

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

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities  
Request for Modification of Availability of Commercial and Industrial Rates

Technical Statement of  
Heather M. Tebbetts

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A. Introduction

My name is Heather M. Tebbetts and my business address is 15 Buttrick Road, Londonderry, NH 03053. I am a Utility Analyst for Liberty Utilities Service Corp. (“Liberty”) which provides services to Liberty Utilities (Granite State Electric) Corp. (“Liberty Utilities” or “the Company”) and in this capacity, am responsible for providing rate-related services for the Company.

B. Purpose of Technical Statement

Liberty Utilities (Granite State Electric) Corp. (“Liberty” or “the Company”) submits this Technical Statement to provide the Commission with information supporting a proposed modification to Liberty’s tariff language that currently prohibits the resale of electricity by customers who receive Delivery Service under General Service Time-of-Use Rate G-1, General Long Hour Service Rate G-2, and General Service Rate G-3. The new language will exclude from the definition of “resale,” and thus permit, the “sale of electricity to a third party from an electric vehicle charging station.”

C. Opportunities for Encouraging Electric Vehicle Charging

Plug-in electric vehicles are a growing sector in the New Hampshire marketplace. With over twenty models of electric vehicles being offered by multiple car makers across the country, Liberty is looking to enhance the opportunities for electric vehicle charging (EVC) in its electric territory.

Companies such as ChargePoint, Tesla and NRG eVgo already provide public charging stations to visitors in New Hampshire, with nine such stations located in Liberty’s service territory. While New Hampshire has 50 charging stations to serve visitors to the state, Massachusetts has 343 electric vehicle charging stations to serve visitors.

The prohibition of resale of electricity in Liberty’s service territory precludes the administrator/owner of the charging station to charge for usage at a per kilowatt-hour (kWh) rate. Rather, they are forced to charge in other manners, such as an hourly flat rate. Customers of these EVC stations have voiced their complaints on websites, such as PlugShare, maintaining that the hourly fees are too high. Liberty would like to work with the EVC industry to make electric vehicle charging stations more economic for customers who utilize such facilities.

With this change, businesses that would like to offer electric vehicle charging to their customers would now be allowed to do so and charge by any method they determine appropriate, including charging on a per kilowatt-hour basis.

D. Trends Around the Country

There are eighteen states that have adopted, through regulatory changes or legislation, exceptions for the resale of electricity for electric vehicle charging stations, including Maine and Massachusetts.

Governors of eight states have signed on to a cooperative agreement with the California Fuel Cell Partnership to put 3.3 million zero-emission vehicles on the road by 2025. New Hampshire and Maine are the only New England states to have not signed on, and Liberty would like to facilitate this initiative in New Hampshire by allowing our customers to install charging stations and have the ability to price the stations as the market demands.

Not only does this create a demand for more electric vehicles, but it allows Liberty to lead by example to allow their customers who choose to install charging stations and charge at their discretion to be excluded from the prohibition of the resale of electricity in the Company's territory.

E. Request

Currently, Liberty's tariff does not allow for the resale of electricity for customers taking service under Rates G-1, G-2, and G-3. The Company is proposing to modify the language in the tariff for these rates to exclude electric vehicle chargers. The specific language for modification is provided in the attached tariff pages 41, 45, and 49.

Customers taking service under these rates would now be allowed to charge per kWh at market prices for services at an electric vehicle charging station.

Liberty requests that the Commission approve the changes to tariff pages 41, 45, and 49 to allow for the exception of resale of electricity for electric vehicle charging stations in the Company's electric territory.