

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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Washington Electric Cooperative (“WEC”) herein provides its comments responsive to the Order of 23 August in Section II, Additional Discussion Topics.

A. Demand Charges

WEC does not have a demand charge tariff for its residential membership, which constitutes 94% of the total membership and 88% of the total energy sold in 2022.

WEC will propose in its pending Construction Work Plan (C.W.P.) that it will deploy radio frequency (RF) mesh communication for RF metering as the WEC territory gains fiber optic communication with the three Communication Union Districts (CUD) that serve our 41 towns.

WEC’s existing Power Line Carrier (PLC) meter platform is extremely limited as to offering any Time of Use (TOU) rate options. WEC does now offer its Powershift program participants a virtual and voluntary TOU rate to charge EVs. This program allows charging between 10 pm and 3 pm the next day; the 7 hour period between 3 pm and 10 pm will not allow charging to occur.

WEC does have a tariff for its commercial member accounts where there is a provision to shift the member into the Large Power tariff which includes a demand component. WEC does not discriminate between residential members and those commercial members, as most commercial members are also residential locations.

B. Multi-unit residences

WEC serves a low density, rural membership. The typical multi-unit location has a single billing meter and is unlikely to have a separate billing meter for the second or third unit. WEC has no knowledge of a multi-unit location with more than three units on one meter. It is the exception where there is a meter for each residential unit.

Consequently, WEC must assume IF an owner of a multi-unit location wants to provide EVSE to a tenant we will work with the owner to properly size the distribution transformer before they participate in the Powershift program.

C. Effectiveness and Design of Whole Premises Time of Use rates.

WEC has an archived Time of Day (TOD) rate with no current members enrolled. This tariff was first offered in the last century in a time when the metering platform then was the glass domed rotating disk utility meter type. The member then would pay a contractor to rewire the existing single meter to add a second meter socket and disconnect and then install timer controls to

switch between meters from the peak to the off peak according to the tariff. The Co-op then had service staff to cover the entire territory to calibrate the equipment (meters and timers) to keep the equipment synchronized with actual time. WEC left the service of this form of TOD in 1998 based on a conclusion that the service labor and expense exceeded the revenue under the tariff design.

As noted above WEC intends to deploy digital RF mesh communication and metering in the next several years, depending on the pending C.W.P. and the financing for all WEC system upgrades.

D. Other Experiences and Lessons Learned.

WEC has evaluated a “Transactive Energy Rate” design from the New Hampshire Electric Co-op. NHEC presented this design first to WEC in 2022 before it was launched . In 2023 NHEC presented the design to the Northeast Association of Electric Co-ops and which has been live at NHEC since 2023.