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**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 23-3604-PET

Petition of Vermont Public Power Supply Authority for approval of a proposed EV/EVSE tariff rider program for its member utilities	
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**RESPONSE TO FIRST SET OF INFORMATION REQUESTS SERVED UPON
VERMONT PUBLIC POWER SUPPLY AUTHORITY BY THE VERMONT
DEPARTMENT OF PUBLIC SERVICE**

NOW COMES Vermont Public Power Supply Authority (“VPPSA”) and pursuant to Vt. P.U.C. Rule 2.214, hereby responds to the Department of Public Service (“Department” or “DPS”)’s First Set of Information Requests to VPPSA dated January 16, 2024 (“Requests”) as follows:

GENERAL OBJECTIONS

The following general objections of VPPSA are incorporated by reference in its responses to each interrogatory, request to admit, or request to produce, whether or not an objection is stated in any particular response. Any response provided below is given without waiver of any objection, whether or not an objection is stated.

1. VPPSA objects to each Request on the grounds and to the extent that they seek responses that are subject to any or all of the following privileges: (i) the attorney-client privilege; (ii) trial preparation privilege; (iii) executive privilege, or that are otherwise privileged or protected from disclosure.
2. VPPSA objects to the Requests as overbroad and unduly burdensome on the grounds and to the extent they call for responses that are neither relevant to the subject matter of the pending action, nor reasonably calculated to lead to the discovery of admissible evidence.
3. VPPSA objects to the Requests and the Requests’ Instructions and Definitions on the grounds and to the extent that they are overbroad, unduly burdensome and oppressive, purport to impose obligations on VPPSA that are beyond the scope of the Public Utility Commission (the "Commission") Rules, including without implied limitation Rule 2.000, or other applicable law, cannot be produced without undue burden to VPPSA and/or that require an unreasonable investigation on the part of VPPSA in order to be produced, or purport to require VPPSA to create documents responsive to any such Requests.

4. VPPSA objects to the Requests to the extent that they seek the production of documents and information already in the possession of, or publicly available to, or readily obtainable by the Department and its counsel, on the ground that with respect to such production, the Department's Requests are thereby rendered unduly burdensome.

5. VPPSA objects to the Requests to the extent that they seek the production of documents and information in the possession, custody or control of entities other than VPPSA, on the ground that such demanded production is beyond the scope of the Commission Rules or other applicable rules and laws.

6. VPPSA expressly reserves the right to supplement, clarify, revise or correct any or all of the responses herein at any time. By making any response to the Requests, VPPSA does not waive, and hereby expressly reserves, the right to assert any and all objections as to the admissibility of such responses into evidence at the time of trial of this action, or in any other proceeding, on any and all grounds, including but not limited to, competency, relevance, materiality and privilege. Further, VPPSA provides the responses herein without in any manner, express or implied, admitting that the items in the Requests, or in any response thereto, are relevant or material to the subject matter of this proceeding.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.VPPSA.1-1. Does VPPSA expect to use any "guardrails" on day-ahead pricing (i.e. minimum or maximum prices expressed in cents per kWh)?

Response:

Based on the formula-based rider structure, the short answer is no; VPPSA does not envision nor intend to establish minimum or maximum kWh prices which would be counter to the market-based dynamic pricing for incremental loads. However, there is an opportunity to explore more targeted participant engagement tactics based on pre-determined thresholds. For example, under ISO New England (ISO-NE) Market Rules, there are certain thresholds that trigger additional alerts or notifications to market participants. A similar concept or structure could be explored as a means to inform participants of market volatility.

Further, on January 29, 2024 the Federal Energy Regulatory Commission (FERC) issued its Order Accepting Tariff Revisions to the ISO-NE proposal to establish a jointly optimized Day-Ahead market, referred to as the Day-Ahead Ancillary Service Initiative (DASI) that would optimize energy and ancillary services within the market, effective March 1, 2025¹. In addition to the FERC Order, Commissioner Clements issued a separate concurring statement highlighting:

The DASI reforms appear to be an important step forward for ISO New England's ancillary services market and one reflecting the region's evolving operational needs as its

¹See FERC Order in [Docket No. ER24-275-000](#) dated January 29, 2024.

resource mix changes. As NESCOE notes, “[a] move toward more weather-dependent resources and increasing electrification will require enhancing the system’s ability to respond to operational uncertainties during the Operating Day,” and “thus it will also become increasingly important for the region to compensate [ancillary services] adequately to ensure adequate participation and performance.

By designing VPPSA’s incremental EV/EVSE loads Tariff Rider Program to be formulaically tied to the regional energy markets, customers and participants have an opportunity to maximize market structures managed and implemented at the ISO/RTO level.

Prepared by: Sarah E. Braese

Administrative unit: Regulatory & Power Services

Date of response: 1/31/24

Q.DPS.VPPSA.1-2. Does VPPSA expect any direct customer involvement on a daily basis? (In other words, customer decision making rather than a third-party service or platform provider.)

Response:

As stated in the PUC's Public Workshop held January 11, 2024, "direct customer involvement" can be as frequently or as infrequently as they choose and is also dependent on how the customer has enrolled (i.e. individual enrollment vs. through an aggregator)².

Prepared by: Sarah E. Braese

Administrative unit: Regulatory & Power Services

Date of response: 1/31/24

² See [Case No. 23-3604-PET Public Workshop Transcript](#), pg. 15-16.

Q.DPS.VPPSA.1-3. Will VPPSA allow customers to participate in the EV rate without using a third-party service platform or provider?

Response:

Per the Eligibility Requirements noted under the Sample Tariffs accompanying VPPSA's Petition (emphasis added)³:

*To be eligible for the EV/EVSE Rider, the Customer's EVSE, EV Telemetry, or Authorized Entity **must measure, record, and transfer interval (hourly) usage data to [INSERT UTILITY NAME]'s Authorized Service Provider under the OpenADR 2.0a, 2.0b or 3.0 Data Standards.***

*Under the OpenADR 2.0a, 2.0b, or 3.0 Data Standards, Customer's EVSE, EV Telemetry, or Authorized Entity **must demonstrate bidirectional communication capabilities to both send and receive real-time data transfers** (i.e., interval usage data and hourly price signals).*

Therefore, to participate in the EV Tariff Rider, the ability to establish and maintain bi-directional communication pathways to send and receive pricing signals and report usage is an integral part of the Tariff Rider structure and functionality.

Prepared by: Sarah E. Braese

Administrative unit: Regulatory & Power Services

Date of response: 1/31/24

³ See [Case No. 23-3604-PET Sample Tariff Rider Templates for Residential and Commercial & Industrial Customers](#) filed October 16, 2023.

Q.DPS.VPPSA.1-4. Please explain what Mr. Farman meant when, in the January 11, 2024 workshop, he described resetting rates on an annual basis.

Response:

Mr. Farman's comments regarding resetting rates were made in recognition of uncertainty related to some of the component costs and assumptions used in constructing the rate. For instance, Regional Network Service (RNS Transmission) rates are reset at the ISO-NE level annually. Forward Capacity market rates are set periodically based on forward auctions. GMP and VEC Schedule 21 transmission rates are reset periodically. As changes in these rates take place, a review of the impact on the EV rate should take place and if necessary, the rate should be recalculated and an update seeking approval could be filed. In addition, there is currently uncertainty with respect to the timing and intensity of EV adoption rates and how customer behavior will impact usage characteristics. As more experience with EV charging usage patterns is gained, the related assumptions underlying the rate calculation should be examined along with changes in relevant market cost data. Whether annual or at some other interval, internal review to assess changes in underlying costs and assumptions, followed up with a filing to update the rate as necessary seems sensible.

Prepared by: Steve Farman
Administrative unit: Rates & Planning
Date of response: 1/31/24

Q.DPS.VPPSA.1-5. How would the PowerShift pilot function once an EV rate is offered by VPPSA's member utilities?

Response:

VPPSA is currently evaluating how best to formalize license agreements with EVSE manufacturers to ensure seamless transfer of participants who wish to enroll in the tariff. There is an opportunity to leverage the pipeline of participants, however VPPSA does not envision a need to expand the VPPSA-EVT/VEIC partnership to deliver benefits to its member customers.

Prepared by: Sarah E. Braese

Administrative unit: Regulatory & Power Services

Date of response: 1/31/24

Q.DPS.VPPSA.1-6. Will the EV rate be the same in each VPPSA member territory?

Response:

The intent is for the EV rate to be the same in each VPPSA Member territory. Because the rate is intended to be primarily based on incremental costs observable in the ISO-NE wholesale markets or other third-party tariffs, and applied to incremental EV charging load, the main components of the rate including energy, regional and local transmission, and forward capacity will apply equally to all members. For other minor components of the rate related to incremental O&M and program costs the intent is to apply a uniform rate to all members.

Prepared by: Steve Farman
Administrative unit: Planning & Support
Date of response: 1/31/24

Q.DPS.VPPSA.1-7. How will an EV rate serve major users, such as the transit bus depot located in the Lyndon Electric Department territory?

Response:

Per the Eligibility Requirements noted under the Sample Tariffs accompanying VPPSA's Petition in Case No. 23-3604-PET, the Program envisions that all customers and customer classes are eligible to participate in the EV/EVSE Tariff Rider. VPPSA finds it important to note that it anticipates appropriate variations of specific language within the Rider will be integrated according to each existing tariff; while the formulaic rate calculations will be uniform, it may be necessary to customize specific language to recognize differences in the base rates (e.g., residential, small commercial, large commercial etc.)

To ensure safe and reliable service, larger anticipated loads/installations will require more traditional demand measurement methods (i.e. wired interval meter(s) to ensure safe delivery of higher loads and current) however, the metering and interconnection costs are independent of the EV/EVSE Tariff Rider.

Further, it is worth noting that VPPSA continues to maintain regular conversations with various stakeholders who may be or are in the process of deploying electric transportation/transit growth in member service territories.

Prepared by: Sarah E. Braese
Administrative unit: Regulatory & Power Services
Date of response: 1/31/24

Q.DPS.VPPSA.1-8. Does VPPSA or its members expect to offer special contracts for major EV charging customers in lieu of participation in the EV rate?

Response:

VPPSA seeks to avoid special contracts and would rather utilize the Tariff Rider structure for incremental loads to limit any specialized customization and strategically standardize the approach to encourage more rapid adoption. See Response 1-7, above.

Prepared by: Sarah E. Braese

Administrative unit: Regulatory & Power Services

Date of response: 1/31/24

Q.DPS.VPPSA.1-9. Certain member territories have a significant share of winter or summer vacation homes, such as Ludlow, Hardwick, and Barton territories. Will the EV rate be available to those customers?

Response:

Based on the formula-based rider structure and proposed eligibility requirements (i.e. established and validated bi-directional communication pathways), the short answer is yes; VPPSA envisions all customers would have equal access to enroll and participate in the EV/EVSE Tariff Rider program for incremental loads.

Prepared by: Sarah E. Braese
Administrative unit: Regulatory & Power Services
Date of response: 1/31/24

Q.DPS.VPPSA.1-10. To assist in understanding the technology and customer experience, please provide a few examples of possible service or platform providers (e.g., a customer's OpenADR-Compliant Authorized Representative).

Response:

There are a number of both devices/device manufacturers and Virtual Top- or End-Node providers that utilize and promote the OpenADR communication protocols to enable open accessibility⁴. Below you will find a sample of potential OpenADR Compliant devices and platform providers, however this list is not exhaustive. Additional information about OpenADR and the OpenADR Alliance members and supporters can be found on the About Us page at openadr.org.

- AmericanStandard
- AMPECO
- AirZone
- AutoGrid
- Bellawatt
- Blink
- ChargePoint
- Chargie
- Connexx Energy
- Cooper Power Systems
- Driivz
- Daiken
- Enbala
- EnelX
- EnerSys
- EnergyHub
- EVConnect
- EVOCharge
- Fujitsu
- Gridpoint
- GridBeyond
- Hitachi
- Honeywell
- Kyocera
- Loop
- Mitsubishi
- NoodoeEV
- Philips
- Rheem
- Shell

⁴ For a list of OpenADR Compliant Products, visit <https://products.openadr.org>

- Siemens
- Terawatt
- Toshiba
- Tellus Power
- Universal Electronics
- Virtual Peaker
- ZEF Energy

Prepared by: Sarah E. Braese

Administrative unit: Regulatory & Power Services

Date of response: 1/31/24

Q.DPS.VPPSA.1-11. Please provide a sample bill showing the line items for the proposed EV. If one is not available, please identify when a sample bill will be available for at least one member territory.

Response:

At this time, VPPSA does not have a sample bill to illustrate the proposed EV/EVSE Tariff Rider applied to a VPPSA member utility customer. Part of the initial Scope of Work under negotiation with our platform provider is to determine exactly what that bill structure would look like for an individual customer and could be highly dependent on utility billing and customer information systems. VPPSA anticipates a sample bill would be available upon completion of VPPSA's initial SOW with our 3rd party PaaS provider.

In the meantime, it may be helpful to review similar programs being offered both within the Northeast or nationally, such as the New Hampshire Electric Cooperative⁵ or various options available for Salt River Project utility customers⁶.

Prepared by: Sarah E. Braese
Administrative unit: Regulatory & Power Services
Date of response: 1/31/24

⁵ See [New Hampshire Electric Cooperative Transactive Energy Rate \(TER\) Pilot Program](#) including a [Sample Residential Electric Customer Bill](#)

⁶ See [Salt River Project Residential Price Plans, including Time of Use](#)

Q.DPS.VPPSA.1-12. Please describe how VPPSA's power supply portfolio, including contract length and hedging activities, will or will not affect the EV rate over the next three to five years.

Response:

VPPSA's power supply portfolio, including contract and hedging activity will not affect the EV rate. The EV rate is constructed to be based on incremental ISO-NE wholesale market rates for energy, capacity, and transmission along with limited adders for O&M and program costs; none of these cost components are dependent on VPSA's power supply portfolio or contract management activities.

Prepared by: Steve Farman
Administrative unit: Planning & Support
Date of response: 1/31/24

Pursuant to Vt. P.U.C. Rule 2.230(F)(1):

/s/ William F. Ellis
William F. Ellis, Esq.
McNeil, Leddy & Sheahan, P.C.
271 South Union Street
Burlington, VT 05401
wellis@mcneilvt.com

cc: ePUC Service List