



March 10<sup>th</sup>, 2022

Daniel C. Goldner, Chair  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

**RE: DE 21-030 Unitil Energy Systems, Inc.**

Dear Chair Goldner,

ReVision Energy is gratified to confirm its support of Unitil's Electric Vehicle (EV) charging make ready proposal.

To support residents and visitors that need to drive their EVs in NH, it is critical that they have easy access to Direct Current (DC) Fast charging as well as Level 2 charging. To make this possible, utilities need to significantly reduce the cost of the installation and operation of DC fast chargers and clearly communicate what costs are covered through educational outreach to all stakeholders.

ReVision Energy is one of New England's leading energy transition companies. With a total of 5 branches and one located in Brentwood and Enfield. We are employee owned and a Certified B Corporation. With 70 plus co-owners located in New Hampshire we have completed over 13,000 projects, including 135 megawatts of solar and hundreds of EV charging stations. We installed all 7 of the Maine DCFC stations as part of the first round of the VW settlement and are now installing 5 more from the second round. Additionally, we are also installing 3 of the highest power DCFC available for the Maine Turnpike Authority that are like the configuration required by the National EV Infrastructure program. Further, we currently own and operate stations on Green Street, Concord and have firsthand knowledge of every aspect of the economics of EV charging.

At the current state of transportation electrification's maturity, and particularly in New Hampshire, the cost of purchasing, installing and operating a DC fast charger cannot be recovered through the sale of energy alone. Furthermore, even with an 80% match from programs such as is offered in the VW RFP or the proposed Federal NEVI program, which mandates 150 kW DC Fast Charging hardware, three times the previous standard's charging capacity, there is no return on investment without utilities covering make ready costs and offering a demand charge alternative.

Nationally, EV sales have been robust, topping over 4% of all new car sales, and the need to anticipate continued robust growth in this sector has never been keener given the number of manufacturers investing in this technology and the global movement favoring electrification to move beyond fossil fuel. New Hampshire, like many other northern New England states, is a rural, low population density state, whose charging stations will not have high utilization in the short-term. Even in more populous regions, EV adoption numbers are still low, limiting the number of charging sessions that could spread out the high cost of demand charges. This limits the revenue that can be generated by DC fast chargers until more plug-in vehicles are introduced. With restricted potential revenue, there is limited economic incentive to develop the public charging network in advance of more widespread adoption. However, without this early buildout of a charging network consumers may not follow through on their desire to purchase an EV out of concern that adequate charging is not available.

Further, as the price of EVs continues to fall and reach parity with gas and diesel vehicles, the lack of a robust public charging may lock low- and middle-income households out of EV ownership. If they do not have home charging available, they would be unable to access the lower total cost of ownership of EVs unless and until a reliable public charging network exists.

Please note that in Massachusetts, Eversource has been covering all charging infrastructure make ready costs from the point of interconnection to the charger location and has a proposed demand charge alternative. Eversource's experience, like many utilities nationally, shows strong demand for these programs. As a result of its early success, Eversource substantially increased the scale of its Phase 2 make ready program proposal in Massachusetts. These programs have shown themselves to be critical incentives to spurring private investment in the short-term so that future sustainable business models will ultimately emerge and require less utility funding.

In conclusion, the combination of high equipment and installation costs, the burden of demand charges and low utilization for an unknown number of years makes operating a DCFC station a very challenging business proposal in most parts of the state. Without investment from all stakeholders, New Hampshire will remain a "charger" desert surrounded by states and provinces with high levels of EV adoption and charging deployment. This will not only burden its residents with high transportation energy costs but also limit the state's attractiveness to tourism from southern New England and Quebec.

Given that DCFC stations can take 12 months from initial planning to operation, we urge the Commission to pass this proposal now so that companies may have the time to work with all stakeholders to start the process.

The Unitol program will gain the attention of national EV charging companies and will become a catalyst for growing a healthier charging ecosystem in the state, enabling profitable business models to evolve, and attracting more private investment.



The price of EVs is dropping and in the next few years, we can expect a thriving used market. Utility investment in EV charging supports New Hampshire residents of all income levels and gives them the freedom to choose their mode of transportation and cost of energy.

Furthermore, with the rapid adoption of EVs in Massachusetts and Quebec, a robust network of charging stations is essential in allowing out-of-state drivers to reach all parts of New Hampshire and continue to support businesses and a healthy tourism economy.

We urge you to approve this proposal and thank you for your consideration.

Sincerely,

*James Penfold*

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