

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

Docket No. DE 21-078

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

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

**DIRECT TESTIMONY OF MATTHEW DEAL
ON BEHALF OF CHARGEPOINT, INC.**

February 25, 2022

1 **I. Introduction and Summary of Recommendations.**

2 **Q: Please state your name.**

3 A: My name is Matthew Deal.

4 **Q: By whom are you employed and in what position?**

5 A: I am Manager of Utility Policy at ChargePoint, Inc. (ChargePoint).

6 **Q: Please describe your qualifications, including your background, experience, and**
7 **expertise.**

8 A: In my current role, I lead ChargePoint's regulatory activity across North America. I engage
9 on behalf of ChargePoint at utility regulatory commissions to promote the development of
10 policies and programs that expand electric vehicle (EV) infrastructure and advance best
11 practices within the EV charging industry.

12 My relevant professional experience appears in my CV, which is attached as
13 Attachment MJD-1.

14 **Q: Have you previously provided testimony in any proceedings before regulatory**
15 **commissions?**

16 A: Yes. I have testified before the New Hampshire Public Utilities Commission in Docket No.
17 DE 20-170 which concerns electric vehicle time-of-use rates and alternative metering
18 assessments and Docket No. 21-030 which concerns, among other things, Unitil Energy
19 Systems, Inc.'s EV infrastructure development program and TOU rate proposals. I have
20 also testified before the Pennsylvania Public Utility Commission in Docket Nos. R-2021-
21 3023618 (UGI Electric), R-2021-3024601 (PECO Energy Company), and R-2021-
22 3024750 (Duquesne Light) in which I evaluated and made recommendations to ensure that

1 the EV charging programs proposed by each utility company complemented the
2 competitive EV charging market. I have also appeared as a witness regarding EV issues
3 before the Connecticut Public Utilities Regulatory Authority (PURA) in Docket No. 17-
4 12-03RE04: Public Utilities Regulatory Authority Investigation into Distribution System
5 Planning of the Electric Distribution Companies – Zero Emission Vehicles.

6 **Q: Please describe ChargePoint.**

7 A: ChargePoint is a world leading electric vehicle (EV) charging network, providing scalable
8 solutions for every charging scenario from home and multifamily to workplace, parking,
9 hospitality, retail, and transport fleets of all types. ChargePoint's cloud subscription
10 platform and software-defined charging hardware is designed to enable businesses to
11 support drivers, add the latest software features and expand fleet needs with minimal
12 disruption to overall business.

13 ChargePoint's hardware offerings include Level 2 (L2) and DC fast charging
14 (DCFC) products, and ChargePoint provides a range of options across those charging levels
15 for specific use cases including light duty, medium duty, and transit fleets, multi-unit
16 dwellings, residential (multi-family and single family), destination, workplace, and more.
17 ChargePoint's software and cloud services enable EV charging station site hosts to manage
18 charging onsite with features like Waitlist, access control, charging analytics, and real-time
19 availability. With modular design to help minimize downtime and make maintenance and
20 repair more seamless, all products are also UL-listed and CE (EU) certified, and Level 2
21 solutions are ENERGY STAR® certified.

1 ChargePoint's primary business model consists of selling smart charging solutions
2 directly to businesses and organizations while offering tools that empower station owners
3 to deploy EV charging designed for their individual application and use case. ChargePoint
4 provides charging network services and data-driven, cloud-enabled capabilities that enable
5 site hosts to better manage their charging assets and optimize services. For example, with
6 those network capabilities, site hosts can view data on charging station utilization,
7 frequency and duration of charging sessions, set access controls to the stations, and set
8 pricing for charging services. These features are designed to maximize utilization and align
9 the EV driver experience with the specific use case associated with the specific site host.
10 Additionally, ChargePoint has designed its network to allow other parties, such as electric
11 utilities, the ability to access charging data and conduct load management to enable
12 efficient EV load integration onto the electric grid.

13 **Q: What is the purpose of your Direct Testimony?**

14 A: The purpose of my Direct Testimony is to respond to the direct testimony of Public Service
15 Company of New Hampshire d/b/a Eversource Energy (Eversource or the Company)
16 witnesses Edward A. Davis, Brian J. Rice and Kevin M. Boughan regarding the Company's
17 proposed Make-Ready EV Charging Infrastructure Program and alternative to traditional
18 demand-based rates for EV charging.

19 **Q: How is the remainder of your testimony organized?**

20 A: Section II addresses Eversource's make-ready EV charging infrastructure program
21 proposal and Section III addresses rate design issues, including the Company's proposed
22 alternative to traditional demand-based rates for EV charging.

1 **Q: Do you have any attachments to your testimony?**

2 A: Yes.

3 • Attachment MJD-1 is a copy of my CV, which describes my relevant professional
4 experience.

5 • Attachment MJD-2 is Eversource's January 25, 2022 response to DOE Data Request
6 No. TS-001.

7 **Q: Please summarize your recommendations.**

8 A: ChargePoint recommends that the Commission:

9 • Modify Eversource's make-ready EV charging infrastructure program proposal to
10 expand eligibility to any proposed EV charging site regardless of whether it was
11 selected through the NH Trust RFP process;

12 • Modify the proposed make-ready program to include sites seeking to deploy stand-
13 alone Level 2 charging;

14 • Approve Eversource's proposed demand charge alternative rate, but direct
15 Eversource to provide all C&I customers, including existing and new site hosts,
16 with non-discriminatory access to that alternative rate.

17 **II. MAKE-READY EV CHARGING INFRASTRUCTURE PROGRAM PROPOSAL**

18 **Q: What will you address in this section of your testimony?**

19 A: In this section of my testimony, I will address Eversource's make-ready EV charging
20 infrastructure program proposal which, as I understand it, is limited to supporting the

1 State's disbursement of New Hampshire Volkswagen Environmental Mitigation Trust (NH
2 Trust) funds consistent with the New Hampshire Beneficiary Mitigation Plan.¹

3 **Q: What is make-ready infrastructure?**

4 A: Generally speaking, make-ready infrastructure includes all the electrical and construction
5 work necessary on both the utility's side of the electric meter (front-of-meter) and the
6 customer's side of the electric meter (behind-the-meter) to make a site ready to connect EV
7 charging equipment. I agree with Eversource that make-ready infrastructure includes the
8 following: "a primary lateral service feed from the existing circuit, any necessary
9 transformer and transformer pad, a new meter, a new service panel, and the associated
10 conduit and conductor to connect the electrical equipment to the EV chargers."²

11 **Q: What has Eversource proposed with respect to the make-ready EV charging
12 infrastructure program?**

13 A: The Company is proposing an approximately \$2 million make-ready program to support
14 deployment of EV charging at sites that are chosen through the New Hampshire
15 Volkswagen Environmental Mitigation Trust (NH Trust) Request for Proposal (RFP)
16 competitive solicitation process.³ The Company estimates that the NH Trust RFP process
17 will result in approximately five DCFC locations being deployed in Eversource's service
18 territory. Additionally, the Company is not proposing to own or operate the chargers
19 themselves. Instead, financing for the Electric Vehicle Service Equipment (EVSE) will
20 come from the NH Trust. The EVSE will then be owned and operated by a third-party who

¹ Testimony of Edward A. Davis, Brian J. Rice and Kevin M. Boughan at 7.

² *Id.* at 9-10.

³ Application at 2.

1 is selected through the NH Trust RFP process. Eversource proposes to provide new service
2 connections for each new charging service location selected through the NH Trust RFP
3 process as well as the requisite new infrastructure both in front of and behind the meter. Of
4 this work, internal Eversource resources will install the front of the meter infrastructure,
5 while work behind the meter will be contracted with third-party electrical contractors
6 selected by the NH Trust awardees.⁴

7 **Q: Why is Eversource proposing a make-ready program?**

8 A: The Company is proposing the make-ready EV charging infrastructure program pursuant
9 to a comprehensive settlement agreement approved by the Commission in Order No.
10 26,433 (Settlement Agreement). That Order required that “[w]ithin four months following
11 approval of [the] Settlement Agreement, Eversource shall file a proposal for make-ready
12 investments supporting EV charging infrastructure in New Hampshire and request that the
13 Commission open a new docket to consider the proposal.”⁵

14 **Q: Does anything in Order 26,433 or the Settlement Agreement require that Eversource**
15 **limit eligibility for the make-ready program to sites selected through the NH Trust**
16 **RFP process?**

17 A. No. On the contrary, I read Order 26,433 as encouraging a broader deployment of EV
18 charging stations in New Hampshire. Not only does the Order direct Eversource to include
19 a proposal for make-ready investments, it also directs Eversource to propose an alternative
20 to demand charges for electric vehicle rates. I believe these requirements, read in

⁴ *Id.*

⁵ Order 26,433 at 16-17.

1 conjunction, suggest that the Commission is interested in a program that will sustainably
2 support the growth of the electric vehicle market in New Hampshire.

3 **Q: Will Eversource’s make-ready proposal encourage the broad deployment of EV**
4 **charging stations in New Hampshire?**

5 A: No. Eversource’s proposal will enable the deployment of charging stations at an extremely
6 limited set of potential locations. The cost of make-ready infrastructure is often one of the
7 largest cost categories of installing and hosting EV charging stations. Eversource’s make-
8 ready EV charging infrastructure program proposal will reduce the cost of installing EV
9 charging equipment for the few site hosts selected through the NH Trust RFP process.⁶ By
10 combining make-ready support from the Company, with financing from the NH Trust,
11 Eversource will facilitate the deployment of EV charging stations *at those sites selected*
12 *through the NH Trust RFP process.*

13 **Q: Do you have reason to believe that there is interest in a greater number of EV**
14 **charging locations in Eversource’s territory?**

15 A. Yes. In response to DOE Data Request No. TS-001, Eversource states that “as of Friday,
16 January 21, the Company has completed 40 site assessments for the DES VW Trust RFP,
17 with 14 more still to be completed.”⁷ The Company evaluates sites based on customer
18 requests, so Eversource’s response suggests customer interest in at least 54 sites—far more
19 than the 5 anticipated sites that will successfully navigate the NH Trust RFP process. Based

⁶ The term “site host” refers to the owner or lessor of the property on which an EV charging station is located. Site hosts include residential customers; owners of multifamily housing units (MFH); commercial customers that offer charging to the public, their customers, and/or their employees; fleet owners; and government entities.

⁷ Attachment MJD-2 (Company Response to DOE Data Request No. TS-001) at 1 (Jan. 25, 2022).

1 on the Company's response, it is evident there is significant interest in developing EV
2 charging locations throughout Eversource's territory.

3 **Q: Apart from the number of make-ready sites proposed, do you have other concerns**
4 **with Eversource's make-ready program?**

5 A: Yes. The Company anticipates that each site selected through the NH Trust RFP process
6 "will include two 150 kw DCFC, with a complementary Level 2 charger."⁸ Unnecessarily
7 restricting eligibility for the proposed make-ready program to sites consisting of a specific
8 EVSE configuration ignores the numerous benefits of deploying stand-alone Level 2
9 charging at long dwell destination sites such as workplaces, retail locations, and
10 multifamily properties, among others. In order to more effectively deploy EV charging
11 stations across its service territory, and allow its customers to reasonably access charging
12 for their EVs, the Company should accommodate stand-alone Level 2 charging as a part of
13 its make-ready program.

14 **Q: How does Eversource's proposed make-ready program compare to the make-ready**
15 **program recently included in the settlement agreement filed in Unitil Energy Systems,**
16 **Inc.'s rate case (Docket DE 21-030)?**

17 A: The make-ready program included in the settlement agreement filed in DE 21-030 would
18 accommodate stand-alone Level 2 charging. The settlement agreement, if approved by the
19 Commission, would commit Unitil to providing make-ready infrastructure to support up to
20 four third-party owned and operated DCFC stations with approximately six ports at each

⁸ Testimony of Edward A. Davis, Brian J. Rice and Kevin M. Boughan at 9.

1 station *and* up to twenty third-party owned and operated Level 2 public charging sites in
2 its service territory, with approximately ten ports at each station.⁹

3 **Q: Based on this discussion, what do you recommend?**

4 A: I recommend that the Commission modify Eversource's make-ready EV charging
5 infrastructure program proposal to expand eligibility to any proposed EV charging site
6 regardless of whether it was selected through the NH Trust RFP process. I further
7 recommend that Eversource modify the proposed make-ready program to include sites
8 seeking to deploy stand-alone Level 2 charging. This eligibility expansion is warranted
9 given the significant amount of third-party interest in developing EVSE throughout
10 Eversource's service territory and the benefits that deployment of Level 2 charging can
11 provide throughout the Company's service territory.

12 **III. DEMAND CHARGE ALTERNATIVE.**

13 **Q: What will you address in this section of your testimony?**

14 A: In this section of my testimony, I will address Eversource's proposed demand charge
15 alternative rate for EV charging.

16 **Q: Why is Eversource proposing an alternative to traditional demand-based rates for
17 EV charging?**

18 A: The Company has proposed an alternative to traditional demand-based rates for EV
19 charging pursuant to a comprehensive settlement agreement approved by the Commission

⁹ See Docket DE 21-030, Settlement Agreement on Permanent Distribution Rates (Feb. 11, 2022).

1 in Order No. 26,433. In that Order, the Commission directed Eversource to “include a
2 proposal for an alternative to demand charges for electric vehicle rates.”¹⁰

3 **Q: What is your overall reaction to Eversource’s proposed demand charge alternative**
4 **rate for EV charging?**

5 A: While I have concerns with the narrow way in which the Company proposes to apply its
6 demand charge alternative, which I will discuss further below, I am generally supportive
7 of Eversource’s proposed demand charge alternative rate construct. At a high level, I
8 believe that, if applied to equitably to all C&I customers hosting EV charging stations,
9 Eversource’s proposed demand charge alternative rate design for EV charging can mitigate
10 the impact traditional demand charges on EV charging facilities. I support that Eversource
11 has designed its proposed rate construct to operate “across a range of utilization...[and
12 that]...the impact of demand charges is dynamically adjusted depending on the level of
13 utilization.”¹¹ I also support that Eversource’s proposed rate is an “optional alternative to
14 the otherwise applicable rate.”¹² I particularly support the Company’s proposal to include
15 fixed volumetric rates due to the inability for EV drivers using DCFC stations to shift usage
16 in response to time of use rates.

17 **Q: What are traditional demand-based rates?**

18 A: Traditional demand-based rates are rates that include demand charges. Demand charges
19 are charges based on a customer’s peak capacity usage, traditionally used to recover the
20 nonfuel costs of electricity. Demand charges are typically based on the highest average 15-

¹⁰ Order No. 26,433 at 17.

¹¹ Testimony of Edward A. Davis, Brian J. Rice and Kevin M. Boughan at 19.

¹² *Id.* at 20.

1 minutes of power use in a monthly billing cycle. They are designed to incentivize
2 customers to level out their load and avoid steep increases in usage that could overload the
3 distribution system.

4 DCFC stations can have low load factors, with sporadic instances of high demand
5 when a vehicle or multiple vehicles are charging. Under traditional demand-based rates,
6 site hosts can face high demand charges due to the few peak charging sessions that occur
7 each month, which effectively penalizes site hosts for providing charging services. In some
8 markets, demand charges can account for as much as 90% of a DCFC site host's electricity
9 cost.¹³

10 **Q: Why are alternatives to traditional demand-based rates necessary?**

11 A: As mentioned above, high demand charges represent one of the biggest financial challenges
12 facing EV charging site hosts. Unsustainable demand charges can be triggered if multiple
13 drivers plug into a bank of DC fast chargers, or clustered L2 stations, at the same time, or
14 if just one driver plugs into a higher-powered DC fast charger. Studies show that demand
15 charges can increase EV charging station utility bills by thousands of dollars per month.¹⁴

16 With very few exceptions (*e.g.*, for very small customers) commercial customers
17 are on rates that include demand charges that are based on the customer's highest measured
18 demand, measured in kilowatts (kW) in a given month. A DCFC station site host may only
19 have a few vehicles use the station in a month during the early years of EV adoption. The

¹³ Rocky Mountain Institute, 2017. "EVgo Fleet and Tariff Analysis." Available at: https://rmi.org/wp-content/uploads/2017/04/eLab_EVgo_Fleet_and_Tariff_Analysis_2017.pdf.

¹⁴ U.S. Department of Energy Vehicle Technologies Office, 2015. "Costs Associated with Non-Residential Electric Vehicle Supply Equipment." Available at: https://afdc.energy.gov/files/u/publication/evse_cost_report_2015.pdf.

1 power demand of these charging sessions will set the demand charge for the month, likely
2 resulting in a significant bill for the site host but the site host will only have a few charging
3 sessions over which to spread these costs (if the site host chooses to pass along its own
4 costs to drivers). Thus, for DCFC sites, conventional commercial rate design often can
5 make otherwise viable and desirable projects uneconomic.

6 Furthermore, unlike traditional commercial customers on demand-based rates,
7 public EV charging station site hosts have very limited ability to manage or mitigate the
8 impact of demand charges without negatively impacting the EV driver experience. For
9 example, a factory or large commercial facility may be able to avoid turning on several
10 large loads at the same time to avoid higher demand charges. By contrast, if a public DCFC
11 site host offers four charging ports, the site host could only avoid significant demand
12 charges by limiting the number of ports in use simultaneously or by restricting the amount
13 of power to each port, or both. Either action could negatively impact the driver experience
14 and thus defeat the purpose of expanding public DCFC infrastructure. Simply put, high
15 demand charges coupled with low utilization can be an impediment to the widespread
16 deployment of EV charging stations.

17 **Q: Will increased EV charging station utilization mitigate the impact of traditional**
18 **demand-based rates?**

19 A: The structural problems with traditional, demand-based C&I rates are not necessarily
20 mitigated by higher utilization, as the total cost share of demand charges at DCFC stations
21 that experience five charging sessions per day can still range from 30-to-80 percent relative

1 to total energy costs.¹⁵ This impact is amplified for electrifying public and private sector
2 fleets and other customers that need to charge multiple vehicles simultaneously at high
3 power levels and/or that do not have the flexibility to adjust the timing of charging sessions
4 for multiple vehicles. Specifically addressing unique fleet charging needs will support EV
5 adoption, as fleet operators are uniquely suited to maximize the operational cost savings of
6 transportation electrification. It is also in the public interest to specifically consider rate-
7 related barriers to electrifying medium- and heavy-duty (MHD) fleets. MHD vehicles
8 touch the lives of everyone in New Hampshire, from school and transit buses to municipal
9 service vehicles to delivery trucks. Reducing barriers for MHD fleet operators to electrify
10 their vehicle fleets will create widespread and equitable benefits for ratepayers and the
11 general public across the State.

12 **Q: Do you expect utilization at all EV charging locations in New Hampshire to increase**
13 **evenly?**

14 A: No. While it is expected that, on average, EV charging stations across New Hampshire will
15 experience increased utilization over time, utilization will vary based on location. For
16 example, DCFC stations deployed in a less-traveled corner of Eversource's New
17 Hampshire service territory will likely consistently experience lower utilization than a
18 high-volume corridor deployment, irrespective of statewide EV adoption.

¹⁵ Great Plains Institute, 2019. "Overcoming Barriers to Expanding Fast Charging Infrastructure in the Midcontinent Region." Available at https://scripts.betterenergy.org/reports/GPI_DCFC_Analysis_July_2019.pdf.

1 **Q: Please explain your concerns with Eversource’s proposed demand charge alternative**
2 **rate for EV charging.**

3 A: It is my understanding that the proposed demand charge alternative will only be available
4 to charging sites selected through the NH Trust RFP process.¹⁶ Yet, Eversource
5 acknowledges that “the demand charges of Rate GV [are] a high-cost barrier to EV
6 charging hosts”¹⁷ which correctly suggests that demand charges can present challenges for
7 economic operation of all EV charging sites. Indeed, even the Commission has itself
8 recognized that “demand charges may limit the economic viability of low utilization rate,
9 high demand draw EVSE” in Order No. 26,394 in Docket No. IR-20-004. I am concerned
10 that Eversource’s proposed limitations on the availability of its demand charge alternative
11 rate for EV charging could negatively impact the competitive EV charging market and
12 therefore frustrate rather than support “growth of public EV charging applications in New
13 Hampshire.”¹⁸

14 **Q: How does Eversource’s proposed demand charge alternative rate for EV charging**
15 **adversely affect the competitive EV charging market?**

16 A: The Company’s proposed demand charge alternative would remove barriers to sustainable
17 operation of a select few *new public* DCFC stations. Site hosts receiving the proposed rate
18 would then be able to set artificially lower prices for DC fast charging services, and
19 therefore have a competitive advantage over (i) existing C&I customers operating DC fast

¹⁶ The company states that its proposed alternative rate is limited to public EV charging stations participating in its proposed make-ready program, which, as discussed above, is currently limited to sites selected through the NH Trust RFP process. *See* Testimony of Edward A. Davis, Brian J. Rice and Kevin M. Boughan at 18.

¹⁷ Application at 3.

¹⁸ Testimony of Edward A. Davis, Brian J. Rice and Kevin M. Boughan at 22.

1 charging stations, (ii) customers that are not selected through the NH Trust RFP process,
2 and (iii) the future customers that would ostensibly host future DCFC stations in
3 Eversource's service territory.

4 Further, the Company's proposal to provide relief from demand charges to public
5 DCFC stations is discriminatory to private (or semi-public) DCFC stations that provide
6 equally valuable charging services in the New Hampshire market. In effect, DCFC stations
7 taking service under the proposed rate would have a competitive advantage over those that
8 do not and in certain instances the competitive advantage could be significant enough that
9 site hosts that cannot access the demand charge alternative may choose to cease operating
10 their stations.

11 **Q: Given your concerns with Eversource's proposed demand charge alternative rate for**
12 **EV charging, what do you recommend?**

13 A: ChargePoint recommends the Commission direct Eversource to provide all C&I customers,
14 including all existing and new site hosts, with non-discriminatory access to the proposed
15 demand charge alternative rate.

16 **Q: Does Eversource's proposed demand charge alternative rate for EV charging include**
17 **a time of use (TOU) component?**

18 A: No. The Company explains that "the timing of public EV charging is largely non-
19 discretionary...While a TOU rate may be introduced for these types of charging
20 applications, the Company expects that consumers who charge their EVs at public stations
21 would not generally be in a position to defer or otherwise schedule charging to a different
22 time. Those who could shift charging might do so, but the design proposed here is

1 particularly for public DCFC applications where charging is expected to occur on demand,
2 when needed, independent of potential time-differentiated pricing alternatives.”¹⁹

3 **Q: Do you agree with Eversource that TOU rates are not a good fit for DCFC stations?**

4 A: Yes. TOU rates may not be a perfect application for certain EV charging use cases – such
5 as public DCFC. DCFC stations are often used by EV drivers that cannot adjust their usage
6 to avoid the impact of higher priced TOU time periods. This user group may include drivers
7 traveling longer distances on highways unable to schedule their stops to align with changes
8 in pricing or charger availability caused by higher priced TOU time periods.

9 Further, it is important to view any TOU rate component in context, with an
10 understanding of distinctions that are unique to DCFC stations. In some circumstances,
11 such as EV drivers with access to a dedicated charging station at their home, TOU rates
12 can provide an actionable rate signal that motivates drivers to adjust their EV charging to
13 coincide with periods when the system has excess capacity or periods of peak renewable
14 energy generation. But TOU rates are inherently limited in their ability to motivate drivers
15 or DCFC site hosts to shift their use of the DCFC station to off-peak periods, and this
16 should be acknowledged in designing rates for DCFCs. A highway EV driver, or a
17 commuting worker relying on a neighborhood DCFC for daily charging, or a 24-hour fleet
18 operator may have little or no ability to respond to an on-peak TOU signal, in which case
19 the on-peak rate can be simply punitive and a deterrent to driving electric.

¹⁹ *Id.*

1 For example, reporting from the Public Service Company of Colorado regarding its
2 Schedule S-EV, a rate available to C&I customers where electrical service is used solely
3 for EV charging and includes CPP, concluded that the "aggregate load patterns for all S-
4 EV customers do not reveal a definitive response to CPP events."²⁰ This demonstrates that
5 rates which include price signals at public DCFC stations, such as CPP and TOU rates, are
6 not actionable for EV drivers due to the inelasticity of DCFC public charging and will
7 therefore not necessarily result in a change in charging behavior.

8 **IV. CONCLUSION**

9 **Q: Please summarize your recommendations to the Commission.**

10 **A:** I recommend that the Commission:

- 11 • Modify Eversource's make-ready EV charging infrastructure program proposal to
12 expand eligibility to any proposed EV charging site regardless of whether it was
13 selected through the NH Trust RFP process;
- 14 • Modify the proposed make-ready program to include sites seeking to deploy stand-
15 alone Level 2 charging;
- 16 • Approve Eversource's proposed demand charge alternative rate, but direct
17 Eversource to provide all C&I customers, including existing and new site hosts,
18 with non-discriminatory access to that alternative rate.

19 **Q: Does this conclude your direct testimony?**

20 **A:** Yes.

²⁰ See p. 11 of the Public Service Company of Colorado's Secondary Voltage Time-of-Use Electric Vehicle Service Supplemental Report #3, filed on August 11, 2021 in Colorado PUC Proceeding No. 19AL-0290E.