

**STATE OF NEW HAMPSHIRE**  
**before the**  
**PUBLIC UTILITIES COMMISSION**

**Public Service Company of New Hampshire d/b/a Eversource Energy**

**DE 19-057**

**PETITION FOR ELECTRIC VEHICLE MAKE-READY AND DEMAND CHARGE  
ALTERNATIVE PROPOSALS**

Pursuant to New Hampshire Code Admin. Rules Puc 203.06 and Order No. 26,433 (December 15, 2020), Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or the "Company") hereby petitions for the New Hampshire Public Utilities Commission ("Commission") to approve Eversource's proposal for its make-ready investments supporting Electric Vehicle ("EV") charging infrastructure in New Hampshire and a proposal for an alternative to demand charges for EV charging rates, and to find that both proposals present a reasonable course of action for EV adoption in New Hampshire. In support of this Petition, Eversource states the following:

1. In section 16.2 of the comprehensive settlement agreement in Eversource's distribution rate case, Docket No. DE 19-057, the Company agreed that "[w]ithin four months following the Commission's approval of this Settlement Agreement, [the Company] shall file a proposal for make-ready investments supporting electric vehicle charging infrastructure in New Hampshire and request that the Commission open a new docket to consider the proposal;" and that included with the filing of the proposal for make-ready investments the Company would "include a proposal for an alternative to demand charges for electric vehicle charging rates." (Order 26,433 at 32). This petition and the supporting testimony and exhibits comprise both of the above-mentioned proposals for the Commission's consideration and approval.

2. As described in the included joint testimony of Edward A. Davis, Brian J. Rice and Kevin M. Boughan, Eversource’s “Make-Ready EV Charging Infrastructure Program” (“Make-Ready”), would support the development of a Direct Current Fast Charging (“DCFC”) corridor throughout New Hampshire, by investing approximately two million dollars in electrical infrastructure to support DCFC stations and by doing so, significantly expand New Hampshire’s network of travel corridor EV charging stations by reducing the cost burden of site hosts seeking to install EV charging equipment.

3. The Company’s Make-Ready investment will directly support sites in Eversource’s service territory that are chosen through the New Hampshire Volkswagen Environmental Mitigation Trust (“NH Trust”) Request for Proposal (“RFP”) competitive solicitation process. The Company estimates that the RFP process will result in approximately five DCFC locations being deployed throughout Eversource’s service territory. Under this proposal, the Company will not own the chargers themselves. Instead, financing for the Electric Vehicle Service Equipment (“EVSE”) will come from the NH Trust. The EVSE will then be owned and operated by a third party (either an EVSE charging vendor or customer site host) who is selected through the NH Trust RFP process. Eversource proposes to provide new service connections for each new charging service location as well as the requisite new infrastructure both in front of and behind the meter. Of this work, internal Eversource resources will install the front of the meter infrastructure, while work behind the meter will be contracted with third-party electrical contractors selected by the NH Trust awardees.

4. Eversource is proposing this DCFC infrastructure program to support the State’s disbursement of NH Trust funds consistent with the New Hampshire Beneficiary Mitigation Plan. In the Company’s assessment, the disbursement of the NH Trust funds alone will not be sufficient to enabling the development of a DCFC travel corridor along the State’s major

roadways and pairing the NH Trust funding with a utility-administered electrical infrastructure program will help to ensure that New Hampshire Department of Environmental Services is able to successfully deploy this network of DCFC.

5. Eversource's proposed "Demand Charge Alternative" is a response to significant stakeholder concerns in both the Company's distribution rate case, Docket No. DE 19-057, as well as the Commission's proceeding in both Docket Nos. IR 20-004 and DE 20-170 over the impact of demand charges on EV charging facilities, which characteristically have a high demand draw but low utilization. General service rates are designed around the demand and energy characteristics for a given class and include demand rates appropriate for that class.

6. Eversource's Demand Charge Alternative would provide an alternative to Eversource's Rate GV, to account for the fact that public EV charging stations are expected to have relatively low energy utilization during at least the first few years of station deployment, which makes the demand charges of Rate GV a high-cost barrier to EV charging hosts. Eversource's proposed approach of addressing Rate GV demand charges effectively reduces the demand charge barrier where utilization is the lowest, while addressing concerns over rate equity. This rate is being presented as an optional alternative to the otherwise applicable Rate GV. Customers will continue to be eligible to take service under Rate GV, including if they initially elected to take service under the alternative rate.

7. At this stage of the Demand Charge Alternative's development, the Company does not have proposed tariff language, as it is likely to be determined by the adjudicative proceeding in which it will be considered. Accordingly, the Company has not included specific proposed tariff language in this initial filing and will work with the parties to the proceeding to determine the most appropriate language to implement the proposed Demand Charge Alternative, which will be presented to the Commission for its review and approval in the course of the proceeding.

WHEREFORE, based upon the above and the included testimony, exhibits and information,

Eversource respectfully requests that the Commission:

1. Open a new docket to consider Eversource's "Make-Ready EV Charging Infrastructure Program" and "Demand Charge Alternative";
2. Approve both Eversource's "Make-Ready EV Charging Infrastructure Program" and "Demand Charge Alternative", finding that both proposals offer reasonable courses of action for EV adoption in New Hampshire; and
3. Order such further relief as may be just and equitable.

Respectfully,

Public Service Company of New Hampshire d/b/a Eversource  
Energy By Its Attorney

Date: 4/15/21

By: 

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