

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

Docket No. DG 20-170 Electric Vehicle Time of Use Rates
Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty

**TESTIMONY
OF
HEATHER TEBBETTS
AND
MELISSA SAMENFELD**

June 15, 2021



1 **I. INTRODUCTION AND BACKGROUND**

2 **Q. Ms. Tebbetts, please state your full name, business address, and position.**

3 A. My name is Heather M. Tebbetts and my business address is 15 Buttrick Road,
4 Londonderry, New Hampshire. I am Manager of Rates and Regulatory Affairs for
5 Liberty Utilities Service Corp. (“LUSC”) and am responsible for providing rate-related
6 services for Liberty Utilities (EnergyNorth Natural Gas) Corp. (“EnergyNorth”) and
7 Liberty Utilities (Granite State Electric) Corp. (“Granite State”), (collectively “Liberty”
8 or “the Companies”).

9 **Q. Please describe your educational background and training.**

10 A. I graduated from Franklin Pierce University in 2004 with a Bachelor of Science degree in
11 Finance. I received a Master of Business Administration from Southern New Hampshire
12 University in 2007.

13 **Q. Please describe your professional background.**

14 A. I joined LUSC in October 2014. Prior to my employment at LUSC, I was employed by
15 Public Service Company of New Hampshire (“PSNH”) as a Senior Analyst in NH
16 Revenue Requirements from 2010 to 2014. Prior to my position in NH Revenue
17 Requirements, I was a Staff Accountant in PSNH’s Property Tax group from 2007 to
18 2010 and a Customer Service Representative III in PSNH’s Customer Service
19 Department from 2004 to 2007.

20 **Q. Have you previously testified before the Commission?**

21 A. Yes, I have testified on numerous occasions before the Commission.

1 **Q. Ms. Samenfeld, please state your full name, business address, and position.**

2 A. My name is Melissa B. Samenfeld and my business address is 15 Buttrick Road,
3 Londonderry, New Hampshire. I am a Rates Analyst II in the Rates and Regulatory
4 Affairs department for LUSC and am responsible for providing rate-related services for
5 EnergyNorth and Granite State.

6 **Q. Please describe your educational background and training.**

7 A. I graduated from Southern New Hampshire University in 2014 with a with a Bachelor of
8 Science degree in Business Administration, with a concentration in Organizational
9 Leadership.

10 **Q. Please describe your professional background.**

11 A. I joined LUSC in December 2016. Prior to my current position, I was employed by
12 LUSC as an Electric Service Representative from 2017 to 2019, and an Electric
13 Operations Coordinator from 2016 to 2017. Prior to my employment at LUSC, I was
14 employed by PSNH as a Utility Worker from 2012 to 2016, a Representative A from
15 2007 to 2012, and a Customer Service Representative III in the Credit and Collections
16 Department from 2001 to 2007.

17 **Q. Have you previously testified before the Commission?**

18 A. No, I have not.

1 **II. PURPOSE OF TESTIMONY**

2 **Q. What is the purpose or your testimony?**

3 A. In Docket No. IR 20-004, Staff recommended the Commission open a new proceeding
4 and direct each electric utility to file (1) an electric vehicle (“EV”) time-of-use (“TOU”)
5 rate proposal for separately-metered residential and small commercial customer
6 applications, and (2) an EV TOU rate proposal for separately-metered high demand draw
7 commercial customer applications that may incorporate direct current fast charging or
8 clustered level two chargers. Staff recommended that each proposal should be
9 accompanied by testimony explaining how those rates were developed, any plans for
10 marketing residential EV TOU rates, and how the rate is consistent with the
11 Commission’s appropriateness determinations herein.

12 Granite State already has an electric vehicle charging rate for residential customers.

13 Therefore, this testimony will focus on small commercial applications and high demand
14 draw commercial applications.

15 **III. SEPARATELY-METERED COMMERCIAL APPLICATIONS**

16 **Q. Please explain the rates the Company is proposing for commercial electric vehicle
17 charging station customers.**

18 A. The Company is proposing two rates, depending on the demand. The first is Rate EV-L
19 for demand 200 kW and greater. The second is Rate EV-M for demands 20 kW to 200
20 kW. Each rate is in line with the Company’s current commercial and industrial rates G-1
21 and G-2, respectively. The Company is not proposing residential TOU electric vehicles
22 rates because it already has such a rate as approved in Docket No. DE 19-064.

1 **Q. How did the Company calculate the rates?**

2 A. The calculation of the rates started with reviewing the revenue requirement currently
3 approved for rates G-1 and G-2 in Docket No. DE 19-064. Both rates have customer,
4 demand, and volumetric charges. The design of these existing rates is such that the
5 demand charges recover the majority of the costs of serving customers in these rate
6 classes, rather than the volumetric charges. To accommodate the fact that electrification
7 of transportation is here to stay, thus providing consistency to the volumetric charges, the
8 rates calculated for Rate EV-L and EV-M provide for the majority of the revenue
9 requirement of Rates G-1 and G-2 to be heavily weighted on the volumetric kWh charge
10 as shown in Attachment 1. The revenue requirement for both rates provides for 85% to
11 volumetric kWh, 5% to the customer charge, and 10% to the demand charge. By making
12 this change, the cost to the customer owning the stations on their monthly bill will be
13 significantly less.

14 **Q. Please explain the differences in the service requirements of each rate.**

15 A. Rate EV-M provides for service for installations of 72 kW or less. This aligns with single
16 phase service requirements in the Company's Specifications for Electrical Standards.
17 Rate EV-L provides for installations greater than 72 kW to align with three phase service
18 requirements in the Company's Specifications for Electrical Standards, as well.

1 **Q. How does the change in the rate structure affect the potential contribution in aid of**
2 **construction that the customer may be required to pay for service to the charging**
3 **stations?**

4 A. Given that the revenues from the proposed rates are lower versus the standard
5 commercial rates, given the change to the allocation of costs between kWh, kW, and the
6 customer charge, the customer will receive less of a revenue credit towards the costs for
7 the make ready work necessary for service, but their monthly bill will be lower.

8 **Q. Does Liberty's tariff allow flexibility in a customer charging the users of charging**
9 **stations?**

10 A. Yes. The tariff currently excludes electric vehicle charging from resale and with these
11 new tariff rates, the customer of record has the ability to charge its customers however
12 they would like -- per kWh or per minute, etc. The customer of record will have the
13 burden of determining the total costs of installing the service plus the monthly bill to
14 calculate the rate that the customer will charge to ensure their costs are being recovered
15 from charging customers.

16 **Q. Will the Company market these new rates?**

17 A. Yes. Once the rates are approved, the Company will market the new rates in its bill
18 inserts, website, and social media to let potential customers know the new rates are
19 available.

20 **Q. Is the Company including tariff pages in this filing?**

21 A. Yes, see Attachment HT/MS-2 for the proposed tariff pages.

1 **Q. Does the Company address make ready work in its tariff?**

2 A. Yes. The tariff describes the respective responsibilities of the Company and the customer
3 to ensure service is installed in accordance with our Standards for Electrical Service.

4 **IV. CONCLUSION**

5 **Q. Does this conclude your testimony?**

6 A. Yes, it does.