



David R. Caron
Town Administrator
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BEFORE THE PUBLIC UTILITIES COMMISSION
STATE OF NEW HAMPSHIRE

DE 20-170

Electric Vehicle Time of Use Rates

May 19, 2021

TOWN OF DERRY PETITION TO INTERVENE

Now comes the Town of Derry (Town) and petitions the New Hampshire Public Utilities Commission, in response to its Order of Notice issued on October 16, 2020 in this proceeding, to allow the Town to intervene in the above captioned matter for the following reasons:

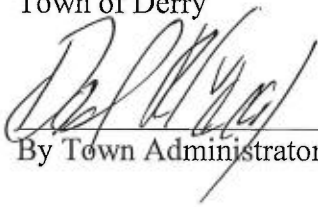
1. The Town is an electric customer of Eversource consuming almost 4 million kwh per year.
2. The Town acquired and has been operating four level 2 electric vehicle charging stations at its Municipal Parking lot since 2018. The four charging stations are served by a separate meter from an adjacent utility pole. Up to the end of year 2020, the average electricity cost to charge an electric vehicle was 16 cents/kwh. In the Fall of 2020, Eversource changed the billing to introduce demand charges and the average cost of electricity increased to fifty to seventy cents/kwh, making it uneconomical to operate.
3. The Derry Town Council voted unanimously to disconnect the charging stations in January 2021 due to the high cost of electricity, primarily due to Eversource adding a demand charge for 5kw or larger.
4. Level 2 chargers (universal or Tesla) typically have a demand of 7-10 kw.
5. The level 2 chargers in the Municipal parking lot are surrounded by commercial buildings. In particular, the Derry Municipal Building has a GV meter and incurs demands of 50-75 kw. If the Town had decided to hook up the chargers to a submeter from the Derry Municipal building (less than 100 feet distance), no demand charges would be incurred for the electric vehicle chargers but the Town would have to spend tens of thousands of dollars to tear up the parking lot and repair the lot in order to connect the meters. The demand from the four charging stations has little effect on the electric grid and does not justify the demand charges.

6. The four charging stations were installed to promote traffic to our downtown area. The majority of the charging at the four charging stations occurs in the evening hours (low demand hours).
7. The Town is actively studying the conversion of its municipal fleet to electric vehicles but the current rates for level 2 chargers make the operational costs prohibitive. The Town cannot implement electric vehicles into its fleet until the electric vehicle use rates drop the demand charges.
8. The Town has substantial interest in the issues to addressed by this docket and the Town'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.

Therefore, the Town requests that the Commission grant this petition to allow the Town to be made a full intervenor in this proceeding and grant such other relief as is just and proper.

Respectfully submitted this 19th day of May 2021.

Town of Derry



By Town Administrator David R. Caron, duly authorized