



May 31, 2023

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

Re: Case No. 23-1364-INV, Public Utility Commission 2023 Investigation
into Rates Related to Electric Vehicles

Dear Ms. Anderson,

Burlington Electric Department ("BED") submits this letter with information on its EV rate tariffs in response to the Public Utility Commission's ("Commission's") April 27, 2023, Order Opening an Investigation and Requesting Comments in this Case.

BED currently has two approved electric vehicle rate tariffs: BED's EV Rate and BED's Public EV Charging Station Rate.

BED's EV Rate

BED's EV Rate was most recently approved in BED's 2021 rate case, Case No. 21-2186-TF. Prior to that, BED received approval from the Commission¹ to expand the customer class eligibility from the initial residential class, to include our small general and large general classes as well.

BED's EV Rate was initially approved for BED's residential rate class by the Commission on August 20, 2018, in Case No. 18-2763-TF for service starting on September 6, 2018. By doing so, the Commission authorized BED to become one of a handful of electric utilities in the United States to offer an EV rate. BED's rate uses an approach we have yet to see replicated elsewhere - our rate provides charging for EVs close to the marginal cost to serve and is administered without additional BED hardware. There is also no increased on-peak charging cost that could result in customers

¹ The Commission approved the eligibility expansion of BED's EV Rate to include the small general and large general rate classes as well as BED's residential rate class on July 1, 2021, in Case Numbers 21-1832-TF, 21-1833-TF, and 21-1834-TF.

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paying higher than expected monthly bills. Instead, BED designed a program where a customer loses the ability to earn a monthly bill credit and pays the normal retail rate for electricity. This design enables a customer to be no worse off than the existing rate, while justifying the lowest rate to charge electric vehicles in the state.

BED expanded this offering to all non-time-of-use rate classes and included a real-time peak scheduling option. These two changes were implemented to reach more customers and provide flexible charging that meets a variety of customer needs. For example, workplace charging under the Fixed EV Charging Hours (10pm to 12pm the next day), would only be able to utilize morning charging. The table below illustrates the terms from BED's EV Rate for both scheduling options.

BED's Public EV Charging Station Rate

BED's tariff for its public EV charging stations was also most recently approved by the Commission in BED's 2021 rate case, Case No. 21-2186-TF. This tariff was originally approved by the Commission on February 10, 2015, for service starting on April 1, 2015.

To facilitate expansion of charging opportunities for BED customers who rent their homes, (60% of Burlington homes are renter occupied), BED has developed a multifamily charger program and as noted above, BED has expanded eligibility of the EV Rate to include the Small General rate class – used for a house-meter owned by a multifamily property owner, and Large General rate class. Additionally, to help BED customers who are interested in installing an at-home level two charger, BED has published a Charger Installation Guide to help them navigate this process.

Thank you for the opportunity to provide information about BED's EV rates. Should the Commission have any concerns or questions about this submittal, please do not hesitate to contact us.

Sincerely,



Amber Widmayer
Regulatory Specialist
Burlington Electric Department
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