



Community is at the Heart of VPPSA.

Vermont Public Power Supply Authority

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Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620-2071

VPPSA Response to PUC Order

Case No. 23-1364-INV : Investigation into Rates Related to Electric Vehicles

On August 23, 2023 following the first Workshop in this Case, the Public Utility Commission (“PUC” or “Commission”) issued its Procedural Order Requesting Comments and feedback on proposed evaluation or EV/EVSE rates as well as topics of discussion at the next public workshop being held October 2, 2023.¹ The Vermont Public Power Supply Authority (“VPPSA”), as an instrumentality of the State of Vermont, has a mission to support and advance the interests of its eleven (11) municipally owned electric utilities, including the customers and communities they serve.² In aggregate, VPPSA’s member utilities serve approximately 30,000 customers in over 50 communities across Vermont in some of the most economically underprivileged and rural areas in the state, including several federally recognized Disadvantaged Communities through the U.S. Council on Environmental Equity’s Climate and Economic Justice Screening Tool (CEJST).³ Throughout its discovery process around

¹ See Case No. 23-1364-INV PUC Order Establishing Filing Procedures, Requesting Comments, and Notice of Second Workshop filed August 23, 2023.

² VPPSA Member Utilities include Barton Village; Village of Enosburg Falls; Hardwick Electric Department; Village of Jacksonville; Village of Johnson; Ludlow Electric Light Department; Lyndonville Electric Department; Morrisville Water & Light; Northfield Electric Department; Village of Orleans; and Swanton Village.

³ See Climate and Economic Justice Screening Tool published Nov. 22, 2022.

the structure and implementation of EV/EVSE rates, VPPSA continues to uphold four guiding principles that illustrate Community is at the Heart of VPPSA: Affordability; Local Energy Democracy; Sustainability & Growth; and Strategic Standardization.

I. Procedures for Filings Under Act 55, Section 33

A. New Tariff Filings Under Section 33 of Act 55;

B. Requests for Extension of Deadline;

C. Exemption Claims under Section 33(d) of Act 55

VPPSA intends to submit a New Tariff Filing for its members under Section 33 by the October 16, 2023 deadline addressing all criteria as defined in Section 33(c).

VPPSA does not have any significant comments related to the proposed procedures, though concur with Burlington Electric Department's concerns around exemption limitations that are outside the bounds of the statutory language, without legislative endorsement.

II. Additional Discussion Topics

Innovative Rates, Rate Design, Electrification & Load Management

VPPSA's relationship with its members creates a clear and distinct delineation between distribution system operations and the joint services offered through the Authority such as regulatory energy services, rate design and financial planning, "back-office" support, wholesale energy market procurement and advocacy, among others. As energy markets mature and evolve to support a cleaner and more resilient future, it must diversify to meet growing demand and capacity constraints under existing grid infrastructure. The traditional transmission, distribution and generation grid infrastructures face a complex transformation to address weaknesses around a linear,

unidirectional system of direct command and control or top-down administration which often drives cost and creates barriers to entry.

To create thriving markets and reliable systems in a grid environment with increasing numbers of distributed energy and inverter-based resources, utilities, market participants and local, regional, and federal regulators have long explored how to modernize while managing affordability and sustainability. It is under this lens VPPSA proposes to leapfrog traditional approaches to rate design and flexible load management by implementing an innovative, market informed EV/EVSE tariff structure that meets the Act 55 requirements but also establishes the necessary technology infrastructure to support future expansion into open communication pathways with other flexible load devices/systems, similar to the Salt River Project's Price Plans⁴, or the New Hampshire Electric Cooperative's Transactive Energy Rate Program⁵. By engaging with and soliciting direct market participant partnerships as well as using cost-effective, open-source based IT solutions, VPPSA and its members have an opportunity to rapidly deliver a dynamic, cutting-edge rate solution while demonstrating the capabilities of affordable, market-based energy services.

In the short term, VPPSA's proposed rate design solution is uniquely suited to operate under a larger technology roadmap strategy and mitigates common challenges around demand charges, separate customer class rate structures, or

⁴ See [Salt River Project Residential Price Plans](#) (plans also available for Business)

⁵ See [New Hampshire Electric Cooperative's Transactive Energy Rate Pilot Program](#)

unnecessary sub-metering infrastructure investments. As VPPSA has discovered through its PowerShift Pilot Program in partnership with Efficiency Vermont, many devices simply have long-term challenges that limit the ability to optimize or measure and verify EVSE usage - or the systems are overly costly to implement at the utility scale.

As noted above, the proposed Platform as a Service (PaaS) or "IT" solution is part of an overall technology roadmap, but one that considers rapid deployment of core IT/OT technology infrastructure now with long-term sustainability and adaptability in mind for future expansion in tandem with already underway projects such as Advanced Metering Infrastructure (AMI) and GIS. VPPSA looks forward to working directly with EV OEMs, EVSE Charging Platform providers and device manufacturers, and/or individual customer enrollment to deliver and incentivize electric vehicle adoption which engages in true cost savings and shared - not competing - values through rates.

VPPSA appreciates the opportunity to participate in the Commission's discovery process and looks forward to delivering transformative, market-based solutions that leverage public/private partnerships while retaining local energy democracy and customer choice.

Respectfully,

/s/
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