

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

DE 20-170
Electric Vehicle Time of Use Rates

Staff Data Requests - Set 2

Date Request Received: 7/21/21
Request No. DOE 2-5

Date of Response: 8/4/21
Respondent: Heather Tebbetts
Melissa Samenfeld

REQUEST:

Reference Response Staff 1-3, stating “The Company did not propose an EV TOU rate for its commercial rates,” and Order No. 26, 394 (August 18, 2020) stating “Staff recommended the Commission open a new proceeding and direct each electric utility to file within 120 days, consistent with the guidance above: (1) an EV TOU rate proposal for separately-metered residential and small commercial customer applications; (2) an EV TOU rate proposal for separately-metered high demand draw commercial customer applications that may incorporate direct current fast charging or clustered level two chargers.”

- a. Please explain why the Company did not develop an EV TOU rate proposal for separately-metered high demand draw commercial customer applications.
- b. Please explain why the Company could not utilize the same method it used to develop EV TOU rates for residential and small commercial customers, and develop a EV TOU rate for high demand draw commercial customer applications.

RESPONSE:

- a. The Company does not agree that offering EV TOU rates for separately-metered high demand draw commercial applications is the appropriate rate design for such electric vehicle charging installations.
- b. The premise of the residential rate is completely different than separately metered commercial customer applications. Residential customers will charge when they are home, most likely on the weekends and evenings, thus charging during off peak hours. Commercial applications provide charging for any time during the day when drivers are out in the community and need to charge; thus, completely different use cases are being compared in the question.