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February 11, 2022

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Post Office Drawer 20
Montpelier, Vermont 05620-2701

Re: **Case No. 19-0856-RULE – Proposed Revisions to Vermont Public Utility Commission Rule 5.500, Efficiency Vermont Response to Specific Request for Comment and Additional Information**

Dear Clerk Anderson,

On January 20, 2022 the Vermont Public Utility Commission (“Commission” or “PUC”) issued a Procedural Order requesting comments on proposed changes to Rule 5.500. In that Order the Commission requested comments and information addressing a number of specific issues. With this filing, Efficiency Vermont provides the following comments in response to a limited number of these questions, specific to issues #2 and #7.

2. The Commission requests comments on whether the interconnection rule should address the interconnection of electric vehicles or fleets of electric vehicles.

Efficiency Vermont is not an entity that would normally provide input on matters of PUC interconnection policies, but in this request Efficiency Vermont has had recent experience with both flexible load resources being developed across the state and working with upstream market partners on deployment of electric vehicles. These recent experiences have given us perspective that, when under load management, individual electric vehicles and fleets of electric vehicles are generally only being managed for the time and duration of charging. As such, an interconnection requirement for most electric vehicles would be unwarranted. Efficiency Vermont would suggest that only if the electric vehicle energy is intended to be discharged to the grid (e.g., vehicle-to-grid) should the Commission consider whether this rule is applicable.

7. The rule proposes to allow the Commission to adopt by order standards for communication protocols. The Commission envisions opening a proceeding in 2022 in which interested stakeholders, including the Vermont System Planning Committee, would be invited to form a working group to develop recommended standards for communication protocols. The

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Commission would not adopt any standards until after an opportunity for public review of the working group's recommendations. The Commission requests comments on this proposed process, including whether the Commission should adopt standards for communication protocols using some other process.

Efficiency Vermont supports the Commission's suggestion that a technical working group should explore and recommend standards for communication protocols. Such a working group would be highly technical and would likely have significant overlap with Vermont System Planning Committee participants and their combined technical knowledge of these matters.

Efficiency Vermont suggests that the technical working group remain informal, and include a focus on communication protocols that would be best suited for connected end-use devices—such as electric vehicle chargers, water heaters, and heat pumps. These measures are commonly associated with a need for direct and remote load control to affect demand on the electric grid, and as such are a focus for flexible load management. Efficiency Vermont understands that storage technologies may ultimately have different communication protocols than these end uses. However, Efficiency Vermont would be grateful to be a part of these discussions so that we can have an informed, state-wide conversation that encompasses the full range of connected technologies.

Efficiency Vermont thanks the Commission for this opportunity to provide comments and looks forward to working with the Commission and stakeholders on the issue of communication protocols.

Sincerely,



David C. Westman

Director, State Agency and Regulatory Affairs