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June 2, 2023

Via ePUC

Holly Anderson, Clerk
Vermont Public Utility 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,

Green Mountain Power (GMP) provides the following information in response to ChargePoint, Inc.'s (ChargePoint) public comment filed May 31, 2023. ChargePoint's comments under Section IV on Alternatives to Traditional Demand-Based Rates require important clarifications.

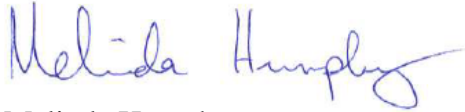
GMP fully agrees that demand charges not appropriately designed can be detrimental to the deployment of fast charging infrastructure. That is why GMP designed and received approval to allow our General Service rate, Rate 6, to be used for all public fast charging infrastructure, regardless of the peak demand and total energy consumption. This solution is further described in our comments filed May 31, 2023 in this proceeding. In Case No. 21-4593-SC, the Commission approved special contracts between GMP and school districts and public transit companies under specific government grants to utilize Rate 6 for fleet charging EV buses without incurring demand charges. These exemptions recognize the low load factors typical of EVSE and enable deployment of DCFC in a cost effective manner.

We are also working on the next phase of our Flexible Load Management (FLM) pilot anticipated to be available by this fall. FLM 3.0 will be a flexible rate with a critical peak pricing component replacing the traditional demand charge. It will be available to a broad set of commercial customers meeting participation requirements, and we plan to expand FLM 3.0 in a way that encourages installation of EVSEs for commercial fleets, providing the convenience of automated scheduling to control costs while sharing the potential for capacity benefits with the rest of our customers. This rate can also be used with V2X opportunities. We will pilot this version of FLM so that in the event it delivers for customers and load control as we expect, we can bring it to tariff.

In our experience working with customers to promote EV use and EVSE infrastructure throughout our service territory, we have found that our current Rate 6 and special contracts meet the needs of most use cases, at this early stage of deployment. The addition of FLM 3.0 will enable more deployment and may prove an even better fit for existing EVSE. As noted in our filed comments, we will continue to look for opportunities to expand EV rates and programs in ways that help all customers and meet Vermont's climate goals.

GMP thanks the Commission for the opportunity to provide comments and accurate data on its existing EV tariffs. Please do not hesitate to reach out with any questions.

Sincerely,



Melinda Humphrey
Manager of Tariffs & Rates

cc: Service list (via ePUC)