

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 21-030

Unitil Energy Systems, Inc.

Request for Change in Rates

**MOTION TO REMOVE UNITIL ENERGY SYSTEMS
ELECTRIC VEHICLE TIME OF USE RATE PROPOSALS**

Pursuant to New Hampshire Code Admin. Rules Puc 203.7, Staff hereby moves the Commission to remove the electric vehicle time of use rate proposals contained in the testimony of Unitil Energy Systems, Inc. (“Unitil” or “the Company”) from DE 21-030.

In support of this Motion, Staff states as follows:

1. On August 18, 2020, the Commission issued Order No. 26,394, determining the appropriateness of rate design standards for electric vehicle charging stations. In that order, the Commission directed, et alia., “that *a new docket* shall be opened for the Commission to consider utility-specific electric vehicle time of use rate proposals,” and directed Staff to “further develop a timeline for filing of electric vehicle time of use rate proposals that will be included in the procedural schedule of *the proceeding* that follows this order” (emphasis added).

2. The Commission issued an Order of Notice on October 16, 2020 opening DE 20-170 “to facilitate the development and subsequent review of utility-specific EV TOU rate proposals.” Staff filed a proposed procedural schedule on behalf of the parties on November 12, 2020. That procedural required that electric vehicle time of use rate and feasibility assessment filings would

be filed in that proceeding by April 30, 2021. The Commission approved the proposed procedural by Secretarial Letter dated November 13, 2020.¹

3. On March 1, 2021, Unitil filed a Notice of Intent to File Rate Schedules pursuant to Puc 1604.05. The following month, Unitil filed its request for change in rates, along with supporting testimony and related exhibits and attachments.

4. The joint testimony of Cindy L. Carroll, Carleton B. Simpson, and Carol Valianti proposing several electric-vehicle related offerings, including: (1) a domestic whole house time of use rate (TOU-D); (2) three different time of use rates for separately-metered electric vehicle charging (TOU-EV-D, TOU-EV-G1, and TOU-EV-G2) (collectively, “EV TOU Proposals”); (3) a residential behind-the-meter electric vehicle supply equipment (EVSE) installation and incentive program; (4) a make-ready public EVSE infrastructure program; and (5) an electric vehicle and time of use marketing, communications, and education plan.

5. Staff is conducting a comprehensive review of Unitil’s request for a permanent rate increase, the first such proceeding initiated by the Company in approximately five years. Unitil is requesting an increase of approximately \$12 million in distribution rates. An extensive amount of due diligence will be required to verify the accuracy of this revenue requirement, the prudence of plant in service, and the other matters described in the Company’s petition. Consistent with RSA 378:6, the Commission intends to conclude its investigation within one year of the date of the filing, during April 2022.

¹ At the request of Eversource, with the support of the parties to the proceeding, the Commission later amended the procedural schedule so that electric vehicle time of use rates and the related alternative metering feasibility assessments would be filed on June 15, 2021.

6. Unitil has stated that it plans to file its EV TOU Proposals in both DE 21-030 and DE 20-170. Staff believes that Commission review of Unitil's EV TOU Proposals in both proceedings would be unnecessarily duplicative and an inefficient use of resources.

7. Consolidated review of electric vehicle time of use rate proposals for all electric utilities in a single generic proceeding would also avoid potentially confusing or conflicting policies on electric vehicle time of use rates for each utility's franchise area, which could result from the differing timelines, participants, and number of issues examined in the two different proceedings.

8. Given the limited period of time allowed for review of the distribution rate case, and the opening of Docket No. DE 20-170, it would also be administratively efficient for the Commission to order that Unitil remove the EV TOU Proposals from its rate case so that review of those rates can occur on a consolidated basis alongside the other regulated New Hampshire Utilities' EV TOU Proposals in DE 20-170. This would allow the Commission Staff, and any other party to DE 20-170, to focus their resources, including any consultants that might be procured, within a single proceeding requiring testimony once, rather than twice; an approach which could result in significant cost savings to New Hampshire ratepayers.

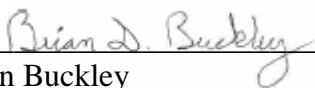
9. In Unitil's last rate case, DE 16-384, the Company proposed a schedule for Domestic Distributed Energy Resources (DDER) at nearly the same time the Commission had opened generic proceeding to determine a net-metering successor tariff. The Commission suspended the investigation of schedule DDER, which had implications for net-metered customers, finding that "the interests of administrative efficiency, limited resource allocation, and [']judicial economy[']" support a determination that Schedule DDER should not be separately reviewed, evaluated, and litigated in this docket while other prospective net metering rate design proposals are under consideration in Docket DE 16-576. At a minimum, this bifurcation would impose additional

burdens on the limited resources of Staff and the consultant it intends to engage, as well as on those of other parties and stakeholders. It also could result in conflicting schedules, redundant discovery, and potentially inconsistent results in the separate proceedings. These potential negative effects will be avoided if Unital's new alternative net metering tariff and related rate design issues are considered at the same time and in the same docket as those of the other utilities." Unital's EV TOU Proposal in DE 21-030 is a direct analogue to schedule DDER in DE 16-384.

10. Staff discussed this motion with several of the parties to the proceeding. The Office of Consumer Advocate and the Conservation Law Foundation expressed support for the removal of EV TOU Proposals from this rate case.

WHEREFORE, Staff respectfully requests that the Commission issue an order removing the EV TOU Proposals from DE 21-030, allowing review of Unital's EV TOU Proposal to occur in DE 20-170 alone.

Respectfully Submitted

By: 
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New Hampshire Public Utilities Commission