

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 23-1364-INV

Public Utility Commission 2023 Investigation into Rates Related to Electric Vehicles	
--	--

e-filed through e-PUC on May 31, 2023

**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 for electric vehicles (“EV”) and electric vehicle supply equipment (“EVSE”).

1. *The approximate date that you expect to file your tariffs with the Commission.*

**Answer:**

SED anticipates filing updated tariffs 45 days before the June 30, 2024 deadline. SED electric vehicle charging station rate 35 will remain in effect for all public charging stations owned and operated by SED.

SED will either establish a specific tariff to address EV charging and EVSE buildout in our service territory or update SED’s current Residential Rate 03 time of use rate to capture EV charging and EVSE buildout.

2. *Whether you will file multiple EVSE tariffs, and to which rate classes, market segments, or customer segments those rates will apply.*

**Answer:**

SED anticipates completing a rate design to update the current SED time of use rate (residential rate 03) and account for EV and EVSE adoption that could occur at non-residential sites, including workplaces and the hospitality sector.

SED’s rate design will consider a time of use rate (‘TOU’) for all electrification projects, including EV charging and EVSE, across all rate classes. The goal is to develop an updated TOU rate for single-family residential EV charging and capture EV charging at multi-family residential, municipal, and commercial locations. SED’s updated TOU would also develop stronger customer incentives to encourage off-peak charging and mitigate system impacts to the extent practicable.

3. *Progress barriers that you are encountering that could prevent you from meeting the requirements of Sections (a) and (b) of Act 55 and possible solutions to overcoming those barriers.*

**Answer:**

SED previously identified barriers to implementing the requirements of Act 55, which includes upgrades to SED's enterprise software and administrative costs to support SED's IT and customer service staff. SED is implementing a new enterprise software system (NISC) on or before December 31, 2023. SED anticipates the new enterprise software system will mitigate most of the barriers to the utility related to implementing a more efficient rebate program and rate structure for EVs and EVSE.

Customer-side barriers include panel upgrades, metering, cellular/broadband connectivity, and interconnection costs, which occur with Level 1, Level 2, and Level 3 charging infrastructure. Most workplace and commercial ratepayers also do not have the staff to effectively manage billing, operations and maintenance, and parking lot management needed to manage EVSE, which has slowed EV and EVSE buildout in Stowe. These customer-side barriers have no impact on SED's ability to meet the requirements of Act 55.

4. *Whether you already offer an EVSE rate that qualifies for the exemption of Act 55, Section (d). Please identify the rate class, market segment, or customer segment to which the exemption applies.*

**Answer:**

SED has a residential time of use rate developed before beneficial electrification projects became popular in Vermont. This rate will be reviewed and modified in 2024 to take into consideration EVs and EVSE.

SED has Rate 35, which applies to publicly available charging stations owned and operated by SED.

5. *Whether you expect to request an extension under Act 55, Section (e), with respect to any of the EVSE rate classes, market segments, or customer segments.*

**Answer:** SED does not anticipate requesting an extension under Act 55, Section (e).

6. *Suggested topics for additional workshops or written filings.*

**Answer:**

Rate design best practices - SED does not offer a specific EV or EVSE rate for residential, commercial, hospitality or workplace customers. Sharing best practices or lessons learned in developing a TOU for EV charging and funding make-ready work for EVSE is valuable. Particularly, the components needed to develop the rate and the administrative requirements to develop and implement customer incentives, enrollment in EVs or EVSE rates, and how to leverage AMI to assist in EVs or EVSE rate design.

Most EV charging in Stowe occurs at single-family residential homes and SED's utility owned publicly available charging infrastructure. Multi-family residential buildings in Stowe are mostly condominium associations, which have shown interest in Level 2 charging but have not installed charging infrastructure. Stowe's hotels and hospitality sector also have shown interest in adding Level 2 and Level 3 charging but have not installed charging infrastructure. Any lessons learned from other distribution utilities related to rate design, program management, and customer incentives for multi-family residential buildings and hotels is welcomed.

Sincerely.

/s/ Michael Lazorchak

Michael Lazorchak

Town of Stowe Electric Department

Regulatory Affairs

Stowe, Vermont 05672

(802) 253-7215

[mlazorchak@stoweelectric.com](mailto:mlazorchak@stoweelectric.com)