



**ReVision Energy
before the
THE PUBLIC UTILITIES COMMISSION**

DOCKET NO. DE 21-078

**EVERSOURCE ENERGY
ELECTRIC VEHICLE MAKE READY AND DEMAND CHARGE ALTERNATIVE**

**PETITION TO INTERVENE
REVISION ENERGY**

Pursuant to N.H. Code Admin. Rules PUC 203.02 and RSA 541-A:32, ReVision Energy (“ReVision”) requests leave to intervene in the above captioned matter. In support of this Petition, ReVision states as follows:

1. ReVision is one of New England's leading full-service solar and energy transition companies. It has five branches in New England and with locations in Brentwood and Enfield, New Hampshire. With over 350 co-owners, (70 plus located in New Hampshire), we have completed over 13,000 clean energy projects, including 135 megawatts of Photovoltaic (“PV”) systems and installed hundreds of Electric Vehicle (“EV”) charging stations in New Hampshire, Maine, and Massachusetts.
2. ReVision has installed seven Direct Current Fast Charge (“DCFC”) stations as part of the first round of the Maine Volkswagen (“VW”) settlement program and are now installing five more from the second round of funding. These sites require significant electrical infrastructure upgrades.
3. ReVision also operates in Maine and Massachusetts and has extensive experience with utility make-ready (“MR”) programs from Eversource (MA) and National Grid (MA) and was the awardee of a Central Maine Power (“CMP”) Company RFP, where we worked with CMP and the Efficiency Maine Trust to install sixty charging ports at fourteen separate sites in 2021.
4. ReVision owns and operates networked smart charging stations on Green Street in Concord. Also, ReVision is installing four DCFC stations in Maine that it will own and operate. These stations allow ReVision to collect and analyze data and provide firsthand knowledge of the effects of the capital and operating costs on the viability of DCFC projects.
5. As a part of submitting applications to the NH VW Environmental Mitigation Trust DCFC Infrastructure RFP # NH-VW-2021-01, ReVision has worked extensively throughout New Hampshire with all stakeholders including , property owners/manager, tenant businesses, Coops, Condos, Boards of Directors, municipal energy committees, city and town managers, municipal planners, charging station manufacturers, network operators, utility engineers and utility company managers to estimate the viability of a

project based on the costs of the MR portion of installing DCFC and ongoing demand charges. During this process, ReVision worked with clients to identify locations to locate charging stations that offer the lowest utility infrastructure cost while providing businesses and EV drivers a safe and convenient place to charge.

6. ReVision Energy is currently installing DCFC stations at three Maine Turnpike locations. These represent the highest level of charging available at up to 150kW per dispenser, which is like the specifications required for projects funded by the recently announced (February 10, 2022) Federal National Electric Vehicle Infrastructure (NEVI) program in order to build out a national fast charging network. With each site requiring a minimum capacity of 600kW, and with rate structures as they currently exist and under current utilization rates for public charging stations the business for private investment is nearly impossible. Existing demand charges result in unfeasibly high energy costs, while sites require significant utility upgrade costs. These current costs cannot be recovered by site operators through sales at stations at this time. This is an enormous deterrent to attracting private investors to New Hampshire that will be critical in building out a comprehensive statewide network. ReVision has the experience and knowledge of the costs, and it will be pleased to provide more information in Docket No. DE 21-078.
7. ReVision Energy has a long history of involvement in New Hampshire energy planning and regulation, including:
 - a. Intervention in numerous PUC dockets related to clean energy generation and participation in dockets related to electric vehicles including IR 20-004 Electric Distribution Utilities Investigation into Rate Design Standards for Electric Vehicle Charging Stations and Electric Vehicle Time of Day Rates, and has provided comments in DE 21-030 Unitil Energy Systems, Inc: related to the utility make ready programs, and
 - b. Testifying before the NH Senate Electric Vehicle Charging Station Infrastructure Commission (Senate Bill 517).

We recognize that this is a late filing, but respectfully request your consideration. Between the announcement of the NH VW Environmental Mitigation Trust DCFC Infrastructure RFP # NH-VW-2021-01 on September 17, 2021, until the submission deadline on February 25th, 2022, we have been exposed to most of the capital and operational costs that will be associated with owning and operating a DCFC in all NH utility territories, but especially at sites served by Eversource. Combined with the data we have collected at other stations that we have installed and/or own and operate, we have highly accurate and up to date information that will be relevant to the proceedings of DE 21-078.



ReVision Energy has substantial interests that will be affected by the outcome of this proceeding, especially as they pertain to the costs of installing and operating public electric vehicle charging stations in New Hampshire. Intervention in the docket will serve the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, ReVision Energy accepts the current procedural schedule for this docket and requests that the Commission grant this Petition, allow ReVision Energy to intervene in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted,

ReVision Energy, Inc.

/s/ James Penfold

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Dated: March. 11th, 2022



Certificate of Service

I hereby certify that on March 11th, 2022, an electronic copy of the foregoing was sent via electronic mail to Commission, to the Utilities, and all other persons on the DE 21-078 Service List.

Consistent with current Commission policy, this filing will be made electronically only. Hard copies of the filing will not follow unless requested. Electronic copies of this Petition will be provided via email to the enclosed Service List for DE 21-078

/s/ James Penfold

James Penfold
Director, eMobility Solutions
ReVision Energy, Inc.