



January 6, 2025

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 in response to the Public Utility Commission's ("Commission's") December 10, 2024, Order Re: Workshop Topics in this Case. BED has provided its responses it shared during the December 18, 2024, workshop along with answers to the Commission's follow-up questions at the workshop, under each Commission question below.

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.

The customer who requests a service upgrade is responsible for the cost associated with installation of the upgrade and BED pays for the cost of the upgraded transformer. As an example, for a recent transformer upgrade project, the BED-paid transformer costs were \$7,712 and the customer-paid installation costs were \$4,642.

At the December 18, 2024, Commission workshop, the Commission asked how many customers are typically served by any one upgraded transformer, how often BED is receiving upgrade requests, and whether the frequency of requests has increased in recent years, potentially reflecting an increase in customer installations of EVSE and/or heat pumps.

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Residential customers are typically connected to a single-phase transformer that is either aerial (pole mounted) or underground (pad mounted). The following shows the average customer count based on the various transformer sizes that serve residential customers.

Transformer KVA Rating	Avg Customer Count
25	9
37.5	16
50	16
75	21
100	22
167	23

BED has seen an increase in applications for service upgrades in recent years. Based on customer's application responses, service upgrades are often due to electrification measures such as heat pumps and EVSE, but as described in question four below, BED does not have accurate data on how many service upgrade requests are for EVSE installations.

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

BED's cost allocation policy is not currently different for upgrades for installation of EVSE.

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

BED's upgrade policies are documented in its Operating Guidelines.

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.

BED does not currently offer 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.

Except in the rare case of a contemporaneous request from multiple customers for a service upgrade, BED does not allocate the costs for shared infrastructure among multiple customers.

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.

While BED requests information in its customer application about the purpose of requested service upgrades, BED does not have accurate data on which upgrades are EVSE-related. Often customers provide general responses such as interest in additional service capacity for projects they may or may not complete in the future.

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

As BED does not have information on how many transformer upgrades are due to EVSE-related service upgrades, it is unclear how such upgrades are impacting rates.

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,



Amber Widmayer
Regulatory Specialist
Burlington Electric Department
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