

**BEFORE THE PUBLIC UTILITIES COMMISSION  
STATE OF NEW HAMPSHIRE**

**DE 20-170**

**Electric Vehicle Time of Use Rates**

November 6, 2020

**CITY OF LEBANON PETITION TO INTERVENE**

*Now Comes* the City of Lebanon (“City”) and petitions the New Hampshire Public Utilities Commission, in response to its Order of Notice issued on October 16, 2020 in this proceeding and pursuant to NH Code of Administrative Rules Puc 203.2 and Puc 203.17 and NH RSA 541:A:32, to allow the City to intervene in the above-captioned matter for the following reasons:

1. The City is a municipal corporation with an address of 51 North Park St., Lebanon, NH 03766.
2. The City is an electric customer of Liberty Utilities with approximately 85 meters and accounts with Liberty at G1, G2, G3 and M01 rates and consumes about 4 million kWh per year.
3. The City has acquired and is operating its first all-electric vehicle and is planning to acquire more electric vehicles and is interested in supporting the development of public and commercial charging stations within the City.
4. The City has been a party or participated in IR 15-296 regarding Grid Modernization; DE 17-189, Liberty’s battery and time-of-use (TOU) rate pilot in which the City collaborated with Liberty Utilities, the Office of the Consumer Advocate, and Staff in developing cost causation based TOU rates that were approved by the Commission; and most recently in DE 19-064, Liberty Utilities electric distribution rate cases in which a residential TOU EV charging rate was proposed and approved based on the battery pilot TOU rates. The City is interested in collaborating with Staff and parties to further develop TOU rates for EV charging.

5. The City has a substantial interest in the issues to be addressed by this docket and the City's intervention will not impair the orderly and prompt conduct of the proceedings, will not result in undue delay, and will not prejudice the interest of any party.

**WHEREFORE**, the City of Lebanon requests that the Commission grant this petition to allow the City to be made a full intervenor in this proceeding and grant such other relief as is just and proper.

*Respectfully submitted* this 6<sup>th</sup> day of November 2020

*City of Lebanon*

A handwritten signature in cursive script that reads "Clifton Below". The signature is written in black ink and is positioned above a horizontal line.

*by Assistant Mayor Clifton Below, duly authorized*