



Melinda Humphrey
Manager of Rates

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January 3, 2025

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) appreciates the opportunity to respond to the Commission's December 10, 2024, *Order Re: Workshop Topics* in the above-referenced investigation and provide this follow-up to information provided at the workshop held December 18, 2024. The topics provided in the Commission's Order are shown below in bold, followed by GMP's response.

- 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.**
 - b) Whether the entity responsible for costs is or would be different if the upgrade purpose is to enable the installation of EVSE.**
 - c) Where your policies are documented (e.g. tariff, internal written procedures).**

GMP Response

In response to subpart (a), a customer may initiate the need for a service upgrade or line relocation for a variety of reasons. GMP works with the customer to determine what work is necessary to meet their service needs. If a service upgrade is required, we provide an estimate for the work to make the change for the requesting customer. The customer requesting the upgrade or relocation will cover the cost of the work to complete this request unless during this process, GMP finds that, in accordance with our Line Extension Tariff, the upgrade has a material benefit

for all customers either due to decreased maintenance, increased reliability, worker and public safety, or flexible electrical devices, including EVSE. In those circumstances, either the cost of the required upgrade will be absorbed by GMP, or, in the case of an upgrade that includes flexible electrical devices, a credit will be applied towards the cost of the upgrade.

In response to subpart (b), additional flexible load on our distribution system helps all customers by lowering costs. If the customer-initiated line relocation or upgrade is being completed to support flexible electrical devices, including EVSE, the cost of the upgrade, no greater than the material benefit, will be absorbed by GMP in accordance with our Line Extension Tariff.

Finally, in response to subpart (c), these policies can be found in our Line Extension Tariff, in Section 9 on relocations and upgrades. The Line Extension Tariff was approved in Case No. 23-1051-TF.

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.

GMP Response

GMP has not denied an EVSE-related service upgrade credit under the terms of the Line Extension Tariff noted above.

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

GMP Response

See responses above. As further described in our October 30, 2024, filing in this proceeding, GMP's Line Extension Tariff provides a credit to the requesting customer for the cost of a transformer and service line upgrade in these circumstances. The credit cannot exceed the net utility benefit to all customers. There may be other customer costs associated with a service upgrade beyond costs associated with GMP owned equipment, and those are not addressed in our tariff.

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.

GMP Response

Our revised Line Extension Tariff was approved and implemented in August 2023. Through October 2024, GMP has provided 51 service upgrade credits for qualifying GMP upgrades where a customer is installing EVSE. These typically do not exceed the \$1,800 net material benefit that caps the credit available to the customer requesting the EVSE related service upgrade. We will

continue to report this annually, as required by the PUC's order approving our Line Extension Tariff.

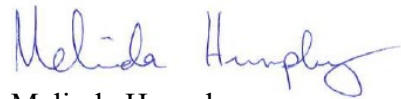
5. Any ratepayer impacts that have or would result due to EVSE-related service upgrades.

GMP Response

Our updated Line Extension Tariff, and the included credit for qualifying upgrades, was based on covering only the costs that do not exceed the material benefit of the flexible electrical device, resulting in an overall positive net benefit from those devices for all customers.

Thank you for the opportunity to provide this information. Please reach out anytime with questions.

Sincerely,



Melinda Humphrey

cc: Service List (via ePUC)