

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty

DE 20-170
Electric Vehicle Time of Use Rates

Staff Data Requests - Set 1

Date Request Received: 6/29/21
Request No. Staff 1-3

Date of Response: 7/13/21
Respondent: Heather Tebbetts
Melissa Samenfeld

REQUEST:

Reference Order No. 26, 394 (August 18, 2020) at 10 stating “we anticipate that any high demand draw rate design proposals filed in an adjudicative proceeding will be informed by an assessment of the costs and feasibility of offering a peak coincident demand charge rate component.” Please provide the Company’s assessment of the costs and feasibility of a peak coincident demand charge rate component. If the Company did not conduct such an assessment, please explain why this is the case.

RESPONSE:

The Company did not create a demand charge directly associated with peak coincident demand for its commercial rates because the Company expects that the charging stations taking these rates will be public and separately metered. Creating a rate that would be higher during the potential peak coincident demand hours will prohibit drivers from charging when they need it most. These charging stations will be located in a franchised territory where drivers may not be able to find a charging station at a reasonable charging price, unlike a gas station where they may be owned by different companies so a driver can search for a reasonable per gallon price of gas in a relatively small geographical area. For a service request for private charging stations, such as for a fleet, the Company would have to look at the circumstances surrounding the request as we do not believe a “one size fits all” rate may be appropriate for all charging installations.

If all public separately metered charging stations in one area are the same approximate price, the driver does not have the opportunity to charge at a reasonable price unless they search outside of that utility’s franchise area. If the Commission finds that peak coincident demand rates for charging stations is the appropriate rate signal, given that the three utilities in New Hampshire are subject to this docket’s outcome, no drivers in New Hampshire will be able to charge at a reasonable price during the peak hours and would completely negate the purpose of advocating for electrification of transportation.