January 6, 2025

Holly Anderson, Clerk
Public Service Commission
116 State St
Montpelier, VT 05620
Re: 24-3023-INV – PUC 2024 Investigation into Rates Related to Electric Vehicles

Dear Ms. Anderson,

Vermont Electric Cooperative (VEC) submits the following written comments in conjunction with the workshop on December 18, 2024 regarding service upgrade practices for electric vehicles (EVs). Below are responses to the Public Utility Commission's specific questions.

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.*

   For distribution transformers, VEC uses software provided by Camus Energy to proactively identify overloaded transformers and unknown EV chargers through AMI analytics. If we identify an overloaded transformer, we contact the member and schedule a transformer upgrade.

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

   VEC covers the cost of these transformer upgrades, which is typically about $3,00. This policy is different from most transformer upgrades, where the cost causer pays the cost.

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

   In June 2020, VEC began offering free transformer upgrades for EV's through an addition to section 17 of VEC's Line Extension Tariff (20-1528-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.*

We do not provide rebates. However, we do not charge for EV-related transformer upgrades. The cost of these upgrades is included in our Tier 3 plans, budgets, and compliance filings.

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

   Customers are not responsible for the upgrade costs.

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.*

   To date, VEC has upgraded about 50 transformers due to EV overloads and is upgrading between 10-20 transformers annually for EV's. Costs vary based on the size of the transformer. The most common upgrade is a 10kVA to 15 kVA which costs around $3,000 with labor and materials.

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

   VEC has found that the revenue created through new sales from electric vehicles exceeds the total cost of the incentives offered (EV incentive, free charger, transformer upgrades). In 2023, the total gross cost of all EV programs was $225,440 and the expected lifetime revenue was $256,894 for a margin of $31,454. Therefore, there is a positive ratepayer impact.

Thank you for the opportunity to comment. Please contact us with any questions.

Sincerely,

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