

**THE STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**Docket No. DE 21-078**

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE  
d/b/a EVERSOURCE ENERGY**

**Petition for Electric Vehicle Make-Ready and Demand Charge Alternative Proposals**

**CONSERVATION LAW FOUNDATION'S  
PETITION TO INTERVENE**

Conservation Law Foundation (CLF) hereby petitions to intervene in the above-captioned proceeding in accordance with N.H. Admin. Rules, Puc 203.17 and with the standards of RSA 541-A:32. In support of its petition to intervene, CLF avers as follows:

1. CLF is a non-profit organization dedicated to protecting New Hampshire's and New England's environment for the benefit of all people. CLF uses the law, science, and markets to create solutions that build healthy communities, sustain a vibrant economy, and preserve natural resources, including resources affected by the generation, transmission, and distribution of electric power. CLF also works to reduce the environmental impacts from the transportation sector, such as by advancing policies that support the increased adoption of electric vehicles ("EVs") and increased deployment of EV charging stations. Consistent with its mission to promote thriving, resilient communities, CLF advances sound clean energy policies that strengthen New Hampshire's, and the region's, economic vitality. CLF has approximately 5,320 members in New England, including over 720 members in New Hampshire.

2. In this docket, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") has filed with the Public Utilities Commission ("Commission") a proposal for make-ready investments supporting EV charging infrastructure in New Hampshire, including

a proposal for an alternative to demand charges for EV charging rates. In particular, Eversource has proposed investing approximately \$2 million in its Make-Ready Program, which would expand the network of EV charging stations by adding five Direct Current Fast Charging (“DCFC”) locations in Eversource’s service territory. Under its proposal, Eversource would install front of the meter infrastructure and provide one-time rebates for funding the installation of behind the meter electrical equipment, which would be owned by the customer.

3. Eversource has also requested that the Commission find that its proposed demand charge alternative (“DCA”) is reasonable. Eversource has proposed the DCA for public EV charging stations participating in its Make-Ready Program as an alternative to its otherwise applicable Rate GV, which includes a demand charge. Instead of a demand charge, the DCA would apply a fixed volumetric rate for a targeted range of utilization.

4. The filing raises several issues, including whether Eversource’s proposed Make-Ready Program and DCA are consistent with the settlement agreement approved by the Commission in Order No. 26,433 (December 15, 2020); whether Eversource’s proposed Make-Ready Program and associated, estimated capital investments in EV charging infrastructure are reasonable and consistent with the New Hampshire Energy Policy stated in RSA 378:37, as well as existing state EV policies; whether Eversource’s DCA is consistent with the New Hampshire Energy Policy stated in RSA 378:37, as well as existing state EV policies; and whether Eversource’s DCA, if approved, would result in rates that are just and reasonable, as required by RSA 374:2, and by RSA 378:5, 7.

5. CLF represents itself and the interests of its members in encouraging the increased use of EVs and deployment of EV charging stations throughout New England and the adoption of rates that facilitate both objectives. The increased use of EVs in New Hampshire will help the state

reduce greenhouse gas emissions from the transportation sector—the single largest contributor of greenhouse gases—in order to address climate change and its impacts on New Hampshire’s environment, communities, and economy. Further, certain rate structures will both encourage EV use and deployment of EV charging stations while reducing the overall electricity bills and energy costs of EV users.

6. CLF has significant institutional expertise in the subjects at issue in this proceeding. CLF is participating in the ongoing Grid Modernization investigatory proceeding, Docket No. IR 15-296. More importantly, CLF has actively participated in the Investigation of Electric Vehicle Rate Design Standards, Electric Vehicle Time of Day Rates for Residential and Commercial Customers, Docket No. IR 20-004, and its follow-up docket, Electric Vehicle Time of Use Rates, Docket No. DE 20-170, which have considered issues relating to (1) the relevant rate design standards regarding EV charging stations and EVs; (2) whether it is appropriate to implement EV time of day rates for residential and commercial customers; and (3) demand charge alternatives for EV time of use rate customers. CLF is also actively participating in the Unitil Energy Systems (“Unitil”) Rate Case, Docket No. DE 21-030, in which Unitil has proposed a suite of EV-related rate offerings, including demand charge alternatives, and an EV make-ready program. CLF was granted intervenor status in both Docket Nos. DE 20-170 and DE 21-030. In Docket Nos. IR 20-004 and DE 20-170, CLF submitted both written and verbal comments regarding EV rate design and demand charge alternatives. On August 11, 2021, Eversource requested that the proposals under consideration in Docket No. DE 21-078 be considered and evaluated in Docket No. DE 20-170.

7. CLF has also intervened in numerous other dockets before the Commission over the past two decades, including the following Docket Nos.: DE 01-057; DE 07-064; DE 08-103;

DE 08-145; DE 09-033; DE 10-160; DE 10-188; DE 10-261; DE 11-215; DE 11-250; DE 13-108; DE 13-275; DE 14-120; DE 14-238; IR 15-124; DE 16-241; DE 16-576; DE 16-693; DE 16-817; DE 17-124; DE 17-136; DG 17-152; DE 17-189; DG 17-198; DE 19-033; DE 19-104; DE 20-092; DG 21-008; and DG 21-036.

8. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. Specifically, CLF members in New England and New Hampshire own and use EVs and will be affected by the decisions made in this docket. The approval of Eversource's make-ready program and the adoption of demand charge alternatives in this docket will likely have a significant impact on the use of EVs and deployment of EV charging stations over the next decade. Intervention in this proceeding will allow CLF to represent the interests of CLF members who will be directly and indirectly impacted by the make-ready programs and rate designs approved by the Commission.

9. As a result of CLF's expertise and experience, its intervention as a party in this proceeding is likely to elucidate important issues and facilitate an expeditious and just resolution of this proceeding. Further, CLF's intervention will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, CLF respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

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