



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



May 24, 2021

Debra A. Howland, Executive Director
State of New Hampshire
Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

**RE: Docket DE 21-030, Unitil Energy Systems Request for Change in Rates
Letter in Support of Unitil Energy Systems Objection to Remove EV Rates**

Dear Director Howland:

On May 21, 2021, Unitil Energy Systems (“Unitil”), ChargePoint, and the NH Department of Environmental Services (“NHDES”) filed an Objection to Staff’s Motion to Remove Unitil Energy Systems Electric Vehicle (EV) Time-Of-Use (TOU) Rate Proposals (“Objection”). Through this letter, NHDES affirms its support for the Objection.

The underlying basis of the Objection is that, while DE 20-170 (Electric Vehicle Time of Use Rates) was opened “to facilitate the development and subsequent review of utility-specific EV TOU rate proposals” for each of the state’s regulated electric utilities, the EV rates proposed by Unitil in 21-030 are nested within a much broader ecosystem of EV and non-EV related rate offerings than are being considered by DE 20-170 and are best considered in DE 21-030.

Prior to DE 21-030 being opened, NHDES had expressed concern with Unitil’s expressed plan to address EV rates in their rate case. NHDES had been concerned with the staff time required to participate across two dockets that addressed the same issues. However, once NHDES completed a review of Unitil’s EV TOU rates, whole-house rate, EV-supply equipment incentives, and other attendant issues contained in DE 21-030, it was clear that NHDES’ interests would best be served by keeping Unitil’s EV-related issues within a single docket, DE 21-030.

If there are questions related to this issue, please contact Chris Skoglund, Climate and Energy Program Manager, as NHDES’s primary representative to this docket. He can be reached at the address on our letterhead, by phone at (603) 271-7624, or by email at

christopher.skoglund@des.nh.gov. Alternately, Rebecca Ohler, Technical Services Bureau Administrator, can be reached by phone at (603) 271-6749, or email at rebecca.ohler@des.nh.gov.

Sincerely,



Michael Fitzgerald
Assistant Director, Air Resources
Division

cc. Docket No. DE 21-030 Service List