

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**Docket No. DE 21-030**

**Unitil Energy Systems, Inc.**

**CLEAN ENERGY NH'S OBJECTION TO STAFF MOTION TO REMOVE UNITIL  
ENERGY SYSTEMS ELECTRIC VEHICLE TIME OF USE RATE PROPOSALS**

Pursuant to New Hampshire Code of Admin. Rules Puc 203.7(e), Clean Energy New Hampshire (“CENH”) hereby objects to Staff’s Motion to Remove the Unitil Energy Systems Electric Vehicle Time-of-Use Rate Proposals (the “Motion”) from the Unitil Energy Systems, Inc. (“Unitil”) Request for Increased Distribution Revenue. In support of its Objection, CENH states the following:

1. On May 11, 2021, Staff filed the Motion arguing, among other things, that the Public Utilities Commission (the “Commission”) should remove Unitil’s electric vehicle time-of-use proposals (“EV TOU Proposals”) from this docket and only review them in the recently opened Docket DE 20-170, where the Commission will be “facilitat[ing] the development and subsequent review of utility-specific EV TOU rate proposals.” 10/16/20 Order of Notice.

2. The Staff’s position is that it would be time-consuming and inefficient to conduct the review and approval of the EV TOU Proposals in this docket because of the one-year period in which to review Unitil’s overall rate proposal and the amount of work involved in such review. Moreover, according to Staff, the removal will avoid duplicating efforts, as many of the same issues will be covered in Docket DE 20-170.

3. CENH objects to the removal of the EV TOU Proposals because it does not believe the removal will cause any material increase in efficiency and prevent a thorough,

comprehensive and expedient review of Unitil's rates generally and the EV TOU Proposals specifically.

4. This current docket provides a clear, definitive deadline for a decision from the Commission on these EV TOU Proposals. On the other hand, Docket DE 20-170 does not provide a definite deadline and has already experienced significant delays in the submission of alternative metering proposals from Eversource. This has caused the entire docket to be delayed. Originally due on April 30, 2021, these proposals are now due on June 15, 2021. The next technical session was rescheduled from May 20, 2021, to July 9, 2021. CENH did not object to this delay, but is seriously concerned that these delays will be more likely in a non-rate case proceeding where there is no deadline to complete the review.

5. CENH believes it is good public policy to review the EV TOU Proposals in the context of Unitil's entire electric vehicle ("EV") proposals. The EV TOU Proposals and the proposed demand charge holiday are essential to consider in tandem with the electric EV make-ready proposal from Unitil. The successful launch of an EV make-ready program is directly tied to reasonable time-of-use rates and alternatives to demand charges. In fact, it may hinder the Commission's ability to analyze Unitil's entire EV offerings if the EV TOU Proposals are removed from this docket.

6. Removing the EV TOU Proposals from this docket likely would not be more administratively efficient. Many of the parties interested in EV time-of-use rates and alternatives to demand charges will also be interested in the EV make-ready proposals in this docket and will still participate in both proceedings.

7. Other EV related proposals are dispersed throughout other dockets and the result of removing the EV TOU Proposals from Unitil's rate case docket would not increase overall

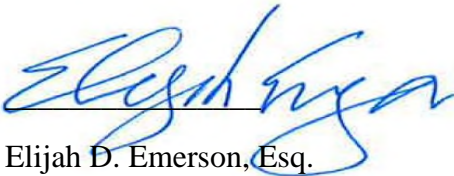
administrative efficiency. For example, Eversource, in compliance with the settlement in its latest rate case, is addressing alternatives to demand charges and make-ready proposals in Docket DE 21-078.

8. It is more efficient to allow Unitil to propose these EV related programs as part of a broader, holistic package of rate proposals to its customer base to ensure continuity. It would certainly be easier, from a ratepayer perspective, to follow one docket that contains all rate proposals that could affect their interests.

9. Clean Energy New Hampshire respectfully requests that the Commission deny the Motion.

Dated at Littleton, New Hampshire, this 20<sup>th</sup> day of May, 2021

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