

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

Docket No. DE 19-157

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

**OBJECTION TO STAFF MOTION TO REMOVE ELECTRIC VEHICLE PROPOSAL**

Pursuant to New Hampshire Code of Admin. Rules Puc 203.7(e), Clean Energy New Hampshire (“CENH”) hereby objects to Staff’s Motion to Remove the Electric Vehicle Proposal from Eversource’s Request for Increased Distribution Revenue (the “Motion”). In support of its Objection, CENH states the following:

1. On February 5, 2020, Staff filed the Motion arguing, among other things, that the Public Utilities Commission (the “Commission”) recently opened Docket IR 20-004 where the Commission will be “receiving public comment on the appropriate rate design standard for EV charging, and the merits of implementing time-of-day rates in place for residential and commercial customers who operate electric vehicles.”

2. In opening Docket IR 20-004, the Commission stated:

The Commission is commencing this investigation to provide *an opportunity for public comment on issues relating to*: (1) the relevant rate design standards regarding electric vehicle charging stations and electric vehicles; (2) whether it is appropriate to implement electric vehicle time of day rates for residential and commercial customers; and (3) any other related issues identified in Staff’s memorandum.

Docket IR 20-004, January 16, 2020, Order of Notice at 2 (emphasis added).

3. Of importance, Docket IR 20-004 will not deal with individual utilities or their distribution rates. It certainly will not evaluate whether, at what amount or in what scope an investment in electric vehicle (“EV”) charging infrastructure would be just and reasonable. Therefore, it is not an appropriate docket to evaluate the proposal that Eversource has presented in this docket.

4. Docket IR 20-004 was opened consistent with SB 575 “for the purpose of receiving public comment on the appropriate rate design standard for EV charging, and the merits of implementing time-of-day rates” for residential and commercial customers with electric vehicles. IR 20-004 was *not* opened to review Eversource’s – or any other utility’s – proposal to make a capital investment in EV charging infrastructure using distribution rates. A rate case is an appropriate place to review such a proposal, which impacts Eversource’s distribution rates. Furthermore, as the Motion notes, it has been a decade since Eversource filed a general rate case. While CENH is sympathetic to Staff’s concern that, as a result, there are many significant issues at stake in this proceeding, that is no basis to arbitrarily exclude the issue of Eversource’s EV charging infrastructure proposal. Indeed, if the Commission ultimately decides that a general rate case is the appropriate venue to review proposals for such capital investments, then by Staff’s own logic, the Commission may be stuck waiting another decade to review such a proposal if it does not do so now.

5. Thus, the current docket is the appropriate place to deal with a proposed expenditure of funds and how those funds would be recovered in distribution rates. To review outside the context of this docket does not make sense.

6. As Staff notes, Eversource presented this proposed use of funds in its initial filing on permanent rates (May 28, 2019) and other parties have decided to intervene and expend their


resources on this issue for the past seven months. It is inappropriate at this late date to render all that effort moot, especially since there is no docket where this issue can be resolved. Such a motion should have been made much earlier in this docket.

7. CENH has not requested that the Commission approve an EV charging rate in this docket. It has only asked that the Commission condition any approval on Eversource filing such an EV charging rate within a defined period after such approval.

8. Clean Energy New Hampshire respectfully requests that the Commission deny the Motion.

Dated at Littleton, New Hampshire, this 12<sup>th</sup> day of February, 2020

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