



May 24, 2021

Debra A. Howland
Executive Director
N.H. Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

**RE: Docket No. DE 21-030, Until Energy Systems Request for Change in Rates,
Letter of Support for Until Energy Systems Objection to Staff Motion to Remove**

Dear Director Howland:

Through this letter ChargePoint, Inc. (“ChargePoint”) affirms its support for Until Energy System’s May 21, 2021 objection to the Motion to Remove Utility Energy Systems Electric Vehicle Time-of-Use Rate Proposals filed by Staff in Docket No. DE 21-030 on May 11, 2021. In its objection, Until noted ChargePoint’s support for denying Staff’s motion.

Staff seeks to remove all electric vehicle (“EV”) time-of-use (“TOU”) rate issues from this docket and to limit the discussion of EV TOU rate designs to Docket No. DE 20-170.¹ Until objects to Staff’s motion, as does Clean Energy New Hampshire (“CENH”).² The New Hampshire Department of Environmental Services (“NH DES”) has also filed a letter of support for Until’s position, requesting that the Commission decline to grant Staff’s motion.³

ChargePoint agrees with Until that the EV TOU rates are interlinked with other elements of Until’s rate case, including the make-ready proposal. If Until’s EV rates proposals were removed from this rate case, the Commission’s ability to review all issues of concern to the success of the make-ready program would be hampered and there would be no assurance of alignment between the timing of EV TOU rates and the implementation of a make-ready proposal.

In addition, it is ChargePoint’s understanding based on statements made in technical sessions in both dockets that Until intends to provide the same general information about its EV TOU rate proposals in DE 20-170 that it is providing in this proceeding, in order to ensure a full and robust discussion of policy issues. On that basis, we anticipate that the outcomes of DE 20-170 will not be diminished by declining Staff’s motion to remove the EV TOU rate issues from this rate case.

¹ Staff Motion to Remove (May 11, 2021).

² Until Objection to Staff Motion to Remove (May 21, 2021); CENH Objection to Staff Motion to Remove (May 20, 2021).

³ NH DES Letter (May 24, 2021).

For the foregoing reasons, in addition to reasons already stated by other parties, ChargePoint affirms its support for Unifil's objection to Staff's motion to remove the EV TOU rate design issues from the instant proceeding.

Sincerely,



Melissa E. Birchard
Keyes & Fox LLP
Tel.: 857-276-6883
E-mail: mbirchard@keyesfox.com

Counsel to ChargePoint, Inc.

CC: Service List DE 21-030