



January 3, 2022

Holly R. Anderson
Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No: 21-5271-INV Public Utility Commission 2021 Investigation into Rates Related to Electric Vehicles

Dear Ms. Anderson,

Burlington Electric Department (“BED”) submits the following responses to the Public Utility Commission’s (“Commission’s”) December 20, 2021, Order Opening an Investigation and Requesting Comments in this case. BED’s responses are provided after each Commission question below.

1. Rate details. Details on the specific rate or rates offered, including eligibility by customer class or group.

BED’s initial Residential Electric Vehicle Rate was approved by the Commission in Case No. 18-2763-TF on August 30, 2018. More recently, the Commission approved BED’s expanded EV rate in Case No. 21-1832-TF on July 1, 2021, to include customers who take service through BED’s Small General Service (“SG”) and Large General Service (“LG”) rates. BED’s Residential Electric Vehicle Rate is now referred to as the Electric Vehicle Rate (“EV Rate”). A copy of BED’s EV Rate, SG and LG tariff sheets, which include a full description of the EV Rate and eligibility requirements, are submitted with this letter.

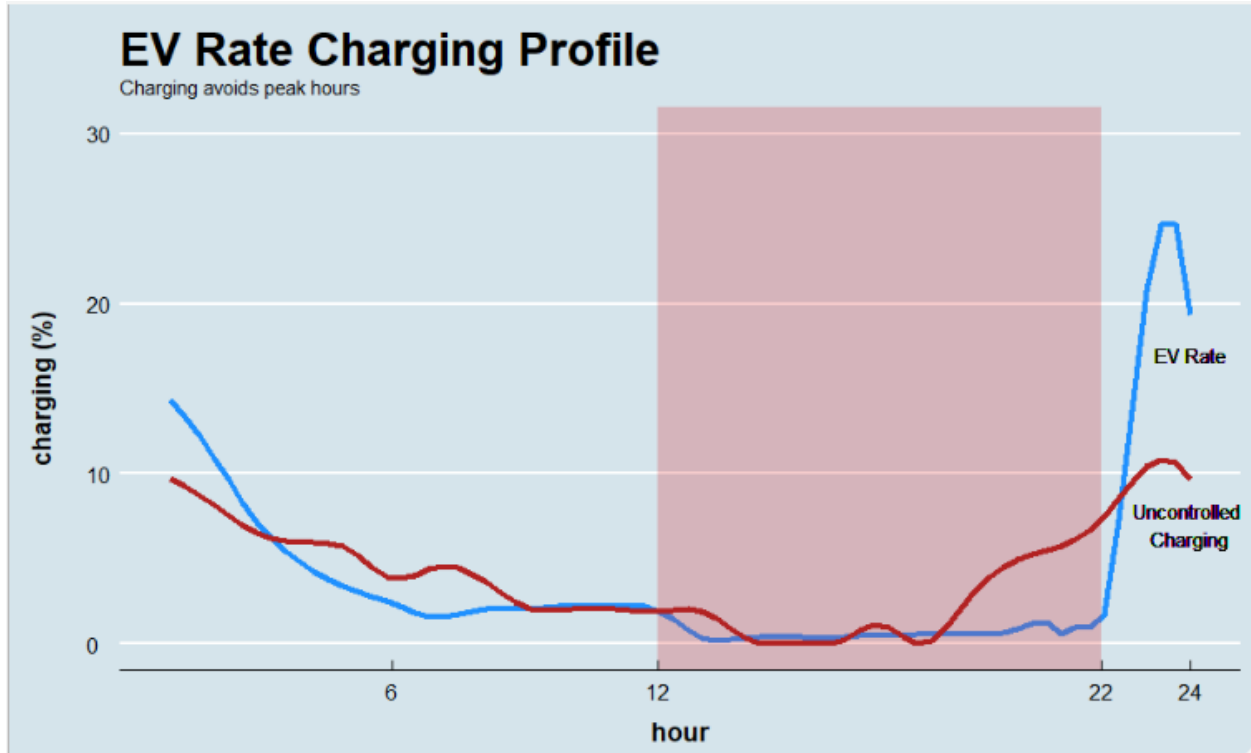
2. Enrollment. The number of customers enrolled in such rates and the percentage of customers who utilize utility incentives related to EVs (Tier III, for example) who are also enrolled in the rate or rates.

Burlington Electric Department
585 Pine Street Burlington, VT 05401
burlingtonelectric.com

Phone 802.658.0300

There are currently 95 BED customers enrolled in BED's EV rate, which is 28% of the 340 BED customers who have utilized BED EV purchase incentives. Joining the EV rate requires a customer to purchase and install a BED-approved charger, which enables BED to submeter and control (as necessary) the customer's EV charging. The ability to submeter loads is a charger function, not a function of the EV itself. A list of approved chargers can be found at www.burlingtonelectric.com/evrate.

3. Effectiveness. Whether the rates appear to be directing load away from peak times related to cost. What are the "lessons learned" during implementation so far?



As shown in the graph above, 94% of BED EV Rate charging avoids peak hours.

The implementation of BED's EV Rate has been largely successful with a few opportunities for improvement along the way, including the following:

- There are several customers enrolled in the EV Rate who repeatedly charge outside of the required 10 p.m. to 12 p.m. window and as a result do not earn their EV Rate credit in any month in which charging outside of that window occurs. BED is drafting outreach materials for its EV users and one goal of this outreach is to learn how this can be resolved.
- EV charger options have expanded rapidly over the past decade and will continue to transform as EVs are more widely adopted. Naturally, there are companies that enter and exit the market throughout this exciting time. From the outset of this program BED recognized the importance of remaining agnostic to hardware and software offerings to minimize exposure to a specific vendor and maintain longevity of the program. Additionally, BED has learned that it can help to safeguard the investments made by its customers by focusing on vendors that enable open

access to data. This promotes flexibility and helps to avoid chargers becoming stranded assets if the software is no longer supported.

- BED has received feedback that some customers have schedules that are not conducive to charging within the current 10 p.m. to 12 p.m. window. BED's EV Rate allows for providing a flexible load alternative to the 10 p.m. to 12 p.m. charging option and BED is conducting a pilot program for this option with a small group of customers at this time. BED anticipates that it will be able to offer a flexible load option to all customers in the near future.
- BED has identified occasional de minimis amounts of charging that occur when a vehicle is first plugged into its home charger despite charging being scheduled to begin during the EV charging hours (beginning at 10pm under the fixed load option). To avoid penalizing customers for this small amount of charging, BED ignores charging events that are less than a set threshold of 0.1 kWh over a 15-minute period in order to allow customers to continue to collect their monthly EV charging credit if such events occur.

Thank you for the opportunity to provide comments. Should you have any questions or concerns, please feel free to contact us at any time.

Sincerely,



Amber Widmayer
Regulatory Specialist
Burlington Electric Department
(802) 735-6918