

STATE OF NEW HAMPSHIRE

COMMISSIONER
Jared S. Chicoine

DEPUTY COMMISSIONER
Christopher J. Ellms, Jr.



TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-3670

Website:
www.energy.nh.gov

DEPARTMENT OF ENERGY
21 S. Fruit St., Suite 10
Concord, N.H. 03301-2429

June 13, 2023

Daniel C. Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, NH 03301

Re: IR 22-076 Electric Distribution Utilities, Investigation of Whether Current Tariffs and Programs are Sufficient to Support Demand Response and Electric Vehicle Charging Programs – DOE Final Comments

Dear Chairman Goldner:

On February 21, 2023, the Public Utilities Commission (Commission) issued a procedural order in the above captioned docket establishing a final comment deadline of June 13, 2023. The Department of Energy (Department), files this letter regarding whether standards in the Infrastructure Investment and Jobs Act of 2021 (Jobs Act) regarding demand response and electric vehicles (EVs) have been met. *See* 16 U.S.C. § 2621(d)(20)-(21).¹ The Department also offers comments regarding several other key issues related to demand response and electric vehicle charging programs.

Demand Response Programs

The Jobs Act requires the Commission consider establishing rate mechanisms allowing the three regulated electric utilities to timely recover the costs of promoting demand response and demand flexibility practices. *See* 16 U.S.C. § 2621(d)(20)(B)(i). The Department notes that the Commission has considered various forms of demand response programs in several dockets, including but not limited to: DE 17-189 (Liberty Battery Storage Pilot Program); DE 17-136 and DE 20-092 (Energy Efficiency, including active demand response pilot programs); DE 19-057 (Eversource Energy's distribution rate case, including time of use (TOU) rate designs, e.g. a two-period rate structure consisting of peak and off-peak periods); and DE 21-030 (Unitil Energy Systems, Inc.'s distribution rate case, including TOU rate designs with a Whole House TOU rate). Additionally, pursuant to RSA 378:38, each utility's least cost integrated resource plan approved by the Commission includes an assessment of demand-side energy management programs.

¹ The Commission previously determined it had conducted the inquiry required by 16 U.S.C. § 2621(d)(21)(A)-(D) relative to electric vehicle charging programs. *See* Order of Notice, IR 22-076 (November 15, 2022)

Finally, the legislature established RSA 374-G to stimulate investment in distributed energy resources, including Commission approved demand response programs.

In response to the Commission's request for additional information related to demand response programs and practices, the Department recommends that several key elements be considered when developing demand response programs and practices, including but not limited to the following:

- Goals – The purpose of the program and practices must be clearly defined.
- Programs/Practices Structure and Framework – The structure/framework of the programs/practices must be carefully crafted to be easily understood, while also prioritizing the achievement of the programs/practices' goals.
- Cost Recovery – If the programs/practices require any cost recovery, then the rate mechanism should be aligned with the goals of the program. For example, if the goal is to reduce transmission costs, then the rate mechanism for any cost recovery should be through transmission-related rates or other appropriate rates.
- Cost-Effectiveness – The programs/practices should consider the benefits and costs, with emphasis on the most cost-effective approaches. Time of use rates are typically the most cost-effective mechanism for reducing demand at peak periods because no additional costs are incurred by the utility to provide incentive.
- Program Incentives – The program incentives should be clear and easily understood while ensuring alignment with the goals of the programs/practices. For example, the incentive should be geared toward the achievement of the goals and must clearly indicate how any demand reduction is calculated, including the baseline determination.
- Benefit/Cost Sharing – If the programs/practices result in cost reductions or payments to the utility, then the utility should share any benefits/savings with ratepayers.

Electric Vehicle Charging Programs

As the Commission considers whether any additional measures are needed in order to promote EV charging and access to charging infrastructure in New Hampshire, the Department suggests review of the various dockets and policy documents related to electric vehicle rates and electric vehicle infrastructure, including the following:

- IR 20-004 – Investigation of EV Rate Design Standards, EV Time of Day Rates for Residential and Commercial Customers
- DE 20-170 – EV Time of Use Rates
- DE 21-078 – Eversource Energy's Petition for Electric Vehicle Make-Ready and Demand Charge Alternative Proposals
- DE 21-030 – Until's Distribution Rate Case
- DE 19-057 – Eversource Energy's Distribution Rate Case
- New Hampshire State Energy Strategy

The Department further suggests that the following topics, which were part of the discussion in the dockets listed above, continue to be evaluated:

- Rate Design – Establishing TOU rates to encourage EV charging during lower cost periods, when possible. Demand charge alternative rates should continue to be reviewed especially for public charging stations where the demand could be variable, particularly in the early stages of adoption.
- Public Charging Infrastructure – Approaches for encouraging more universal public infrastructure/chargers, including multi-unit residential units. For example, limited and focused ratepayer-funded make-ready infrastructure could assist to expand the charging network.
- Alternative Metering – Utilizing meters on EVs and/or the chargers for alternative metering so that customers are not required to add a separate utility meter for EV specific rates. For example, the customer or another entity could be required to transmit the alternative metering data for use in calculating an EV specific rate as a subrate to the main rate as explored in other regions and suggested for study in New Hampshire.

Sincerely,



Matthew C. Young
Hearings Examiner/Staff Attorney

cc: Docket Service List

View Service Lists

[↑](#) (../Regulatory/regulatory.htm)

A A A

Service List - Docket Related

Docket# : 22-076

Printed: 6/13/2023

Email Addresses

ClerksOffice@puc.nh.gov
nhregulatory@eversource.com
tga@tga3.com
jessica.arnold@libertyutilities.com
asbury@unitil.com
nikhil@greentelgroup.com
Scott.T.Balise@energy.nh.gov
beaulieuc@unitil.com
clifton.below@lebanonNH.gov
kevin.boughan@eversource.com
john.braswell@eversource.com
peter@necsema.net
steve@weavegrid.com
eburgess@strategen.com
rburke@nhla.org
packyc@rsarealty.com
davecaron@derrynh.org
melissa@fermataenergy.com
jessica.chiavara@eversource.com
Corson@unitil.com
Michael.J.Crouse@oca.nh.gov
john@bestfordnh.com
edward.davis@eversource.com
matthew.deal@chargepoint.com
mdean@mdeanlaw.net
demeris@unitil.com
Energy-Litigation@energy.nh.gov
dori.drachman@gmail.com
sdunbar@keyesfox.com
eisfeller@unitil.com
joshua.w.elliott@energy.nh.gov
sam@cleanenergynh.org
mikefowler@derrynh.org
thomas.c.frantz@energy.nh.gov
Bart.Fromuth@felpower.com

sgeiger@orr-reno.com
golding@communitychoicepartners.com
ethan.goldman@gmail.com
gouldingc@unitil.com
egreen@clf.org
Everett.Hammond@LebanonNH.gov
christine.hastings@eversource.com
henry@cpcnh.org
tirwin@clf.org
christina.jamharian@eversource.com
maureen.karpf@libertyutilities.com
Goksin.Kavlak@brattle.com
Jessyca@SkiNH.com
george.knowles@eversource.com
nkrakoff@clf.org
donald.m.kreis@oca.nh.gov
Philip.W.LaMoreaux@des.nh.gov
clane@synapse-energy.com
christopher.leigh@eversource.com
heidi.w.lemay@energy.nh.gov
marc.lenenager@eversource.com
Molly.M.Lynch@energy.nh.gov
main@unitil.com
pmartin2894@yahoo.com
kat.mcghee@leg.state.nh.us
melansona@nhec.com
Erica.Menard@libertyutilities.com
mandymerrill60@gmail.com
kevin.miller@chargepoint.com
tad.montgomery@LebanonNH.gov
brian.morris@eversource.com
jason.morse@baesystems.com
jeff.moulton5@gmail.com
Shaun.Mulholland@LebanonNH.gov
michael@missiondata.io
nawazelski@unitil.com
nhregulatory@eversource.com
elizabeth.r.nixon@energy.nh.gov
amanda.o.noonan@energy.nh.gov
okeefe@unitil.com
ocalitigation@oca.nh.gov
rebecca.ohler@des.nh.gov
polmsted@freewiretech.com
marisa.paruta@eversource.com
jpenfold@revisionenergy.com
katherine.peters@eversource.com
melissa.price@eversource.com
katherine.provencher@eversource.com
vprovenzano@capbm.org

jralston@keeganwerlin.com
brian.rice@eversource.com
tanika.richardson@eversource.com
agustin.ros@brattle.com
Laura.Sasso@libertyutilities.com
mary.e.schwarzer@energy.nh.gov
sanem.sergici@brattle.com
Jon@necsema.net
michael.sheehan@libertyutilities.com
david.j.shulock@energy.nh.gov
karen.sinville@libertyutilities.com
chris@cleanenergynh.org
mal.skowron@chargepoint.com
Eileen.P.Smiglowski@energy.nh.gov
taylorp@unitil.com
heather.tebbetts@libertyutilities.com
stower@nhla.org
bruce@2cker.com
jennifer.ullram@eversource.com
jvanrossum@clf.org
dvenora@keeganwerlin.com
nvijaykar@keyesfox.com
chris@pluggedinstrategies.com
allison@44northlaw.com
theresa.washington@eversource.com
david.wiesner@eversource.com
barryw@revisionenergy.com
twoolf@synapse-energy.com
craig.wright@des.nh.gov
Matthew.C.Young@energy.nh.gov

Without Email Addresses

All

ClerksOffice@puc.nh.gov

Eversource Energy

nhregulatory@eversource.com

Greg Ames

tga@tga3.com

Jessica Arnold
Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty

jessica.arnold@libertyutilities.com

Karen Asbury
Unitil Svc Corp.
6 Liberty Lane West
Hampton NH 03842-1720
asbury@unitil.com

Nikhil Balakumar

nikhil@greentelgroup.com

Scott T Balise
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
Scott.T.Balise@energy.nh.gov

Carole Beaulieu
Unitil Service Corporation
5 McGuire St
Concord NH 03301
beaulieuc@unitil.com

Clifton Below
City of Lebanon

clifton.below@lebanonNH.gov

Kevin Boughan
Eversource Energy
780 N. Commercial St.
Manchester NH 03105-0330
kevin.boughan@eversource.com

John Braswell
Eversource Energy

john.braswell@eversource.com

Peter Brennan
New England Convenience Store and Energy Marketers Association

peter@necsema.net

Steve Bright
Weave Grid, Inc.

steve@weavegrid.com

Ed Burgess

eburgess@strategen.com

Raymond A Burke
New Hampshire Legal Assistance
117 North State St
Concord NH 03301
rburke@nhla.org

Packy Campbell

packyc@rsarealty.com

David R Caron
Town of Derry
14 Manning St.
Derry NH 03038
davecaron@derrynh.org

Melissa Chan

melissa@fermataenergy.com

Jessica Chiavara
Eversource Energy

jessica.chiavara@eversource.com

Sue Corson

Corson@unitil.com

Michael Crouse
Office of Consumer Advocate

Michael.J.Crouse@oca.nh.gov

John Crowley

john@bestfordnh.com

Edward A Davis
Eversource Energy
107 Selden St
Berlin CT 06037
edward.davis@eversource.com

Matthew Deal

matthew.deal@chargepoint.com

Mark W Dean
Attorney-at-Law
13 Samuel Dr
Concord NH 03301
mdean@mdeanlaw.net

Elena Demeris
Unitil Energy Systems, Inc.
6 Liberty Lane West
Hampton NH 03842
demeris@unitil.com

Department of Energy
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
Energy-Litigation@energy.nh.gov

Dori Drachman

dori.drachman@gmail.com

Scott Dunbar
Keyes & Fox, LLP
1580 Lincoln St.
Denver CO 80203
sdunbar@keyesfox.com

Justin C Eisfeller
Unitil Energy Systems, Inc.
6 Liberty Lane West
Hampton NH 03842-1720
eisfeller@unitil.com

Joshua W Elliott
Department of Energy
21 South Fruit St Ste.10
Concord NH 03301
joshua.w.elliott@energy.nh.gov

Sam Evans-Brown
Clean Energy
14 Dixon Ave.
Concord NH 03301
sam@cleanenergynh.org

Mike Fowler

mikefowler@derrynh.org

Thomas C Frantz
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
thomas.c.frantz@energy.nh.gov

Bart Fromuth
Freedom Logistics, LLC d/b/a Freedom Energy Logistics
5 Dartmouth Dr Ste 301
Auburn NH 03032
Bart.Fromuth@felpower.com

Susan Geiger
Orr & Reno, P.A.
45 S Main St
Concord NH 03302-3550
sgeiger@orr-reno.com

Samuel V Golding
Community Choice Partners
12 South Spring St.
Concord NH 03301
golding@communitychoicepartners.com

Ethan Goldman

ethan.goldman@gmail.com

Christopher Goulding
Unitil Energy Systems, Inc.
6 Liberty Lane West
Hampton NH 03842
gouldingc@unitil.com

Emily K Green
Conservation Law Foundation
53 Exchange St Ste 200
Portland ME 04101
egreen@clf.org

Everett Hammond
City of Lebanon

Everett.Hammond@LebanonNH.gov

Christine Hastings
Eversource Energy
780 N. Commercial St
Manchester NH 03105-0330
christine.hastings@eversource.com

Henry Herndon

henry@cpcnh.org

Thomas F Irwin
Conservation Law Foundation
27 North Main St
Concord NH 03301-4930
tirwin@clf.org

Christina Jamharian
Eversource Energy

christina.jamharian@eversource.com

Maureen Karpf
Liberty Utilities
15 Buttrick Rd
Londonderry NH 03053
maureen.karpf@libertyutilities.com

Goksin Kavlak

Goksin.Kavlak@brattle.com

Jessyca Keeler
Ski New Hampshire, Inc.

Jessyca@SkiNH.com

George Knowles
Eversource Energy

george.knowles@eversource.com

Nicholas Krakoff
Conservation Law Foundation

nkrakoff@clf.org

Donald M Kreis
Office of Consumer Advocate
21 South Fruit St Ste 18
Concord NH 03301
donald.m.kreis@oca.nh.gov

Phillip W LaMoreaux
Department of Environmental Services

Philip.W.LaMoreaux@des.nh.gov

Courtney Lane

clane@synapse-energy.com

Christopher Leigh
Eversource Energy

christopher.leigh@eversource.com

Heidi Lemay
New Hampshire Department of Energy

heidi.w.lemay@energy.nh.gov

Marc Lemenager
Eversource Energy

marc.lemenager@eversource.com

Molly M Lynch
Department of Energy

Molly.M.Lynch@energy.nh.gov

Daniel Main
Northern Utilities, Inc.
6 Liberty Lane West
Hampton NH 03842
main@unitil.com

Patricia Martin

17 Farrar Rd
Rindge NH 03461
pmartin2894@yahoo.com

Kat McGhee

kat.mcghee@leg.state.nh.us

Alicia Melanson
New Hampshire Electric Cooperative, Inc.

melansona@nhec.com

Erica Menard
Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Vegetation Management Program

Erica.Menard@libertyutilities.com

Amanda Merrill

mandymerrill60@gmail.com

Kevin Miller

kevin.miller@chargepoint.com

Tad Montgomery
City of Lebanon

tad.montgomery@LebanonNH.gov

Brian Morris
Eversource Energy
780 N. Commercial St.
Manchester NH 03105-0330
brian.morris@eversource.com

Jason Morse
BAE Systems
10 Tara Blvd.
Nashua NH 03062
jason.morse@baesystems.com

Jeff Moulton

jeff.moulton5@gmail.com

Shaun Mulholland
City of Lebanon
51 North Park St
Lebanon NH 03766
Shaun.Mulholland@LebanonNH.gov

Michael Murray

1752 NW Market St #1513
Seattle WA 98107
michael@missiondata.io

Dan Nawazelski
Unitil Energy Systems, Inc.
6 Liberty Lane West
Hampton NH 03842
nawazelski@unitil.com

NHRegulatory
Eversource Energy

nhregulatory@eversource.com

Liz R Nixon
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
elizabeth.r.nixon@energy.nh.gov

Amanda O Noonan
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
amanda.o.noonan@energy.nh.gov

Matthew O'Keefe
Unitil Energy Systems, Inc.

okeefe@unitil.com

OCA Litigation
OCA Litigation
21 South Fruit St Ste 18
Concord NH 03301
ocalitigation@oca.nh.gov

Rebecca Ohler
New Hampshire Department of Environmental Services
29 Hazen Dr
Concord NH 03301
rebecca.ohler@des.nh.gov

Peter Olmstead
FreeWire Technologies

polmsted@freewiretech.com

Marisa Paruta
Eversource Energy

marisa.paruta@eversource.com

James Penfold
Revision Energy, Inc.

jpenfold@revisionenergy.com

Kate Peters
Eversource Energy
780 North Commercial St
Manchester NH 03101
katherine.peters@eversource.com

Melissa Price
Eversource Energy

melissa.price@eversource.com

Katherine Provencher
Eversource Energy
780 N. Commercial St
Manchester NH 03105-0330
katherine.provencher@eversource.com

Valerie Provenzano

vprovenzano@capbm.org

Jessica Ralston
Keegan Werlin, LLP

jralston@keeganwerlin.com

Brian J Rice
Eversource Energy

brian.rice@eversource.com

Tanika Richardson
Eversource Energy
780 N. Commercial St.
Manchester NH 03105-0330
tanika.richardson@eversource.com

Agustin Ros

agustin.ros@brattle.com

Laura Sasso
Liberty Utilities
116 North Main St
Concord NH 03301
Laura.Sasso@libertyutilities.com

Mary E Schwarzer
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
mary.e.schwarzer@energy.nh.gov

Sanem Sergici

sanem.sergici@brattle.com

Jon Shaer

Jon@necsema.net

Michael Sheehan
Liberty Utilities
15 Buttrick Rd
Londonderry NH 03053
michael.sheehan@libertyutilities.com

David J Shulock
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
david.j.shulock@energy.nh.gov

Karen Sinville
Liberty Utilities

karen.sinville@libertyutilities.com

Christopher Skoglund
Clean Energy NH

chris@cleanenergynh.org

Mal Skowron

mal.skowron@chargepoint.com

Eileen P Smiglowksi
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
Eileen.P.Smiglowksi@energy.nh.gov

Patrick H Taylor
Unitil Energy Systems, Inc.
6 Liberty Lane West
Hampton NH 03842
taylorp@unitil.com

Heather Tebbetts
Liberty Utilities
15 Buttrick Rd
Londonderry NH 03053
heather.tebbetts@libertyutilities.com

Stephen Tower
New Hampshire Legal Assistance

stower@nhla.org

Bruce Tucker

bruce@2cker.com

Jennifer Ullram
Eversource Energy
780 N. Commercial St.
Manchester NH 03105-0330
jennifer.ullram@eversource.com

Johanne S Van Rossum
Conservation Law Foundation

jvanrossum@clf.org

Daniel Venora
Keegan Werlin, LLP

dvenora@keeganwerlin.com

Nikhil Vijaykar
Keyes & Fox, LLP
580 California St., 12th Floor
San Francisco CA 94104
nvijaykar@keyesfox.com

Christopher Villarreal

chris@pluggedinstrategies.com

Allison Wannop
Packetized Energy Technologies, Inc.

allison@44northlaw.com

Theresa Washington
Eversource Energy

theresa.washington@eversource.com

David Wiesner
Eversource Energy

david.wiesner@eversource.com

Barry Woods
Revision Energy, LLC

barryw@revisionenergy.com

Tim Woolf

twoolf@synapse-energy.com

Craig A Wright
Department of Environmental Services, Air Resources Division
29 Hazen Dr
Concord NH 03302-0095
craig.wright@des.nh.gov

Matthew C Young
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
Matthew.C.Young@energy.nh.gov

