



June 13, 2023

Daniel C. Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: Docket No. IR 22-076, Investigation of Whether Current Tariffs and Programs are Sufficient to Support Demand Response and Electric Vehicle Charging Programs

Clean Energy NH's Reply Comments

Dear Chairman Goldner,

Thank you for the opportunity to submit final comments in Docket No. IR 22-076, Investigation of Whether Current Tariffs and Programs are Sufficient to Support Demand Response and Electric Vehicle (EV) Charging Programs. ReVision Energy appreciates the Public Utilities Commission's engagement in an investigative process, and we look forward to understanding the scope of the adjudicative docket to follow.

ReVision Energy submits these comments as an employee owned, certified B Corporation clean energy construction company with over 385 employees across our five branches in New England, with 100 staff in New Hampshire at our Brentwood and Enfield locations. In 2022 alone, we installed 10,000 kilowatts of residential solar and nearly 24 megawatts of commercial solar across the region as well as hundreds of EV charging projects. We have learned invaluable lessons over the past five years in effective charging infrastructure across multiple jurisdictions, and we are participating in this investigative docket to share key findings to inform future regulatory framework.

1. The Commission Should Prioritize and Address the Critical Issue of Demand Charges

ReVision remains critically concerned that demand charges must remain front and center within this docket and this proceeding given such charges will inevitably be the top challenge to implementation of the National Electric Vehicle Infrastructure (NEVI) framework to increase electrification within the state of New Hampshire. Demand charges throughout all utilities have the ability to destroy viable business models for public charging stations. This issue has been raised nationally, most recently validated by the National Association of Convenience Stores calling on state regulators to reduce demand charges associated with peak demand to ensure private businesses can install chargers en masse.¹

Rocky Mountain Institute released a study in 2017² showing demand charges could ultimately be responsible for over 90% of a charging station's electricity costs, and since released, states have developed and implemented responsive policies. To date, there are multiple models that have been tested within other jurisdictions that can be applied to ensure New Hampshire is not left a charging desert. Specifically, ReVision proposes the Sliding Scale Demand Charge

¹Demand Charges Hamper C-Store Investment in EV Charging, 2023, Accessed:

https://www.convenience.org/Media/Daily/2023/February/6/1-Hamper-Investment-in-EV_FuelRetailing

²Rocky Mountain Institute: EVGO Fleet and Tariff Analysis: Phase 1: California, 2017, Accessed: https://rmi.org/wp-content/uploads/2017/04/eLab_EVgo_Fleet_and_Tariff_Analysis_2017.pdf



Alternative³ for the consideration in the adjudicative docket to follow. This model was widely endorsed by multiple stakeholders in its adoption by the Massachusetts Department of Public Utilities in 20-69-A. Having such a model is incredibly advantageous when considering that many of the stakeholders agreeing to this framework are the very stakeholders present here in New Hampshire, including Eversource and Unitil. This framework provides public charging station owners with predictable operational costs during the initial years of lower utilization, and therefore incentivizes investment in public charging in new markets.

A fair Demand Charge Alternative (DCA) is critical to the future of charging infrastructure in New Hampshire as currently high demand charges stifle private investment in public charging and even when significant grant funding is realized, a return on private investment is impossible even with high utilization rates. Anticipating utilization rates will take longer to grow in a rural state, addressing these issues by adopting a DCA moving forward is imperative for supporting proliferation of electric vehicle infrastructure. Not only does such policy support Granite Staters who own or wish to invest in an electric vehicle given the anticipated increase in market availability, a DCA would also support transporting out-of-staters into and through New Hampshire to provide critical tourism revenue to our state's budget.

2. The Commission Should Holistically Assess Gaps and Needs in Charging Infrastructure Given Recent Announcements Regarding Proliferation of NACS Chargers

ReVision has also been engaged in many policy discussions following the recent announcements Ford and General Motors have made in regard to utilization of Tesla's charging technology. With Tesla's charging infrastructure now becoming more standard across multiple vehicle manufacturers, this increases accessibility to the existing North American Charging Standard (NACS) charger network. While this may appear to be a resolution in the challenge of charging infrastructure development, the decision to make NACS standard technology will inevitably result in 1) increased adoption of electric vehicles and thus the need to match that adoption with necessary charging infrastructure and 2) further interest in proliferation of the charging market, as rival charging network operators can now install chargers with NACS plugs. This announcement will leave considerable gaps in the remaining charging infrastructure that is needed. Therefore, the need to holistically enable electric vehicle charging programs remains critical.

ReVision Energy thanks the Commission for the opportunity to offer these comments and participate in this investigative proceeding, and we are available to answer any questions. ReVision looks forward to continuing to participate in this docket.

Sincerely,

/s/ Lindsay Bourgoine

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³ReVision Energy's Initial Comments on 22-076, 2023, Accessed: https://www.puc.nh.gov/Regulatory/Docketbk/2022/22-076/LETTERS-MEMOS-TARIFFS/22-076_2023-03-29_REVISION_INITIAL-COMMENTS.PDF