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

RE: PUC Workshop - Case No. 24-3023-INV

Dear Ms. Anderson:

Washington Electric Cooperative (“WEC”) submits the following written summary responses as part of the guidance provided by Vermont Public Utility Commission (“Commission”) on December 10, 2024, in the abovementioned case:

1) Each utility’s policies for responding to customer requests for service upgrades that require upgrading utility-owned equipment (e.g., lines, transformers), including:

a) Whether and when customers requesting service upgrades are or would be responsible for costs associated with upgrading utility-owned equipment when upgrades are necessary.

WEC members requesting service upgrades are responsible for costs associated with service upgrades in the following scenarios: 1) new service, 2) net-metering, 3) load increases requiring transformer upgrades >37.5kVa.

b) Whether the entity responsible for costs is or would be different if the upgrade purpose is to enable the installation of EVSE.

WEC members requesting service upgrades are not responsible for costs associated with upgrading utility-owned equipment when upgrades are necessary for electric vehicle chargers.

c) Where your policies are documented (e.g., tariff, internal written procedures).

WEC’s policy is an internal written procedure that has been shared with our membership publicly, including in our co-op publication, *Co-op Currents*. The policy was first discussed and then accepted by our Board of Directors, who are elected from among the co-op membership.

2) If your utility provides rebates for EVSE-related service upgrades, please explain if you have ever denied a rebate. If so, how many times and for what reason.

WEC is an equal opportunity employer and energy provider owned by its members since 1939.

N/A; WEC does not provide rebates for EVSE-related service upgrades.

3) If customers are or would be responsible for upgrade costs, please explain whether your utility allocates the costs for shared infrastructure among customers.

N/A; WEC does not require members to be responsible for upgrade costs associated with EVSE.

4) The frequency and typical costs of EVSE-related service upgrades over the past three years, if you have performed any EVSE-related service upgrades.

The frequency of EVSE-related service upgrades has been impacted by the fact that many of WEC's existing transformers are undersized due to past regulatory guidance to decrease transformer capacities for efficiency purposes.

As a result, the vast majority of WEC members' EVSE inquiries have resulted in required transformer upgrades. The past three years have all been very different:

- In 2022, a transformer shortage in the supply chain led WEC to reserve and prioritize a limited number of transformers for projects related to emergency repairs, new connections, and obligations related to net metering projects. No EVSE-related service upgrades were performed.
- In 2023, WEC performed (18) transformer upgrades: (2) specific to EVSEs and (16) related to more general service upgrades, which included EVSEs in some instances.
- Thru mid-December of 2024, WEC has assessed (48) transformers for EVSE-related upgrades and (46) required upgrades have been completed.

The typical cost of EVSE-related service upgrades (mainly related to the incremental costs between a "base" transformer and a new, larger capacity transformer) have fluctuated drastically in recent years depending on supplier pricing at the time and the size requirements of the new transformer. In 2023, the average cost across all transformer upgrades was \$1,658 per transformer.

5) Any ratepayer impacts that have or would result due to EVSE-related service upgrades.

For all WEC members, the rate impacts due to EVSE-related service upgrades have not been calculated. There are many factors at play that would make this analysis difficult, including consideration of the fact that many of WEC's existing transformers are undersized. (See #4 above.) To accurately parse out causality would be a laborious task that would result in imprecise results.

For individual ratepayers, the average impact (cost) in 2023 was \$1,658 per EVSE-related service upgrade. Due to the recent policy change, there are no cost impacts for individual ratepayers who require EVSE-related service upgrades.

If the Commission should have any additional questions, WEC would be glad to provide responses.

Sincerely,

A handwritten signature in blue ink, appearing to read "JJ Vandette". The signature is fluid and cursive, with a prominent vertical stroke at the beginning.

JJ Vandette
Director of Special Projects & Innovation