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Via Electronic Mail Only

Daniel C. Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. IR 22-076, Investigation of Whether Current Tariffs and Programs are Sufficient to Support Demand Response and Electric Vehicle Charging Programs
Public Service Company of New Hampshire d/b/a Eversource Energy Comments on Commission Staff Report

Dear Chairman Goldner:

Pursuant to the Commission's procedural order dated September 21, 2023, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource"), submits these comments regarding the *Report on Demand Response and Electric Vehicle Charging Programs* filed by Commission Staff on October 20, 2023 (the "Staff Report").

Eversource appreciates the significant effort of the Commission's Staff to prepare a detailed summary of the various positions presented and recommendations made by the diverse group of stakeholders participating in this investigatory proceeding. These comments are intended to clarify certain points regarding Eversource's positions and recommendations, which in certain cases diverge from recommendations made by other non-utility participants.

In particular, the Executive Summary section of the Staff Report contains a list of "Participant Recommendations for Future Action" which should not necessarily be understood to represent the consensus positions of all participating stakeholders, as noted below with respect to each such specific recommendation:

1. Reinstate working group on EDI to determine changes needed to accommodate DR, EV charging and other competitive offerings.

As noted by Eversource in its comments, the Electronic Data Interchange ("EDI") system, as implemented in New Hampshire, serves as the primary means of communication between distribution utilities and competitive electric power suppliers ("CEPS") and now also with community power aggregations (CPAs) acting as load-serving entities ("LSEs"). EDI is not designed for the exchange of real-time metering or system operational data, and therefore it is not useful for the control or dispatch in real-time of distributed energy resources ("DERs"), such as those related to existing demand response ("DR") programs. EDI therefore has not been

designed or implemented to provide real-time exchange of data with CEPS, CPAs, or any other relevant third parties.

Eversource reiterates that a discussion about what EDI is intended to do, and what it does and can be adapted to do, is important context when discussing policy objectives such as those at issue in this investigation, and a more detailed examination and analysis of the current and possible future functionality of EDI and the processes necessary to harness those capabilities may be warranted, as those capabilities are considerable but entail a good deal of complexity. The selection of what functionality to adopt and how to implement it is an involved process that requires in-depth input from several relevant stakeholders in addition to the work of actual implementation. These procedural and substantive elements need to be discussed together to fully understand the scope and possibilities of EDI in the context of certain policy objectives and doing so will facilitate any decision on what approach to take to achieve those objectives.

That said, the question whether the EDI working group should be reconvened in order to address those issues and, if so, when that working group process should recommence, remain open questions at this point.¹

2. Reconsider TOU rates with higher rate differentials and lower demand charges.

Eversource continues to believe that DR programs will be most effective if they employ a reasonable combination of upfront and pay-for-performance incentives for customer participation, rather than being based on novel and complex time-of-use (“TOU”) rate designs.² Eversource’s experience in New Hampshire and other states supports the conclusion that customers prefer simpler rate designs over TOU rates and easily understandable incentive structures have the greatest potential to encourage customer acceptance of utility DR programs.

As a result, Eversource believes that future DR program development and expansion should focus on utility-managed DR programs, including those involving managed electric vehicle (“EV”) charging, that employ incentives based on customer participation and performance, without the added complexity of TOU rate designs.

3. Develop metering standards for behind the meter sub-meters and enable broader use of submeters.

Eversource did not address sub-metering in its three sets of comments submitted in this investigation, and it is unclear how sub-meters would be deployed and for what purpose. While Eversource is open to considering specific proposals for use of sub-metering, the respective benefits and costs of any such proposals, as well as potential impacts on utility metering and billing systems, must be carefully considered by all relevant stakeholders and regulators.

Accordingly, this statement should not be understood to represent a consensus position of participants in this investigation docket.

¹ Eversource also notes that any future rulemaking regarding EDI standards and requirements, if deemed necessary by stakeholders, may fall within the purview of the Department of Energy (“DOE”) under RSA 374-F:7, V, rather than within the purview of the Commission.

² Eversource recognizes, however, that higher demand charges may effectively serve as a barrier to certain EV charging applications, and the rate design changes implemented as a result of the settlement approved in Docket No. DE 21-078 were intended to address that issue.

4. Explore funding and installation of EV charging infrastructure.

Eversource strongly supports efforts to fund EV charging infrastructure, including utility “make-ready” development programs funded through customer rates. Eversource has experience with such “make-ready” programs in New Hampshire through its \$2.1 million funding program approved in Docket No. DE 21-078, as well as similar programs involving its utility affiliates in Massachusetts and Connecticut. Further opportunities to implement such initiatives should be explored by the utilities and interested stakeholders and then considered for approval by the Commission.

5. Develop tariffs and programs to incentivize use of battery storage with EV charging equipment.

Eversource believes that co-location of battery storage with EV charging equipment, where the net demand on the distribution system is managed by the utility, has significant potential and programs that would incentivize such beneficial co-location should be explored by the utilities and interested stakeholders and then considered for approval by the Commission.³

6. Open a proceeding to consider proposals for EV-managed charging programs.

Eversource strongly supports increased investment in DR using EV managed charging programs and intends to explore the potential for development of such programs in New Hampshire, consistent with the Commission’s encouragement in Order No. 26,797 (March 31, 2023) issued in Docket No. DE 20-170. Adoption of EV managed charging programs would be an easily implementable, effective, and relatively inexpensive and cost-effective method to achieve the dual objectives of relieving stress on the electric distribution system and reducing coincident peak demand system-wide.

Accordingly, Eversource reiterates its recommendation that, at the conclusion of this investigation, the Commission open a new adjudicative proceeding docket to consider proposals for EV managed charging programs.

7. Increase demand response through a combination of upfront incentives, pay for performance and TOU rates.

As stated above with respect to statement 2, Eversource continues to believe that DR programs will be most effective if they employ a reasonable combination of upfront and pay-for-performance incentives for customer participation, rather than being based on novel and complex TOU rate designs.

Accordingly, Eversource believes that future DR program development and expansion should focus on utility-managed DR programs, including those involving EV managed charging, that employ incentives based on customer participation and performance, without the added

³ In particular, Eversource believes there is merit in considering an approach such as that suggested by the Conservation Law Foundation, in which incentives would be used to encourage co-location of battery storage with EV direct current fast charging (“DCFC”) infrastructure, as that would allow managing DCFC during system peaks in a way that has minimal customer impacts.

complexity of TOU rate designs. To that extent, the statement regarding TOU rates should not be understood to represent a consensus position of participants in this investigation docket.

8. Develop EV and EVSE metering pilots in New Hampshire.

Eversource did not address the development of EV or EVSE metering pilots in its three sets of comments submitted in this investigation, and it is unclear how any such metering pilots would be implemented and for what specific purpose. Eversource is open to considering specific pilot proposals for EV or EVSE metering; however, the respective benefits and costs of any such pilot program proposals, as well as potential impacts on utility metering and billing systems, must be carefully considered by all relevant stakeholders and regulators.

Accordingly, this statement should not be understood to represent a consensus position of participants in this investigation docket.

9. V2G is an emerging technology worthy of further consideration in an investigative docket.

Eversource believes that vehicle-to-grid (“V2G”) technology has the potential to achieve beneficial impacts that may be worthy of further exploration through an investigatory proceeding or some other initiative. In particular, a pay-for-performance program structure for V2G resources is appropriate and helps to lower the risks associated with EVs being mobile rather than stationary assets, and therefore potentially unavailable during DR events. Eversource notes that two sites with bidirectional chargers are already participating as battery assets in its Massachusetts affiliate’s ConnectedSolutions daily dispatch DR program. EVs that participate effectively as a “battery,” such as V2G assets, receive greater compensation as compared to other EV resources that only have load curtailed rather than discharging energy during DR events.

Eversource appreciates the opportunity to provide these additional comments with respect to the Staff Report and looks forward to further engagement with the Commission, DOE, and other stakeholders as these important issues are addressed through future proceedings or other initiatives.

Consistent with current Commission policy, this filing is being made electronically only and paper copies will not follow. If you should have any questions, please contact me.

Sincerely,

/s/ David Wiesner

David K. Wiesner
Senior Counsel

cc: IR 22-076 Service List