

BEFORE THE STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

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

**Petition for Electric Vehicle Make-Ready and
Demand Charge Alternative Proposals**

Docket No. DE 21-078

CHARGEPOINT'S CLOSING STATEMENT

ChargePoint, Inc. (ChargePoint), intervenor in this docket, offers the following closing statement as directed by the Commission in its August 4, 2022 Procedural Order Re: August 9, 2022 Hearing.

I. Introduction

ChargePoint believes that the provisions in the comprehensive settlement agreement¹— including the demand charge alternative and make-ready program—are reasonable, are in the public interest, and will benefit Eversource’s customers. ChargePoint also believes that the settlement agreement addresses certain of the concerns that ChargePoint raised in its direct testimony² submitted in this proceeding. The elements of the settlement agreement have been carefully designed to support the deployment of electric vehicle service equipment (EVSE) which will facilitate the development of the electric vehicle (EV) market in Eversource’s service territory. The Commission should approve the settlement agreement.

¹ Hearing Exhibit 1, filed July 14, 2022.

² Hearing Exhibit 4, Direct Testimony of Matthew Deal, filed February 25, 2022.

II. The proposed demand charge alternative is just, reasonable and in the public interest.

At a high level (and as further described in its direct testimony submitted in this docket), ChargePoint advocates for rate optionality for EV charging site hosts. EV charging use cases cover a wide range of customers with vastly different consumption patterns and as such, there is not a one-size-fits-all rate structure for providers of EV charging services.

The comprehensive settlement agreement currently before the Commission includes a demand charge alternative rate that addresses a key market barrier for public EV charging stations: demand charges.³ It offers those stations an optional fixed volumetric rate, which is more appropriate for public DC fast charging stations than a time-varying rate. That is because EV drivers using public DC fast charging stations are not reasonably able to shift usage in response to time of use rates. Further, the record demonstrates that the demand charge alternative rate is not redundant with rate options already available to Eversource customers, and will not result in unjust or unreasonable cost-shifting among customer classes. The demand charge alternative is therefore just, reasonable, and in the public interest, and the Commission should approve it.

III. The proposed make-ready program is just, reasonable and in the public interest.

The comprehensive settlement agreement also includes an EV Make-Ready Infrastructure Program. That program is designed to support deployment of publicly accessible DC fast charging stations funded via New Hampshire's Volkswagen Mitigation Trust (VW Trust). The cost of make-ready infrastructure is often one of the largest cost categories of installing and hosting EV charging stations. Combining limited make-ready support from Eversource with

³ See Order 26,394 at 9 (acknowledging that demand charges may limit the economic viability of low utilization rate, high demand draw EVSE).

funding from the New Hampshire VW Trust will facilitate the deployment of EV charging stations in New Hampshire.

The VW Trust references two categories of costs: “eligible” and “non-eligible” costs.⁴ Eligible costs include, for example, upgrades to customer-side electric supply to make a site ready to accept EVSE. Non-eligible costs include, for example, electric utility infrastructure needed to connect and serve new EVSE. Under the New Hampshire Department of Environmental Services (NHDES) VW Trust Request for Proposals, the VW Trust will reimburse up to 80 percent of eligible costs.⁵ To the extent that the VW Trust covers *less than 80* percent of eligible costs for a given deployment, Eversource make-ready funding may cover those eligible costs, but again, the combination of VW Trust and Eversource funding would cover *no more than 80 percent* of all eligible costs. Eversource make-ready funding will also cover a portion—but likely not the full amount—of non-eligible costs associated with a site. This means that the combination of make ready and VW trust funding will not fully fund the total costs associated with a charging station—station deployment will require the site owner or developer to leverage additional private capital. Commission approval of the make-ready program will therefore ensure that private, third-party capital is invested in the state of New Hampshire. The proposed make-ready program is just, reasonable and in the public interest, and the Commission should approve it.

IV. Conclusion

Taken together, the two components of the settlement agreement—the demand charge alternative and the make-ready infrastructure program—will provide the support necessary to

⁴ Record Request 1, Attachment 1 at 11.

⁵ *Id.* at 4.

facilitate the development of the electric vehicle market in Eversource's service territory. Those components will also ensure that private, third-party capital is invested in the state of New Hampshire. ChargePoint therefore respectfully requests that the Commission approve the settlement agreement.

Dated: August 10, 2022

Respectfully submitted,

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