

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 22-4269-INV

Public Utility Commission 2022 Investigation into Rates Related to Electric Vehicles	
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e-filed through e-PUC on December 12, 2022

TOWN OF STOWE ELECTRIC DEPARTMENT COMMENT

The Town of Stowe Electric Department (“SED”) submits to the Vermont Public Utility Commission (“PUC”) this update on SED’s rates and tariffs related to electric vehicles (“EVs”) and electric vehicle supply equipment (“EVSE”).

1. **Rate details**

SED does not currently offer a specific rate for residential, commercial, or workplace EV charging. All residential customers in SED’s service territory have the option to enroll in SED’s time of use rate. SED also offers an electric vehicle charging rate at the 11 electric vehicle charging stations SED owns and operates.

SED’s Residential Rate 01
Customer Charge
First 76kWh per Month \$16.62
\$0.0932 All kWh over 76 per month \$0.1919

SED’s small commercial rate 20
Customer Charge \$16.64/Month
All kWh \$0.1862/kWh

Electric Vehicle Charging Station Rate 35¹
Rate will consist of a flat fee of \$2.29 regardless of actual charging time plus an additional fee of \$0.58 per hour while connected to the charging station for the initial four (4) hours and \$1.14 per hour thereafter.

Most of SED’s residential ratepayers rely on Level 1 home charging or Level 2 or Level 3 public charging at an SED owned station. SED notifies those ratepayers that received an EV or EVSE rebate regarding best practices for charging is to not charge during daytime hours, but to charge EVs between 7PM and 5AM. This is intended to inform consumer behavior before an EV rate is adopted.

¹ SED is preparing a tariff filing for 12/15/2022 that will include amending Rate 01 and Rate 20. The new tariff will amend Rate 35 so EV charging station rates are at a per kWh basis.

SED offers a Level 2 charger rebate for all rate classes. SED does not know of any ratepayers planning to install Level 2 or Level 3 chargers at workplaces or multi-family residential buildings in 2023. SED encourages small commercial customers and workplaces to take advantage of installing charging infrastructure that SED owns and operates. These ratepayers can partner with SED to install chargers that are separately metered to avoid increasing kWh usage associated with a ratepayer's meter. This model would also allow SED to remain the primary contact for operations and maintenance agreements with certified EVSE contractors.

2. Enrollment

SED does not have an applicable EV rate that ratepayers can enroll in. SED does not have any ratepayer enrolled in a Level 2 charging program. SED's Tier III incentives provided to our customers for EVs: 12 rebates paid in 2021 and 26 rebates paid as of 12/01/2022. SED provided 1 rebate to small commercial customers that installed a Level 2 charging station in 2021.

3. Effectiveness

SED does not have an applicable rate to evaluate the effectiveness of directing load away from peak times. SED staff have no practical way to evaluate or determine how public charging is impacted by peak times. Similarly, SED does not have a practical way to determine other value streams or opportunities presented by EV rates. SED has no practical way of evaluating how EV rates can assist in avoiding upgrades to the distribution system or aid in reducing power supply costs.

SED staff assumes that ratepayers will utilize SED owned public charging stations out of convenience and because SED's chargers offer a faster charging session without the accompanying upgrades needed at the ratepayer's residential or commercial address.

4. Progress

SED has no immediate plans to expand utility owned charging infrastructure. SED will continue to offer Tier III incentives on EVs and EVSEs and the option for small commercial and multi-family residential ratepayers to partner with SED on Level 2 and Level 3 charging infrastructure.

SED's most significant barrier to adopting new EV or EVSE rates are required upgrades to SED's billing and enterprise software infrastructure. For SED ratepayers, barriers include the cost of panel upgrades, additional metering, hardware and software upgrades, site preparation and transformer upgrades, and interconnection costs. Most ratepayers also do not have the staff to effectively manage billing, operations and maintenance, and parking lot management needed to manage EVSE.

SED is currently moving toward a new billing and enterprise software solution that will

allow for the adoption of new EV charging rates for all rate classes. SED will also review its time of use rate design to see how that might encourage the adoption of EV charging infrastructure and capture impacts on increase EV charging on power supply costs.

SED also continues to encourage all EV owners to utilize Level 1 and Level 2 home charging during overnight hours. This will encourage best practices when it comes to residential charging and inform consumer behavior in the event that SED has a EV charging rate or curtailable EV charging. SED also is investigating managing Level 2 and Level 3 charging infrastructure for multi-family, workplaces, and single-family residential ratepayers through demand side management software.

5. **Addressing barriers**

At this time, SED is not taking any affirmative steps to overcome these barriers for ratepayers. SED already has AMI installed throughout its service territory which provides little benefit for increasing EVs or EV charging infrastructure adoption. Cellular connectivity and communications between devices are not improved or resolved through increased AMI. SED has no plans to get involved in building cellular towers, repeaters, or new broadband service in SED's service territory. These are steps that go beyond our current mandate and ability to provide least-cost and reliable power to our ratepayers. SED understands that broadband providers, like Stowe Cable and the Lamoille FiberNet, are making progress towards increasing access for Stowe residents and businesses. SED actively works with any communication provider seeking to attach to SED owned poles and any applicable make-ready work associated with attachments.

SED provides Tier III rebates for EVs and EV charging infrastructure. However, SED does not have the capability to overcome barriers that individual ratepayers have with expanded metering, changing technology, costs, and broadband access.

Sincerely,

/s/ Michael Lazorchak

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