

February 1, 2022

Daniel C. Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

**Re: DE 20-170, Electric Vehicle Time of Use Rates  
Record Request**

Dear Chairman Goldner,

During the evidentiary hearing held on Tuesday, January 25, 2022 in Docket DE 20-170, Commissioner Chattopadhyay requested that ChargePoint produce an analysis of payback periods for electric vehicle (EV) charging facilities under various rate scenarios. The Commission requested that ChargePoint complete that analysis by Friday, January 28, 2022. On January 28, during the second day of the evidentiary hearing in Docket DE 20-170, counsel for ChargePoint Inc. informed the Commission in good faith that while ChargePoint personnel were working diligently on conducting the requested analysis, that analysis would not be complete by the requested deadline. The Commission requested that ChargePoint complete that analysis and provide it to the Commission in live Excel format by Tuesday, February 1.<sup>1</sup>

While ChargePoint personnel have indeed worked diligently to complete the requested analysis, ChargePoint has concluded that it cannot complete and provide that analysis without disclosing both its own confidential, proprietary, market-sensitive data as well as the confidential, proprietary, market-sensitive data of public EV charging site hosts. Disclosure of that information would risk competitive harm to ChargePoint and/or to site hosts. Moreover, ChargePoint has concluded that a complete and representative analysis of payback periods for L2 and DCFC charging facilities would require certain data that is either not in ChargePoint's possession or not reasonably generalizable across EV charging sites. This includes, for example, data related to the many site-specific factors that can influence the requested payback analysis of EV charging deployments, such as ongoing operation and maintenance costs, as well as indirect revenues generated from EV charging station usage.

ChargePoint appreciates the Commission's desire to better understand the economics of electric vehicle charging in New Hampshire and the impacts of the various rate proposals contemplated in Docket DE 20-170 (and related dockets) on those economics. To that end, ChargePoint offers the following data points, which may aid the Commission in its evaluation of those proposals. During 2019, the Rocky Mountain Institute (RMI) undertook a confidential charging industry survey and published average cost findings for key elements of charging infrastructure equipment. The results of this survey yielded a cost range of \$75,600 - \$100,000

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<sup>1</sup> See Docket DE 20-170, Procedural Order Re: Record Requests at 1 (Feb. 1, 2022).

for a 150 kW DCFC charging station and \$2,500 - \$7,210 for a L2 commercial charger.<sup>2</sup> Additionally, in currently-pending Docket DE 21-030, Unitil Energy Services has estimated make-ready costs for L2 sites at \$77,143.00 (to accommodate up to ten L2 ports) and \$143,394.00 for DCFC sites (to accommodate up to six 50 kW chargers).<sup>3</sup> ChargePoint offers these cost ranges as independent estimates of certain capital costs to deploy and operate public EV charging stations.

While ChargePoint cannot complete and provide the Excel-based analysis that the Commission requested for the reasons described above, ChargePoint would welcome an opportunity to meet with the Chairman and Commissioners to discuss the interaction between rates (including demand charges) and charging station economics in New Hampshire in greater detail.

Best regards,

/s/ Nikhil Vijaykar

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<sup>2</sup> RMI, *Reducing EV Infrastructure Costs*, available at: <https://rmi.org/wp-content/uploads/2020/01/RMI-EV-Charging-Infrastructure-Costs.pdf>.

<sup>3</sup> NH PUC Docket No. DE 21-030, Exhibit CSV-12, p. 1.