

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

RE: DE 21-078, Petition for Electric Vehicle Make-Ready and Demand Charge Alternative Proposals-NHADA Comments

Dear Chair Goldner,

On behalf of the New Hampshire Automobile Dealers Association (NHADA) and our membership please accept these comments in regards to DE 21-078.

NHADA is a statewide trade association, established in 1921, representing the interests of the motor vehicle industry. Our membership consists of all the new-car and new-truck dealers in the state, along with motorcycle, recreational vehicle, farm equipment, used-car, snowmobile and OHRV dealers, and construction equipment dealers, as well as motor vehicle service, autobody repair, and motor vehicle parts sales facilities. Our members are over 500 small businesses in all corners of the state that employ over 14,000 citizens and make up close to 25% of the state's retail sales.

NH dealers are all in on EV's and acknowledge that in addition to vehicle availability, the state charging infrastructure must be well positioned for what is the future of personal transportation.

With that being said we believe the PUC should:

Fund robust electric utility make-ready investments in public charging networks in advance of broader EV adoption by the NH public.

An interested EV buyer needs to be certain that they can make it to their destination and home before buying. Residential consumers' familiarity with EVs is growing, and "range anxiety" is a significant barrier to EV purchases. We need a robust, visible well-marked public charging network in advance of a large number of EV models arriving on dealer lots.

Support rebates for at home Level 2 Charging tied to managed charging programs.

Residential Level 2 charging requires an additional investment of close to \$1000 (\$500 for the charger, \$500 for the electrical work). The cost is higher if they require an electrical service upgrade due to the higher load added to the system. This is a barrier to EV adoption. If charging is managed so that it happens largely during the overnight hours it drives down electrical rates for all customers, even non-EV owners. As such, rebates should be given, but tied to enrolling in a charging management program.

Fund a manufacturer-neutral robust electric vehicle purchase incentive program available at NH dealerships.

The global automotive industry is electrifying its vehicle lineup with major transitions occurring by 2025 and many with an end to most internal combustion vehicles by 2035. NH dealers are working hard to educate their customers and get them ready and excited to buy these new cars. NH dealership sales depend on customer enthusiasm for the new vehicles on their lot. An electric vehicle purchase incentive program will substantially encourage and speed up this market shift. Such a market shift must be done with a carrot not a stick. As evidenced by many states, including our North East neighbors, a robust electric vehicle purchase incentive program is highly successful in motivating the EV transition.

Sincerely,



Peter J. McNamara

Cc: Jared Chicoine, Director, NH Department of Energy, Chris Ellms, Deputy Director, NH Department of Energy