

State of Vermont
Department of Public Service
112 State Street
Montpelier, VT 05620-2601
<http://public.service.vermont.gov>

[phone] 802-828-2811
[fax] 802-828-2342
[tdd] 800-734-8390

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January 6, 2022

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

Re: Case No. 21-5271-INV, PUC 2021 Investigation into Rates Related to Electric Vehicles

Dear Ms. Anderson:

The Department of Public Service (“Department”) appreciates this opportunity to comment on the progress of distribution utilities in developing rates to promote electric vehicles and manage the resulting impacts on other ratepayers. The inventories submitted in response to the Vermont Public Utility Commission’s (“Commission”) Order of December 20, 2021, demonstrate that utilities vary widely in their readiness to adopt electric vehicle (“EV”) rates.

In 2019 and 2020, the Department convened Phase I of the Rate Design Initiative (“RDI”) to analyze innovative retail rate applications. In 2021, the Department commenced Phase II of RDI to assist municipal and cooperative distribution utilities develop and implement innovative rate and pilot projects. The following EV-focused projects proposed by utilities were selected in December 2021 to receive State Energy Program grant funds and are now proceeding through the contracting process. (Two other selected projects address rates for non-EV loads.)

1. **VPPSA EV Charging Rate Development (\$51,660):** The project consists of research, data acquisition, and implementation of innovative tariffs by deploying residential Level 2 EV chargers, developing customer load management incentives, and understanding customer behavior and billing system capabilities. Three of VPPSA’s members will be involved, but the methodology developed will be applicable to all eleven member utilities.
2. **VEC/WEC/BED Level 1 EV Charging (\$13,340):** These three utilities will work together on a combined project to use low-cost, web-connected “smart plugs” to monitor Level 1 residential EV charging and promote off-peak charging through EV-specific rates.

Although the available funding is modest, each project will include utility contributions of at least 20% towards total project costs. These projects will expand each utility’s capacity to manage flexible loads such as EVs and demonstrate approaches that may be adopted by other utilities in the state.

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Thank you for the opportunity to provide comments. Please contact me should additional questions arise.

Sincerely,

Philip Picotte

Philip Picotte
Utilities Economic Analyst
Vermont Department of Public Service