

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

Docket No. DE 21-030

UNITIL ENERGY SYSTEMS, INC.

Request for Change in 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 non-profit organization dedicated to protecting New Hampshire's and 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 and the transportation and use of natural gas. Consistent with its mission to promote thriving, resilient communities, CLF advances sound clean energy policies that strengthen New Hampshire's, and the region's, economic vitality. CLF has approximately 5,140 members in New England, including over 730 members in New Hampshire.

2. In this docket, Until Energy Systems, Inc. (Unitil) requests new permanent rate changes. Unitil's filing proposes, *inter alia*, the following plans and programs: (1) a Grid Modernization Plan; (2) a suite of time of use (TOU) rate offerings, which, in some instances, include demand charge alternatives; (3) an electric vehicle (EV) infrastructure development program; and (4) a Marketing, Communications, and Education Plan to engage with customers

about the TOU rates and EV program offerings. 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, where the Commission ordered that a new docket be opened to consider utility-specific EV TOU rate proposals, *see also* Docket No. DE 21-170, and 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.

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 ongoing Grid Modernization investigatory proceeding, Docket No. IR 15-296. CLF is also participating in the Unil 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 investigated and considered TOU rate designs. More importantly, CLF has 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, and its follow-up docket, Electric Vehicle Time of Use Rates, Docket No. DE 20-170, which have considered issues relating to (1) the relevant rate design

standards regarding EV charging stations and EVs; (2) whether it is appropriate to implement EV time of day rates for residential and commercial customers; and (3) demand charge alternatives for EV TOU rate customers. In Dockets No. IR 20-004 and DE 20-170, CLF submitted both written and verbal comments regarding EV rate design and demand charge alternatives.

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; DE 20-092; and DG 21-008.

6. Unitil has stated that the proceedings in Docket No. DE 20-170 will inform and influence its EV TOU rate proposals in the instant docket. In fact, at the preliminary hearing and first technical session in Docket No. DE 20-170, Unitil indicated that it would not object to CLF intervening in the instant matter because both dockets relate to Unitil's development of EV TOU rates.

7. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. Specifically, CLF has members in New England and New Hampshire who own and use EVs and will be affected by the decisions made in this docket. The adoption of EV TOU rate designs and demand charge alternatives 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.

8. 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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