



Stowe Electric Department
PO Box 190
435 Moscow Rd
Stowe, VT 05672
802-253-7215
www.stoweelectric.com

January 6, 2022

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05620

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

Dear Ms. Anderson:

On December 20, 2021, the Vermont Public Utility Commission entered an Order requesting the distribution utilities provide an update on rates and tariffs related to electric vehicles ('EV') and electric vehicle supply equipment ('EVSE'). This Order was amended on December 22, 2021 to allow the utilities to respond to the Commission's request on or before January 6th, 2022. Stowe Electric Department ('Stowe') now offers the following responses.

1. Rate details.

Stowe has an ev charging rate under Tariff Rate 35, most recently updated in 18-2372-TF and applied at each of the utility's public charging stations. Stowe has discussed with ChargePoint and DriveElectric about updating the fee structure for the charging stations owned by Stowe. However, the utility has not updated rates at Stowe owned charging stations. Stowe Electric does not have a commercial, residential, or multi-family ev charging rate.

2. Enrollment.

Stowe has 11 stations (20 ports) enrolled in Rate 35 and publicly available to any ev user. Stowe offers incentives under the Tier 3 program for evs and evse (level 2 and level 3 chargers). Since 2019, Stowe provided Tier 3 incentives for the installation of 1 publicly available Level 2 charger and provided 25 rebates for new and used all-electric and plug-in hybrid vehicles purchased or leased by a Stowe customer.

3. Effectiveness.

At this time, Stowe has not analyzed whether Tariff Rate 35 shifts load during peak times. Stowe is a winter peaking utility and Tariff Rate 35 applies only to charging at Stowe owned chargers.

4. No EV or EVSE rates.

Stowe has considered a residential ev charging rate. However, the utility has not implemented a tariff for residential charging. Any residential customer using a Level 1 or Level 2 charger is subject to Stowe's Residential Rate 01 tariff, which does not have a demand rate. Stowe staff provide guidance to residential customers who purchased an ev about home and public charging, electrical upgrades needed for Level 2 home chargers, and planning for future home charging. We have not seen the interest level in Level 2 residential chargers to justify the administrative costs to investigate and establish a specific residential ev rate. Stowe intends to utilize Vermont Act 13 to further investigate a residential rate for ev charging. See Case No. 21-2642-INV, re: standards and procedures as identified in Act No. 13.

Stowe does not have a tariff related to charging stations owned by commercial or residential customers, or a third-party provider with a site agreement with a Stowe customer. Stowe provides information to those customers who express an interest in evse and are on the Small Commercial Rate 20 about demand charges. Stowe encourages these customers to install stations that are networked and enrolled in an operation and maintenance agreement. Stowe is not aware of any commercial customer that has been placed into the Large Commercial Demand Rate 25 because of electric vehicle charging stations or electric vehicle charging.

In Stowe, 11 of the approximately 16 publicly available charging stations are owned and operated by the utility. Stowe strategically located utility owned evse in the Town center and at popular commercial destinations to encourage charging without burdening customers with operations and maintenance costs. Stowe has worked with partners to develop a plan to assist commercial and multi-family residential customers to build out evse. However, the biggest barrier for customers are costs associated with make-ready work, installation, and operation and maintenance. Stowe has the workforce capacity to complete this work and provide operation and maintenance support, but currently the utility and our customers do not have the financial ability to pay for expanded adoption of evse in Stowe.

Please contact me with any questions.

Electronically filed in Stowe, Vermont on January 6th, 2022

Sincerely,

_____/s/_____

Michael N. Lazorchak

Manager Regulatory Affairs

Stowe Electric Department

PO Box 190

Stowe, VT 05672

Phone: 802.253.7215

mlazorchak@stoweelectric.com

www.stoweelectric.com

STOWE ELECTRIC DEPARTMENT
ELECTRIC VEHICLE CHARGING STATION RATE 35

AVAILABILITY:

For use at electric vehicle charging stations for public use which are owned and maintained by Stowe Electric Department (SED).

TERMS:

Payment for services will be required by approved credit card or a prepaid service card accepted by the network service vendor selected by SED for payment processing on its charging stations.

RATES:

Rate will consist of a flat fee of \$2.03 regardless of actual charging time plus an additional fee of \$0.51 per hour while connected to the charging station for the initial four (4) hours and \$1.01 per hour thereafter.

There will be no other fees or charges associated with use of the charging stations.

EFFECTIVE:

For charging station use on and after August 15, 2018.