



September 22, 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”) August 23, 2023, Order Establishing Filing Procedures, Requesting Comments, and Notice of Second Workshop in this Case. BED’s responses are provided following each italicized Commission inquiry below. For reference, BED has copied the description of its existing EV rates from its May 31, 2023, letter in this Case, at the bottom of this letter. BED will also formally submit a Section 33(d) of Act 55 of 2021 exemption request by the Commission’s October 16, 2023, deadline, in accordance with the Commission’s instructions in its August 23, 2023, Order.

Should exemptions apply to PEV rates for customer classes or segments of customer classes where the rate has not advanced the goals of Section 33(b) of Act 55 because participation in the rate has been minimal; or should exemptions be limited to rates that have demonstrated that they encourage material participation and advance the goals of Section 33(b).

A Commission-imposed limitation on the application of the exemption in Section 33(d) of Act 55 of 2021 would be inconsistent with the statutory language of that exemption and with the legislative intent that informed the drafting and approval of that language. Accordingly, it seems that any qualifications or limitations on the application of that statutory language would need to be made by the legislature.

Burlington Electric Department
585 Pine Street Burlington, VT 05401
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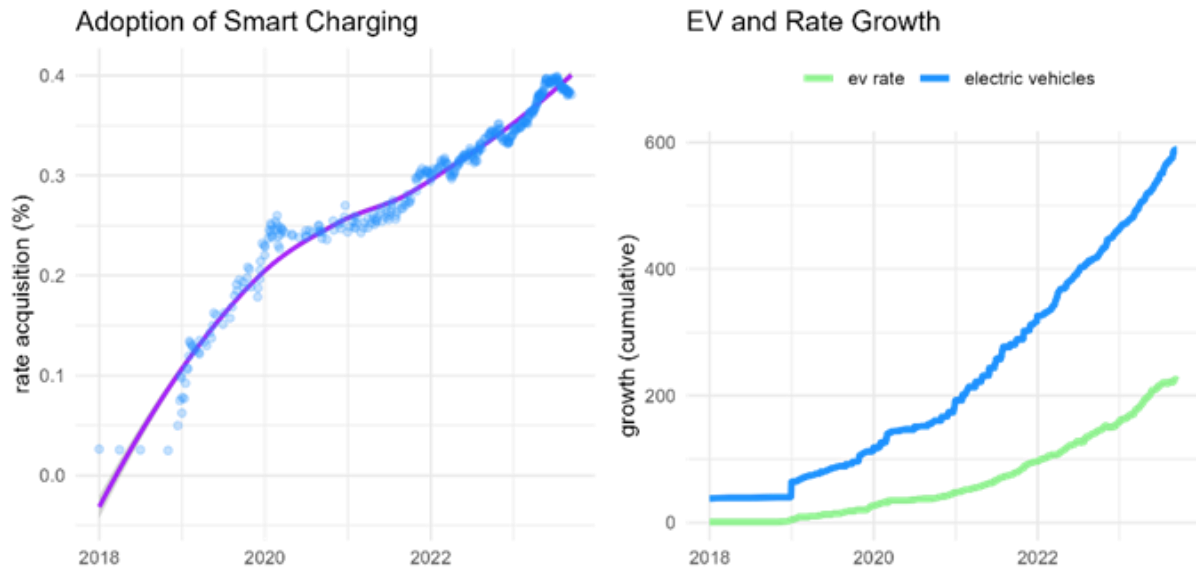
Phone 802.658.0300

The number of customers eligible for participation in the applicable rates (i.e., the rates for which the utility is seeking the exemption) and the number of customers that have elected to participate in each applicable rate;

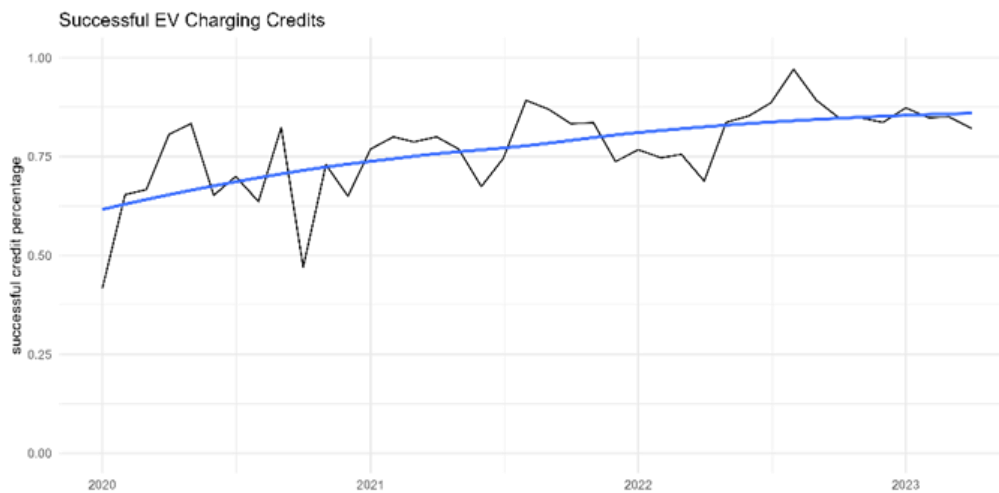
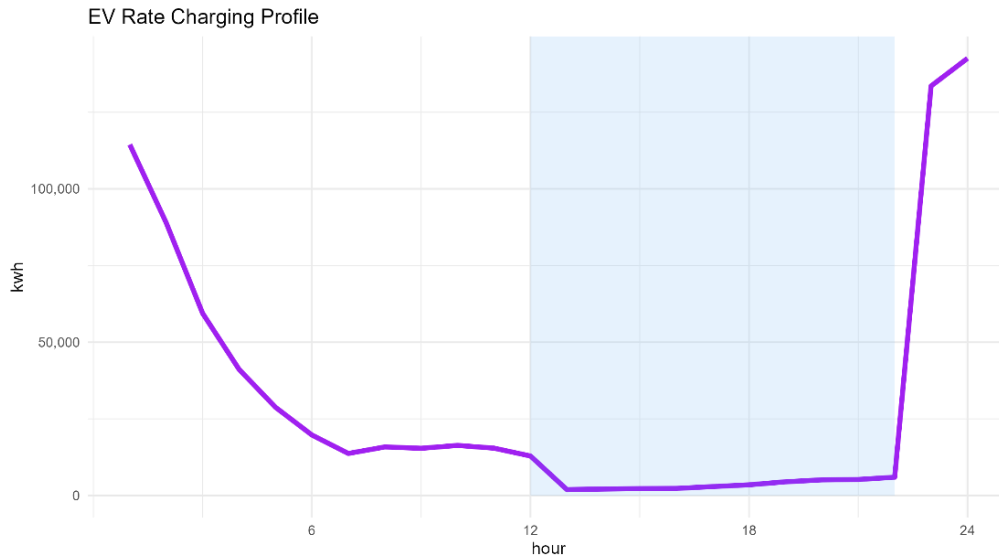
There are currently 225 customers enrolled in BED’s EV Rate and 61 customers in BED’s time of use (“TOU”) rates. BED is including all potential eligible customers in this number, regardless of whether they have an EV or not.

<i>Rate class</i>	TOU	Customers	EV Rate
<i>Primary Service</i>	Yes	9	-
<i>Large General TOU</i>	Yes	10	-
<i>Small General TOU</i>	Yes	6	-
<i>Residential Service TOU</i>	Yes	36	-
<i>Large General</i>	No	936	0
<i>Small General</i>	No	2,932	1
<i>Residential Service</i>	No	17,754	224

The total loads that are eligible to participate in the applicable rates and the total loads that participate in each applicable rate;



The above graphs illustrate the numbers of customers who have participated in BED's EV Rate since it was first offered in 2018. The graphs below illustrate the EV charging profile of BED's customers who are on the EV rate and the number of customers that receive the charging credit by successfully avoiding charging during the restricted hours each month.



The rate differentials that encourage both participation in the rate and then encourage meaningful responsiveness to either time-varying pricing or managed loads.

	kWh Rate	EV Credit kWh	EV Credit kW
Large General	\$ 0.089228	-	(\$ 21.53)
Small General	\$ 0.168002	(\$ 0.072815)	
Residential Service	\$ 0.158815	(\$ 0.072815)	

Description of BED’s EV Rates, as provided in BED’s May 31, 2023, letter 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 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 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

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.

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
(802) 735-6918