



June 15, 2021

Via Electronic-Mail

Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

RE: DE 20-170, Electric Vehicle Time of Use Rates
Unitil Energy Systems, Inc.'s Electric Vehicle Time of Use Rates Proposal

Dear Secretary Howland,

Unitil Energy Systems, Inc. ("Unitil" or the "Company") appreciates the opportunity to provide DE 20-170 stakeholders with a copy of the Company's electric vehicle time of use ("EV TOU") rate proposal. The proposal provided herein was submitted to the Commission on April 2, 2021 in the Company's base rate case docketed in DE 21-030. The Company has requested approval of a suite of time of use ("TOU") rates (including EV-specific rates), an EV Program infrastructure proposal, and an EV TOU Marketing, Communications, and Education ("MC&E") Plan. The EV TOU rates and infrastructure deployment efforts were developed in conformance with the principles supported by the Commission and stakeholders in IR 20-004, Order 26,394, and DE 20-170.

As stated previously in this docket, the Company believes that the most appropriate and efficient forum to litigate these proposals exists within base rate case DE 21-030.¹ Unitil recently submitted an objection to the Staff's motion to remove the Company's EV TOU rate proposals from the pending rate case to this docket.² Staff's motion was denied by the Commission on June 9, 2021 in Order 26,486.³ This approach was supported by stakeholders in DE 20-170 and DE 21-030 and will provide certainty with respect to the timeline for approval of these crucial electrification efforts.⁴ Unitil has worked

¹ See UES DE 20-170 December 9, 2020 Comments and January 8, 2021 Reply Comments: https://www.puc.nh.gov/Regulatory/Docketbk/2020/20-170/LETTERS-MEMOS-TARIFFS/20-170_2020-12-09_UES_COMMENTS.PDF and https://www.puc.nh.gov/Regulatory/Docketbk/2020/20-170/LETTERS-MEMOS-TARIFFS/20-170_2021-01-08_UES_REPLY_COMMENTS.PDF

² See May 2, 2021 Objection to Motion to Remove Unitil Energy Systems, Inc.'s Electric Vehicle Time of Use Rate Proposals https://www.puc.nh.gov/Regulatory/Docketbk/2021/21-030/MOTIONS-OBJECTIONS/21-030_2021-05-21_UES_OBJ_STAFF_MOTION_REMOVE.PDF

³ See https://www.puc.nh.gov/Regulatory/Docketbk/2021/21-030/ORDERS/21-030_2021-06-09_ORDER_26486.PDF

⁴ See NH DES and Chargepoint letters affirming support of Unitil Energy Systems, Inc.'s Objection to Staff Motion to Remove EV TOU Rate Proposals from DE 21-030, https://www.puc.nh.gov/Regulatory/Docketbk/2021/21-030/LETTERS-MEMOS-TARIFFS/21-030_2021-05-24_NHDES_AFFIRM_UNITIL_OBJECTION.PDF and https://www.puc.nh.gov/Regulatory/Docketbk/2021/21-030/LETTERS-MEMOS-TARIFFS/21-030_2021-05-24_CHARGEPOINT_AFFIRM_UNITIL_OBJECTION.PDF

diligently to engage a variety of stakeholders throughout the development of this effort and looks forward to further collaboration in both DE 20-170 and DE 21-030.

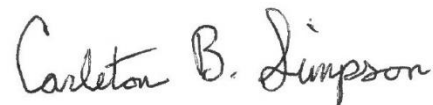
The Company has developed a suite of TOU rates designed to support the adoption of distributed energy resources and EVs. The suite of rates includes a whole-house domestic TOU, a domestic EV TOU, a small general service EV TOU, and a large general service EV TOU. In accordance with the Commission's findings in Order 26,394, these rates account for seasonality, incorporate load management techniques, are based on cost causation principles, and have time-vary billing components, three time periods, and a peak period of five hours in duration. Furthermore, the residential EV TOU rate has an average annual price differential between off-peak and peak of 3:1 and does not include a demand charge. All EV-specific rates are separately metered. The two general service EV TOU rates include a demand charge holiday offered at 75% for year 1, 50% for year 2, 25% for year 3, and ending thereafter.

The Company has also proposed, in its rate case, an EV Program to stimulate the adoption of EV infrastructure and the EV charging market in New Hampshire. The Company proposes to accomplish this goal through two initiatives: a residential behind-the-meter EV supply equipment (EVSE) installation and incentive program and a "make-ready" public EV infrastructure installation program. For the residential effort, the Company has proposed to offer rebates of up to \$600 for the procurement and installation of smart, managed Level 2 EV chargers for 500 residential customers who enroll on the EV TOU rate. The Company intends to partner with EV charging and telematics providers to analyze embedded metering functionality from EVSE. This program will advance the Commission's desire for further investigation of this capability as provided in Order 26,394 and detailed in the Company's Alternative Metering Assessment Outline circulated to the DE 20-170 service list on February 2, 2021.

The third element of the Company's rate case proposal includes an EV TOU MC&E Plan designed to meaningfully increase consumer awareness, interest in and adoption of EVs, EV charging infrastructure and EV TOU rates. This Plan will include an education campaign to increase awareness of and inform customers of the benefits of EVs, available vehicle models, incentives, options for charging, and the new EV/TOU rates. The Plan will also focus on creating experiential opportunities for customers and building partnerships with EV charging infrastructure providers.

Please do not hesitate to contact me if you have any additional questions concerning this matter.

Sincerely,

A handwritten signature in cursive script that reads "Carleton B. Simpson".

Carleton B. Simpson
Attorney for Unitil Service Corp.

UNITIL ENERGY SYSTEMS, INC.

DIRECT TESTIMONY

OF

CINDY L. CARROLL

CARLETON B. SIMPSON

CAROL VALIANTI

EXHIBIT CSV-1

New Hampshire Public Utilities Commission

Docket No. DE 21-030

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1 **I. INTRODUCTION AND SUMMARY**

2 **Q. Ms. Carroll, please state your name and business address.**

3 A. Cindy Carroll, 325 West Road, Portsmouth, New Hampshire.

4 **Q. For whom do you work and in what capacity?**

5 A. I am the Vice President of Customer Energy Solutions at Unitil Service Corp. (“Unitil
6 Service”), an affiliate of Unitil Energy Systems, Inc. (“UES” or the “Company”). Unitil
7 Service provides, at cost, a variety of administrative, managerial and professional
8 services on a centralized basis to Unitil Corporation’s (“Unitil”) affiliates, including
9 UES. In this testimony, we refer to Unitil Service and Unitil’s utility operating
10 companies collectively as the “Unitil Companies.” My primary responsibilities are the
11 development, implementation, and advancement of Unitil's distribution utilities’ business
12 expansion and economic development programs, energy efficiency programs, and critical
13 customer management.

14 **Q. Please describe your professional and educational background.**

15 A. I possess more than twenty years of experience in the utility industry working on matters
16 directly related to business expansion, account management and customer field services.
17 I joined Unitil Service in October 1997 and have held several positions of increasing
18 responsibility. I hold a Master’s Degree in Business Administration from Southern New
19 Hampshire University and a Bachelor of Arts degree in Communications from the
20 University of New Hampshire.

1 **Q. Have you previously testified before the New Hampshire Public Utilities**
2 **Commission ("Commission")?**

3 A. Yes, I have testified before the Commission on numerous occasions on behalf of UES
4 and Northern Utilities, Inc.

5 **Q. Mr. Simpson, please state your name and business address.**

6 A. Carleton Brown Simpson, 6 Liberty Lane West, Hampton, New Hampshire.

7 **Q. What is your position and what are your responsibilities?**

8 A. I am Regulatory Counsel for Unitil Service. In this position, I represent the Company in
9 regulatory and legal proceedings. My primary responsibilities include the development
10 of clean energy strategy related to electrification, transportation, energy storage, data
11 sharing, and decarbonization.

12 **Q. Please describe your educational background and professional experience in the**
13 **energy and utility industries.**

14 A. I have held a variety of engineering, compliance, external affairs, regulatory, and legal
15 positions while at Unitil Service. I started my career at Unitil Service in 2013 in the role
16 of Compliance Engineer. I was promoted to NERC Regulatory Compliance Specialist in
17 2016, Director of Government Affairs in 2017, and Regulatory Counsel in 2019.

18 I received a Bachelor of Science degree in Electrical Engineering, Summa Cum Laude,
19 from the University of New Hampshire ("UNH") in 2012 and a Master of Science degree
20 in Electrical and Computer Engineering from Worcester Polytechnic Institute with a
21 concentration in electric power systems in 2014. I also earned a Juris Doctor focused in

1 Energy and Environmental Law from Suffolk University Law School in 2019. I am a
2 member in good standing of the New Hampshire Bar and U.S. District of New
3 Hampshire Bar.

4 In 2012, I converted a gasoline-powered motorcycle to battery electric as a capstone
5 engineering project while at UNH and was awarded “Best Presentation” at the 2012
6 Undergraduate Research Conference. From August 2018 through October 2020, I served
7 on the New Hampshire General Court’s SB 517 Electric Vehicle Charging Stations
8 Infrastructure Commission on behalf of the Company.

9 **Q. Have you previously testified before the New Hampshire Public Utilities
10 Commission or other regulatory agencies?**

11 A. I have not previously filed testimony before the New Hampshire Public Utilities
12 Commission. I have provided written testimony before the Massachusetts Department of
13 Public Utilities in Docket 16-148, petition for approval of a request to purchase, own and
14 operate a 1.3 megawatt (“MW”) solar facility by the Company’s regulated Massachusetts
15 affiliate, Fitchburg Gas and Electric Light Company.

16 **Q. Ms. Valianti, please state your name and business address.**

17 A. Carol Valianti, 6 Liberty Lane West, Hampton, New Hampshire.

18 **Q. What is your position and what are your responsibilities?**

19 A. I am the Vice President, Communications and Public Affairs for Unitil Service. My
20 responsibilities include the development, execution and operations leadership for the
21 Company’s strategic communications including Customer Communications, Digital

1 Communications, Public Relations, Employee Communications and Engagement,
2 Community Development, and Emergency Response Communications.

3 **Q. Please describe your business and educational background.**

4 A. I earned a Bachelor of Arts degree in American Studies and Communications from
5 Fairfield University in 1989. Following graduation, I was employed by Major League
6 Baseball, working in various broadcasting and communications managerial roles.
7 Following Major League Baseball, I was employed by Malden Mills in marketing and
8 communications roles including as Vice President, Global Communications and then by
9 Segway as Vice President, Global Communications. I joined Unitil Service in September
10 of 2009 as the Vice President, Communications and Public Affairs.

11 **Q. Have you previously testified before the Commission or any other Regulatory**
12 **agencies?**

13 A. No, I have not previously filed testimony before the New Hampshire Public Utilities
14 Commission.

15 **Q. What is the purpose of your testimony?**

16 A. The purpose of our testimony is to provide the Commission with an overview of the
17 Company's request for approval of three programs: (1) a suite of time of use ("TOU")
18 rate offerings, (2) an electric vehicle infrastructure development program ("EV
19 Program"), and (3) a Marketing, Communications, and Education ("MC&E") Plan to
20 increase customer awareness of electric vehicles ("EVs") and engage with customers
21 about the TOU rates and EV Program offerings as described herein. These initiatives are

1 intended to enable adoption of distributed energy resources (“DERs”), transportation
2 electrification, and individualized energy management to reduce carbon emissions from
3 the electricity sector while providing savings for our customers. The technology,
4 environmental & climate policy, and market forces driving this evolution are discussed in
5 Part II.

6 Part III of this testimony discusses the suite of proposed TOU rates. The Company
7 recognizes that varying customer behaviors may necessitate a suite of EV charging rate
8 structures, including fixed rates and TOU options. Proper rate design will balance
9 demand and energy charges to ensure cost causation while enabling EV adoption.

10 Pricing structures must be simple and easily understood to promote managed or smart
11 charging to best utilize existing system capacity and mitigate environmental impacts.

12 The TOU rate offerings proposed includes a “whole-house” residential TOU rate and
13 separately-metered EV TOU rates for residential, small general service, and “high
14 demand draw” large general service customers. These rates serve as a foundation for the
15 EV Program, customer behavioral changes to mitigate peak demand, and other future
16 customer investments in DERs.

17 In Part IV of our testimony, we describe the Company’s proposed EV Program that is
18 structured to stimulate the EV market in New Hampshire. The EV Program contains two
19 initiatives: (1) a behind-the-meter partnership program to incentivize residential
20 customers to procure and install smart Level 2 electric vehicle supply equipment
21 (“EVSE”) for charging at their homes, and (2) a public “make-ready” EV infrastructure
22 program to expand the availability of charging stations in New Hampshire.

1 Finally, Part V of our testimony discusses the MC&E Plan that is designed to
2 meaningfully increase consumer awareness, interest in, and adoption of EVs, EV
3 charging infrastructure and EV TOU rates. The MC&E Plan consists of two parts: (1) a
4 Consumer EV Education Campaign; and (2) a Consumer EV Marketing and Promotion
5 Program. The Consumer EV Education Campaign will increase awareness of and inform
6 the Company's customers about the benefits of EVs, options for home and public
7 charging, and the proposed EV TOU rates. The Consumer EV Marketing and Promotion
8 Program will focus on creating experiential learning opportunities for customers,
9 partnerships with EV dealerships, and partnerships and incentives/rebates with behind-
10 the-meter EVSE vendors.

11 **II. TECHNOLOGY, ENVIRONMENTAL & CLIMATE POLICY, AND MARKET**
12 **EVOLUTION**

13 **Q. Have advancements in energy technology affected the environment in which electric**
14 **distribution companies such as UES operate?**

15 **A.** Yes. Technology innovation has both accelerated and reinforced this transformation as
16 customers now have access to services, markets, and home energy tools previously
17 unimagined. Advancements in technology are driving down the cost of clean energy,
18 making it more affordable for consumers. Energy markets continue to emerge as
19 innovators develop new ways to control and manage energy usage and market new
20 services directly to end-use customers.

1 As society adopts new technologies, and as DERs are increasingly connected to the
2 distribution system, the fundamental architecture of the electricity delivery system (the
3 “grid”) must change. The 20th Century electric grid, originally designed to distribute
4 power from large centralized generating plants, must now integrate a wide array of
5 distributed load, storage and generation resources. A grid that was designed for “one-
6 way” power flow must now accommodate two-way power flow, increasing the need for
7 sophisticated protection, communication, metering, and intelligence. The grid must also
8 provide opportunities for customers to understand and actively participate in energy
9 markets to enhance efficient utilization and consumption of electricity, while delivering
10 improved reliability and power quality.

11 Utility operations are transitioning away from the traditional model of energy delivery, to
12 one that integrates and optimizes the needs and interests of consumers, producers,
13 markets, service providers and other participants. New markets and new technologies are
14 rapidly emerging in response to public policies, climate action, and the changing
15 preferences of customers. We are seeing a significant transformation in how customers
16 are powering their homes and businesses, including the ability to generate and store their
17 own electricity. More recently, the promise of significant choice in EV options has
18 moved the market from niche to mainstream. Implementing enabling technologies and
19 programs to facilitate this transition will meet public demands while making the electric
20 system more efficient, economic, and environmentally friendly.

21 For over a decade, the Company has visualized the utility of the future as an enabling
22 platform with the capabilities to unlock the full potential of today’s customers, markets

1 and technologies. Our vision is to transform the way people meet their evolving energy
2 needs to create a clean and sustainable future. Distributed energy resources, including
3 EVs, are essential elements in this transition. The proposed program offerings described
4 herein represent a step towards the Company’s utility of the future.

5 **Q. What are the environmental drivers behind these new program offerings?**

6 A. The global imperative of combating climate change and reducing carbon emissions has
7 driven a fundamental transformation of the energy sector. In its *2020 Corporate*
8 *Sustainability & Responsibility Report*, Unitil outlined its goal to be the most
9 technologically advanced utility in the region in order to realize the promise of a fully
10 modernized grid and clean energy future.¹ The Company’s vision of the modern grid as
11 an “enabling platform” will empower customers to adopt new technologies through a
12 transition of distribution operations to distributed energy resources, enhancing the
13 customer experience, and supporting diverse actions by customers and third-party
14 providers.

15 Electrification of the transportation sector represents an opportunity to dramatically
16 reduce greenhouse gas (“GHG”) emissions with electric utilities representing a critical
17 enabling stakeholder. According to the U.S. Energy Information Administration (“EIA”),
18 New Hampshire’s largest source of carbon dioxide (“CO₂”) emissions is the

¹ “2020 Corporate Sustainability & Responsibility Report.” *Unitil Corporation*, <https://unitil.com/2020-Sustainability-Report/>.

1 transportation sector, representing approximately half of all CO₂ emitted.²

2 Transportation is also the largest source of greenhouse gas emissions nationally
3 according to the Environmental Protection Agency (“EPA”), with more than 90 percent
4 of the fuels used coming from petroleum sources.³ Addressing emissions and reducing
5 energy intensity in the transportation sector is vital to meeting New Hampshire’s
6 environmental goals and objectives.⁴ As EVs produce zero direct emissions and typically
7 produce fewer life cycle emissions relative to conventional vehicles, transportation
8 electrification represents a key opportunity to solve society’s current climate and
9 environmental challenges.⁵

10 **Q. Please describe recent directives from the White House regarding advancing clean**
11 **transportation.**

12 A. On January 20, 2021, President Biden issued an Executive Order on Protecting Health
13 and the Environment and Restoring Science to Tackle the Climate Crisis.⁶ Sec. 2(iii) of
14 the Order directs the National Highway Traffic Safety Administration (“NHTSA”) and
15 EPA to review and possibly reconsider rules related to fuel economy standards for
16 passenger vehicles and trucks. On January 27, 2021, President Biden issued an Executive

² “State Carbon Dioxide Emissions Data.” *U.S. Energy Information Administration*, March 2, 2021, <https://www.eia.gov/environment/emissions/state/>.

³ “Sources of Greenhouse Gas Emissions.” *U.S. Environmental Protection Agency*, <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>.

⁴ “New Hampshire 10-Year State Energy Strategy.” *New Hampshire Office of Strategic Initiatives*, April 2018, <https://www.nh.gov/osi/energy/programs/documents/2018-10-year-state-energy-strategy.pdf>.

⁵ “Reducing Pollution with Electric Vehicles.” *U.S. Department of Energy*, <https://www.energy.gov/eere/electricvehicles/reducing-pollution-electric-vehicles>.

⁶ “Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis.” *The White House*, January 20, 2021, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-protecting-public-health-and-environment-and-restoring-science-to-tackle-climate-crisis/>.

1 Order on Tackling the Climate Crisis at Home and Abroad.⁷ Part II Sec. 205(ii) outlines
2 the Federal Clean Electricity and Vehicle Procurement Strategy to develop a plan to
3 facilitate the procurement of “clean and zero-emission vehicles for Federal, State, local,
4 and Tribal government fleets, including vehicles of the United States Postal Service.”⁸
5 Furthermore, on March 2, 2021, the White House hosted a meeting led by National
6 Climate Advisor Gina McCarthy with CEOs from EV charging infrastructure companies
7 to support the Biden Administration’s goal to build more than 500,000 EV chargers.⁹

8 **Q. Please describe the current state of EV adoption in New Hampshire and the**
9 **Company’s projections for the future.**

10 A. The Company has analyzed actual EV registration data from the State of New Hampshire
11 and developed EV adoption projections through 2031 based on compiled data from the
12 Edison Electric Institute (“EEI”) and Institute for Electric Innovation (“IEI”). From the
13 State registration data, UES believes that approximately 5,070 EVs are registered in New
14 Hampshire as of January 2021. Exhibit CSV-2. We estimate that 580 EVs are registered
15 in municipalities where the Company provides electric service. Exhibit CSV-3. EEI and
16 IEI developed a consensus forecast of EV sales projections from 2018 to 2030 based on
17 five independent forecasts: Bloomberg New Energy Finance, Boston Consulting Group,

⁷ “Executive Order on Tackling the Climate Crisis at Home and Abroad.” The White House, January 27, 2021, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>.

⁸ Id.

⁹ “Readout of the White House’s Meeting with Electric Vehicle Charging Infrastructure Leaders.” *The White House*, March 2, 2021, <https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/02/readout-of-the-white-houses-meeting-with-electric-vehicle-charging-infrastructure-leaders/>.

1 Energy Innovation, U.S. Energy Information Administration, and Wood Mackenzie.¹⁰
2 Applying this adoption model to the Company’s New Hampshire service territories yields
3 approximately 3,753 EVs registered by 2028 and 6,767 electric vehicles registered by
4 2031. Exhibit CSV-3. The Company’s TOU rate offerings, EV Program, and MC&E
5 Plan are intended to support these vehicles and customers in the transition to electric
6 transportation.

7 **Q. Please describe recent developments from original equipment manufacturers**
8 **(“OEMs”) in the vehicle market.**

9 A. Automobile OEMs have made significant commitments to develop the EV market as of
10 late. A recent industry survey conducted by CarGurus found that more than half of
11 Americans believe that they will probably or definitely own an EV within the next ten
12 years.¹¹ Jaguar, Volvo, and General Motors have committed to fully electrifying their
13 model ranges by 2025, 2030, and 2035, respectively.¹² Honda, BMW, Ford, Hyundai,
14 Kia, Mercedes-Benz, Nissan, Stellantis (formerly Fiat Chrysler Automobiles), Toyota,
15 and Volkswagen have announced that they will be releasing electrified vehicle options
16 within the next few years.¹³

17 **Q. Please explain the power levels and connector types for EV charging.**

¹⁰ “Electric Vehicle Sales Forecast and the Charging Infrastructure Required Through 2030.” *Edison Electric Institute*, November 2018, https://www.edisonfoundation.net/-/media/Files/IEI/publications/IEI_EEI-EV-Forecast-Report_Nov2018.ashx.

¹¹ “Are electric vehicles poised to kill the gasoline engine car? Welcome to the ‘golden age’ of EVs.” *USA Today*, March 11, 2021, <https://www.usatoday.com/story/money/cars/2021/03/11/electric-vehicles-tesla-gm-lucid-rivian-volvo-gas-cars/4581584001/>.

¹² “Here Are Automakers’ Plans for Adding More Electric Vehicles to Their Lineups.” *Consumer Reports*, March 11, 2021, <https://www.consumerreports.org/hybrids-evs/why-electric-cars-may-soon-flood-the-us-market/>.

¹³ *Id.*

1 A. EV charging segments include Level 1, Level 2, and Direct Current Fast Chargers
2 (“DCFCs”).¹⁴ Level 1 charging occurs at 120 volts (“V”) alternating current (“AC”)
3 using a standard electrical outlet and may require more than 24 hours to fully charge an
4 EV, depending on charging rate and battery capacity. Level 2 chargers utilize a 240V
5 AC connection and can fully charge most EVs in approximately 12 hours or less,
6 depending on charging rate and battery capacity. DCFCs use direct current (“DC”) with
7 power outputs currently ranging from 50 kilowatts (kW) up to 350 kW, with higher
8 outputs expected in the future, and can typically fully charge an EV in approximately an
9 hour.

10 EV charging connectors can vary by vehicle type and manufacturer. Tesla vehicles
11 utilize a proprietary connector for native charging at all levels, but also can be charged
12 using the standardized connectors discussed below through the use of adaptor plugs.¹⁵
13 SAE J1772 is the industry standard for all EVs charging at Level 1 or 2. For DCFC,
14 CHAdeMO and SAE Combined Charging System (CCS) offer charging depending on the
15 vehicle OEM. CHAdeMO currently supports charging up to 62.5 kW with a future
16 versions supporting up to 900 kW for heavy-duty vehicles.¹⁶ SAE CCS currently
17 supports charging up to 350 kW.

18 III. TIME OF USE (TOU) RATE PROPOSALS

¹⁴ “Electric vehicle (EV) charging standards and how they differ.” *Elektrek*, March 5, 2021,
<https://electrek.co/2021/03/05/electric-vehicle-ev-charging-standards-and-how-they-differ/>.

¹⁵ “CCS1 to Tesla Adapter Finally Available for North American Market.” *InsideEVs*, December 31, 2020,
<https://insideevs.com/news/463721/tesla-ccs-fast-charge-adapter-setec/>.

¹⁶ “New CHAdeMO 3.0 aims to harmonize global EV quick-charging standards.” *SAE International*, May 28, 2020,
<https://www.sae.org/news/2020/05/chademo-3.0-to-harmonize-global-ev-quick-charging-standards>.

1 **Q. Please describe the Company’s approach to offering TOU rates.**

2 A. While current fixed electricity rate structures have proven sufficient to enable early
3 adoption of new technologies, including EVs and DERs, the Company believes that a
4 suite of TOU rates will encourage energy conservation, optimal and efficient use of grid
5 facilities, and mitigate increases in peak demand. The Company offering includes a
6 residential whole-house TOU rate, residential EV TOU rate, and EV TOU rates for small
7 and large general service applications. Given the dynamic nature of the transportation
8 market and the wide variety of customer travel needs, it is unlikely that any one option
9 will be suitable for all customers. Innovative rate designs will afford customers the
10 opportunity to adopt new technologies, manage energy consumption and enhance
11 efficient utilization and consumption of electricity to save money.

12 In October of 2019, the National Association of Regulatory Utility Commissioners
13 (“NARUC”) released *Electric Vehicles: Key Trends, Issues, and Considerations for State*
14 *Regulators*.¹⁷ The two main principles of EV-specific rate design were identified as
15 follows: (1) rate design should encourage efficient usage of existing assets rather than
16 undergoing expensive distribution system upgrades to serve EVs, and (2) bill increases
17 due to EV infrastructure upgrades should be kept to a minimum for customers who do not
18 own EVs.¹⁸ Perhaps most importantly, the NARUC report provides that EV adoption

¹⁷ “Electric Vehicles: Key Trends, Issues, and Considerations for State Regulators.” *National Association of Regulatory Utility Commissioners*, October 2019, <https://pubs.naruc.org/pub/32857459-0005-B8C5-95C6-1920829CABFE>.

¹⁸ Id. at 25.

1 could lead to lower rates for all electric customers.¹⁹ Fixed system costs, particularly
2 when viewed in the context of TOU rates, may be spread across added volumes from
3 electrification, potentially reducing electric rates for all customers.

4 The overarching objective of rate design is the pricing for grid services that adhere to the
5 principles of fairness, transparency and economic efficiency. Transparent and
6 economically efficient pricing structures will ensure a viable and sustainable long-term
7 model that provides sufficient revenue to support the modernization of the electric
8 system. Innovative rate design encourages appropriate behaviors and assures fairness and
9 equity among customers.

10 The Company recognizes the evolving needs of the public that have occurred over the
11 last several years and that are expected to continue in the future as customers transition
12 from passive recipients to active participants in the energy market. The transition from
13 offering traditional rate designs to tailored and more personalized options, especially for
14 EV owners, is an important step to fulfill customers' evolving requirements from their
15 utility. Customer education is an important aspect to innovative rate design. A strong
16 customer communication, education and outreach plan is required to support new rate
17 offerings. Customers will be more likely to adopt new rate structures if they are aware of
18 and understand the new rates. Offering tools that help customers compare rate offerings
19 is critical for beneficially influencing individual usage patterns and resulting bill impacts.

20 **Q. Please describe the Company's proposed TOU rates.**

¹⁹ Id. at 21.

1 A. The Company proposes to offer a suite of TOU rates to enable customer adoption of new
2 technologies, reduce peak demand, support energy efficiency and optimization, reduce
3 emissions, and stimulate opportunities for retail market activity through the distribution
4 system. The rates proposed include: (1) domestic “whole-house” TOU (TOU-D); (2)
5 domestic EV TOU (TOU-EV-D); (3) small general service EV TOU (TOU-EV-G-2); and
6 (4) large general service EV TOU (TOU-EV-G1). The development of these rates was
7 informed by the Commission’s findings in Order 26,394 that resulted from IR 20-004,
8 *Investigation of Electric Vehicle Rate Design Standards, Electric Vehicle Time of Day*
9 *Rates for Residential and Commercial Customers*, and the ongoing EV TOU proceeding
10 DE 20-170, *Electric Vehicle Time of Use Rates*. Please see the Direct Testimony of
11 Company witness John Taylor, Exhibit JDT-1, supporting the calculation of these rates.

12 **i. Domestic “Whole-House” TOU (TOU-D)**

13 The whole-house, domestic TOU rate is offered to allow residential customers to benefit
14 from time-based energy optimization without the costs of a separate service. This rate is
15 an important option for both EV and non-EV customers who want to change their
16 behaviors and usage to reduce costs and peak demand. Customers will have the
17 opportunity to realize savings for all uses, including EV charging.

18 Principles supported within the design of the whole-house TOU rate include:

- 19 • Seasonality is reflected in the rate;
- 20 • The rate incorporates load management techniques;
- 21 • The rate is based directly on cost causation principles;

- 1 • Energy supply and transmission billing components are time-varied;
- 2 • Three time periods are included (off peak, mid-peak and peak);
- 3 • The rate is seasonally differentiated (“summer” and “winter” rates that change
- 4 coincident with default service adjustments);
- 5 • The peak period is five hours in duration; and
- 6 • The rate does not include a demand charge.

7 These principles are consistent with the guidelines set forth in Order 26,394. Please see
8 Exhibit CSV-4 for an illustrative tariff for the TOU-D rate.

9 **ii. Domestic EV TOU (TOU-EV-D)**

10 EEI predicts that approximately 80% of EV charging happens and will continue to occur
11 at the home; therefore, it is important for customers to have options for residential
12 charging, including TOU rates.²⁰ The separately-metered residential EV TOU rate has
13 been tailored to the unique charging needs and characteristics of EVs at customers’
14 homes. As EVs are adopted in greater numbers, a dedicated residential rate class for EV
15 charging only will represent a key customer option. The proposed rate offers
16 incentivized off peak charging with significantly more expensive mid-peak and peak
17 rates. An additional, dedicated meter ensures that EV charging has a discrete rate class,
18 is controllable through demand response programs, and is individually measured and
19 managed apart from other loads.

²⁰ “Electric Vehicle Sales Forecast and the Charging Infrastructure Required Through 2030.” *Edison Electric Institute*, November 2018, https://www.edisonfoundation.net/iei/publications/Documents/IEI_EEI%20EV%20Forecast%20Report_Nov2018.pdf.

1 In accordance with the Commission’s findings in Order 26,394 for residential EV TOU:

- 2 • Seasonality is reflected in the rate;
- 3 • The rate incorporates load management techniques;
- 4 • The rate is based directly on cost causation principles;
- 5 • All three billing components (supply, transmission, and distribution) are time-
6 varied;
- 7 • Three time periods are included (off peak, mid-peak and peak);
- 8 • The rate is seasonally differentiated (“summer” and “winter” rates that change
9 coincident with default service adjustments);
- 10 • The average annual price differential between off peak and peak is 3:1;
- 11 • The peak period is five hours in duration;
- 12 • The rate does not include a demand charge; and
- 13 • All customers on this rate will be separately-metered.

14 The Company believes that introducing a demand charge for residential customers is
15 unnecessary at this time due to current levels of EV penetration. Residential customers
16 are unlikely to be charging more than one EV using Level 2 charging. Therefore,
17 significant demand increases by individual customers is not expected to result in the near
18 term if charging occurs off peak. Furthermore, demand charges may present complexity
19 resulting in customer confusion, requiring additional outreach and education to ensure
20 desired charging behaviors. The Company also intends to leverage the residential EV
21 TOU rate as a pathway to performing the alternative metering feasibility assessment as
22 ordered by the Commission in Order 26,394. Further details are provided below in the

1 EV Program discussion within Part IV of our testimony. Please see Exhibit CSV-5 for an
2 illustrative tariff for the TOU-EV-D rate.

3 **iii. Small General Service EV TOU (TOU-EV-G2)**

4 EV TOU rates for small general service customers are essential offerings to stimulate the
5 EV market. Businesses, municipalities, and other small general service customers will
6 continue to adopt and support EVs at an accelerating rate as EV availability continues to
7 increase and become more affordable. Such customers may choose to utilize these rates
8 to charge fleet vehicles, offer EV charging to patrons and customers, develop publicly
9 available merchant EV charging, or other use cases. Off peak charging is necessary to
10 mitigate peak demand and reduce charging costs for these customers as well. An
11 additional, dedicated meter ensures that the small general service EV TOU G2 rate exists
12 within a dedicated rate class, is manageable through demand response programs, and is
13 discrete from other loads.

14 The separately-metered small general service EV TOU (TOU-EV-G2) rate is tailored to
15 serve up to 200 kVA of load, or approximately up to ten Level 2 chargers charging at
16 19.2 kW peak. This customer demand designation aligns with the Company's current
17 fixed (i.e. non time-varying) small general service (G2) customer class. In accordance
18 with the Commission's findings in Order 26,394 for small commercial customer
19 applications:

- 20 • Seasonality is reflected in the rate;
- 21 • The rate incorporates load management techniques;

- 1 • The rate is based directly on cost causation principles;
- 2 • Default energy supply and transmission billing components are time-varied;
- 3 • Three time periods are included (off peak, mid-peak and peak);
- 4 • The rate is seasonally differentiated (“summer” and “winter” rates that change
5 coincident with default service adjustments);
- 6 • The peak period is five hours in duration;
- 7 • All customers on this rate will be separately-metered; and
- 8 • A temporary demand charge holiday is offered for these customers at 75% for
9 year 1, 50% for year 2, 25% for year 3, and ending thereafter.

10 Unlike the residential EV TOU rate, the small general service EV TOU rate does include
11 a demand charge component. The Company’s current small general service (G2)
12 customers have demand charges; therefore, an understanding of this billing component
13 already exists amongst the applicable customer group. While a demand charge is present,
14 the Company is proposing to offer customers that select the small general service EV
15 TOU rate a temporary demand charge holiday. For years 1, 2, and 3, customers will be
16 billed demand charges reduced by 75%, 50%, and 25%, respectively. After year 3, the
17 full demand charge component will be billed. This program is intended to support the
18 nascent state of the EV charging market, recognizing that during early years of operation,
19 the demand charge component may present challenges for economic operation of EV
20 charging sites. The demand charge holiday is further intended to support and incentivize
21 broader customer adoption of EVs through the incentivized charging rate. Please see
22 Exhibit CSV-6 for an illustrative tariff for the TOU-EV-G2 rate.

1 **iv. Large General Service EV TOU (TOU-EV-G1)**

2 The “high demand draw” large general service EV TOU rate provides passenger car fleet
3 customers, heavy duty vehicles, or large public charging sites, including clustered Level
4 2 or DCFC, an optimized rate design. Off peak charging is necessary to mitigate peak
5 demand and reduce charging costs for these customers as well. An additional, dedicated
6 meter ensures that the large general service EV TOU G1 rate exists within a dedicated
7 rate class, is manageable through demand response programs, and is discrete from other
8 loads. The “high demand draw” rate is tailored to serve customers with more than 200
9 kVA of load, enabling sites with clustered Level 2 and DCFC chargers which currently
10 range from 50 kW to 350 kW per charger.

11 In accordance with the Commission’s findings in Order 26,394:

- 12 • Seasonality is reflected in the rate;
- 13 • The rate incorporates load management techniques;
- 14 • The rate is based directly on cost causation principles;
- 15 • The transmission billing component is time-varied;
- 16 • Three time periods are included (off peak, mid-peak and peak);
- 17 • The rate is seasonally differentiated (“summer” and “winter” rates that change
18 coincident with default service adjustments);
- 19 • The peak period is five hours in duration;
- 20 • All customers on this rate will be separately-metered; and
- 21 • A temporary demand charge holiday is offered for these customers at 75% for
22 year 1, 50% for year 2, 25% for year 3, and ending thereafter.

1 Similar to the small general service EV TOU G2 rate, the large general service EV TOU
2 G1 rate includes a demand charge component. The Company's current large general
3 service (G1) customers have demand charges, therefore an understanding of this billing
4 component already exists amongst the applicable customer group. While a demand
5 charge is present, the Company is proposing to offer customers that select the large
6 general service EV TOU G1 rate a temporary demand charge holiday. For years 1, 2, and
7 3, customers will be billed demand charges reduced by 75%, 50%, and 25%, respectively.
8 After year 3, the full demand charge component will be billed. This program is intended
9 to support the nascent state of the EV charging market, recognizing that during early
10 years of operation, the demand charge component may present challenges for economic
11 operation of EV charging sites. The demand charge holiday is further intended to support
12 and incentivize broader customer adoption of EVs through the incentivized charging rate.
13 Please see Exhibit CSV-7 for an illustrative tariff for the TOU-EV-G1 rate.

14 **v. TOU Ratemaking, Technological, and Customer Considerations**

15 **Q. What rate design principles have influenced the TOU rates proposed?**

16 A. Innovative rate design is driven by timely and accurate data. Data has been leveraged
17 from the Company's Advanced Metering Infrastructure ("AMI"), Meter Data
18 Management System ("MDMS") and Customer Information System ("CIS") for the
19 proposed, innovative rate designs. The Company believes that rates should be based on
20 cost of service rate design principles to ensure economic efficiency and limit cost
21 shifting. Marginal energy costs are typically driven by wholesale electric market (ISO
22 New England in this case) factors and may not fluctuate for different customer segments.

1 EV adoption forecasts have been developed and indicate that such incremental loads may
2 require new transformers, service lines and meter upgrades over time. Instances may also
3 arise where the addition of loads would require an upstream feeder and/or substation
4 upgrade.

5 The Company's TOU rate designs also take into account the effect technology adoption
6 will have on the electric distribution system and subsequent system planning and
7 investment. Technology adoption rates will be forecast over the coming years and those
8 loads will be integrated into planning studies and load forecasts. Possible changes to
9 engineering and construction standards may be warranted to ensure reliability, safety, and
10 appropriate equipment sizing to account for an increase in electric load. The design of
11 electric services may need to change as well, such as shorter distances and increased
12 conductor size to address voltage drop concerns. Ongoing capital budgeting may need to
13 accommodate early replacement of current infrastructure that is undersized and unable to
14 accommodate new customer loads. Additionally, the Company has concluded that the
15 installation of interval metering for all future TOU customers is prudent given the
16 increasingly dynamic loads and generation that have the potential to export energy onto
17 the distribution system and necessitate more granular planning analyses.

18 The Company believes that the rate design options for any type of electric load should
19 reflect cost causation principles and be designed to promote the efficient use of the
20 electric system resources and enable customers to reduce costs. Rate options must
21 provide proper price signals and influence customer behavior in a manner that creates
22 beneficial outcomes for the customer (through higher system utilization) and for the

1 utility (through a reduction in system costs over time). To achieve these objectives, the
2 design of the rate options should reflect system costs that are time-varying in nature, and
3 provide customers a cost-based price signal through the rate design. The time-varying
4 costs embedded within the rates offered here are intended to optimize system capacity
5 and flatten the load curve.

6 Throughout the TOU rate design process, UES has worked to understand and evaluate
7 how customers will respond to TOU rate options, anticipating future refinements to the
8 TOU rate design given that load shape and resulting costs will likely change over time.
9 The TOU rate designs aim to balance the desire of creating a significant peak-to-off-peak
10 rate differential to increase the likelihood of a positive customer response while
11 accurately reflecting, to the greatest extent possible, the underlying costs of the utility.

12 Incorporating considerations into the design of TOU rates that may be non-cost causative
13 in the near-term will provide an opportunity to gauge the resulting longer-term impact of
14 electrification on the electric distribution system. Affording rate benefits to customers
15 who can change their electric usage patterns even though the utility does not experience a
16 corresponding reduction in cost will help achieve non-cost causative objectives, such as
17 supporting technology adoption, gaining an understanding of consumer behavior, and
18 gaining insights into grid operations and future investment requirements by the utility.

19 **Q. Why does the Company propose to time-vary all three billing components (energy,**
20 **distribution, and transmission) within the proposed domestic EV TOU rate?**

1 A. As a general proposition, rate design should strive to accurately reflect cost causation and
2 avoid cost shifting. The overarching goal is to promote the transition of more customers
3 to beneficial technologies, such as EVs. Rates with more sizable cost differentials
4 between the peak and off peak rates will help to achieve this paradigm while mitigating
5 peak load impacts. The Company believes including all three billing components
6 (energy, transmission, and distribution) provides enough cost inclusion to incorporate a
7 beneficial TOU rate differential while still reflecting a reasonable allocation of actual
8 costs. Additionally, the Commission has expressed a preference for three-part TOU rate
9 designs in Order 26,394 and approved a separately-metered EV TOU rate offered by
10 Liberty Utilities in DE 19-064 (based upon the TOU rate approved for Liberty Utilities'
11 Battery Storage Pilot Program in 17-189), which provides time-varying rates for supply,
12 transmission, and distribution.

13 **Q. Can customers on competitive supply select the EV TOU rates?**

14 A. Yes. At this time, however, customers on competitive electric supply may only see or
15 participate in time-varying distribution and transmission charges, as applicable. If
16 competitive electric suppliers offer future products with time-varying supply service on
17 the same intervals as the proposed TOU rates, the Company will work with those
18 suppliers and customers to determine cost, process, and system alterations required to
19 provide a similar service.

20 **Q. Please describe the Company's approach to demand charges within the proposed**
21 **EV TOU rates.**

1 A. Demand charges are designed to capture the infrastructure costs to meet a customer's
2 peak capacity requirement. Currently, only UES's small general and large general
3 service customer classes have a demand charge component. EV charging stations,
4 particularly DCFC, are susceptible to high demand charges as these sites draw significant
5 amounts of energy (50 kW up to 350 kW per charging station). Some DCFC sites have
6 low load factors and utilization, so a demand rate may create a barrier to entry for some
7 competitive market charging infrastructure companies. UES believes that EV rates
8 should be designed for off peak usage and to encourage managed charging capabilities
9 (controllable power output depending on time and rate). However, for customers that
10 cannot manage demand during peak system periods, the demand charge must reflect the
11 service being provided. In order to stimulate the EV market in NH and meet the
12 Commission's directive in Order 26,394 regarding demand charge alternatives, the
13 Company has proposed demand charge holidays for the small and large general service
14 EV TOU rates as discussed in Parts III(iii) and (iv) above.

15 **Q. Please describe the Company's consideration of load management and demand**
16 **response in designing the TOU rates.**

17 A. Load management techniques represent an important consideration for EV rate design.
18 First and foremost, the TOU rates as proposed encourage customers to charge EVs during
19 times of reduced system demand via price signals. As EV adoption continues to grow,
20 charging (particularly DCFC) has the potential to quickly magnify electricity demand
21 peaks. However, as EV load is flexible, one goal of EV rate design should be to promote
22 charging at times of low demand. Through rate design structures that maximize capacity

1 availability and minimize system upgrades and costs, the benefits of added energy
2 volumes from EV load can flow to all customers. Such techniques are often referred to
3 as “managed charging” or “smart charging”. Additional opportunities for customers to
4 manage load may arise through demand response offerings as part of the NHSaves
5 energy efficiency programs which the Company believes will be complementary to TOU
6 rates.

7 **Q. Would non-EV customers be precluded from enrolling in the EV TOU rates?**

8 A. Yes. These rates have been designed and optimized for EV charging with policy
9 principles embedded to promote the adoption of EVs. The Company’s strategy has been
10 to develop a suite of rates designed with specific uses in mind, such as EV customers in
11 this case.

12 **Q. Please describe how the Company plans to meter customers who elect to switch to**
13 **TOU rates.**

14 A. The Company will separately meter all EV TOU installations in accordance with the
15 Commission’s findings in Order 26,394. Depending on the customer’s service
16 configuration and requirements, the Company will install an interval-based AMI meter to
17 provide TOU billing data and interval data for customer edification.

18 UES initially installed AMI in 2006; today, all electric customers currently have AMI
19 meters. This early vintage AMI uses powerline carrier technology to receive daily reads
20 for each meter. Landis & Gyr provides UES’s AMI within their Gridstream TS2 system
21 which is capable of interval data recording using 4 separate meter registers and 2-way

1 communication. UES is in the process of upgrading the existing “TS2” system and
2 deploying new Gridstream “PLX” data collectors and associated systems. The Landis &
3 Gyr PLX system is designed to be a replacement for the TS2 technology and, as such, is
4 backwards compatible, meaning the PLX collectors and transmitters can communicate
5 with existing TS2 AMI meters. The system can record 15 minute metered intervals and
6 is capable of reading PLX meters three times per day. Meters deployed to new TOU
7 customers and under the normal meter replacement cycle will utilize PLX-compatible
8 meters which will allow interval data for customer and Company use. The Company’s
9 MDMS and CIS already support these enhanced AMI capabilities.

10 **Q. Has the Company provided illustrative tariffs for each of the TOU rates proposed?**

11 A. Yes. Please see the exhibits below for each of the respective illustrative TOU tariffs.

12 The Company has characterized these tariffs as illustrative as the rates must be calculated
13 based on the external delivery charge (“EDC”) and default service rates in effect at the
14 time permanent rates are approved.

- 15 • Domestic Delivery Service Schedule TOU-D: Exhibit CSV-4
- 16 • Schedule TOU-EV-D: Exhibit CSV-5
- 17 • Schedule TOU-EV-G2: Exhibit CSV-6
- 18 • Schedule TOU-EV-G1: Exhibit CSV-7

19 **Q. Has the Company outlined service requirements and the installation process for**
20 **future EV TOU customers?**

21 A. Yes. Please see Exhibit CSV-8 for a description of the service requirements for EV TOU
22 customers.

1 **IV. EV PROGRAM INFRASTRUCTURE PROPOSAL**

2 **Q. Please describe the Company’s EV Program proposal.**

3 A. The Company is proposing an EV Program to stimulate the adoption of EV infrastructure
4 and the EV charging market. The EV Program is focused on increasing the availability
5 of charging stations, lowering the investment barrier faced by customers regarding
6 infrastructure needed for ownership of charging stations, and preparing for integration of
7 EVs with the electric distribution system. Robust charging infrastructure is required to
8 allow travel, alleviate range anxiety, and fundamentally change customer behavior to
9 facilitate an economic and environmentally sound transition to EVs.

10 The Company is proposing to facilitate the development of EV charging stations and
11 infrastructure in New Hampshire through two initiatives encompassing the EV Program:
12 (1) a residential behind-the-meter EVSE installation and incentive program, and (2) a
13 “make-ready” public EV infrastructure installation program to expand public EV
14 charging stations in New Hampshire.

15 **i. Residential Behind-the-Meter EVSE Installation and Incentive Program**

16 **Q. Please describe the proposed residential behind-the-meter EVSE installation and**
17 **incentive program.**

18 A. The Company proposes to offer rebates of up to \$600 for the procurement and installation
19 of smart, managed Level 2 EV chargers to 500 residential EV TOU customers. This
20 proposed program represents a culmination of efforts from IR 20-004 and the
21 Commission’s Order 26,394, as well as ongoing efforts in DE 20-170. The Company

1 will further utilize the residential EV program as a means of assessing alternative
2 metering capability from behind the meter EVSE as required in Order 26,394.

3 Residential customers represent an important class given the disproportionate ratio of
4 charging at home versus other locations and the need to optimize EV loads to mitigate
5 peak demand and new infrastructure costs. Level 2, residential home EV charging is
6 estimated to represent approximately 80% of the EV charging market.²¹ Industry
7 analysts believe that electric system upgrades will be needed to handle the increased load
8 from EVs and impacts will depend on charging locations on the distribution system along
9 with the time of day when vehicles are charged.²² Managing these impacts through smart
10 charging can improve asset utilization and may mitigate needed system investments.

11 Managed charging can be accomplished in two ways: active management and passive
12 management. Active managed charging is the practice of sending control signals to a
13 vehicle or the charging equipment to adjust the time of charge, the rate of charge or
14 otherwise direct charging behavior. Passive managed charging is the effort to influence
15 charging times by modifying customer behavior through TOU rates. The Company is
16 proposing to facilitate behind-the-meter partnerships via the incentive to encourage
17 customers to install charging equipment that can be actively managed while providing an
18 opportunity for the Company to assess EVSE alternative metering capabilities.

²¹ “Charging at Home.” *U.S. Department of Energy, Office of Energy Efficiency & Renewable Energy*, <https://www.energy.gov/eere/electricvehicles/charging-home>.

²² “Transportation & Mobility Research: Electric Vehicle Grid Integration.” *National Renewable Energy Laboratory*, <https://www.nrel.gov/transportation/project-ev-grid-integration.html>.

1 Several market participants have advocated for the utilization of EVSE for metering
2 purposes.²³ Commission Staff and the Commission have expressed a desire to further
3 investigate this capability as a means of expanding EVSE deployment in the state while
4 reducing barriers to customer installation of such technologies. In Order 26,394 at 13,
5 the Commission stated that “further investigation of issues related to advanced metering
6 functionality associated with EVSE embedded meters is warranted.”

7 **Q. How will the Company select eligible equipment that qualifies for the incentive?**

8 A. UES will issue a public request for information (“RFI”) to EVSE vendors and software
9 providers to gather information on EVSE metering capability and participation in an
10 evaluation pilot. The Company will seek responses from such EVSE providers, including
11 software-based telematics equipment embedded within EVs, to gain an understanding of
12 EVSE charging session data accuracy, availability, format, interface capabilities, data
13 sharing, load metering, sub-metering, metering data disaggregation, remote control,
14 volt/VAR capability, customer controls, testing, privacy, and cyber & physical security
15 considerations. The Company will learn about embedded EVSE metering capability
16 from the responses, determine what standards are used to ensure device accuracy and
17 interoperability, and how stakeholders can obtain data from EVSE third parties.

18 From the RFI, UES will develop a residential EV charger “standard” based upon desired
19 characteristics shared by available solutions providers. The Company will then issue a

²³ See Comments of Chargepoint, Inc in Docket No. IR 20-004: February 20, 2020 and July 31, 2020 and Docket DE 20-170: December 9, 2020 and January 8, 2021; Written Comments of Tesla, Inc. in Docket No. IR 20-004, July 25, 2020; Comments of Clean Energy NH, Conservation Law Foundation, NHDES, City of Lebanon and OCA in Docket DE 20-170: December 9, 2020

1 request for proposal (“RFP”) to EVSE vendors for inclusion on the Company’s list of
2 chargers and solutions eligible for customers to receive a purchase incentive up to \$600.
3 In order for a charging solution to receive an incentive, the charger/software vendor must
4 agree to share all charging session and embedded metering data with UES for five years.
5 All participating residential EV customers will be required to enroll in the separately-
6 metered domestic EV TOU rate where a Company AMI meter will be provided, enabling
7 15 minute interval data and enhanced data sharing capability. The Company will collect
8 the data from participating EVSE vendors and the Company’s EV TOU meters. UES
9 will analyze and compare historical embedded EVSE data against the utility metering
10 interval data to assess accuracy, availability, format, interface capabilities, data sharing,
11 load metering, sub-metering, metering data disaggregation, remote control, volt/VAR
12 capability, customer controls, testing, privacy, and cyber and physical security, along
13 with other considerations that arise during the assessment.

14 The Company hopes to develop behind-the-meter partnerships with EVSE equipment
15 providers and local installers as part of the EV Program to assist customers with the
16 installation process. UES believes that the residential behind-the-meter EVSE
17 installation and incentive program will provide benefits to customers, the electric grid,
18 the local economy, and society-at-large. By incentivizing customers to install smart,
19 managed EV charging equipment during the early stages of EV market growth, EV
20 customers will benefit from future demand management, energy efficiency and
21 optimization offerings. Managed charging functionality allows EV loads to be flexible,
22 curtailing or adding charging load as electric system conditions warrant. While managed

1 charging programs do not currently exist within the NHSaves energy efficiency
2 programs, this is an area of interest and likely development. Encouraging customers to
3 adopt this functionality at the beginning of EV ownership will enable future participation
4 in demand management programs.

5 The Company will submit an annual report to the Commission outlining the number of
6 residential customer participants in the program, incentives distributed, third party
7 partners within the program, and periodic findings related to embedded metering and
8 future use cases. At a time to be determined, but to likely coincide with efforts on going
9 in DE 20-170, the Company will offer a recommendation for next steps in leveraging
10 EVSE data for future service offerings specific to EV customers.

11 **Q: Has the Company performed any cost benefit analysis on the proposed residential**
12 **behind-the-meter EVSE installation and incentive program.**

13 A: Yes. For illustrative purposes, the Company has screened the residential behind-the-
14 meter EVSE installation and incentive program using the Granite State Test recently
15 approved by the Commission to evaluate cost-effectiveness of the energy efficiency
16 programs administered by UES under the Energy Efficiency Resource Standard
17 (“EERS”).²⁴ Exhibit CSV-9. This analysis was conducted to determine, generally, if the
18 behind-the-meter EVSE installation and incentive program would be cost effective if
19 operation of charging equipment is limited during the ISO-NE summer and winter peak
20 periods. This would demonstrate tangible benefits from the program above and beyond

²⁴ On December 30, 2019, the Commission issued Order 26,322, approving the Benefit-Cost Working Group’s recommendations to take effect for the 2021-2023 EERS term.

1 the benefits of advancing public policy and further assessing alternative metering
2 capability from behind-the-meter EVSE.

3 **Q: Explain the details of how the Company performed the cost benefit analysis on the**
4 **proposed residential behind-the-meter EVSE installation and incentive program.**

5 A: The Company used the same energy efficiency benefit cost model used to evaluate the
6 2021-2023 statewide energy efficiency plan. The modeling assumptions were as follows:

- 7 • 500 ENERGY STAR certified EV chargers enrolled with demand response
8 capability through open communication protocols. Chargers are required to be
9 networked so that they can be monitored and controlled remotely.
- 10 • Incentive is \$600 per unit (equals total utility cost)
- 11 • The measure has a 10 year life, during which time the equipment is controlled
12 during peak periods.
- 13 • Energy Savings = 50 kWh per unit annually as compared to a non-ENERGY
14 STAR charger
- 15 • Demand Savings = 0.5 kW average per unit per year
- 16 • Energy load shape = all summer / winter peak
- 17 • Peak coincidence factor is 100% summer / winter

18 **Q: What were the results of the analysis?**

19 A: The result of the modeling is a benefit / cost ratio of 2.2. The net present value of the
20 benefits when modeled are \$654,000 with a total cost of \$300,000 (\$600 per unit with
21 500 total units). The Company is providing this analysis to illustrate that the behind-the-
22 meter EVSE installation and incentive program could be cost effective however, since
23 many of the assumptions used in this modeling could be adjusted for sensitivity analysis,
24 the Company is providing this modeling in Exhibit CSV-9 for illustrative purposes only.

1 **ii. “Make-Ready” Public EV Infrastructure Program**

2 **Q. Please describe the proposed “make-ready” public EV infrastructure program.**

3 A. As part of the EV program, UES proposes to offer a make-ready EV infrastructure
4 program essential to the development of public EV charging stations throughout New
5 Hampshire. The make-ready program targets investment of approximately \$4.0 million
6 over five years to deploy EV charging at approximately 37 Level 2 and 8 DCFC public
7 sites (total of 45 sites) in the Company’s service area. UES further proposes to install
8 required upgrades on the distribution system and to contract with third-party electrical
9 contractors to install behind-the-meter “customer-side” infrastructure. Specifically, the
10 make-ready investments the Company proposes to install and own includes the following
11 electrical equipment, infrastructure, and connections:

- 12 • The distribution primary lateral service feed;
- 13 • The necessary transformer and transformer pad;
- 14 • The new service meter;
- 15 • The new service panel; and
- 16 • The associated conduit and conductor necessary to connect each piece of
17 equipment.

18 At a minimum the “make-ready” program will provide adequate capacity for future
19 growth. The Company recommends “future-proofing” installations by class as follows:

- 20 • 0 kVA to 200 kVA Make-Ready (Level 2 Charging):
 - 21 ○ Install make-ready infrastructure for 200 kVA load (up to ten Level 2
 - 22 chargers)
 - 23 ○ Customer to supply a minimum of two Level 2 chargers initially

- 1 • 200 kVA to 1000 kVA Make-Ready (DCFC/Clustered Level 2):
 - 2 ○ Install make-ready infrastructure for up to 1000 kVA load
 - 3 ○ Customer to supply a minimum of two DCFC chargers initially with a
 - 4 peak cumulative output exceeding 200 kW

5 The Company has provided additional information regarding make-ready service
6 requirements in Exhibit CSV-10.

7 The exact number of charging ports deployed will be determined in collaboration with
8 participating customer site hosts, considering the unique real property, service
9 requirements, and site layout. UES will help customers understand their options within
10 the make-ready program with the goal of optimizing the number of charging ports to
11 maximize the number of vehicles that can charge at each location. Participating
12 customers will be required to provide EVSE with non-propriety charging plugs and
13 networked functionality.

14 The Company will target make-ready site hosts with publicly-available, long-dwell time
15 parking including but not limited to the following types of customers:

- 16 • Workplaces
- 17 • Fleet parking facilities
- 18 • Public parking lots, garages, parks, beaches, and transit hubs
- 19 • Hotels, hospitals, and educational institutions
- 20 • Federal, state, and municipal properties
- 21 • Dining, entertainment, and shopping plazas
- 22 • Multi-family and apartment buildings
- 23 • Low to moderate income communities

1 The proposed make-ready program represents a significant increase in Company-
2 supported, customer-sided and behind-the-meter infrastructure. UES believes that the
3 make-ready program is necessary to expand New Hampshire’s network of charging
4 stations, that the make-ready program is in the public interest, and will reduce barriers to
5 investments in EV charging infrastructure.

6 According to the U.S. Department of Energy, New Hampshire has approximately 281
7 public charging outlets in the state.²⁵ This is significantly less than all surrounding states
8 including Maine (503), Vermont (786), Massachusetts (3,469), Connecticut (1,154), and
9 Rhode Island (474).²⁶ Experts in the EV field believe that New Hampshire is lagging
10 behind other states in the region both in terms of EV adoption and the deployment of EV
11 charging infrastructure.²⁷ The Company’s proposed make-ready program will therefore
12 meet a need regarding the adoption of electric vehicles and associated public charging
13 infrastructure in New Hampshire.

14 **Q. Is the Company proposing to make any investments in owning and operating EV**
15 **charging stations within the make-ready program?**

16 A. At this time, UES is not proposing to own or operate EV chargers within the make-ready
17 program. The focus of the make-ready program is to support the installation and
18 deployment of the electrical infrastructure required to promote and serve publicly

²⁵ “Electric Vehicle Charging Outlets by State.” *U.S. Department of Energy, Alternative Fuels Data Center*, <https://afdc.energy.gov/data/10366>.

²⁶ *Id.*

²⁷ “If electric vehicles are the future, is New Hampshire ready? Are you?” *Megan Fernandes, Fosters Daily Democrat*, March 24, 2021, <https://www.seacoastonline.com/story/news/local/2021/03/24/electric-vehicles-new-hampshire-charging-stations-range-anxiety/4665825001/>.

1 available EVSE, including the infrastructure behind-the-meter, by offering a turn-key
2 installation solution. UES intends to work with owners and operators of publicly
3 available parking sites to deploy make-ready infrastructure with the eligible customer
4 providing the EVSE charging stations utilizing non-proprietary, open standard connectors
5 at their cost.

6 The Company will evaluate the success of the make-ready offering throughout the course
7 of the program. If the make-ready infrastructure deployment goals are not met or
8 additional EV charging needs are identified in New Hampshire, the Company will
9 consider deploying Company-owned and operated EVSE in a future proposal to the
10 Commission.

11 **Q. How many sites are you proposing to develop with make-ready infrastructure?**

12 A. The modeling of the five year program includes an investment in 37 Level 2 Public sites
13 and 8 DCFC Public sites (total of 45 sites) in the UES service area. The US Department
14 of Energy's ("DOE") Electric Vehicle Infrastructure Projection Tool ("EVI-Pro") Lite
15 was used as a guide when choosing the number of sites to model. By entering the
16 number of EVs to support with EVSE, the tool calculates the number of Public Level 2
17 and Public DCFC plugs needed. The Company's modeling as provided in Exhibit CSV-3
18 indicates that approximately 3,753 EVs will be registered in the UES electric service
19 territory through 2028. This figure was entered into the EVI-Pro calculator along with
20 the percent of drivers with access to home charging. According to U.S. Census Bureau
21 data, approximately 71% of New Hampshire's homes are owner-occupied, meaning that

1 such customers have control over their ability to charge at home.²⁸ The Company intends
2 to provide full support for both battery electric vehicles (“BEVs”) and plug-in hybrid
3 electric vehicles (“PHEVs”) and used the DOE’s recommended vehicle mix for
4 distribution of such models. The resulting EVI-Pro calculation indicates that in order to
5 support 3,753 EVs, 338 public Level 2 charging plugs/ports and 51 public DCFC
6 charging plugs/ports will be required. These results are provided in Exhibit CSV-11.
7 This calculation led to the Company’s recommendation to develop make-ready
8 infrastructure at approximately 37 Level 2 sites and 8 DCFC sites with approximately 10
9 Level 2 plugs/ports and 6 DCFC plugs/ports at each respective site.

10 **Q. Did the Company develop estimated make-ready costs for the Level 2 and DCFC**
11 **scenarios?**

12 A. Yes. UES developed estimated cost scenarios for both the Level 2 and DCFC proposals:
13 (1) five 19.2 kW Level 2 chargers with ten total plugs/ports for a total of 96 kW of
14 connected load, and (2) six 50 kW DCFC for a total of 300 kW of connected load. The
15 Company estimates installed make-ready costs to be approximately \$77,000 for the (1)
16 Level 2 scenario and \$143,000 for the (2) DCFC scenario. A breakdown of these
17 estimates is provided in Exhibit CSV-12.

18 **Q. Has the Company evaluated the economics of the proposed investment?**

19 A. Yes, the Company has evaluated the proposed make-ready program using a discounted
20 cash flow (“DCF”) analysis. To perform this analysis, the Company used its existing and

²⁸ “QuickFacts: New Hampshire.” *U.S. Census Bureau*, July 1, 2019,
<https://www.census.gov/quickfacts/fact/table/NH/PST045219>.

1 long-standing customer contribution model. Under this approach, a DCF analysis is
2 performed that compares the estimated distribution revenues (i.e., excluding revenues
3 attributed to supply) to the estimated cost of service. The cost of service reflects the
4 incremental costs associated with the program, including investment in facilities,
5 depreciation expense, and property and income taxes. The distribution revenues reflect
6 estimated customer usage applied to the respective distribution rates for each customer
7 class. The annual cost of service and revenue cash flows are discounted to the present
8 value at the Company's after tax real weighted average cost of capital. If the Net Present
9 Value ("NPV") of the cash flows is at or above zero, then the proposed investment is
10 considered economically feasible and should be accepted.

11 Using the Company's DCF analysis, we have modeled the proposed five year program in
12 Exhibit CSV-13. The Company utilized the estimated costs discussed above and in
13 Exhibit CSV-12 of \$77,000 per Level 2 site (five 19.2 kW Level 2 chargers with ten total
14 plugs/ports for a total of 96 kW of connected load) and \$143,000 per DCFC site (six 50
15 kW DCFC for a total of 300 kW of connected load), respectively. The modeling of the
16 program includes an investment of approximately \$3.99 million over five years. The
17 modeling uses UES' existing distribution rates to calculate revenue estimates in order to
18 assess the economic feasibility of the projects at existing rate and forecasted demand.
19 The analysis returns a NPV of \$243,869 over a dynamic 10 year term (14 Years total).
20 Modeling the program demonstrates that the additional revenues generated under existing
21 distribution rates and expected usage and demand are sufficient to cover the Company's
22 after-tax weighted-average cost of capital and provide recovery of project costs over a

1 period of 10 years. From a financial perspective, these projects should be accepted and
2 the incremental costs will not be borne by existing customers.

3 **Q. How does the Company categorize and propose to recover the costs associated the**
4 **make-ready EV infrastructure program?**

5 A. As described in the direct testimony of Kevin E. Sprague, costs associated with the make-
6 ready EV infrastructure program are categorized within the Company's Grid
7 Modernization Plan. As Mr. Sprague explains in more detail, such costs undergo
8 rigorous planning and budgeting processes to ensure the most cost-effective solution is
9 proposed. The recovery of make-ready EV infrastructure and other Grid Modernization
10 costs are proposed to be included in annual step adjustments described in the testimony of
11 Messrs. Goulding and Nawazelski.

12 **Q. Please describe the process for make-ready project approvals with customers.**

13 A. The process for project approval will be as follows:

- 14 • Receive application from customer;
- 15 • Preapproval assessment with customer site visit;
- 16 • Determine where power source will come from (site must be within 300 ft of
17 power source, not over a public way, and outside environmentally sensitive
18 areas);
- 19 • Receive signed site host agreement and license agreement;
- 20 • Generate work order with engineering study;
- 21 • Obtain proof of purchase of EVSE (i.e. charging station) from customer;
- 22 • Arrange installation with 3rd party contractor

1 Please also reference Exhibit CSV-10 for additional make-ready installation detail.

2 **Q. Will make-ready program installations be required to enroll in the Company’s EV**
3 **TOU rate offerings?**

4 A. Yes. Any customer who develops EV charging stations through the Company’s make-
5 ready program will be required to enroll in the applicable TOU rate. Customers that
6 develop make-ready sites from 0-200 kVA will be required to enroll in the small general
7 service EV TOU rate (Schedule TOU-EV-G2). Customers that develop make-ready sites
8 above 200 kVA will be required to enroll in the large general service “high demand
9 draw” EV TOU rate (Schedule TOU-EV-G1).

10 **Q. Have similar EV programs been approved in other jurisdictions?**

11 A. Yes, make-ready programs have been approved by regulatory commissions as such
12 investments are viewed as being in the public interest, will reduce barriers to investments
13 in EV charging infrastructure, will meet a need regarding the adoption of electric vehicles
14 that is unlikely to be met by the competitive EV charging market, and will not impede the
15 competitive EV charging market.²⁹ State utilities commissions have approved make-
16 ready programs in Massachusetts (Eversource, D.P.U. 17-05), Rhode Island (National
17 Grid, Docket No. 4780), New York, (Consolidated Edison, Case No. 19-E-0065 and
18 National Grid, Case No. 17-E-0238), California (Pacific Gas & Electric, Case A1701022,

²⁹ MA D.P.U. 13-182-A, Investigation by the Department of Public Utilities upon its own Motion into Electric Vehicles and Electric Vehicle Charging at 13.

<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/9233599>

1 San Diego Gas & Electric, Case A1801012, and Southern California Edison, Case
2 A1701021) and Minnesota (Xcel Energy, Docket 18-643), among others.

3 **Q. Please describe how your proposals align with New Hampshire’s public policy**
4 **initiatives.**

5 A. Make-ready programs align with New Hampshire policy objectives and have been
6 supported by several EV market participants and stakeholder groups.³⁰ In July 2019, the
7 New Hampshire Department of Business and Economic Affairs (“NH BEA”) released a
8 report (*Evaluating Electric Vehicle Infrastructure in New Hampshire*) following an
9 extensive stakeholder process.³¹ The most common policy recommendation identified
10 was “approval of reasonable utility make-ready investments as necessary investments in
11 the distribution system and therefore eligible for rate-basing. Make-ready investments
12 include the utility infrastructure just up to the [electric vehicle supply] equipment”.³²
13 Senate Bill (SB) 575-FN was introduced in 2018, aiming to establish requirements for
14 electric vehicle charging stations. This bill led to the Commission’s investigation in IR
15 20-004 and subsequent docket DE 20-170, both regarding the development of EV TOU
16 rates. UES supported SB 575-FN and testified that further development of electric
17 vehicle infrastructure is essential to meet New Hampshire’s environmental and

³⁰ See Comments of Greenlots in IR 20-004, February 20, 2020; Written Comments of Tesla, Inc. in IR 20-004, July 25, 2020; and Comments of Chargepoint, Inc. in IR 20-004, May 11, 2020 and DE 20-170, January 8, 2021.

³¹ “Evaluating Electric Vehicle Infrastructure in New Hampshire.” *New Hampshire Department of Business and Economic Affairs*, July 2019, <https://www.nh.gov/osi/resource-library/documents/nh-ev-infrastructure-analysis.pdf>.

³² *Id.* at 2.

1 transportation goals.³³ The bill received bipartisan support throughout the legislative
2 process and was signed into law by Governor Sununu on June 12, 2018.

3 In addition to SB 575-FN, another EV bill was passed by the New Hampshire legislature
4 and signed into law by Governor Sununu in 2018, SB 517, *Establishing an Electric*
5 *Vehicle Charging Stations Infrastructure Commission*.³⁴ UES also supported SB 517 and
6 was a member of the SB 517 commission (“EV Commission”) to provide input to the
7 legislature on how EV infrastructure can be advanced within the state.³⁵ UES,
8 Eversource, Liberty Utilities, and the New Hampshire Electric Cooperative jointly
9 proposed to support the make-ready work required to install DCFC and Level 2 chargers
10 funded by the VW Settlement Trust.³⁶ The legislative EV Commission has requested
11 “the electric utilities work with the Public Utilities Commission to design and obtain
12 approval for a ‘make ready’ program from New Hampshire that is designed to work in
13 conjunction with the RFP and beyond.”³⁷ The NH BEA stakeholder group also
14 supported these investments stating, “New Hampshire utilities have outlined a proposal
15 for investment in DCFC that combines utility investments in make-ready infrastructure
16 with a portion of the Volkswagen Settlement funding. This proposal is widely supported

³³ NH Senate Transportation Committee SB 575-FN, relative to electric vehicle charging stations, January 23, 2018, http://gencourt.state.nh.us/bill_Status/HearingReport.aspx?id=9685&sy=2018.

³⁴ Senate Bill 517 – Final Version, An Act establishing an electric vehicle charging stations infrastructure commission, May 30, 2018, http://gencourt.state.nh.us/bill_Status/billText.aspx?sy=2018&id=1829&txtFormat=html.

³⁵ NH Senate Transportation Committee SB 517, establishing an electric vehicle charging stations infrastructure commission, January 30, 2018, http://gencourt.state.nh.us/bill_Status/HearingReport.aspx?id=10182&sy=2018.

³⁶ NH Electric Vehicle Charging Stations Infrastructure Commission Meeting Minutes, June 28, 2019, <https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/2020-01/20190628-meeting-notes.pdf>.

³⁷ Id. at 2.

1 by stakeholders surveyed.”³⁸ While the competitive RFP process is still underway for the
2 first phase of this effort, UES will continue to support the development of EV charging in
3 NH and intends to seek recovery of any investments as part of the proposed make-ready
4 program.

5 **V. ELECTRIC VEHICLE (EV) & TIME OF USE (TOU) MARKETING,**
6 **COMMUNICATIONS AND EDUCATION PLAN**

7 **Q. Please describe the Company’s MC&E Plan.**

8 A. The Company is proposing a comprehensive, multi-channel MC&E Plan that is designed
9 to meaningfully increase consumer awareness, interest in and adoption of EVs, EV
10 charging infrastructure and EV TOU rates during the initial five years of the EV
11 Program. The MC&E Plan consists of two parts: (1) a Consumer EV Education
12 Campaign (EVs, charging infrastructure, EV/TOU rates); and (2) a Consumer EV
13 Marketing and Promotion Program. The Consumer EV Education Campaign will
14 increase awareness of and inform the Company’s customers about the benefits of EVs,
15 new EV and PHEV technologies, available vehicle models, federal and state incentives
16 for vehicle purchases or leases, options for home and public charging, when, where, and
17 how to charge EVs safely, and new EV/TOU rates to encourage customer savings and
18 electric system demand benefit from off-peak charging. The Consumer EV Marketing
19 and Promotion Program will focus on creating experiential learning opportunities for

³⁸ Id.

1 customers, partnerships with EV dealerships, and partnerships and incentives/rebates
2 with EV charging infrastructure dealers.

3 **Q. Why does the Company need an education campaign to promote EVs to its**
4 **customers?**

5 A. In order to help drive the transition to electric transportation and meet Company, federal
6 and state goals, consumers must be educated on the benefits of EVs to create an
7 awareness of and interest in EV ownership. An effective education and outreach
8 initiative can increase the adoption rate for electric vehicles. Of the 71 utilities across the
9 country with active EV adoption strategies/programs, the majority have an integrated
10 education and outreach initiative design to increase awareness of what EVs are and how
11 they work, the difference between plug-in hybrid electric vehicles and battery electric
12 vehicles, the benefit of EV TOU-specific rates, and increase customer understanding of
13 EV charging at home, work, and public locations, and the implications for the customer
14 and the electric system of unmanaged charging. According to the UC Davis
15 International EV Policy Council, although EVs are becoming more popular, “consumer
16 awareness and knowledge of PEVs remains too low in many markets, limiting market
17 growth.”³⁹

18 To capitalize on any increased interest in EVs, barriers inhibiting consumers from
19 purchasing an EV should be identified and then countered with educational messaging

³⁹ “Driving the Market for Plug-in Vehicles: Increasing Consumer Awareness and Knowledge,” *UC Davis International EV Policy Council*, March 2018, <https://phev.ucdavis.edu/wp-content/uploads/Consumer-Education-Policy-Guide-March-2018.pdf>.

1 that removes these barriers from consideration when customers shop for vehicles.

2 Market research has identified the primary consumer barriers currently inhibiting EV
3 sales as: cost to purchase and maintain an EV; range of travel distance possible on a fully
4 charged battery; limited access to public charging infrastructure; and average time it takes
5 to charge an EV.⁴⁰

6 The Company's customer communication channels have universal reach throughout our
7 service territory in New Hampshire, and the Company communicates with customers on
8 at least a monthly basis through bills, home energy reports, and regularly through other
9 channels such as email, social media, call center interaction, and direct mailings. The
10 Company currently communicates to customers about energy efficiency products and
11 services, in collaboration with other program administrators under the NHSaves brand.

12 Therefore, the Company proposes to leverage these capabilities and develop a Consumer
13 EV Education Campaign that will educate consumers on the benefits of EVs, the
14 decreasing costs to purchase and maintain an EV, advances made in extending driving
15 range, continued increases in charging station availability, newer charging technologies
16 that greatly reduce EV charging time, and federal and state incentives and rebates for
17 EVs and EV charging infrastructure. The Campaign will also educate customers on EV
18 charging issues such as residential (at home) charging options, when to charge an EV for
19 optimal cost-savings and impact to the electric infrastructure, and how to safely charge an
20 EV. Customers will be educated about the Company's newly proposed suite of EV/TOU

⁴⁰ "NESCAUM Multi-State ZEV Action Plan." *NESCAUM*, May 2014,
<http://www.nescaum.org/documents/multistate-zev-action-plan.pdf/>.

1 rates developed to encourage EV adoption including rates for (a) residential whole-house
2 TOU rate; (b) residential EV TOU rate; (c) small general service EV TOU rate; and (d)
3 large general service EV TOU rate using cost comparison tools that allow customers to
4 compare usage and savings potential.

5 **Q. What are the goals of the Consumer EV Education Campaign to promote EVs?**

6 A. The Consumer EV Education Campaign seeks to increase customer awareness,
7 familiarity, and interest in EVs by making available information about EVs through a mix
8 of utility customer channels, collaborative marketing efforts with other utilities, auto
9 dealers, and EV advocacy groups. Helping customers understand new vehicle types,
10 advances in EV technology, available state and federal incentives, and availability of
11 charging stations and options will increase customers' consideration of EVs and help
12 foster a step change in the way EVs are viewed by the consumer.

13 **Q. Why is the Company interested in customer adoption of EVs?**

14 A. The Company has made a commitment to sustainability to ensure the actions we take
15 today, as a business and as members of our community, deliver long-term value to our
16 customers. The Company must transform our business and provide solutions that
17 advance our region's environmental goals while providing the safe, reliable, affordable
18 service our customers expect. Meeting the Company's environmental goals, as well as
19 federal and state decarbonization targets requires a transformation of the consumer light-
20 duty vehicle market from traditional fossil fuel-based vehicles to EVs. This type of
21 transformation of one of the largest consumer markets in less than a decade requires a

1 collective effort of all stakeholders in the electric vehicle value chain, including New
2 Hampshire car buyers, utilities, automotive manufacturers and dealers, as well as EVSE
3 vendors.

4 **Q. How will the Company know if the Consumer EV Education Campaign is**
5 **successful?**

6 A. The Company proposes to conduct a consumer awareness study to establish baseline
7 information about our customers' understanding and attitudes toward EVs in order to
8 assess the effect of the education and outreach program and to compare what happens
9 before and after the program has been implemented. Without baseline data, it is difficult
10 to estimate any changes or to demonstrate progress. Following the baseline study,
11 education and outreach efforts can be measured through a mixture of metrics the
12 Company establishes for each education and marketing tactic. The Company will
13 establish milestones for the Campaign and at the end of the education and outreach phase
14 perform qualitative and quantitative analysis (website analysis and social media
15 sentiment and engagement, message testing, surveys) to measure progress versus the
16 baseline study to evaluate the success and efficacy of the Consumer EV Education
17 Campaign.

18 Specifically, the Company will also measure web traffic to an informational area on the
19 Company website. For any direct email communications to customers, the Company
20 would measure how many customers read (opened) or engaged with an email about EVs,
21 and also track visibility and engagement of its campaign messages on Company social
22 media channels. Initiatives such as these help determine the effectiveness of awareness

1 campaigns. The Company's goal will be to promote its EV benefits messaging to the
2 Company's more than 77,000 New Hampshire electric customers over a five year period.
3 The Company will accomplish this by messaging directly to account holders through
4 their bills and email addresses, and by having messaging about EVs available for
5 customers that are interested when they reach out to our call center. Goals and metrics
6 for each initiative will be developed as part of the campaign design effort.

7 **Q. How will the Company develop the Marketing and Promotion Program and what**
8 **tactics will it use?**

9 A. The Company will work with internal Communications and Customer Energy Solutions
10 teams, an advertising agency, research firm, and partners to develop campaigns that will:

- 11 • Identify and prioritize consumer benefits for EV education
- 12 • Identify and prioritize barriers to EV adoption for education and barriers to hosting
13 for business, public site hosts
- 14 • Develop multiple messages that highlight benefits, remove barriers, and increase
15 adoption of EVs and EV charging infrastructure and drive EV adoption and
16 participation in the EV TOU rates
- 17 • Deliver developed messaging through multiple channels such as:
 - 18 ○ Company-owned
 - 19 ▪ Dedicated informational area on Company website
 - 20 ▪ Targeted social media advertising (UES Customer Zip codes only)
 - 21 ▪ Email campaign (UES Customer Zip codes only)
 - 22 ▪ Bill inserts (UES Customers only)

- 1 ▪ Call centers
- 2 ○ Customer Cost Comparison tool to compare EV TOU rate impact
- 3 ○ Partner Channels (other utilities, EVSE vendors, and trade groups)
- 4 ○ Press Coverage (local print, broadcast, and digital media outlets)
- 5 ○ Purchased Media (advertising: social media advertising, banner ads)
- 6 ○ EV Events (National Drive Electric Week, and Ride & Drive)
- 7 ○ EV Manufacturers, Dealer Promotions (Dealerships with New & Pre-Owned
- 8 EV inventory)
- 9 ○ EV Advocacy Groups

10 The Company proposes the above as foundational strategies that will be refined with the
11 advertising agency using data derived from research with input from the partners prior to
12 any campaign launch.

13 **Q. Will the Company work with partners in developing these campaigns?**

14 A. Yes. The Company will first identify and then contract with an external advertising
15 agency and a research firm each with large consumer awareness marketing experience, an
16 understanding of New Hampshire consumers and experience developing messages geared
17 toward sustainability and energy efficiency. Then, the Company will identify and partner
18 with strategic stakeholders in the EV value chain to develop as comprehensive and as
19 aligned an approach as possible to increase campaign effectiveness, expand reach and
20 control costs. Partners may include:

- 21 • Other utilities
- 22 • EVSE Providers

- 1 • Business/Trade Groups/Partnerships/Networking Associations
- 2 • Event sponsors

3 **Q. What are the estimated costs of the MC&E Plan?**

4 A. The Company’s estimate of the proposed MC&E Plan costs is \$370,000 as shown in
5 Exhibit CSV-14.

6 **Q. How did the Company develop the estimated costs for the proposed MC&E Plan?**

7 A. The Company first identified recent, similarly themed and sized awareness and
8 participation campaigns to establish baseline costs of similarly-structured educational
9 campaigns. The Company prioritized leveraging “Company-owned” communications
10 channels and materials (website, social media, email, bill inserts, call center) to maximize
11 efficiency and reduce costs. The Company also researched the cost of available cost
12 comparison tools to provide educated estimates, including required web development and
13 integration. While the final strategy may alter tactics and associated costs, the Company
14 believes the aggregate total that is presented in this filing is what would be necessary to
15 successfully meet the goals put forth in its TOU rate offerings and EV Program.

16 **Q. How will the Company measure effectiveness and cost efficiency?**

17 A. To ensure that its campaign tactics and messaging are effective and cost-efficient, the
18 Company will:

- 19 • Perform qualitative and quantitative analyses (site traffic analysis, event
20 attendance, focus groups, sentiment, surveys) at established milestones for the
21 Consumer EV Education Campaign and the Consumer EV Marketing and
22 Promotion Program

- 1 • Continue messaging and tactics that are meeting established goals/metrics for
2 each campaign and change or replace those that are not

3 The most successful campaigns require some refining after launch due to the constantly
4 shifting markets, technological improvements, and competing priorities. The Company
5 anticipates that the initiatives under the MC&E Plan will be no different and would adjust
6 and refocus tactics in response to any anticipated or unanticipated results.

7 **Q. Why does the Company need to promote the benefits of its TOU rates and EV
8 Program to consumers and prospective charging site hosts?**

9 A. To increase EV adoption, the Company must address the barrier concerning at-home EV
10 charging by increasing consumer awareness and understanding of the benefits of
11 residential EV at home charging using smart Level 2 chargers when paired with
12 specifically designed a residential EV TOU rate. The Company is proposing a behind-
13 the-meter EVSE installation and incentive program with up to \$600 rebates for 500
14 customers to drive adoption. Efforts are also needed to increase prospective public
15 charging station site hosts' familiarity with EV charging as an amenity for employees,
16 customers, tenants, or visitors. The Company's make-ready program is designed to
17 address these barriers through simplifying and reducing the cost of installing public EV
18 charging equipment. The MC&E Plan will support the broad marketing of the make-
19 ready program to potential site hosts across the Company's New Hampshire service
20 territory. The Company believes marketing to potential site hosts is essential to the
21 development of EV charging infrastructure in New Hampshire.

22 **Q. Are there other EV related costs the Company is proposing for recovery?**

1 A. Yes, in addition to the make-ready EV infrastructure costs the Company has outlined, the
2 Company proposes to recover the actual and incremental costs associated with the
3 Residential Behind-the-Meter EVSE Installation and Incentive Program and MC&E Plan
4 through the External Delivery Charge (“EDC”). The Company will include an estimate
5 of these costs in the annual EDC filing which would be reconciled to actual costs
6 consistent with the operation of the EDC.

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

8 A. Yes it does.

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Statewide EV Registrations as of 01/02/2021
 Exhibit CSV-2

Town	# of BEV	# of PHEV	# of Unknown	Total EVs 2021
ACWORTH	2	1	0	3
ALBANY	1	2	0	3
ALEXANDRIA	0	3	1	4
ALLENSTOWN	2	3	1	6
ALSTEAD	5	7	1	13
ALTON	13	7	1	21
AMHERST	53	33	2	88
ANDOVER	4	6	1	11
ANTRIM	3	3	0	6
ASHLAND	1	2	1	4
ATKINSON	7	7	4	18
AUBURN	23	7	0	30
BARNSTEAD	1	1	0	2
BARRINGTON	11	11	3	25
BARTLETT	8	1	0	9
BATH	0	1	0	1
BEDFORD	110	48	17	175
BELMONT	5	4	4	13
BENNINGTON	0	2	0	2
BERLIN	0	5	3	8
BETHLEHEM	3	2	1	6
BOSCAWEN	1	5	0	6
BOW	24	20	3	47
BRADFORD	3	0	1	4
BRENTWOOD	15	10	4	29
BRIDGEWATER	6	2	1	9
BRISTOL	2	3	2	7
BROOKLINE	13	10	1	24
CAMPTON	4	10	0	14
CANAAN	3	6	1	10
CANDIA	2	5	0	7
CANTERBURY	5	15	1	21
CARROLL	1	0	1	2
CENTER HARBOR	1	0	0	1
CHARLESTOWN	3	4	1	8
CHESTER	16	4	1	21
CHESTERFIELD	6	10	3	19
CHICHESTER	2	6	1	9
CLAREMONT	4	11	1	16
COLEBROOK	1	0	0	1
CONCORD	51	69	5	125
CONWAY	9	6	2	17
COOS COUNTY TREASU	0	0	1	1

Town	# of BEV	# of PHEV	# of Unknown	Total EVs 2021
CORNISH	1	4	1	6
CROYDON	2	2	1	5
DALTON	2	2	0	4
DANVILLE	6	3	1	10
DEERFIELD	3	9	3	15
DEERING	2	2	0	4
DERRY	36	34	3	73
DORCHESTER	0	1	0	1
DOVER	52	44	5	101
DUBLIN	3	9	0	12
DUMMER	2	1	0	3
DUNBARTON	6	5	0	11
DURHAM	45	39	3	87
EAST KINGSTON	5	7	2	14
EASTON	1	0	0	1
EATON	1	1	1	3
EFFINGHAM	2	1	1	4
ELLSWORTH	1	0	0	1
ENFIELD	11	15	1	27
EPPING	12	8	1	21
EPSOM	3	8	1	12
ERROL	0	0	1	1
EXETER	45	38	5	88
FARMINGTON	3	5	1	9
FITZWILLIAM	2	6	1	9
FRANCESTOWN	1	4	0	5
FRANCONIA	2	2	0	4
FRANKLIN	5	10	0	15
FREEDOM	0	1	0	1
FREMONT	3	6	0	9
GILFORD	19	8	9	36
GILMANTON	2	3	0	5
GILSUM	1	7	1	9
GOFFSTOWN	19	23	4	46
GORHAM	3	1	1	5
GRAFTON	1	0	0	1
GRANTHAM	11	13	1	25
GREENFIELD	3	4	0	7
GREENLAND	11	8	0	19
GREENVILLE	3	1	0	4
GROTON	0	1	0	1
HAMPSTEAD	10	7	1	18
HAMPTON	23	28	2	53
HANCOCK	4	4	0	8
HANOVER	64	43	13	120
HARRISVILLE	1	11	0	12

Town	# of BEV	# of PHEV	# of Unknown	Total EVs 2021
HARTS LOCATION	0	1	0	1
HVERHILL	0	1	0	1
HEBRON	1	1	3	5
HENNIKER	11	4	0	15
HILL	0	0	1	1
HILLSBORO	0	1	0	1
HINSDALE	1	17	0	18
HOLDERNESS	5	6	0	11
HOLLIS	61	39	1	101
HOOKSETT	21	21	6	48
HOPKINTON	14	16	1	31
HUDSON	45	36	8	89
JACKSON	5	3	0	8
JAFFREY	10	16	3	29
JEFFERSON	0	3	0	3
KEENE	28	84	3	115
KENSINGTON	7	4	1	12
KINGSTON	10	5	0	15
LACONIA	11	16	7	34
LANCASTER	5	7	2	14
LANDAFF	1	0	0	1
LANGDON	2	3	0	5
LEBANON	18	37	1	56
LEE	11	13	2	26
LEMPSTER	1	3	0	4
LINCOLN	5	2	1	8
LISBON	1	5	0	6
LITCHFIELD	6	11	3	20
LITTLETON	3	10	1	14
LONDONDERRY	44	36	5	85
LOUDON	4	5	3	12
LYMAN	0	2	0	2
LYME	18	12	1	31
LYNDEBOROUGH	2	4	0	6
MADBURY	8	6	1	15
MADISON	3	4	0	7
MANCHESTER	95	91	12	198
MARLBOROUGH	0	11	0	11
MARLOW	1	5	0	6
MASON	1	4	0	5
MEREDITH	16	4	0	20
MERRIMACK	50	37	5	92
MIDDLETON	1	2	0	3
MILAN	1	0	0	1
MILFORD	20	18	1	39
MILTON	4	9	0	13

Town	# of BEV	# of PHEV	# of Unknown	Total EVs 2021
MONROE	2	6	0	8
MONT VERNON	9	7	1	17
MOULTONBORO	12	7	5	24
NASHUA	173	137	24	334
NELSON	7	4	0	11
NEW BOSTON	11	5	0	16
NEW CASTLE	16	4	4	24
NEW DURHAM	5	3	0	8
NEW HAMPTON	2	3	4	9
NEW IPSWICH	2	10	1	13
NEW LONDON	22	13	3	38
NEWBURY	7	7	1	15
NEWFIELDS	9	2	1	12
NEWINGTON	3	8	2	13
NEWMARKET	12	17	0	29
NEWPORT	1	8	2	11
NEWTON	4	5	0	9
NORTH HAMPTON	9	5	2	16
NORTHFIELD	4	1	1	6
NORTHUMBERLAND	1	0	0	1
NORTHWOOD	5	10	1	16
NOTTINGHAM	9	5	2	16
ORANGE	1	2	0	3
ORFORD	6	6	0	12
OSSIPEE	1	1	1	3
PELHAM	31	30	9	70
PEMBROKE	9	10	1	20
PETERBOROUGH	21	27	1	49
PIERMONT	1	1	0	2
PITTSBURG	0	1	0	1
PITTSFIELD	1	0	0	1
PLAINFIELD	11	9	3	23
PLAISTOW	7	7	1	15
PLYMOUTH	8	11	1	20
PORTSMOUTH	82	72	9	163
RANDOLPH	2	1	0	3
RAYMOND	9	4	1	14
RICHMOND	0	5	0	5
RINDGE	8	8	1	17
ROCHESTER	21	26	3	50
ROLLINSFORD	8	2	0	10
ROXBURY	1	1	0	2
RUMNEY	0	7	0	7
RYE	40	13	4	57
SALEM	55	32	7	94
SALISBURY	0	2	0	2

Town	# of BEV	# of PHEV	# of Unknown	Total EVs 2021
SANBORNTON	5	7	2	14
SANDOWN	5	2	1	8
SANDWICH	5	2	0	7
SEABROOK	19	10	5	34
SHELBURNE	0	1	0	1
SOMERSWORTH	9	12	1	22
SOUTH HAMPTON	4	4	0	8
SPRINGFIELD	4	6	0	10
STEWARTSTOWN	1	0	0	1
STODDARD	2	4	1	7
STRAFFORD	2	6	0	8
STRATHAM	27	16	2	45
SUGAR HILL	2	4	0	6
SULLIVAN	0	2	0	2
SULLIVAN COUNTY	110	102	22	234
SUNAPEE	9	8	1	18
SURRY	0	1	0	1
SUTTON	2	2	0	4
SWANZEY	6	27	1	34
TAMWORTH	5	5	1	11
TEMPLE	3	2	2	7
THORNTON	2	4	0	6
TILTON	1	3	1	5
TROY	1	4	0	5
TUFTONBORO	4	3	2	9
UNITY	0	1	0	1
WAKEFIELD	3	7	0	10
WALPOLE	9	14	0	23
WARNER	2	8	1	11
WARREN	0	1	0	1
WASHINGTON	3	2	2	7
WATERVILLE VALLEY	5	1	0	6
WEARE	9	8	1	18
WEBSTER	2	1	0	3
WENTWORTH	0	1	0	1
WESTMORELAND	2	6	0	8
WHITEFIELD	1	3	0	4
WILMOT	10	5	1	16
WILTON	14	7	0	21
WINCHESTER	0	10	1	11
WINDHAM	57	35	6	98
WINDSOR	1	0	0	1
WOLFEBORO	8	9	2	19
WOODSTOCK	1	1	4	6
Statewide Totals	2410	2298	362	5070

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UES EV Adoption Model 2020-2031
 Exhibit CSV-3

Total Registered EV Through 2020	
Capital	248
Seacoast	332
UES Total	580

Customer Count	
UES-Capital	30654
UES-Seacoast	47713

General Assumption	
Aggressiveness applied to EEI Projection	100%

	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
EEI EV Projection (National)	1,947,370	2,554,186	3,278,421	4,115,521	5,185,763	6,529,197	8,192,743	10,194,411	12,600,697	15,423,574	18,719,480	22,719,697

Town	Total EVs
Capital-Region	
BOSCAWEN	6
BOW	47
CANTERBURY	21
CHICHESTER	9
CONCORD	125
DUNBARTON	11
EPSOM	12
LOUDON	12
SALISBURY	2
WEBSTER	3
Capital-Region Total	248
Seacoast-Region	
ATKINSON	18
DANVILLE	10
EAST KINGSTON	14
EXETER	88
HAMPTON	53
HAMPTON FALLS	11
KENSINGTON	12
KINGSTON	15
NEWTON	9
PLAISTOW	15
SEABROOK	34
SOUTH HAMPTON	8
STRATHAM	45
Seacoast-Region Total	332
UES Total:	580

Note - No Data for Hampton Falls - assumed total based on customer served of seacoast towns

Note - Did not include towns that Unitil serves less than 100 customers

Aggressiveness applied to EEI Projection	100%
--	------

EEI EV Projection	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
EVs Nationally	1,947,370	2,554,186	3,278,421	4,115,521	5,185,763	6,529,197	8,192,743	10,194,411	12,600,697	15,423,574	18,719,480	22,719,697
Growth Rate		0.31	0.28	0.26	0.26	0.26	0.25	0.24	0.24	0.22	0.21	0.21

	Registered EVs (baseline)	UES Projected EV by Year										
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
Capital	248	325	418	524	660	832	1,043	1,298	1,605	1,964	2,384	2,893
Seacoast	332	435	559	702	884	1,113	1,397	1,738	2,148	2,630	3,191	3,873
UES Total	580	761	976	1,226	1,545	1,945	2,440	3,036	3,753	4,594	5,575	6,767

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Exhibit CSV-4
NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

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FOR ILLUSTRATIVE PURPOSES ONLY
DOMESTIC DELIVERY SERVICE
SCHEDULE TOU-D

AVAILABILITY

Service is available under this schedule for all domestic purposes, subject to the conditions contained herein at individual private dwellings and farms connected herewith, and in individual apartments, and includes the operation of single phase motors having such characteristics and so operated as not to impair service to other Customers. Single phase motors exceeding five (5) horsepower will be allowed only upon approval by the Company in each instance.

This schedule is available to domestic Customers having uncontrolled (quick recovery) electric water heating equipment only if such equipment has two (2) thermostatically operated heating elements, each with a rating of no more than 5,500 watts, so connected and interlocked that they cannot operate simultaneously.

When service is delivered through one meter and used for both domestic and non-domestic purposes, billing shall be under this Schedule when the predominate use of demand, as determined by the Company, is for domestic purposes.

If electricity is delivered through more than one meter, the charge for electricity delivered through each meter shall be computed separately under this rate. The availability of this rate will be subject to the Company's ability to obtain the necessary meters and to render such service.

This Schedule is not available for service furnished for commercial or business purposes, farms where the maximum demand exceeds 15 kW, motels, hotels and boarding or lodging houses or residences in which three (3) or more rooms are rented, except as specifically provided for under Special Provisions below, or for any other non-residential purposes.

The actual delivery of service and the rendering of bills under this rate is contingent upon the installation of the necessary time-of-use metering equipment by the Company; subject to both the availability of such meters from the Company's supplier and the conversion or installation procedures as established by the Company

CHARACTER OF SERVICE

Electricity will normally be delivered at 120/240 volts using three wire, single phase service. In some areas service may be 120/208 volts, single phase, three wire.

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

Issued: April 2, 2021
Effective: May 2, 2021

Issued by: Robert Hevert
Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
DOMESTIC DELIVERY SERVICE
SCHEDULE D-TOU (continued)

CHARGES - MONTHLY

The Delivery Service Charges shall include Distribution Charges and Adjustments, set forth below. The rates for energy (kWh) based charges are seasonal with a winter period from November 1 to April 30 and a summer period from May 1 to October 31.

Rates for Retail Delivery Service Effective May 1, 2021 through October 31, 2021

Customer Charge: \$21.07 per meter

Distribution Charge:

Off Peak kWh	4.622¢ per kWh
Mid Peak kWh	4.622¢ per kWh
On Peak kWh	4.622¢ per kWh

External Delivery Charge - Transmission:

Off Peak kWh	0.408¢ per kWh
Mid Peak kWh	4.683¢ per kWh
On Peak kWh	11.567¢ per kWh

Default Service Charge:

Off Peak kWh	6.304¢ per kWh
Mid Peak kWh	7.003¢ per kWh
On Peak kWh	8.594¢ per kWh

Off peak hours will be from 12AM to 6AM and all day holidays and weekends.
Mid peak hours will be from 6AM to 3PM daily Monday through Friday, except holidays.
Peak hours will be from 3PM to 8PM daily Monday through Friday, except holidays.

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

Issued: April 2, 2021
Effective: May 2, 2021

Issued by: Robert Hevert
Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
DOMESTIC DELIVERY SERVICE
SCHEDULE D-TOU (continued)

ADJUSTMENTS

These Adjustments, included in the Delivery Service Charges, shall be adjusted from time to time.

External Delivery Charge (non-transmission): All energy delivered under this Schedule shall be subject to the External Delivery Charge, non-transmission as provided in Schedule EDC of the Tariff of which this is a part.

Stranded Cost Charge: All energy delivered under this Schedule shall be subject to the Stranded Cost Charge as provided in Schedule SCC of the Tariff of which this is a part.

Storm Recovery Adjustment Factor: All energy delivered under this Schedule shall be subject to the Storm Recovery Adjustment Factor as provided in Schedule SRAF of the Tariff of which this is a part.

System Benefits Charge: All energy delivered under this Schedule shall be subject to the System Benefits Charge as provided in Schedule SBC of the Tariff of which this is a part.

Revenue Decoupling Adjustment Charge: All energy delivered under this Schedule shall be subject to the Revenue Decoupling Adjustment Charge as provided in Schedule RDAC of the Tariff of which this is a part.

TERMS OF PAYMENT

The charges for service hereunder are net, billed monthly and due within 25 days following the date postmarked on the bill, as specified in the Terms and Conditions for Distribution Service, which is a part of this Tariff. Amounts not paid prior to the due date shall be subject to interest on past due accounts, as provided in Appendix A of the Terms and Conditions for Distribution Service, and will apply to the unpaid balance. When billing on the OL Schedule is combined with billing on this rate, the interest on past due accounts shall apply to the total bill. The Company will waive the residential late payment fee if the Customer can provide evidence of their eligibility in any of the following programs: Statewide Low-Income Electric Assistance Program (NHPUC Order No. 23,980), Fuel Assistance, Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), Aid to the Permanently and Totally Disabled (APTD), Aid to the Needy Blind (ANB), Old Age Assistance (OAA), Subsidized School Lunch Programs, Title XX Day Care Program, Food Stamps, Medicaid, Subsidized Housing, or Women, Infant and Children Program (WIC).

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

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Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
DOMESTIC DELIVERY SERVICE
SCHEDULE D-TOU (continued)

TERM OF CONTRACT

A customer is eligible to take service on this Schedule upon meeting the qualifications for this Schedule to the satisfaction of the utility and with the consent of the utility. A customer receiving service under this schedule may elect to change to another applicable rate schedule but only after receiving service on this schedule for at least 12 consecutive months. If a customer elects to discontinue service on this schedule, the customer will not be permitted to return to this schedule for a period of one year.

EXTRA SERVICE CHARGES

In addition to the charges for electric service herein specified, additional charges for extra services rendered will be made in accordance with the Tariff which this Schedule is a part.

TARIFF PROVISIONS

The Company's complete Tariff where not inconsistent with any specific provisions hereof, is part of this Schedule.

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

Issued: April 2, 2021
Effective: May 2, 2021

Issued by: Robert Hevert
Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
SCHEDULE TOU-EV-D

AVAILABILITY

Service under this schedule is specifically limited to residential customers who require service restricted to charging a battery electric vehicle (BEV) or plug-in hybrid electric vehicle (PHEV) via a recharging outlet at the customer's premises. This schedule is not available to customers with a conventional charge sustaining (battery recharged solely from the vehicle's on-board generator) hybrid electric vehicle (HEV). This Schedule is available for all customers currently taking service or eligible to receive service from Schedule D or Schedule TOU-D.

CHARACTER OF SERVICE

The charging station shall be connected by means of an approved circuit to a separate charging meter for electric vehicles. Electricity will normally be delivered at 120/240 volts using three wire, single phase service. In some areas service may be 120/208 volts, single phase, three wire.

CHARGES – MONTHLY

The Delivery Service Charges shall include Distribution Charges and Adjustments, set forth below. The rates for energy (kWh) based charges are seasonal with a winter period from November 1 to April 30 and a summer period from May 1 to October 31.

Rates for Retail Delivery Service Effective May 1, 2021 through October 31, 2021

Customer Charge \$5.26 per meter

Distribution Charge

Off Peak kWh	2.941¢ per kWh
Mid Peak kWh	4.941¢ per kWh
Peak kWh	8.797¢ per kWh

External Delivery Charge - Transmission:

Off Peak kWh	0.408¢ per kWh
Mid Peak kWh	4.683¢ per kWh
Peak kWh	11.567¢ per kWh

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

Issued: April 2, 2021
Effective: May 2, 2021

Issued by: Robert Hevert
Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
SCHEDULE TOU-EV-D (Continued)

Default Service Charge:

Off Peak kWh:	6.304¢ per kWh
Mid Peak kWh	7.003¢ per kWh
Peak kWh	8.594¢ per kWh

Off peak hours will be from 12AM to 6AM and all day holidays and weekends.
Mid peak hours will be from 6AM to 3PM daily Monday through Friday, except holidays.
Peak hours will be from 3PM to 8PM daily Monday through Friday, except holidays.

ADJUSTMENTS

These Adjustments, included in the Delivery Service Charges, shall be adjusted from time to time.

External Delivery Charge (non-transmission): All energy delivered under this Schedule shall be subject to the External Delivery Charge, non-transmission as provided in Schedule EDC of the Tariff of which this is a part.

Stranded Cost Charge: All energy delivered under this Schedule shall be subject to the Stranded Cost Charge as provided in Schedule SCC of the Tariff of which this is a part.

Storm Recovery Adjustment Factor: All energy delivered under this Schedule shall be subject to the Storm Recovery Adjustment Factor as provided in Schedule SRAF of the Tariff of which this is a part.

System Benefits Charge: All energy delivered under this Schedule shall be subject to the System Benefits Charge as provided in Schedule SBC of the Tariff of which this is a part

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Effective: May 2, 2021

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Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
SCHEDULE TOU-EV-D (Continued)

TERMS OF PAYMENT

The charges for service hereunder are net, billed monthly and due within 25 days following the date postmarked on the bill, as specified in the Terms and Conditions for Distribution Service, which is a part of this Tariff. Amounts not paid prior to the due date shall be subject to interest on past due accounts, as provided in Appendix A of the Terms and Conditions for Distribution Service, and will apply to the unpaid balance. When billing on the OL Schedule is combined with billing on this rate, the interest on past due accounts shall apply to the total bill. The Company will waive the residential late payment fee if the Customer can provide evidence of their eligibility in any of the following programs: Statewide Low-Income Electric Assistance Program (NHPUC Order No. 23,980), Fuel Assistance, Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), Aid to the Permanently and Totally Disabled (APTD), Aid to the Needy Blind (ANB), Old Age Assistance (OAA), Subsidized School Lunch Programs, Title XX Day Care Program, Food Stamps, Medicaid, Subsidized Housing, or Women, Infant and Children Program (WIC).

TERM OF CONTRACT

A customer is eligible to take service on this Schedule upon meeting the qualifications for this Schedule to the satisfaction of the utility and with the consent of the utility. A customer receiving service under this schedule may elect to change to another applicable rate schedule but only after receiving service on this schedule for at least 12 consecutive months. If a customer elects to discontinue service on this schedule, the customer will not be permitted to return to this schedule for a period of one year.

TARIFF PROVISIONS

The Company's complete Tariff where not inconsistent with any specific provisions hereof, is part of this Schedule.

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

Issued: April 2, 2021
Effective: May 2, 2021

Issued by: Robert Hevert
Senior Vice President

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NHPUC No. 3 - Electricity Delivery
 Unitil Energy Systems, Inc.

**FOR ILLUSTRATIVE PURPOSES ONLY
 SCHEDULE TOU-EV-G2**

AVAILABILITY

Service under this schedule is specifically limited to customers who require service for charging a battery electric vehicle (BEV) or plug-in hybrid electric vehicle (PHEV) via a recharging outlet at the customer’s premises. This Schedule is available for use at business locations or commercially owned electric vehicle charging stations with average use consistently below two-hundred (200) kilovolt-ampere (kVA) of demand and generally less than one-hundred thousand (100,000) kilowatt-hours per month, as measured by the Company.

CHARACTER OF SERVICE

The charging station shall be connected by means of an approved circuit to a separate charging meter for the electric vehicle charging station. Electric service of the following description is available, depending upon the location of the Customer: (1) 120/240 volts, single phase, three wire; (2) 120/208 volts, single phase, three wire; (3) 208Y/120 volts, three phase, four wire; (4) 480Y/277 volts, three phase, four wire; (5) 4160 volts, three phase, four wire or such higher primary distribution voltage as may be available, the voltage to be designated by the Company.

CHARGES - MONTHLY

The Delivery Service Charges shall include Distribution Charges and Adjustments, set forth below. The rates for energy (kWh) based charges are seasonal with a winter period from November 1 to April 30 and a summer period from May 1 to October 31.

Rates for Retail Delivery Service Effective May 1, 2021 through October 31, 2021

Customer Charge \$32.20 per meter

Distribution Demand Charge \$11.59 per kW

External Delivery Charge - Transmission:

Off Peak	0.408¢ per kWh
Mid Peak	3.717¢ per kWh
Peak	14.354¢ per kWh

Default Service Charge

Off Peak	5.278¢ per kWh
Mid Peak	6.035¢ per kWh
Peak	7.378¢ per kWh

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 Effective: May 2, 2021
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 Senior Vice President 77

NHPUC No. 3 - Electricity Delivery
 Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
 SCHEDULE TOU-EV-G2 (continued)

Off peak hours will be from 12AM to 6AM and all day holidays and weekends.
 Mid peak hours will be from 6AM to 3PM daily Monday through Friday, except holidays.
 Peak hours will be from 3PM to 8PM daily Monday through Friday, except holidays.

DEMAND CHARGE DISCOUNT

During the first three years of service, Demand Charges for any new customer will be discounted each year in accordance with the table below.

	1 st Year	2 nd Year	3 rd Year	4 th Year
Demand Charge Discount	75%	50%	25%	0%

ADJUSTMENTS

These Adjustments, included in the Delivery Service Charges, shall be adjusted from time to time.

External Delivery Charge (non-transmission): All energy delivered under this Schedule shall be subject to the External Delivery Charge as provided in Schedule EDC of the Tariff of which this is a part.

Stranded Cost Charge: All energy delivered under this Schedule shall be subject to the Stranded Cost Charge as provided in Schedule SCC of the Tariff of which this is a part.

Storm Recovery Adjustment Factor: All energy delivered under this Schedule shall be subject to the Storm Recovery Adjustment Factor as provided in Schedule SRAF of the Tariff of which this is a part.

System Benefits Charge: All energy delivered under this Schedule shall be subject to the System Benefits Charge as provided in Schedule SBC of the Tariff of which this is a part.

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____
 Issued: April 2, 2021 Issued by: Robert Hevert
 Effective: May 2, 2021 Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
SCHEDULE TOU-EV-G2 (continued)

DETERMINATION OF DEMAND

The metered demand used for billing shall be the maximum fifteen-minute kilowatt (kW) demand determined during the current month, but in no case less than one kW or the minimum available demand capacity specified by an agreement between the Customer and the Company. The billing demand shall be taken in 0.1 kW intervals, and those demands falling between the intervals shall be billed on the next lower 0.1 kW.

If the Customer's average use is consistently equal to or in excess of two-hundred (200) kilovolt-ampere (kVA) of demand and is generally greater than one-hundred thousand (100,000) kilowatt-hours per month, as measured by the Company, the Customer may be placed on rate TOU-EV-G1.

The Company reserves the right to install kilovolt-ampere meters, and in such case the monthly demand shall not be less than 90% of the measured kVA.

TERMS OF PAYMENT

The charges for service hereunder are net, billed monthly and due within 25 days following the date postmarked on the bill, as specified in the Terms and Conditions for Distribution Service, which is a part of this Tariff.

TERM OF CONTRACT

A customer is eligible to take service on this Schedule upon meeting the qualifications for this Schedule to the satisfaction of the utility and with the consent of the utility. A customer receiving service under this schedule may elect to change to another applicable rate schedule but only after receiving service on this schedule for at least 12 consecutive months. If a customer elects to discontinue service on this schedule, the customer will not be permitted to return to this schedule for a period of one year.

METERING

The Company may at its option meter at the Customer's utilization voltage or on the high tension side of the transformer through which service is furnished.

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Effective: May 2, 2021 Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
SCHEDULE TOU-EV-G2 (continued)

In the later case, or if the Customer's utilization voltage requires no transformation, and if the Company meters service at 4,160 volts or over, a compensating deduction of 2.0% will be made from the metered kilowatt or kilovolt-ampere demand and metered kilowatt-hour usage to determine billing amounts. If the Company meters service at 34,500 volts or over, a compensating deduction of 3.5% will be made from the metered kilowatt or kilovolt-ampere demand and metered kilowatt-hour usage to determine billing amounts. Demands for these purposes will be as determined under the Determination of Demand provision of this Schedule.

CREDIT FOR TRANSFORMER OWNERSHIP

If the Customer furnishes all transformers which may be required so that the Company is not required to furnish any transformers, there will be credited, against the amount established under the Determination of Demand and Metering provisions of this Schedule, 50 cents for each kilowatt of monthly billing demand, or 50 cents for each kilovolt-ampere of monthly billing demand

MINIMUM CHARGE

The Minimum Charge per month shall be no less than the Customer Charge for each type of service installed plus a capacity charge based upon a minimum demand as defined under the Determination of Demand provision of this Schedule.

TARIFF PROVISIONS

The Company's complete Tariff where not inconsistent with any specific provisions hereof, is part of this Schedule.

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____
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Issued by: Robert Hevert
Senior Vice President

Exhibit CSV-7
NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

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FOR ILLUSTRATIVE PURPOSES ONLY
SCHEDULE TOU-EV-G1

AVAILABILITY

Service under this schedule is specifically limited to customers who require service for charging a battery electric vehicle (BEV) or plug-in hybrid electric vehicle (PHEV) via a recharging outlet. This Schedule is available for use at business locations or commercially owned electric vehicle charging stations with average use consistently equal to or in excess of two-hundred (200) kilovolt-ampere (kVA) of demand and is generally greater than one-hundred thousand (100,000) kilowatt-hours per month, as measured by the Company.

CHARACTER OF SERVICE

The charging station shall be connected by means of an approved circuit to a separate charging meter for the electric vehicle charging station. Electric service of the following description is available, depending upon the location of the Customer: (1) 120/240 volts, single phase, three wire; (2) 120/208 volts, single phase, three wire; (3) 208Y/120 volts, three phase, four wire; (4) 480Y/277 volts, three phase, four wire; (5) 4160 volts, three phase, four wire or such higher primary distribution voltage as may be available, the voltage to be designated by the Company.

CHARGES - MONTHLY

The Delivery Service Charges shall include Distribution Charges and Adjustments, set forth below. The rates for energy (kWh) based charges are seasonal with a winter period from November 1 to April 30 and a summer period from May 1 to October 31.

Rates for Retail Delivery Service Effective May 1, 2021 through October 31, 2021

Customer Charge

Secondary Voltage \$178.93 per meter
Primary Voltage \$95.42 per meter

Distribution Demand Charge \$8.37 per kVa

External Delivery Charge - Transmission:

Off Peak 0.408¢ per kWh
Mid Peak 3.867¢ per kWh
Peak 14.117¢ per kWh

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

Issued: April 2, 2021
Effective: May 2, 2021

Issued by: Robert Hevert
Senior Vice President

NHPUC No. 3 - Electricity Delivery
 Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
 SCHEDULE TOU-EV-G1 (continued)

Off peak hours will be from 12AM to 6AM and all day holidays and weekends.
 Mid peak hours will be from 6AM to 3PM daily Monday through Friday.
 Peak hours will be from 3PM to 8PM daily Monday through Friday, except holidays.

DEMAND CHARGE DISCOUNT

During the first three years of service, Demand Charges for any new customer will be discounted each year in accordance with the table below.

	1 st Year	2 nd Year	3 rd Year	4 th Year
Demand Charge Discount	75%	50%	25%	0%

ADJUSTMENTS

These Adjustments, included in the Delivery Service Charges, shall be adjusted from time to time.

External Delivery Charge (non-transmission): All energy delivered under this Schedule shall be subject to the External Delivery Charge as provided in Schedule EDC of the Tariff of which this is a part.

Stranded Cost Charge: All energy delivered under this Schedule shall be subject to the Stranded Cost Charge as provided in Schedule SCC of the Tariff of which this is a part.

Storm Recovery Adjustment Factor: All energy delivered under this Schedule shall be subject to the Storm Recovery Adjustment Factor as provided in Schedule SRAF of the Tariff of which this is a part.

System Benefits Charge: All energy delivered under this Schedule shall be subject to the System Benefits Charge as provided in Schedule SBC of the Tariff of which this is a part.

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

Issued: April 2, 2021
 Effective: May 2, 2021

Issued by: Robert Hevert
 Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
SCHEDULE TOU-EV-G1 (continued)

DETERMINATION OF DEMAND

For the purpose of demand billing under the Large General Service Schedule G1, metered demands shall be measured as the highest 15-minute integrated kilovolt-ampere (kVA) demand determined during the current month for which the bill is rendered. The monthly billing demand charge shall be based upon this metered demand except that it shall not be less than 80% of the highest demand in any of the immediately preceding eleven months, and in no event shall such demand be taken or considered as being less than 50 kVA.

MINIMUM CHARGE

The Minimum Charge per month shall be no less than the Customer Charge for each type of service installed plus a capacity charge based upon a minimum demand and/or demand ratchet as defined under the Determination of Demand provision of this Schedule.

TERMS OF PAYMENT

The charges for service hereunder are net, billed monthly and due within 25 days following the date postmarked on the bill, as specified in the Terms and Conditions for Distribution Service, which is a part of this Tariff. Amounts not paid prior to the due date shall be subject to interest on past due accounts, as provided in Appendix A of the Terms and Conditions for Distribution Service, and will apply to the unpaid balance. When billing on the OL Schedule is combined with billing on this rate, the interest on past due accounts shall apply to the total bill.

TERM OF CONTRACT

A customer is eligible to take service on this Schedule upon meeting the qualifications for this Schedule to the satisfaction of the utility and with the consent of the utility. A customer receiving service under this schedule may elect to change to another applicable rate schedule but only after receiving service on this schedule for at least 12 consecutive months. If a customer elects to discontinue service on this schedule, the customer will not be permitted to return to this schedule for a period of one year.

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

Issued: April 2, 2021
Effective: May 2, 2021

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Senior Vice President

NHPUC No. 3 - Electricity Delivery
Unitil Energy Systems, Inc.

FOR ILLUSTRATIVE PURPOSES ONLY
SCHEDULE TOU-EV-G1 (continued)

METERING

The Company may at its option meter at the Customer's utilization voltage or on the high tension side of the transformer through which service is furnished.

In the later case, or if the Customer's utilization voltage requires no transformation, and if the Company meters service at 4,160 volts or over, a compensating deduction of 2.0% will be made from the metered kilowatt or kilovolt-ampere demand and metered kilowatt-hour usage to determine billing amounts. If the Company meters service at 34,500 volts or over, a compensating deduction of 3.5% will be made from the metered kilowatt or kilovolt-ampere demand and metered kilowatt-hour usage to determine billing amounts. Demands for these purposes will be as determined under the Determination of Demand provision of this Schedule.

CREDIT FOR TRANSFORMER OWNERSHIP

If the Customer furnishes all transformers which may be required so that the Company is not required to furnish any transformers, there will be credited, against the amount established under the Determination of Demand and Metering provisions of this Schedule, 50 cents for each kilowatt of monthly billing demand, or 50 cents for each kilovolt-ampere of monthly billing demand

TARIFF PROVISIONS

The Company's complete Tariff where not inconsistent with any specific provisions hereof, is part of this Schedule.

Authorized by NHPUC Order No. _____ in Case No. DE _____ dated _____

Issued: April 2, 2021
Effective: May 2, 2021

Issued by: Robert Hevert
Senior Vice President

Exhibit CSV-8

UES EV TOU Service Requirements

Domestic EV TOU (TOU-EV-D)

Residential customers, who request to participate in the electric vehicle (EV) time of use (TOU) rate program (TOU-EV-D), will have their current load and service conditions reviewed and evaluated by UES (or “the Company”) to determine if the existing utility facilities can accommodate the addition of the proposed EV charging.

The field review will determine whether the capability of the existing service is rated for a minimum of 200 amps from the pole to the weather head where overhead (“OH”), or to the meter where underground (“URD”).

In the event the existing service is rated for the additional load, the customer will coordinate with the Company for an additional customer-supplied and installed meter socket to accommodate the required UES-provided metering for EV charging. Depending on the installation, the customer may be required to provide and install a multi-gang meter socket. All equipment, installation and methodology of the meter socket installation shall meet Company and National Electric Code (“NEC”) standards and specifications in affect at the time of the EV charger installation.

Should the customer’s existing service not meet the threshold requirements outlined above and a service upgrade is required, such upgrades will be coordinated in accordance with existing service terms and conditions for distribution service. For an OH service installation, the Company will provide, at no direct cost, a new appropriately sized service drop. Where the existing installation is a URD service connected by a conduit system or a URD service fed with direct buried cable, the Company would replace the cable in accordance with existing terms and conditions for distribution service.

The Customer shall be responsible for the provision, installation, excavation and grading required to facilitate the installation as well as any associated structures that may be required to complete the installation.

For any of the above scenarios, should the utility transformer serving the impacted property require additional capacity, the Company will provide an appropriately sized transformer, ancillary equipment and associated labor to complete the service.

For all underground services, the customer will also be required to provide and install a multi-gang meter socket to accommodate the Company supplied meter. All equipment, installation and methodology of the conduit systems and meter socket installation shall meet both Company and NEC standards and specifications in affect at the time of the installation.

Once the meter socket and associated equipment installation is complete and approved by the local authorities having jurisdiction, the Company will install the metering required to monitor the EV charger and the customer will then be eligible for the TOU-EV-D rate.

Small General Service EV TOU (TOU-EV-G2)

Commercial and industrial customers who routinely consume less than 200 kVa and 100,000 kWh per billing month for EV charging only will be eligible for the TOU-EV-G2 rate. Their services, termed

Exhibit CSV-8

secondary services, may be delivered from single, banked or networked transformers that may or may not require current transformers (CTs) to meter their accounts. The methodology of service delivery may vary considerably within this customer class.

Eligible customers who request to participate in TOU-EV-G2 rate program will have their load and service conditions reviewed and evaluated by UES to determine if the existing utility facilities can accommodate the addition of the proposed EV charging.

Due to the range of equipment and installations to provide services to these customers, the Company anticipates working closely with customers to coordinate the installation of the customer-supplied meter socket required to accommodate the Company-supplied metering equipment. The installation, equipment and methodology must meet Company and NEC requirements that are in effect at the time of the installation or service modifications.

Once the metering installation is completed, providing a dedicated meter socket to monitor the EV charging equipment, the customer will then be eligible for TOU-EV-G2 rate.

Large General Service EV TOU (TOU-EV-G1)

Commercial and industrial customers that have a monthly demand in excess of 200 kVa and 100,000 kWh per billing month for EV charging only will be eligible for the TOU-EV-G1 rate. Typically, such customers are served from individual transformers and are classified as “transformer-rated,” equipped with CT cabinets which provide for remote metering equipment. The installation of such stand-alone EV charging shall require the installation of a separate, individual meter socket for monitoring the EV charging equipment by a Company-supplied meter.

Eligible customers who request to participate in the TOU-EV-G1 rate program will have their current load and service conditions reviewed and evaluated by UES to determine if the existing utility facilities can accommodate the addition of the proposed EV charging.

Due to the range of equipment and installations to provide services to these customers, the Company anticipates working closely with customers to coordinate the installation of the customer-supplied meter socket required to accommodate the Company-supplied metering equipment. The installation, equipment and methodology must meet Company and NEC requirements that are in effect at the time of the installation or service modifications.

Once the metering installation is completed, providing a dedicated meter socket to monitor the EV charging equipment, the customer will then be eligible for TOU-EV-G1 rate.

Exhibit CSV-9

EERS Granite State Test BCR for Behind-the-Meter EVSE Installation and Incentive Program (Illustrative Model)

Program Cost-Effectiveness - 2021 PLAN

	Benefit/Cost Ratio		Benefits (\$000)		Utility Costs (\$000 - 2021\$) ²	Customer Costs (\$000 - 2021\$) ²	Annual MWh Savings	Lifetime MWh Savings	Winter kW Savings	Summer kW Savings
	Granite State Test	Granite State Test	Granite State Test	Granite State Test						
Residential Programs										
B1 - Home Energy Assistance	-	-	-	-	-	-	-	-	-	-
A1 - Energy Star Homes	-	-	-	-	-	-	-	-	-	-
A2 - Home Performance with Energy Star	-	-	-	-	-	-	-	-	-	-
A3 - Energy Star Products	2.18	-	653.975	-	300.000	-	25.0	250.0	250.0	250.0
A4 - Residential Behavior	-	-	-	-	-	-	-	-	-	-
A5 - Residential Active Demand Response	-	-	-	-	-	-	-	-	-	-
A6b - Res ISO Forward Capacity Market Expenses	-	-	-	-	-	-	-	-	-	-
A6c - Res Education	-	-	-	-	-	-	-	-	-	-
A6d - Energy Optimization Pilot	-	-	-	-	-	-	-	-	-	-
Sub-Total Residential	2.18	-	653.975	-	300.000	-	25.0	250.0	250.0	250.0
Commercial, Industrial & Municipal										
C1 - Large Business Energy Solutions	-	-	-	-	-	-	-	-	-	-
C2 - Small Business Energy Solutions	-	-	-	-	-	-	-	-	-	-
C3 - Municipal Energy Solutions	-	-	-	-	-	-	-	-	-	-
C5 - C&I Active Demand Response	-	-	-	-	-	-	-	-	-	-
C6b - C&I ISO Forward Capacity Market Expenses	-	-	-	-	-	-	-	-	-	-
C6c - C&I Education	-	-	-	-	-	-	-	-	-	-
Sub-Total Commercial & Industrial	-	-	-	-	-	-	-	-	-	-
Total	2.18	-	653.975	-	300.000	-	25.0	250.0	250.0	250.0

Notes:

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Description of Electric Vehicle (EV) Make-Ready Service Requirements

The UES Make-Ready Public EV Infrastructure Program is designed to reduce or remove barriers to initiating and installing EV charging stations at publically-available locations. The program consists of utility-supported facilities that will provide the appropriate alternating current (“AC”) infrastructure for the installation of charging stations and supporting equipment. Though the make-ready program is generally foreseen to be implemented in three primary scenarios as discussed below, the Company will engage with customers to evaluate other potential installations and deployment of EV charging infrastructure. Electric vehicle supply equipment (EVSE) and any direct current (DC) equipment, as applicable, will be provided by participating customers.

Installation Scenarios

There are principally two major types of equipment for charging – Level 2 chargers which AC output at 240 volts up to 19.2 kW and DC fast chargers (“DCFC”) which provide a DC output directly to EVs.

The proposed facilities are designed to support both types of chargers in various configurations. Each description provides an outline of equipment, materials and services from the relative primary utility facilities into the location of the EVSE. All equipment, whether provided by the Company or customer, shall be installed according to Company standards.

Scenario 1 - Level 2 Chargers (up to 10) Served from Overhead (OH) Utility Facilities

This service design would provide for a three phase, 120/208 volt electric service that begins with the replacement of the mainline street pole or the installation of a mid-span street pole to facilitate a tap on the Company’s primary system. The tap will consist of overcurrent protective devices (cutouts) and the appropriately sized conductor to extend one span, not to exceed 200’, to a service pole which will be equipped with three pole-mounted transformers of the appropriate size.

An underground (“URD”) service will be installed from the transformers to a specifically-designed weather resistant cabinet, mounted on a concrete footing. Traditional utility services would end at this point; however, the program will provide the cabinet to accept the URD service lateral and contain the required utility metering, a service-rated distribution panel equipped with a main breaker/disconnect and the necessary size and quantity of circuit breakers to serve the charging facilities.

The program provides for the installation of the required conduits to each of the pedestal locations where concrete footings will be provided for the installation of the EVSE. The appropriate branch circuit wiring will also be provided from the service cabinet to the individual kiosk locations for the connection of the EVSE. All excavation and rough grading will be provided as part of the program.

Scenario 2 - Level 2 Chargers (up to 10) Served from URD Utility Facilities

This installation, designed to provide a three phase 120/208 volt service, includes replacement of the mainline pole or installation of a mid-span pole to facilitate a tap from the utility primary system, equipped with “cutouts”, to a utility pole located no more than 175’ from the mainline/mid-span pole. A primary voltage loop cable system with cutouts will be installed to provide the transition from OH facilities to underground and extended underground, no more than 750’ to a transformer pad located within 200’ of the location of the charging facility location. A pull box will be installed no more than 250’ away from the riser pole to facilitate the installation of the cabling in the primary underground conduit

Exhibit CSV-10

system. The appropriately-sized transformer will be installed on a supplied pad and the secondary conductors will be run in conduit to the service cabinet providing metering, the distribution panel with a main breaker and the appropriately sized branch circuit breakers for the charging facility. The branch circuit conduits and wiring will be installed to the individual charging facility pads to facilitate the wiring of the EVSE. Excavation, footings and grading will be provided.

Scenario 3 - DCFC Served from URD Utility Facilities

Due to the capacity required to serve the DCFC, URD is the only option provided. Installation will provide a pad mounted transformer with 277/480 volt secondary appropriately sized. OH construction will include: 175' from mainline to riser pole, a primary loop feed with cable and conduit not to exceed 750' from riser pole to transformer pad and pull box no more than 250' from riser pole, supplied transformer pad, secondary conduit and cabling, the switchgear, branch circuit conduit and wiring, excavation, grading, and footings/pads. The applicable customer will be responsible for the procurement and installation of all items on the DC-side of the installation including but not limited to the AC/DC converters, conduit, wiring, footings/pads, excavation, grading etc.

Exhibit CSV-11

U.S. Department of Energy EVI-Pro Calculation of EVSE Ports Required to Support EVs in 2028

U.S. Department of Energy, Alternative Fuels Data Center, Electric Vehicle Infrastructure Projection Tool (EVI-Pro) Lite

<https://afdc.energy.gov/evi-pro-lite>

NH owner-occupied housing rate 2015-2019, U.S. Census Bureau = 71%

<https://www.census.gov/quickfacts/fact/table/NH/PST045219>

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Exhibit CSV-12

UES Budgetary Model for Make-Ready

Level 2 - 19.2 kW EV chargers, 5 chargers for 96 kW total connected load

Equipment	Quantity(ft)	Cost/Unit(\$/ft)	Cost/Item(\$)
120/208V distribution enclosure	1		\$6,000
4" PVC Conduit	100	3	300
2" PVC Conduit	460	1.45	667
500KCMIL Copper	900	8.52	7668
#2 GND Copper	120	1.6	192
#6 Copper	2400	0.65	1560
#8 GND Copper	1200	0.4	480
Civil Foundation(Xfmr, distribution Panel, chargers)(Materials Include Concrete, Rebar and backfill)			2000
Total Equipment Cost			\$16,867

Labor	Description
\$3,000.00	Install all Electrical equipment and Cable
\$2,500.00	Excavate and install Conduit (\$25.00 PF)
\$6,900.00	Excavate and install Conduit (\$15.00 PF)
\$2,000.00	Excavate, form and pour concrete
\$14,400.00	Site Work Total
\$45,876.00	Unitil Primary Line Work
\$16,867.00	Total Equipment Cost
\$77,143.00 Level 2 Total	

DCFC - 50 kW EV chargers, 6 chargers for 300 kW total connected load

Equipment	Quantity(ft)	Cost/Unit(\$/ft)	Cost/Item(\$)
120/208V distribution enclosure	1		\$11,000
4" PVC Conduit	200	3	600
2" PVC Conduit	720	1.45	1044
500KCMIL Copper	1800	8.52	15336
#2 GND Copper	900	1.6	1440
#6 Copper	2800	0.65	1820
#8 GND Copper	1400	0.4	560
Civil Foundation(Xfmr, distribution Panel, chargers)(Materials Include Concrete, Rebar and backfill)			3000
Precast Transformer vault & pad		1	4000
5"Primary Conduit	500	10	5000
Total Equipment Cost			\$43,800

Labor	Description
\$5,000.00	Install all Electrical equipment and Cable
\$6,000.00	Excavate and install Conduit (\$25.00 PF)
\$10,800.00	Excavate and install Conduit (\$15.00 PF)
\$4,000.00	Excavate, form and pour concrete. Install precast Transformer vault and pad
\$12,500.00	Primary conduit installation
\$38,300.00	Site Work Total
\$61,294.00	Unitil Primary Line Work
\$43,800.00	Total Equipment Cost
\$143,394.00 DCFC Total	

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Unitil - UES

Customer Project Evaluation & Determination of Non-Refundable Customer Contribution

Note: User Inputs are within Blue highlight cells

yes
no

Exhibit CSV-13: UES Make-Ready DCF Analysis		
Public Level 2 - 5 Chargers / 10 plugs (\$77k) per site	77,000	37x10=370
Public DCFC - 6 Chargers / 6 plugs (\$143k) per site	143,000	8x6=48
Load per charger = 19.2 kW for Level 2 and 50kW for DCFC		

Project Inputs:

Relative Year	-	1	2	3	4	5	6	7	8	9	
Absolute Year	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	Total

Total Project Cost (before any customer contrib) <i>(on incremental basis = excl Gen Constr OH's)</i>	<i>Model accepts multi-year phase-in of capital project costs; Enter as Positive Amounts.</i>											
	\$ 231,000	\$ 748,000	\$ 902,000	\$ 979,000	\$ 1,133,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,993,000

Incremental Number of Meters by Year:	Class											Total
(1) Primary Class/Meters added per Year	03 G2	3	6	8	9	11						37
(2) Add'l Class/Meters added per Year	07 G1	-	2	2	2	2						8
(3) Add'l Class/Meters added per Year	01 D											-
												45

Average Consumption & Demand		Hi-Volt Metering Discount?	Transform Ownership Credit?	Historical Average Billed kWh	Billed Demand	Annual Average Billed kWh	Billed Demand
(1) Primary Class/Meters added per Year	03 G2	no	no	31,384	122	67,277	1,152
(2) Add'l Class/Meters added per Year	07 G1	no	no	2,154,514	6,409	341,640	3,600
(3) Add'l Class/Meters added per Year	01 D	no	no	7,475	-	-	-

*(As a 'default', model provides - by class - avg consumption and demand per meter based on prior five years)
If known, actual project estimates should be substituted for these historic averages
Model accepts up to three different classes within one 'project'.*

Optional Calculation of Consumption and Demands

(If this module is utilized, manually input these calculated demand/kwh values into input table above)

		Connected Load kW	Utilization Factor %	Avg Peak Demand kW (mth)	Annual Demand kW	Power Factor %	Avg Peak Demand kVa (mth)	Annual Demand kVa	Load Factor %	Annual Consumpt kWh
(1) Primary Class/Meters added per Year	03 G2	96	100%	96	1,152	100%	96	1,152	8%	67,277
(2) Add'l Class/Meters added per Year	07 G1	300	100%	300	3,600	100%	300	3,600	13%	341,640
(3) Add'l Class/Meters added per Year	01 D			-	-	100%	-	-		-

Solve for Required Customer Contribution

*Run the Model with No Customer Contribution
(for 'benchmark' dynamic analytic periods ending 10 or 20 years beyond year of last capital expenditure)*

Run Dynamic 10-Yr Analysis with No Customer Contribution	Run Dynamic 20-Yr Analysis with No Customer Contribution
--	--

*If IRR/NPV results are below benchmarks:
Re-Run the model to determine the required non-refundable customer contribution*

Run Dynamic 10-Yr Analysis Solve for Customer Contribution	Run Dynamic 20-Yr Analysis Solve for Customer Contribution
--	--

	Dynamic 10-Yr (C&I) Analysis			Dynamic 20-Yr (Res) Analysis		
	Results	Benchmark	Flag	Results	Benchmark	Flag

Total Analysis Years	14
Non-Refundable Customer Contribution	\$ -

Total Analysis Years	24
Non-Refundable Customer Contribution	\$ -

Customer Contribution Payment Plan Option	0 Months
Monthly Payment Required	\$ -

Customer Contribution Payment Plan Option	0 Months
Monthly Payment Required	\$ -

IRR on Net Cash Flow (Excl Financing)	8.86%	7.18%	OK	13.30%	7.18%	OK
Net Present Value - at AfTax WACC	\$ 243,869		OK	\$ 1,522,146		OK
Net Company Capital Expenditure	\$ 3,993,000			\$ 3,993,000		
Simple Payback within relative year ==>	10			10		

Customer Contribution Requirements via Alternative Static Analysis Periods

Time periods reflect relative years identified above and do not begin with the year after the last capital expenditure

	Static 5 yr	Static 10 yr	Static 15 yr	Static 20 yr	Static 25 yr
Non-Refundable Customer Contrib	\$ -	\$ -	\$ -	\$ -	\$ -
IRR on Net Cash Flow (Excl Financing)		1.39%	9.81%	12.44%	13.44%
Net Present Value - at AfTax WACC	\$ (1,889,012)	\$ (549,856)	\$ 413,106	\$ 1,116,476	\$ 1,604,401
Net Company Capital Expenditure	\$ 3,993,000	\$ 3,993,000	\$ 3,993,000	\$ 3,993,000	\$ 3,993,000
Simple Payback within year==>	10	10	10	10	10

(Note: Project acceptance using analysis period other than dynamic 10-year for C&I or 20-year for Residential requires CFO approval)

Docket No. DE 21-030
Exhibit CSV-13
<<Page 1 of 1>>

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UES MC&E Plan Cost Analysis
Exhibit CSV-14

<u>Cost Category</u>	<u>Estimated Cost</u>
Market Research/Survey	\$30,000.00
Messaging/Design - Integrated Campaign	\$15,000.00
Website - Micro site w/ embedded cost calculator tool	\$15,000.00
Video/animation	\$12,500.00
Rate comparison tool w/ shadow billing	\$169,000.00
Social Advertising	\$25,000.00
Direct Mail - print + postage	\$85,000.00
Bill Insert(s) - print	\$15,000.00
Flyers - production	\$3,500.00
	<hr/>
	\$370,000.00

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