docket.² Staff's motion was denied by the Commission on June 9, 2021 in Order 26,486.³ This approach was supported by stakeholders in DE 20-170 and DE 21-030 and will provide certainty with respect to the timeline for approval of these crucial electrification efforts.⁴ Unitil has worked

¹ See UES DE 20-170 December 9, 2020 Comments and January 8, 2021 Reply Comments: https://www.puc.nh.gov/Regulatory/Docketbk/2020/20-170/LETTERS-MEMOS-TARIFFS/20-170_2020-12-09_UES_COMMENTS.PDF and https://www.puc.nh.gov/Regulatory/Docketbk/2020/20-170/LETTERS-MEMOS-TARIFFS/20-170_2021-01-08_UES_REPLY_COMMENTS.PDF

² See May 2, 2021 Objection to Motion to Remove Unitil Energy Systems, Inc.'s Electric Vehicle Time of Use Rate Proposals https://www.puc.nh.gov/Regulatory/Docketbk/2021/21-030/MOTIONS-OBJECTIONS/21-030_2021-05-21_UES_OBJ_STAFF_MOTION_REMOVE.PDF

³ See https://www.puc.nh.gov/Regulatory/Docketbk/2021/21-030/ORDERS/21-030_2021-06-09_ORDER_26486.PDF

⁴ See NH DES and Chargepoint letters affirming support of Unitil Energy Systems, Inc.'s Objection to Staff Motion to Remove EV TOU Rate Proposals from DE 21-030, https://www.puc.nh.gov/Regulatory/Docketbk/2021/21-030/LETTERS-MEMOS-TARIFFS/21-030_2021-05-24_NHDES_AFFIRM_UNITIL_OBJECTION.PDF and https://www.puc.nh.gov/Regulatory/Docketbk/2021/21-030/LETTERS-MEMOS-TARIFFS/21-030_2021-05-24_CHARGEPOINT_AFFIRM_UNITIL_OBJECTION.PDF

diligently to engage a variety of stakeholders throughout the development of this effort and looks forward to further collaboration in both DE 20-170 and DE 21-030.

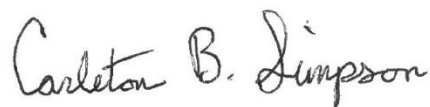
The Company has developed a suite of TOU rates designed to support the adoption of distributed energy resources and EVs. The suite of rates includes a whole-house domestic TOU, a domestic EV TOU, a small general service EV TOU, and a large general service EV TOU. In accordance with the Commission's findings in Order 26,394, these rates account for seasonality, incorporate load management techniques, are based on cost causation principles, and have time-vary billing components, three time periods, and a peak period of five hours in duration. Furthermore, the residential EV TOU rate has an average annual price differential between off-peak and peak of 3:1 and does not include a demand charge. All EV-specific rates are separately metered. The two general service EV TOU rates include a demand charge holiday offered at 75% for year 1, 50% for year 2, 25% for year 3, and ending thereafter.

The Company has also proposed, in its rate case, an EV Program to stimulate the adoption of EV infrastructure and the EV charging market in New Hampshire. The Company proposes to accomplish this goal through two initiatives: a residential behind-the-meter EV supply equipment (EVSE) installation and incentive program and a "make-ready" public EV infrastructure installation program. For the residential effort, the Company has proposed to offer rebates of up to \$600 for the procurement and installation of smart, managed Level 2 EV chargers for 500 residential customers who enroll on the EV TOU rate. The Company intends to partner with EV charging and telematics providers to analyze embedded metering functionality from EVSE. This program will advance the Commission's desire for further investigation of this capability as provided in Order 26,394 and detailed in the Company's Alternative Metering Assessment Outline circulated to the DE 20-170 service list on February 2, 2021.

The third element of the Company's rate case proposal includes an EV TOU MC&E Plan designed to meaningfully increase consumer awareness, interest in and adoption of EVs, EV charging infrastructure and EV TOU rates. This Plan will include an education campaign to increase awareness of and inform customers of the benefits of EVs, available vehicle models, incentives, options for charging, and the new EV/TOU rates. The Plan will also focus on creating experiential opportunities for customers and building partnerships with EV charging infrastructure providers.

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.