



Melinda Humphrey
Manager of Rates

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October 30, 2024

Via ePUC

Holly Anderson, Clerk
Vermont Public Utility 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,

Green Mountain Power (GMP) provides the following response to the Commission’s Order of September 27, 2024, regarding rates related to Electric Vehicles (EVs). The Commission’s questions are set out in italics below, followed by our response.

1. *For utilities that received exemptions:*
 - a. *Please provide data about historical and current customer participation levels in the exempt EV rates.*
 - b. *Please describe the performance of the EV rates in meeting the goals of subsections (c)(1)(A) – (F) of Act 55, Section 33 since receiving your exemption.*
 - c. *Please describe any outreach efforts or promotion of the EV rates to utility customers since receiving your exemption, including any EV-rate participation incentives or coordination with dealers offering EVs.*
 - d. *If the Commission required you to implement additional rates, please provide an update on your progress toward filing the additional EV rates for Commission approval.*

GMP Response

- a. Residential Off Peak Electric Vehicle Rate 72 and Residential Time of Use Electric Vehicle Rate 74 were implemented in August 2020. The following table summarizes enrollment since implementation.

	Rate 72	Rate 74	Total
9/30/2024	981	2,447	3,428
12/31/2023	832	1,809	2,641
12/31/2022	596	1,078	1,674
12/31/2021	373	536	909
12/31/2020	90	116	206

The General Service Rate 6 EV Charging Equipment Exemption for fast chargers was implemented in January 2021. Following the Commission's Tariff Approval Order issued January 29, 2021 in Case No. 20-3832-TF, we file a report every year detailing the use of this exemption. For reporting year 2021, there were five publicly accessible DC fast charger locations using the exemption. For reporting years 2022 and 2023, there were six. There are also many fast charger installations that do not need to access Rate 6 because they are either behind the meter or have small enough usage at this point not to trigger potential demand charges. Specifically, there are 28 public facing DC fast charger locations GMP has facilitated and seven additional in GMP district office parking locations that are available throughout our service territory. We will report to the Commission on the results for calendar year 2024 in March 2025.

- b. As stated in our October 16, 2023, testimony in Case No 23-3612-PET, GMP's exempted rates are cost-effective for participants and other customers; they drive the dollar per gallon equivalent for EVs even lower for participants, encouraging greater adoption of EVs. They are also designed to provide benefits that meet our cost of service by adequately compensating participating customers contributing to peak reductions without putting additional costs on other customers. These programs also meet Section 33(c)(2), by using time-varying rates and load control to support lower-cost PEV charging.

The Rate 6 fast charger exemption also continues to help ameliorate the demand charges that would otherwise make deploying this equipment less economically viable, particularly at a time of still low overall usage and low load factor. Therefore, Rate 6 encourages adoption of this technology and supports adequate compensation of both EVSE owners and all customers. As indicated in our annual reports for Rate 6 noted above, we are monitoring deployment and usage of this equipment in order to adjust rate offerings in the future as needed to maintain that balance.

- c. We continue to find that the vast majority of customers who install charging equipment through our offering enroll smoothly in one of our available rates. Under Tier III of the Vermont Renewable Energy Standard, GMP provides a vehicle incentive for any EV purchased or leased by a GMP customer—often times, provided directly at the point of sale with the auto dealer.

When a customer receives a GMP EV incentive, residential customers are also made aware of GMP's additional Tier III incentive of a free Level 2 Smart charger. Customers utilizing our charger incentive receive information with a reminder that a requirement of the incentive is enrollment in either of the discounted residential EV rates, Rate 72 or 74. This includes an explanation of the rate, savings opportunities, and instructions for enrollment. We help customers with questions to complete enrollment in these rates when they install their

charging equipment and continue to communicate with customers who have not yet enrolled their chargers.

We also continue to support and host ride and drive events, communicate and work with dealers, and work with customers to make the transition to EVs easy.

For Rate 6, installation of fast charger equipment is recognized by our Field Tech and Energy Services teams and reported to our Billing team when an EVSE meter point is added in the field. The owners are generally commercial customers aware of demand charges. Enrolling in the Rate 6 exemption when needed has worked well for customers to date. In addition, our billing team reviews all Rate 6 accounts monthly to identify any that have met the kW and kWh thresholds that would otherwise require a move to Rate 63/65 so that any EVSE that qualify are flagged and remain on Rate 6. As mentioned earlier, an annual report of accounts utilizing this exemption is filed under Case No. 20-3832-TF.

- d. Not applicable. See below for continued work on additional EV-related rates.
- 2. *For utilities that received extensions, please describe your progress toward filing your EV rates with the Commission for approval.***

GMP Response

GMP is currently working to enroll the four customers that utilized an EV Bus Special Contract that expired this past summer into our Flexible Load Management (FLM) 3.0 Pilot.¹ It is most cost-effective for these customers to remain on our commercial Rate 63/65 for all load at their location rather than use dedicated service points for their bus charging infrastructure and their initial grant funding sources prevented them from enrolling in demand management programs for the initial years. Now that they are able, the special contract is no longer needed because enrolling in the FLM 3.0 program will allow them to benefit from the EVSE enabled load control, while remaining on a single Rate 63/65 service point.

- 3. *For utilities that filed new tariffs that were approved by the Commission:***
- a. *Please provide data about customer participation levels in the EV rate since implementation.***
 - b. *Please describe the performance of the EV rates in meeting the goals of subsections (c)(1)(A) – (F) of Act 55, Section 33 since implementation.***

¹ FLM 3.0 was filed in December 2023 and the transition of FLM 2.0 participants and recruitment of new participants began in summer 2024. The first customers were enrolled in October 2024 and the six-month report will be filed in January 2025.

- c. Please describe any outreach efforts or promotion of the EV rates to utility customers since approval, including any EV-rate participation incentives or coordination with dealers offering EVs.*
- d. If the Commission required you to implement additional rates, please provide an update on your progress toward filing the additional EV rates for Commission approval.*

GMP Response:

Not applicable. See responses above regarding GMP's currently offered EV rates and programs.

4. For all utilities:

- a. Please identify and discuss any continuing barriers to your progress toward meeting the goals of subsections (a) and (b) of Act 55.*
- b. Please describe your service upgrade practices related to the installation of EVSE across all electric distribution utilities, including a description of the frequency and typical costs of EVSE-related service upgrades and ratepayer impact.*

GMP Response

- a. There continues to be steady progress and uptake of EVs in GMP territory. Price of vehicles and availability of incentives are considerations when customers look to purchase an EV, along with range and ease of charging infrastructure. The absence of State-level incentives as of October 2024 will likely have an impact on customer decisions. Additionally, while GMP has worked to deploy EVSE throughout its territory, both through its own charging equipment and through programs to help customers install fast chargers and Level 2 chargers, more fast charging stations like those funded through NEVI funds are needed for customers to feel comfortable opting for an EV. Deploying more EVSE throughout Vermont will continue to be important as more customers acquire new and used EVs.

Commercial fleet, multifamily, and workplace charging have diverse use profiles and require more individualized solutions compared to residential offerings. Through the EVSE grant management we are facilitating for the State and through our own work with customers, we are investigating whether there are common solutions that should be deployed to facilitate shared savings and load management for these customers, such as using the EVSE as metering and managing load during grid events through GMP. For multifamily residential installations, GMP continues to think about and learn from others regarding how charging can be provided equitably so that rate savings opportunities are available in these shared-use locations where customers cannot install EVSE directly.

- b. In 2023, GMP updated our Line Extension Tariff to include service upgrade credits when the upgrade is being driven due to a flexible load being added such as an EV, battery or similar device. This update to our tariff which was approved by the PUC in Case No. 23-1051-TF, provides a credit to the cost of a transformer and service line upgrade to a customer that requires the upgrade due to the installation of the aforementioned flexible equipment. Through October 2024, GMP has provided 51 service upgrade credits for qualifying upgrades where a customer is installing EVSE.

GMP also continues to use available technology that provides load control features, enabling customers to electrify their transportation and increase resilience without other service upgrades. In 2021, GMP piloted SPAN smart electric panels, which allow for electrification without the need for service upgrades. This technology was extended to the Resilient Neighborhood Pilot, a community of new, fully electrified homes in South Burlington, each with all electric heating and cooling, induction stoves, and Level 2 EV chargers. These homes demonstrate that 200A service equipment and a home energy management system can meet the needs of a fully electrified house without the need for upgrading to a larger service. Additionally, through its Tier III program, GMP deploys Emporia Level 2 EV chargers with load control capability and recently approved the ConnectDER EV device, which allows customers to connect a level 2 EV charger to a service panel that otherwise would be overloaded and require an upgrade. The Emporia load control EV charger and the ConnectDER EV device work similarly, managing the load, curtailing the EV charger as needed, and preventing overload due to EV charging.


5. *Any other topics for inclusion in the 2025 EV report or suggestions for workshops or written filings.*

GMP Response

The set of information requested is appropriate for this topic and GMP does not have further suggestions for this year's report.

GMP thanks the Commission for the opportunity to provide comments and data on its existing EV rates and programs. Please do not hesitate to reach out with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Melinda Humphrey". The signature is written in a cursive style with a long horizontal flourish at the end.

Melinda Humphrey
Manager of Tariffs & Rates

cc: Service list (*via ePUC*)