



January 6, 2022

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05602
Re: Investigation into Rates Related to Electric Vehicles (Case No. 21-5271-INV)

Dear Clerk Anderson,

Renewable Energy Vermont (“REV”) appreciates the opportunity to provide comments pertaining to the Commission’s Investigation into Rates Related to Electric Vehicles (Case No. 21-5271-INV).

The Commission is required by Section 33(f) of Act 55, enacted on June 3, 2021, to file a report in January 2022 with the Legislature relating to the adoption of electric vehicle charging rates to help manage electric load and to encourage electric vehicle adoption in Vermont. To help inform the Commission’s upcoming report, the Commission issued an order on December 20, 2021 in the above-referenced case seeking information from the state’s electric distribution utilities about their EV charging rates and soliciting comments from the Department of Public Service and other stakeholders. REV offers this letter in response to the Commission’s solicitation and looks forward to future proceedings to help guide the Commission’s implementation of the legislature’s directives set out in Section 33 of Act 55.

Section 33 of Act 55 has an express statutory purpose to “encourage efficient integration of [electric vehicles] and [electric vehicle supply equipment] into the electric system and the timely adoption of [EV]s and public charging through managed loads or time-differentiated price signals.” The report due to the Legislature in January is just one part of a legislative plan to promote the deployment of electrical infrastructure that will enable Vermonters to replace their fossil-fueled vehicles with EVs and reduce carbon emissions.

Implementing Section 33 of Act 55 will require that the Commission establish clear and transparent metrics to evaluate each of the statutory criteria that EV rates must meet as a condition of Commission approval. Specifically, the statute mandates the Commission to approve a utility’s proposed EV charging rates if the Commission finds, “at a minimum” that the rates will:

- (A) support greater adoption of PEVs;
- (B) adequately compensate PEV operators and owners of EVSE available to the public for the value of grid-related services, including costs avoided through peak management;
- (C) adequately compensate the electric distribution utility and its customers for the additional costs that are directly attributable to the delivery of electricity through a PEV rate;
- (D) include a reasonable contribution to historic or embedded costs required to meet the overall cost of service;



(E) do not discourage EVSE available to the public; and

(F) do not have an adverse impact to ratepayers not utilizing the PEV rate.

Act 55, § 33(c)(1) (June 3, 2021). The Commission should convene a workshop(s) to examine the parameters of such metrics so that utilities design their EV rates to meet these statutory requirements and ensure that they effectively support greater adoption of EVs. In addition, electrifying Vermont's transportation sector will necessarily have an impact on our local electric grid. The Commission's workshop should also look at the scope and timing of that impact and what the state's utilities are doing now to plan for an increase in EV use in Vermont and how to intergrate of EV charging in a manner that promotes the use of clean renewable energy.

Renewable Energy Vermont is prepared to participate in these workshops and will bring the experience and expertise of its membership to help inform the Commission's work.

Sincerely,

A handwritten signature in cursive script that reads "Jonathan Dowds".

Jonathan Dowds

Deputy Director

Renewable Energy Vermont