



**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION  
DOCKET NO. DE 20-170  
January 8, 2021**

**Response to Comments Resulting from November 9, 2020 prehearing  
conference and technical session  
by  
The New England Convenience Store & Energy Marketers Association, Inc.**

The New England Convenience Store and Energy Marketers Association (NECSEMA) is pleased to submit for the Commission's consideration our response to comments received from the November 9, 2020 preliminary initial statements and technical session concerning public utility development of electric vehicle ("EV") time of use ("TOU") rate proposals and alternative metering feasibility assessments.

NECSEMA represents convenience store and gasoline retailers, independent transportation fuel distributors, and the businesses which supply them. According to the National Association of Convenience Stores, there are almost 900 convenience stores in New Hampshire (655 of which sell motor fuels) employing over 14,000 people.

NECSEMA members are extremely interested in EV adoption and believe we have an essential role to play, as we all address climate change impacts, and the public transition away from traditional fuels toward widespread EV adoption. As the public's fuel choices evolve, we want to continue meet their needs; whatever their fuel choice is, be it electric, hydrogen fuel cells, or other renewable alternative fuels.

1044 Central Street, Suite 203  
Stoughton, MA 02072  
(781) 297 – 9600

NECSEMA supports Initial Comments of ChargePoint, Inc., Docket No. DE 20-170, dated December 9, 2020 (“ChargePoint Comments”), page 5, that the development of TOU rate designs or other alternative rate design approaches must have embedded the collection and submission of data to the Commission on each proposed program’s performance, costs, and efficacy across intended users and rate classes to evaluate their success, continued use, amendment, or termination consistent with the guiding principles described in Docket IR 20-004 and Order No. 26,394. We further suggest that this important component, not be an afterthought post rate design, but be identified as a component of each approach with a hypothesis or goal, and correlating metrics that will accurately measure performance of said approaches initially and over time so that a meaningful temporal evaluation may occur for each goal, its feasibility, policy options, and overall costs and benefits. Moreover, Utility proposals should state with specificity its goals with respect to data collection, impact on customer behavior, and impact on EV adoption metrics such as EV miles traveled and, in accordance with RSA 378:5 and :7, demonstrate any rate impacts are reasonable.

2) NECSEMA members have, albeit cautiously, installed Level II and DCFC’s, at select locations in our membership footprint. In addition, and more commonplace, are efforts by our members to future-proof new stations and station rebuilds for market readiness once EV proliferation and DCFC installations become a viable business model for private investment. NECSEMA members own thousands of potential host locations along New England’s most traveled highways and roadways; and will remain arguably the most desirable locations for hosting DCFC’s. One of several barriers to private investment installing DCFC’s are the resultant electric charges, charging equipment costs, and upgrades necessary to install and operate these high draw charging systems, and

specifically the host location responsibility for demand charges. We wish to support ChargePoint Comments, pages 6-7, concerning TOU rate designs may not be an appropriate one-size fits all approach considering the need for EV charging by different users, such as a distant day-tripper, vacationer, renter, or homeowner/condominium owner lacking a personal EV charger, long distance business traveler, or those impacted by localized service interruptions, or human error. It's one thing if your alarm doesn't sound, but it's an entirely different matter if you can't maintain your mobility and convenience.

3) On page 9 of ChargePoint Comments, they suggest the development and application of rate designs based on a user needs and limitations, specifically those in transit, whose needs are remarkably different than other users such as a residential EV owner or fleet charging. We would expand that comment to include DCFC host owner locations also be specifically considered as its own user category, given the widespread public benefit these host locations would provide, their highly trafficked locations, and corresponding societal benefits including DCFC charging being observed on-site, resulting in decreased range anxiety by current EV owners, and lessening more generalized driver anxiety over EV adoption. Seeing is believing.

4) Measures for public charging host sites could also include measures to promote DCFC adoption by enabling make-ready programs, where service infrastructure cost is lowest, along with consideration of demand charge alternatives suggested by ChargePoint in ChargePoint Comments, pages 9-10.

5) Unitil is proposing a demand charge or a flat or fixed energy charge for non-residential EV charging<sup>1</sup>. For residential charging it appears TOU charging as opposed to demand charging is supported by all commentors and not requiring a demand charge since: (i) charging would occur at night and (ii) this user group is “unlikely to create a sufficiently large demand to warrant such a charge”. This approach appears to greatly benefit residential charging and penalizes traditional options for EV charging at public sites.

We note that if a significant number of residential customers opt for at home charging, as projected by ChargePoint and Unitil, it will, as EV adoption rates increase, have a remarkable impact on demand, but it may be dispersed and spread out across the grid.

Although the grid will not be able to avoid upgrades as increasing number of customers opt for residential charging over public charging locations. However, the cost of these grid and line upgrades to accommodate this steady increase in load and demand, could become lost in the overall cost of service in a rate case, rather than be collected as a demand charge specifically for EV charging. Therefore, in fairness to all users and rate classes, if demand charges remain shouldn't they apply similarly or equally to all customers and users.

6) Last, from the perspective of the consumer, there needs to be price transparency and choice as part of any utility EV service and rate plan. Currently, transportation fuels are sold in a hyper-competitive market, with consumer-friendly tools such as GasBuddy, GasGuru, Google Maps, and other apps that provide the consumer with real time gasoline pricing and transparency. It is important that, along with the development of EV rates that maximize benefits to utility ratepayers, the utilities and the Public Utility Commission provide mechanisms for consumer-driven price comparison shopping. For example, it

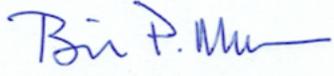
---

<sup>1</sup> Comments of Unitil Energy Systems, Inc. (“Unitil”), Docket DE 20-170, December 9, 2020.

might cost less to charge an EV at a public charging station than at a home facility, depending on the consumer's location, driving habits, and preferences.

NECSMA respectfully requests that the PUC explore available technology and other options for continued consumer choice.

Respectfully submitted:



Brian P. Moran  
Director of Government Affairs  
Brian@necsema.net | (781) 297-9600 ext. 5