

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

IR 22-076

ELECTRIC DISTRIBUTION UTILITIES

Investigation of Whether Current Tariffs and Programs are Sufficient to Support Demand Response and Electric Vehicle Charging Programs

Reply Comments of Unitil Energy Systems, Inc.

I. Introduction

Unitil Energy Systems, Inc. (“Unitil” or the “Company”) submits these reply comments pursuant to the procedural schedule approved by the Commission in this docket. The Company notes that it has not attempted to address every comment raised by participants in these reply comments. To the extent Unitil does not address specific comments offered by other parties participating in this docket, the Company’s silence should not be construed as support for or opposition to such specific comments, nor should it be deemed a waiver of any right to respond to comments in future submissions or proceedings before the Commission.

II. Time of Use Rates

Conservation Law Foundation (“CLF”) recommends that the Commission prioritize Time of Use (“TOU”) rates that are “opt-out.” CLF Comments at 2. Unitil believes that making TOU rates “opt out” has the potential to create customer confusion, and in some cases may result in a customer paying more for energy than the customer would pay on a non-TOU rate. TOU rate compatibility depends upon a customer’s usage patterns and the customer’s ability and willingness to shift loads to less expensive off-peak periods. Some customers may not fully understand the complexities of time varying rates, or may simply not have the interest or ability to adjust their usage patterns to take advantage of such rates. Automatically enrolling customers on TOU rates would also likely lead to customer frustration and confusion due to additional billing line items. Unitil believes that the best approach is to provide a suite of rate offerings so that customers may select from multiple rate options that best suit their needs.

III. Demand Response

CLF recommends that the Commission explore the increased use of active demand response (ADR) programs for both residential and C&I customers. CLF Comments at 3. As noted by CLF, Unitil notes that it is already operating ADR pilot programs in New Hampshire, id. at 3, and the Company intends to propose implementation of these pilots as full programs in connection with the next three-year energy efficiency plan. Unitil is open to piloting additional ADR pilots and approaches, and believes that any such programs should be considered as part of the three-year energy efficiency plan docket.

CLF also recommends the adoption of winter demand response programs. CLF comments at 4. At this time, winter demand response programs have very limited ability to influence pricing, and provide little to no system or ratepayer benefit because the ISO New England system is summer peaking. Unitil does not believe, in this case, that it should offer incentives without a corresponding savings.

Unitil notes that CLF asserts the deployment and adoption of demand response in New Hampshire “will be hindered by the lack of AMI across the state.” CLF Comments at 5. It also references “the lack of AMI in the three utilities’ service territories.” Id. at 6. This statement is not accurate with respect to Unitil. The Company began implementing AMI in New Hampshire in 2006 and completed implementation in 2008; Unitil also has critical systems, including a Meter Data Management System and Customer Information System, in place to support its existing AMI infrastructure as well as any future enhancements to that infrastructure.

IV. EV Charging

Unitil agrees with CLF’s statement that “EV charging station development will result in significant benefits for New Hampshire’s economy,” and that “there is justification for using ratepayer funding for EV charging infrastructure.” CLF Comments at 6. EDCs should play a key role in the development of EV charging infrastructure in the state, and particularly with respect to underserved communities. As the Company explained in its initial comments, one of the biggest barriers to EV adoption is the lack of charging infrastructure. Make-ready investments in the electric distribution system are necessary to overcome this barrier, and to that end, Unitil recently proposed an EV infrastructure development program to support the installation of Electric Vehicle Supply Equipment in New Hampshire in its most recent rate case, DE 21-030. Unitil proposed an EV infrastructure development program comprised of two initiatives: (1) a behind-the-meter partnership program to incentivize residential customers to procure and install smart Level 2 electric vehicle supply equipment for charging at their homes, and (2) a public “make-ready” EV infrastructure program to expand the availability of charging stations in New Hampshire. Though the Commission ultimately did not approve an EV infrastructure development program in DE 21-030, Unitil believes that it should play an important role in the development of EV infrastructure in the state and remains committed to working with the Commission and other stakeholders to deploy such infrastructure.

CLF also supports “vehicle to grid” technology enabling the export of energy from EVs to the distribution system. Unitil looks forward to further discussing such technology with the participants to this investigation. The Company notes the importance of utility control in connection with such technology. Vehicle-to-grid technology can only provide distribution system value effectively if an EDC maintains control of the technology and the systems are located where they are most needed (e.g., they are positioned to offset distribution investment or replacements).

V. Electronic Data Interchange (EDI)

CPCNH makes numerous statements regarding EDI, not all of which are the subject of these reply comments. As noted above, the fact that Unitil may not address every point raised by CPCNH regarding EDI should not necessarily indicate agreement with those points. Unitil does

note that the Company does not currently have 5-minute interval data in its metering systems, nor does it currently have systems to process such data. As such, the Company does not offer, at this time, any real-time or interval-based tariffs, and it would require significant time and investment to be able to implement such changes. Thus, CPCNH's recommendation that EDCs "seek to have their load settlement vendors modify their load settlement systems so suppliers can have the option of settling load at 5-minute intervals" is not feasible at this time. Similarly, the Company is not able to provide "access to real time pricing, down to 5-minute intervals," at this time.

VI. Conclusion

Unitil appreciates the opportunity to provide these reply comments and intends to provide Final Comments consistent with the Commission-approved procedural schedule.