

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-1809-TF

Tariff filing of Town of Stowe Electric Department for approval of EV and EVSE Flexible Load Management Program effective on service rendered on or after October 1, 2025	
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Case No 25-1792-TF

Tariff filing of Town of Stowe Electric Department revising residential time of use rate 03 and adding small commercial time of use rate - rate 21 and commercial demand time of use rate- rate 26 effective on service rendered on or after October 1, 2025	
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PREFILED REBUTALL TESTIMONY OF
Michael Lazorchak
Town of Stowe Electric Department

February 27, 2026

Summary: Michael Lazorchak provides rebuttal testimony to clarify the Program's design in response to the Vermont Department of Public Service's pre-filed testimony which interprets a more complicated Program than the one the Town of Stowe Electric has presented in this docket.

Exhibits: No exhibits

1 **Q1 Please identify yourself.**

2 A1. My name is Michael Lazorchak. I am the regulatory manager for the Town of Stowe
3 Electric Department (SED). My office address is 435 Moscow Road Stowe, Vermont.

5 **Q2. What is the purpose of your testimony?**

6 A2. The purpose of my testimony is to supplement information about SED’s electric vehicle
7 (EV) and electric vehicle supply equipment (EVSE) flexible load management program
8 (Program) that I presented in my pre-filed testimony. The Program is SED’s least-cost
9 plan to encourage the “efficient integration” of EVs and EVSE into SED’s electric
10 system and “timely adoption” of EVs and public charging. *Section 33 of Act 55, Public*
11 *Act No. 55 (2021 Vt., Bien. Sess.) (hereafter Act 55 or Sec. 33).* SED and its Board of
12 Commissioners created a Program that offers a cost competitive, simple, and
13 comprehensive opportunity for SED customers to reduce their electric bills when adding
14 EV loads to their household. The Program is predicated on the customer’s ability to opt-
15 into the Program, which gives the customer flexibility to enroll when their household can
16 take advantage of the savings offered through this Program. This Program also does not
17 penalize customers who elect to not participate. *See Sec. 33(c)(1)(f).*

19 **Q3: Please explain the enrollment process for a customer to join Connected Homes?**

20 A3: SED provided information on how it will generally advertise the Program. *See Case No*
21 *1809-TF, pf. Testimony Michael Lazorchak pages 9-10.* SED also has a list of customers

1 interested in participating in the Program. After the Vermont Public Utility Commission
2 (Commission) approves the Program, then SED staff will contact those customers to
3 make them aware it's available. The enrollment process asks customers to navigate to
4 SED's Connected Homes Program website, <https://www.stoweelectric.com/ch>, and select
5 'Sign Up Today'. The customer is asked to provide customer contact information,
6 account details, and information about the EVs and EVSE they wish to enroll into the
7 Program. The website collects the information and SED staff receive an alert to verify the
8 customer's information. After verification by SED staff, the customer is enrolled in the
9 Program. The customer can participate in curtailment events within the same month they
10 are registered.

11
12 **Q4: Please explain the enrollment process for a customer to join the Time of Use Rates**
13 **Proposed in Case No. 25-1792-TF.**

14 A4: SED provided information on how it will generally advertise the new TOU Rates in *Case*
15 *No 1792-TF, pf. Testimony Michael Lazorchak page 16, lines 5-18*. In addition, SED has
16 a list of customers interested in joining SED's revised residential time of use rate (TOU
17 Rate). After the Commission approves the TOU Rates, then SED staff will contact those
18 customers to make them aware the rate is available. From there, the customer simply
19 needs to contact SED customer service staff to request to enroll in the rate.

20 **Q5. Please provide additional information on the Program design presented in Case No**
21 **1809-TF.**

1 A5. I provided a comprehensive explanation of the Program design in my direct pre-filed
2 testimony. *See Case No 25-1809-TF, pf. Testimony Michael Lazorchak pages 2-9.*
3 However, in response to the Department of Public Service's (Department) opinion that
4 the design is "complex, demanding, and potentially punitive" I will offer additional
5 information to show the Program is based on an effective and proven design. *Case No 25-*
6 *1809-TF, pf. Testimony Phillip Picotte page 3, lines 16-17.*

7 SED joined the Massachusetts Municipal Wholesale Electric Company
8 (MMWEC) Connected Homes program to take advantage of an existing simple and
9 efficient program to manage EV charging loads. MMWEC's Connected Homes program
10 started in 2020 and has over 3,500 devices across 18 public power utilities enrolled in this
11 platform, which includes more than 700 enrolled EVs and EVSE. By leveraging
12 MMWEC's experience in load forecasting, customer enrollment and technical support,
13 and Virtual Peaker's demand side management platform, SED can offer a consistent
14 customer experience to encourage participation in an EV charging program.

15 MMWEC's program is centered on simplicity, automation, and sending clear
16 financial signals to maximize participation in the Program. The automated program
17 design allows customers to manage EV charging without having to evaluate the timing of
18 their charging or calculate whether they will have sufficient battery life to go about their
19 daily activities. The Program accomplishes this by integrating with the EV or EVSE to
20 allow the customer to schedule charging during off-peak hours and receive automatic
21 peak event alerts to participate in load curtailment events.

1 The Program’s eligibility rules are also clear and transparent. Customers can
2 enroll up to three EVs or one EVSE per household into the Program. The customer can
3 opt out of as many as two events called per month and still receive the per device
4 monthly incentive. This provides clear guidance to our customers – if they voluntarily
5 curtail EV loads that they could otherwise charge during system peaks, then they will
6 receive a financial benefit. The Program’s incentive structure also allows for an
7 additional one-time \$100 enrollment incentive, which will be paid to the customer by
8 SED - Efficiency Vermont (EVT) will reimburse SED the incentive.

9 SED elected a 12-month enrollment period to avoid free ridership and to make
10 sure the utility and its customers can benefit from the power supply savings year around.
11 *Case No 25-1792-TF, pf. Testimony Michael Lazorchak page 4, lines 1-12 (discussing*
12 *free rider concerns). But see Case No 25-1809-TF, pf. Testimony Phillip Picotte page 7,*
13 *lines 1-5 (the Department states customers should be allowed “to exit the program at any*
14 *time with 30-days’ notice (or other reasonable exit from the program).)* SED, EVT, and
15 MMWEC will benefit from sustained customer enrollment, which will keep
16 administrative costs low and increase the potential power supply cost savings to SED and
17 its customers.

18 **Q6. Please provide additional information on the Program’s coordination with SED’s**
19 **proposed Time of Use Rates presented in Case No. 25-1792-TF.**

20 A6. It’s important to reiterate that SED decided to modernize its residential TOU Rate
21 because the critical peak pricing component of the current rate made it complex for the

1 utility to manage and explain to customers. *See Case No 25-1809-TF, pf. Testimony*
2 *Michael Lazorchak page 5, lines 3-12.* SED also extended TOU Rates to its small
3 commercial and commercial demand customers, which previously did not have an option
4 to enroll in TOU Rates and benefit from load shifting activities.

5 The proposed TOU Rates provides an incentive for customers to shift
6 discretionary electric loads to off-peak hours. The TOU Rates and Program integrate to
7 respond to the statutory mandate Act 55 by sending an accurate price signal to customers,
8 utilizing the customer's ability to schedule EV charging during off-peak hours, and
9 engaging in voluntary peak load curtailment in exchange for an on-bill credit.
10 Participants in the Program will benefit from lower off-peak energy rates and a peak
11 curtailment monthly incentive. The Program also gives customers the flexibility to elect
12 to override a peak curtailment call based on their household needs or to charge during on-
13 peak times. For example, net-metering customers might find it more beneficial to charge
14 their vehicle during on-peak hours when their solar generation can provide electricity to
15 charge their vehicle(s). This flexibility will help increase customer enrollment and
16 participation.

17 SED's Program also leverages the customer's AMI data and the customer's EV
18 telematics data to ensure EV customers suited to benefit from the Program will enroll.
19 SED's customer portal provides customers with access to their advanced metering
20 infrastructure (AMI) meter data and electric consumption history. The portal provides
21 clear information to help customers evaluate whether they can benefit from shifting

1 discretionary electric loads to off-peak hours. With access to this data, the customer will
2 be able to quickly determine which household electric loads can be shifted to off-peak
3 hours. In addition to the AMI data, the EV and EVSE telematics data, which is available
4 to EV users, provides an owner data that includes the state of battery charge and energy
5 consumption. The telematics data clearly shows the customer the electric load attributable
6 to EV charging. Therefore, SED customers are not faced with “uncertainty” over their
7 total electric load, because the AMI data is shown clearly in their customer portal and the
8 EV charging data is provided directly through their telematics data. *But see Case No 25-*
9 *1809-TF, pf. Testimony Phillip Picotte page 4, lines 16-18 (Department states customers*
10 *would have “uncertainty” over the loads that “can and cannot be shifted.”*

11 The Program and TOU Rates individually offer electric rate savings for the
12 customer and utility. However, the Programs work together to shift customer
13 discretionary loads from on-peak to off-peak times and curtail EV/EVSE loads during
14 peak events whether the events occur during on-peak or off-peak hours. ISO-NE and
15 VELCO peaks are becoming less predictable and ISO-NE and VELCO peaks do not
16 always coincide. Therefore, the Program creates an opportunity for SED to curtail
17 EV/EVSE loads during on-peak and off-peak hours, which increases the opportunities for
18 power supply cost savings.

19
20 **Q7. How does SED’s Program meet the statutory mandate in Section 33 of Act 55.**

21 **A7.** As shown in my pre-filed testimony, SED’s Program is the “least cost design” that meets

1 the ordinary meaning of the words within the statute. *Sec. 33(b)(1) ref. 30 V.S.A. § 218c*
2 *and 30 V.S.A. §202(b)*. I have shown how SED's Program design meets the plain
3 meaning of the statutory phrases presented in *Sec.33(c)(1)(A)-(F)*. *Case No 25-1809-TF,*
4 *pf. Testimony Michael Lazorchak page 10-13*. The Program design does not rely on novel
5 interpretations of the statute or reading meaning into phrases that are not apparent within
6 the statute. *But see Case No 25-1809-TF, pf. Testimony Phillip Picotte page 4, lines 16-*
7 *23, and page 5 lines 3-8 (the Department offered its opinion that the statute provides for*
8 *an evaluation of whether the Department thinks a utility's program design would create*
9 *"uncertainty over the magnitude of total electric load on premises" or "collective*
10 *uncertainty" evaluating the benefits they would receive.")*.

11 Sec. 33 grants the Commission the authority to approve EV rates and innovative
12 practices that "utilize direct load control, third-party managed load control, static or
13 dynamic time varying rates or other innovative practices." *Sec.33(c)(2)*. *See Case No.*
14 *1809-TF, pf. Testimony Michael Lazorchak page 5-7. (showing the Program will save the*
15 *utility costs for curtailing EV loads during peaks.); and Case No 1792-TF, pf. Testimony*
16 *Michael Lazorchak page 6, lines 3-9 (showing under the TOU Rates customers who shift*
17 *15% - 20% of their current electric usage to off-peak hours can realize monthly savings*
18 *of \$5- \$10)*. SED's program meets this statutory mandate in a least cost and
19 uncomplicated manner.

20 **Q8. Does this conclude your pre-filed supplemental testimony?**

21 A8. Yes.

DECLARATION OF MICHAEL LAZORCHAK

I declare that the testimony and exhibits that I have sponsored are true and accurate to the best of my knowledge and belief and were prepared by me or under my direct supervision. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

February 27, 2026
Date

Michael Lazorchak
Michael Lazorchak
Town of Stowe