

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 24-3023-INV

Public Utility Commission 2024 Investigation |  
into Rates Related to Electric Vehicles

**COMMENTS OF THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department”) appreciates this opportunity to comment on electric vehicle (“EV”) rates. The Vermont Public Utility Commission (“Commission”) has issued orders in nine cases over the past year approving new EV tariffs, confirming that existing rates meet certain requirements set by the Legislature, or approving time extensions for one, two, or three years. Despite this meaningful progress, however, work remains to ensure that EV rates are fully utilized and continue to maintain their relevance into the future.

The Commission’s questions regarding utility service upgrade policies and practices are a welcome addition to the 2025 report. In addition to transformer and service drop upgrade costs, the Department notes that installing Level 2 EV charging at certain residences also requires additional in-home costs such as panel upgrades (for capacity or space reasons), subpanels, and wiring.

With the Commission’s 2023-2024 deadline-driven process for reviewing and approving EV rates largely complete, today’s comments do not rehash key topics previously presented and summarized in the “Challenges and Barriers” section of the 2024 Act 55 report to the Legislature.<sup>1</sup> However, even with recent Commission orders, those topics remain pertinent, namely:

1. Demand charges, especially for public fast chargers and commercial fleets;

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<sup>1</sup> Public Act No. 55 (2021 Vt., Bien. Sess.) .; “Act 55: 2024 Report on Electric Rates for Electric Vehicles,” dated January 15, 2024

2. Multifamily residences and ensuring resident access to lower-cost rates; and
3. Whole-premises time-of-use rate consumer understanding and participation.

### **Managed Charging Participation**

Each year, the Department estimates the proportion of Vermont's EVs that participate in EV rates and other utility managed charging programs. In 2022 and 2023, 31% of Vermont's registered EVs participated. This autumn, the figure fell to 29%. While the causes of this modest decline are unknown, it speaks to the continued importance of ensuring that distribution utilities actively recruit participants into EV rate and other management programs.

### **State EV Supply Equipment ("EVSE") Funding Programs**

State agencies continue to manage a variety of public-serving EVSE programs. The 2024 Transportation Bill authorized nearly \$5 million in annual spending by the Agency of Transportation on the National Electric Vehicle Infrastructure ("NEVI") Program.<sup>2</sup> NEVI is a federal program totaling \$21.2 million for Vermont over five years and primarily supports fast charging along major highway corridors.

Separately, the 2024 Transportation Bill authorized \$1.7 million for workplace and multifamily residence charging to continue programs overseen by the Agency of Commerce and Community Development ("ACCD").

Finally, for the first time, the 2024 Transportation Bill established an ongoing revenue source for workplace and multifamily EVSE programs supporting Level 1 and Level 2 charging. Beginning January 1, 2025, Vermont EV drivers will pay an additional fee when registering their EVs. The fee is \$44.50 for plug-in hybrid EVs and \$89.00 for all-electric vehicles, and these fees

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<sup>2</sup> Public Act No. 148 (2024 Vt., Bien. Sess.)

are collected in addition to standard vehicle registration fees. The new revenue is dedicated to support ACCD's EVSE program for workplaces and multifamily residences. In addition, the Agency of Transportation is instructed to provide recommendations for additional funding sources to build the EVSE necessary to meet Vermont's Comprehensive Energy Plan and Climate Action Plan goals. This report is due on January 15, 2025.

Thank you for the opportunity to provide these comments. Please contact the undersigned counsel with any questions.

Dated at Montpelier, Vermont this 30<sup>th</sup> day of October 2024.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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