



October 30, 2024

Holly R. Anderson  
Clerk of the Commission  
112 State Street  
Montpelier, VT 05620-2701

Re: Case No. 24-3023-INV, Public Utility Commission 2024 Investigation  
into Rates Related to Electric Vehicles

Dear Ms. Anderson,

Burlington Electric Department (“BED”) submits this letter with updated information on its EV Rate in response to the Public Utility Commission’s (“Commission’s”) September 27, 2024, Order Opening Investigation and Requesting Comments in this Case.

In the Commission’s June 8, 2023, Final Order Granting Exemption in Case No. 23-3611-PET, the Commission determined that BED’s EV Rate, EV Charging Station Rate, and Primary Service Tariff Rate satisfy the exemption requirements of Section 33(b) and (d) of Act 55 of 2021 and granted BED’s request for an exemption from the requirements of Act 55 for all of its relevant customer classes. Accordingly, BED has provided responses to the questions the Commission posed to utilities that received exemptions.

***Data about historical and current customer participation levels in the exempt EV rates***

BED’s EV Rate is available to customers who take service under BED’s non-time-of-use residential service (“RS”), small general (“SG”) and large general (“LG”) rate classes. BED’s public EVSE tariff specifies the terms of service for anyone who charges an electric vehicle at one of BED’s public EVSE stations.<sup>1</sup>

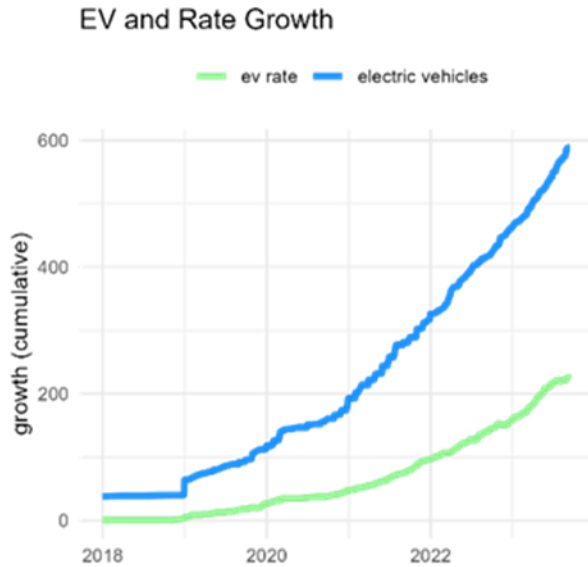
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<sup>1</sup> BED has also proposed a pilot discounted public EV charging option at its five neighborhood pole-mounted charging stations as described in BED’s October 1, 2024, filing Case No. 24A-3053.

**Burlington Electric Department**  
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As of today, there are 327 chargers at 315 customer locations within BED's territory that are enrolled in the BED's EV Rate. Six of these chargers (located at five customer locations) are SG rate customers, while the rest are RS customers. As shown in the graph below, the number of customers participating in the EV Rate has continued to grow since it was first offered in 2018.



***BED's EV Rate meets the goals of subsections (c)(1)(A) – (F) of Act 55 of 2021, Section 33***

As described above, BED's customer enrollment in the EV Rate continues to rise over time, likely due to a combination of factors, including BED's robust community outreach activities described below, the customer financial compensation for participation, and interest in participating in a peak management program that provides a valuable grid-related service to all BED customers. In combination with BED's EV purchase incentives, the financial benefit to customers enrolled in BED's EV Rate serves as a key layer in the stack of incentives BED provides to incentivize greater customer adoption of EVs. BED is able to offer the EV Rate as a credit to customers without imposing fees on non-participating customers and the EV Rate has no negative impact on EVSE available to the public.

***Outreach efforts and promotion of the EV rates to utility customers***

BED promotes its EV Rate in regularly featured materials on its website, BED's Net Zero Energy podcast, social media platforms and Front Porch Forum posts. Additionally, any customer who applies for EV purchase incentive rebates receives information about the EV Rate encouraging them to enroll. For BED customers who are interested in installing an at-home level-two charger so that they can participate in the EV Rate, BED has published a Charger Installation Guide to help them navigate this process.

BED's team hosts numerous community outreach events throughout the year at which it promotes the EV Rate. Such events include BED's September 21, 2024, Net Zero Energy Festival, at which six

local car dealerships showcased available EVs, and along with BED staff, highlighted the financial benefits of BED's EV Rate, a BED-sponsored EV Ride and Drive event at the Old North End Community Center which promoted the many advantages of EV adoption, including discounted EV charging options through the EV Rate, an energy clinic in August with Community Gardeners in the New North End which highlighted e-bikes, EV purchase incentives and the EV Rate, as well as tabling at Burlington's Juneteenth celebration, at Lake Monsters games and at Summervale.

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,



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Regulatory Specialist  
Burlington Electric Department  
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