

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

DOCKET NO. IR 22-076

Electric Distribution Utilities

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

**FINAL COMMENTS OF PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY**

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) offers these final comments and a recommendation that the Public Utilities Commission (“Commission”) open an adjudicative proceeding docket to consider proposals for electric vehicle (“EV”) managed charging programs. After review of the comments submitted in this investigation by the various participants, there are clearly differing opinions on how to approach a range of EV and demand response (“DR”) issues, and how to effectuate these policies in a way that best suits New Hampshire.¹ However, there seems to be near-consensus support for one potential approach: increased investment in DR using EV managed charging.² Indeed, multiple participants’ reply comments acknowledge the consensus regarding that approach, recommending that the Commission pursue EV managed charging programming.³

¹ To the extent the Company does not address any specific comments offered by a stakeholder in this docket, that fact should not be construed as either support for or opposition to the substance of such specific comments.

² See Conservation Law Foundation Initial Comments at 7; Vehicle Grid Integration Council Initial Comments at page 1; Weave Grid Initial comments at 6-8; Unitil Energy Systems, Inc. Initial Comments at 10, 12.

³ “Several other participants in this docket support the establishment of EV managed charging programs in their initial comments. These comments reflect a relative consensus on the need for EV managed charging programs. EV managed charging programs can reduce or eliminate distribution system upgrades, as well as commensurate rate increases, that might be necessitated by increased load resulting from EV charging. Accordingly, the Commission

In addition, the Commission itself has recently expressed an interest in utility-administered EV managed charging programs in Order No. 26,797 (March 31, 2023) in Docket No. DE 20-170, where it stated: “The Commission agrees with the merits of demand management programs . . . [w]e encourage Eversource to explore flexible solutions, including managed charging, for New Hampshire with best practices derived from Connecticut and Massachusetts, that especially target lowering coincident peak demand systemwide.”

In view of this growing consensus regarding EV managed charging programs, the timing seems right for an adjudicative docket to consider such proposals. But consensus around this approach is not the only reason that an adjudication would be timely. There is also an increasingly exigent need to address stressors on the distribution system related to increasing electrification, with EV adoption representing a particularly significant factor. As Eversource noted in its initial comments, a single EV “adds approximately 14 kW of demand to the average existing household demand of 4-6 kW, effectively tripling household demand. Adding just a few electric vehicles to a single circuit makes a significant impact on the demand for that circuit.” Eversource Initial Comments at 2. That kind of impact means that DR programs like EV managed charging programs would not be fulfilling an esoteric policy objective, but rather would be addressing an immediate need for relief on existing distribution grid infrastructure.

The average adjudicative proceeding can take up to a full year to complete, so should EV managed charging programs be approved through such a docket, implementation of programs would be well-timed, as EV adoption in New Hampshire continues to increase. Adoption of EV

should consider, and ultimately approve, EV managed charging programs in the subsequent adjudicative phase of this docket.” Conservation Law Foundation Reply Comments at 3-4; “WeaveGrid agrees with the general recommendation of other participants that the Commission should strongly consider the implementation of managed charging programs.” WeaveGrid Reply Comments at 2-3.

managed charging programs would be an easily implementable, effective, and relatively inexpensive and cost-effective method to achieve the dual objectives of relieving stress on the distribution system and reducing coincident peak demand system-wide. In addition to EV managed charging being both an impactful and reasonable solution to contribute to a safer and more reliable grid, broader DR program adoption could also certainly advance these policy objectives.

For these reasons, Eversource recommends that, at the conclusion of this investigation, the Commission open a new adjudicative proceeding docket to consider proposals for EV managed charging programs. The Company appreciates the opportunity to offer its thoughts throughout this investigation, as well as the time and effort that all participants have expended in putting forth well-considered comments on these significant and relevant policy considerations facing the electric grid. The Company looks forward to discussing these comments and related issues at the status conference scheduled for June 15.