

**Before the State of New Hampshire  
Public Utilities Commission  
Docket # DE 20-170  
Electric Distribution Utilities  
Electric Vehicle Time of Use Rates**

**The Town of Derry Comments on Partial Settlement**

The Town of Derry (Derry), intervenor in this docket, is a municipality who has implemented Level 2 chargers on behalf of its residents to attract tourists to its downtown area from Interstate 93. The four Level 2 chargers were operational from 2018 to the beginning of 2021.

Rather than repeat in-depth coverage, Derry echoes the points raised by CLF and CENH in their own comments. Derry also opposes the inclusion of demand charges to a nascent industry that will harm ratepayers as well as NH tourism.

Although Derry is served by Eversource, we offer the following data:

1. Derry has three Telsa Level 2 chargers (50A each) and one Clipper Creek Level 2 charger (40A) and has seen typical usage of 800-1400 kwh/month. Vast majority of charging was done from 5 to 11pm. Chargers were primarily installed to promote usage of the downtown area and attract tourists from Interstate 93.
2. The four Derry Level 2 chargers are serviced by a separate meter in our municipal parking lot, in order to track usage and is adjacent to our Municipal Building that uses over 500,000 kwh/year and has demand peaks of 50-75 kW.
3. Typical bill from Eversource from 2020, prior to Eversource adding Demand charges (see Exhibit 1):
  - a.  $\$183.90/1135 \text{ kwh} = \$0.16/\text{kwh}$
4. Typical bill from Eversource from 2021, after Eversource added demand charges (see Exhibit 2):
  - a.  $\$571.92/818 \text{ kwh} = \$0.70/\text{kwh}$
  - b. Demand peaks were 10-25 kW
  - c. Demand charges accounted for 78% of the bill
5. Typical residential cost to charge an electric car via Eversource rate (December 2021) using a Tesla long range vehicle (75 kwh battery, 310 mile range, 85% efficiency for charging):
  - a.  $(75 \text{ kwh} \times \$0.20/\text{kwh})/0.85 = \$17.65$
6. Typical residential/commercial cost for a gasoline powered car that has a range of 310 miles and gets 25 MPG:
  - a. Average cost per gallon of gas:  $\$3.20 - \$0.42$  (Federal & State taxes) =  $\$2.78/\text{gallon}$
  - b. Average cost to travel 310 miles:  $(310 \text{ miles}/25 \text{ MPG}) \times \$2.78/\text{gallon} = \$34.47$

The Town of Derry disconnected the four Level 2 chargers after the introduction of the demand charges by Eversource due to the poor economics for the Town. Users are better off charging at their homes or other sources.

If Derry had connected the four Level 2 chargers to our main meter at the Municipal building, the cost would have continued to be in the \$0.16/kwh range as the demand charges from the Municipal Building exceed the demand charges from the Level 2 chargers meter (but we would have lost insight into the usage patterns). This demonstrates that the demand charges for this example are unwarranted and that overcharging may be typical for other commercial installations.

In summary, Derry objects to the inclusion of demand charges for commercial rates, specifically the inclusion of Time Varying Periods, Time Varying Components, and Rate Development Method, Demand Charge, and Revenue Neutrality provisions.

Sincerely,



Jeff Moulton, PE  
Chair, Town of Derry Net Zero Task Force  
603-421-4905  
Jeff.moulton5@gmail.com

EXHIBIT 1

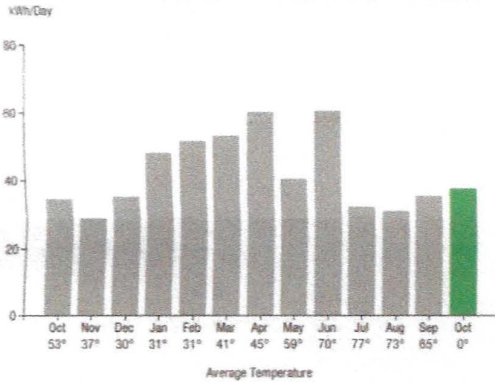
# EVERSOURCE

Account Number: 5633 101 6030  
Statement Date: 10/01/20  
Service Provided To:  
TOWN OF DERRY

Total Amount Due by 10/26/20 **\$183.90**

Amount Due On 09/26/20 \$172.30  
Last Payment Received On 09/21/20 -\$172.30  
Balance Forward \$0.00  
Total Current Charges \$183.90

## Electric Usage History - Kilowatt Hours (kWh)



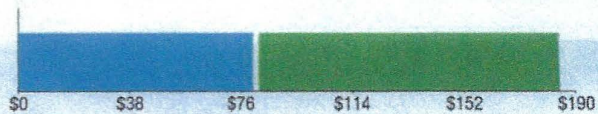
## Current Charges for Electricity

Supply **\$80.22**

Cost of electricity from Eversource

Delivery **\$103.68**

Cost to deliver electricity from Eversource



## Electric Usage Summary

This month your average daily electric use was **38.0 kWh**

This month you used **8.6% more** than at the same time last year



RECEIVED  
OCT 05 2020  
DEPT. OF PUBLIC WORKS  
DMCMKT  
18020015

Your electric supplier is  
Eversource  
PO Box 330  
Manchester, NH 03105-0330

## News For You

If you are having trouble paying your Eversource bill, we're here to help. Enroll in a payment plan to pay a past-due balance over a period of up to 12 months, or Budget Billing to avoid seasonal spikes on your bill. For eligible customers, financial assistance programs can help you eliminate overdue balances. For more information, visit [Eversource.com/BillHelp](http://Eversource.com/BillHelp).

Remit Payment To: Eversource, PO Box 56003, Boston, MA 02205-6003

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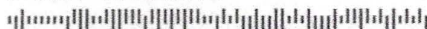
# EVERSOURCE

Account Number: 5633 101 6030

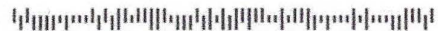
Total Amount Due by 10/26/20 **\$183.90**

Amount Enclosed **183,90**

018867 000006179



TOWN OF DERRY  
ATTN: PUBLIC WORKS DEPARTMENT  
14 MANNING ST  
DERRY NH 03038-3201



Eversource  
PO Box 56003  
Boston, MA 02205-6003



2 45678

5633101603028 0000183901 0000183901



# EVERSOURCE

Account Number: 5633 101 6030

Customer name key: TOWN

Statement Date: 10/01/20

Service Provided To:  
TOWN OF DERRY

Svc Addr: 0 MCALLISTER CT  
DERRY NH 03038

Serv Ref: 200133001

Bill Cycle: 06

Service from 09/01/20 - 10/01/20

30 Days

Next read date on or about: Oct 30, 2020

Meter Number	Current Read	Previous Read	Current Usage	Reading Type
S71115089	24336	23201	1135	Actual

## Monthly kWh Use

Oct	Nov	Dec	Jan	Feb	Mar	Apr
971	841	1166	1491	1497	1641	1741
May	Jun	Jul	Aug	Sep	Oct	
1256	1932	943	1033	1034	1135	

## Contact Information

Emergency: 800-662-7764

www.eversource.com

BusinessCenterNH@eversource.com

Pay by Phone: 888-729-7764

Customer Service: 866-554-6025

For information or questions regarding your account, please contact Eversource at the number above. If, after contacting us, your billing dispute is still unresolved, you may call the New Hampshire Public Utilities Commission at 800-852-3793.

## Important Messages About Your Account

The stranded cost recovery charge is composed of a rate reduction bond charge owned by PSNH Funding LLC 3 as filed with the NHPUC and a stranded cost recovery amount approved by the NHPUC.

Total Amount Due  
by 10/26/20

**\$183.90**

## Electric Account Summary

Amount Due On 09/26/20	\$172.30
Last Payment Received On 09/21/20	-\$172.30
Balance Forward	\$0.00
Current Charges/Credits	
Electric Supply Services	\$80.22
Delivery Services	\$103.68
Total Current Charges	\$183.90
<b>Total Amount Due</b>	<b>\$183.90</b>

## Total Charges for Electricity

### Supplier

Eversource

Service Reference: 200133001

Energy Chrg - Rate G	1135.00kWh X \$0.07068	\$80.22
Subtotal Supplier Services		\$80.22

### Delivery

(RATE G GENERAL SERVICE)

Service Reference: 200133001

Customer Chrg 1-Phase		\$16.21
Distribution Chrg	500.00kWh X \$0.07604	\$38.02
	635.00kWh X \$0.01884	\$11.96
Transmission Chrg	500.00kWh X \$0.02807	\$14.04
	635.00kWh X \$0.01056	\$6.71
Strnded Cst Recovery Chrg	1135.00kWh X \$0.00732	\$8.31
System Benefits Chrg	1135.00kWh X \$0.00743	\$8.43
Subtotal Delivery Services		\$103.68
<b>Total Cost of Electricity</b>		<b>\$183.90</b>

**Total Current Charges**

**\$183.90**

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## IDENTITY PROTECTION

On November 1, 2008, Eversource implemented additional identity protection measures to safeguard our customers' confidential account information. These measures will help us to protect your confidential personal information and ensure only authorized access to your account. For current customers requesting account information or access, Customer Service Representatives will ask several simple questions to verify the caller's identity and their right to access the requested account information. We are committed to providing the excellent customer service you deserve and the timely information you need to manage your energy use.

# EVERSOURCE

Account Number: **5633 101 6030**  
 Statement Date: **03/03/21**

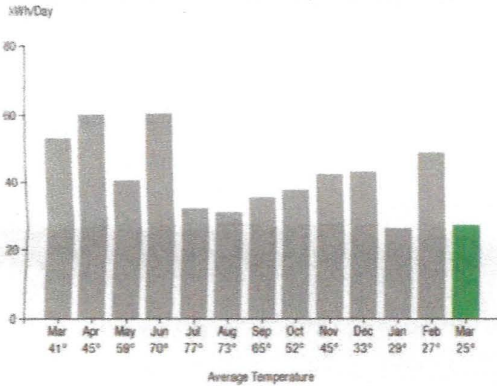
Service Provided To:  
**TOWN OF DERRY**

EXHIBIT 2

**Total Amount Due by 03/28/21** **\$571.92**

Amount Due On 02/26/21 \$656.88  
 Last Payment Received On 02/24/21 -\$656.88  
 Balance Forward \$0.00  
 Total Current Charges \$571.92

## Electric Usage History - Kilowatt Hours (kWh)



## Current Charges for Electricity

**Supply**  
**\$54.21**

Cost of electricity from Eversource

**Delivery**  
**\$517.71**

Cost to deliver electricity from Eversource



Your electric supplier is

Eversource  
 PO Box 330  
 Manchester, NH 03105-0330

RECEIVED

MAR 10 2021

DEPT. OF PUBLIC WORKS  
 DMC MKT  
 18020015

## Electric Usage Summary

This month your average daily electric use was **27.0 kWh**

This month you used **49.1% less** than at the same time last year



## News For You

Changes to your rates effective Feb. 1, 2021. Based on recently approved rate changes, the average bill impact for a residential customer using 600 kilowatt-hours (kWh) of electricity will be approximately \$3.76 or 3.4%. Rate impacts may be lower or higher for some customer categories. Visit [Eversource.com](http://Eversource.com) for more information

Remit Payment To: Eversource, PO Box 56003, Boston, MA 02205-6003

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# EVERSOURCE

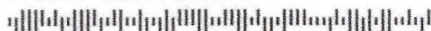
Account Number: **5633 101 6030**

Please make your check payable to Eversource and consider adding \$1 for Neighbor Helping Neighbor. Visit [Eversource.com](http://Eversource.com) to make your payment today. If mailing payment, please allow up to 5 business days to post.

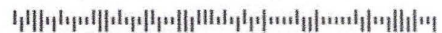
**Total Amount Due by 03/28/21** **\$571.92**

**Amount Enclosed** **571.92**

010895 000013345



TOWN OF DERRY  
 ATTN: PUBLIC WORKS DEPARTMENT  
 14 MANNING ST  
 DERRY NH 03038-3201



Eversource  
 PO Box 56003  
 Boston, MA 02205-6003



2-456

5633101603028 0000571924 0000571924



# EVERSOURCE

Account Number: 5633 101 6030

Customer name key: TOWN

Statement Date: 03/03/21

Service Provided To:  
TOWN OF DERRY

Svc Addr: 0 MCALLISTER CT  
DERRY NH 03038  
Serv Ref: 200133001 Bill Cycle: 06  
Service from 02/01/21 - 03/03/21 30 Days  
Next read date on or about: Apr 01, 2021

Meter Number	Current Read	Previous Read	Current Usage	Reading Type
S79067784	5707	4889	818	Actual

Total Demand Use = 26.90 KW

Monthly kWh Use						
Mar	Apr	May	Jun	Jul	Aug	Sep
1641	1741	1256	1932	943	1033	1034
Oct	Nov	Dec	Jan	Feb	Mar	
1135	1230	1423	871	1365	818	

### Contact Information

Emergency: 800-662-7764  
www.eversource.com  
BusinessCenterNH@eversource.com  
Pay by Phone: 888-729-7764  
Customer Service: 866-554-6025

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**Total Amount Due by 03/28/21** **\$571.92**

### Electric Account Summary

Amount Due On 02/26/21	\$656.88
Last Payment Received On 02/24/21	-\$656.88
Balance Forward	\$0.00
Current Charges/Credits	
Electric Supply Services	\$54.21
Delivery Services	\$517.71
Total Current Charges	\$571.92
<b>Total Amount Due</b>	<b>\$571.92</b>

### Total Charges for Electricity

#### Supplier

Eversource		
Service Reference: 200133001		
Energy Chrg - Rate G	818.00kWh X \$0.06627	\$54.21
Subtotal Supplier Services		\$54.21

#### Delivery

(RATE G GENERAL SERVICE)		
Service Reference: 200133001		
Customer Chrg 1-Phase		\$16.21
KW Distrib Chrg, Over 5.0	21.90KW X \$11.49000	\$251.63
KW Transmission Chrg, Over 5.0	21.90KW X \$7.77000	\$170.16
KW Strnd Cst Recovery Chrg	21.90KW X \$1.14000	\$24.97
Distribution Chrg	500.00kWh X \$0.02805	\$14.03
	318.00kWh X \$0.02268	\$7.21
Transmission Chrg	500.00kWh X \$0.02807	\$14.04
	318.00kWh X \$0.01056	\$3.36
Strnded Cst Recovery Chrg	818.00kWh X \$0.01225	\$10.02
System Benefits Chrg	818.00kWh X \$0.00743	\$6.08
Subtotal Delivery Services		\$517.71
<b>Total Cost of Electricity</b>		<b>\$571.92</b>

**Total Current Charges** **\$571.92**

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