

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**Docket No. DE 20-170**

**ELECTRIC DISTRIBUTION UTILITIES**

**Electric Vehicle Time of Use Rates**

**REPLY COMMENTS OF CHARGEPOINT, INC.**

ChargePoint, Inc. (“ChargePoint”) is grateful for the opportunity to provide these reply comments pursuant to the Commission’s September 16, 2020 Notice opening this proceeding for the utilities to develop electric vehicle (“EV”) time of use (“TOU”) rate proposals and alternative metering feasibility assessments, and consistent with the procedural schedule established by Secretarial Letter dated November 13, 2020.

**I. Comments**

ChargePoint appreciates the initial comments provided by all parties on December 9, 2020. These reply comments briefly respond to the initial comments of Eversource and Unitil.

A. Eversource

ChargePoint supports Eversource’s interest in carrying out load management programs in its New Hampshire territory and recognizes Eversource’s valuable experience in other jurisdictions implementing such programs. Load management, also known as managed charging, offers a well-established and successful approach to manage EV load. Load management options can include utility-managed charging such as incrementally powering up or down customer consumption or reducing charging output as a response to a signal from the utility or at certain times of day, among

others.<sup>1</sup> Such options can be especially beneficial for use cases where individual drivers may not have the ability to change or reschedule their charging behavior to respond to TOU rates (i.e. workplace, multifamily, sites with limited number of chargers). Managed charging can achieve load savings by enabling one central source (the operator of the station or the network operator) to direct the output from the charger without requiring multiple drivers to unplug or change their behavior. EV TOU rate designs and managed charging programs are complementary options that together provide a more comprehensive solution to addressing load management needs than either approach alone. New Hampshire should consider both options as effective means to address a broader scope of transportation use cases and to provide maximum benefit to the grid including lowering costs for all utility customers.

Eversource's concern that up-front costs for EV TOU programming can be prohibitive has been addressed by other states through the use of alternative metering such as embedded meters available in smart charging devices. Eversource expresses preliminary concerns about potential costs associated with communications, data management, and billing systems. Additional information about the nature of Eversource's concerns would be helpful in order to ensure that they are resolved and do not serve as obstacles to program success.

ChargePoint appreciates Eversource's eagerness to work with Staff and stakeholders to assess the feasibility of utilizing embedded EVSE capabilities to enable increased EV adoption. Implementing meaningful utility pilot programs, in cooperation with EV charging hardware and network providers, is a key step to set the path for increased EV adoption and use in the state of New Hampshire. The data and experience gleaned from utility pilot programs that utilize EVSE

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<sup>1</sup> See Comments of ChargePoint, Inc. on Staff Recommendations dated May 11, 2020 at p. 7 in Docket No. 20-004 for more discussion of load management techniques.

embedded metering will ultimately lead to increased EV adoption and enable lower costs for customers.

## B. Unitil

Unitil's commitment to filing a suite of EV rates and programs is significant and commendable. To the extent it entails investment in behind the meter infrastructure, Unitil's interest in utility-facilitated make-ready programs and charging incentives reflects an important and appropriate means of supporting developing EV markets in the state. This approach can help to keep New Hampshire competitive with other states while thriving as a tourist and outdoor sports destination.

Unitil's efforts to explore and assess alternative metering and other customer options are also notable and important. Unitil appropriately adopts the position that "EVSE capability to manage demand, provide measurement functionality, and inform customer behaviors is worthy of additional study."<sup>2</sup> As ChargePoint recommended in its initial comments, a pilot or pilots would be one means to further study and deploy these benefits.

Fixed charges and subscription fees are not necessary to support residential EV TOU rates. Properly designed TOU rates will incentivize EV charging to take place at off-peak times, thus not placing additional demands on the utility system. In fact, off-peak EV charging increases overall system efficiency and spreads system costs more widely by increasing overall sales without contributing to peak demand. EV TOU rates result in lower overall costs for customers and maximize existing utility infrastructure. To the extent that existing rates and charges do not recover the demands that residential customers place on the utility system, that would be best addressed in a general rate case.

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<sup>2</sup> Unitil Initial Comments at 5.

Unitil expresses certain concerns about C&I charging that can be addressed by appropriately designed alternatives to demand charges.<sup>3</sup> ChargePoint provided examples of such alternatives in its initial comments in this proceeding as well as in comments in Proceeding IR 20-004.<sup>4</sup> Eversource currently provides a demand charge alternative rate rider for public charging stations in its Connecticut service territory.<sup>5</sup> Fixed charges for EV C&I customers that do not apply to other C&I customers are inappropriate. EV adoption in New Hampshire is in its early stages and therefore system impacts due to incremental EV charging load are not likely. As Unitil notes, at later stages of adoption, EVSE can offer beneficial services such as power optimization while spreading system costs more widely. To the extent necessary once EV adoption reaches higher levels, Unitil should consider making information about system capacity levels publicly available in order to help avoid any potential system costs.

## II. Conclusion

ChargePoint appreciates the opportunity to provide these initial comments on EV TOU rate designs and alternative metering and looks forward to further discussions at the technical session scheduled for January 19, 2021 and over the course of this proceeding.

Respectfully submitted,



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<sup>3</sup> See *id.* at 2, 4.

<sup>4</sup> See, e.g., ChargePoint Initial Comments at 11-12.

<sup>5</sup> See *id.* at 11 and Attachment I.

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**Electric Distribution Utilities**

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing documents has, on this 8<sup>th</sup> day of January 2021, been sent by email to the service list in Docket No. DE 20-170.



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Alicia Zaloga