

STATE OF VERMONT PUBLIC
UTILITY COMMISSION

Case No. 23-1364-INV

Public Utility Commission 2023 Investigation into Rates Related to Electric Vehicles	
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e-filed through e-PUC on May 31, 2023

WASHINGTON ELECTRIC CO-OP COMMENT

Washington Electric Co-op (“WEC”) submits to the Vermont Public Utility Commission (“PUC”) this update on WEC’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:

WEC anticipates providing its Time of Use/EV rate tariff by 16 October 2023, as noted in the Order of 27 April (footnote 1).

WEC will establish a Time of Use tariff to include EV charging and EVSE buildout in our service territory.

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

Answer:

WEC anticipates completing a rate design based on a peak/off peak block rate design. Any WEC member would be eligible for the proposed Time of Day /EV tariff. WEC has residential, small commercial and large power tariffs.

2. *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:

WEC’s power line carrier (PLC) meter topology is limited as to its ability to provide a Time of Day (T.O.D.) rate offer. WEC intends to migrate towards a radio frequency (RF) meter platform and operate a hybrid PLC/RF mesh network under its next four year Construction Work Plan (C.W.P.).

The most significant barrier technical WEC faces is the existing capacity of the majority of WEC’s transformer population. In the last century WEC (and other distribution utilities) were directed by our regulatory agencies to “right size” transformers. With a low density rural market WEC has a majority of its member locations served by 5 kva transformers. The barrier

to EVSE capacity is an on-going supply chain disruption and delay in getting larger capacity transformers. The supply chain issue first arose during the pandemic, but we are still facing 2 to 3 year delivery times for new orders today.

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.

3. *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:

WEC does not qualify for an exemption under Act 55, Section (d)

4. *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: WEC does anticipate requesting an extension under Act 55, Section (e). The rationale for such an extension is (1) to get an approved C.W.P. where we define how WEC intends to migrate towards a hybrid PLC/RF mesh metering platform, and (2) to work towards a resolution of the supply chain delay for transformers.

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

Answer:

None.

Please contact me if there are any questions.

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