

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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**PREFILED REBUTALL TESTIMONY
ON BEHALF OF THE TOWN OF STOWE ELECTRIC DEPARTMENT**

Pursuant to Vermont Public Utility Commission (Commission) Rule 2.213, the Town of Stowe Electric Department (SED) respectfully files the pre-filed rebuttal testimony of Michael Lazorchak.

On August 17, 2025, SED filed its direct pre-filed testimony of Michael Lazorchak. On February 17, 2026, the Vermont Department of Public Service (Department) filed its direct pre-filed testimony of Philip Picotte. In its direct pre-filed testimony, the Department recommended that the Commission deny SED’s flexible load management program presented in this docket, because “it does not meet the requirements of Act 55 of 2021. *Case No 1809-TF, pf. Testimony Philip Picotte page 6, lines 22-23.* The Department supported this conclusion by stating customers should be allowed to “exit the program at any time with 30-days’ notice (or other reasonable exit from the program))” and the Commission should “not require enrollment in a whole-home TOU rate to take advantage of the EV rate program”. *Case No 1809-TF, pf. Testimony Philip Picotte page 7, lines 1-5.*

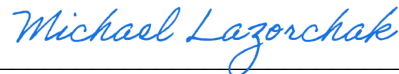
The points raised by the Department in its direct pre-filed testimony are based on a judgment call that SED’s program design is “complex, demanding, and potentially punitive.”

Case No 1809-TF, pf. Testimony Philip Picotte page 3, lines 15-17. However, this judgment call is not supported by the statutory language of Section 33 of Act 55, Public Act No. 55, 2021 Vt., Bien. Sess., or in the filings submitted by SED in Case Nos. 25-1809-TF and 25-1792-TF.

To clarify points of confusion between the filings submitted by SED and the Department, and to move forward with the Commission's expedited approval of the Program presented here, SED now submits the attached rebuttal pre-filed testimony of Michael Lazorchak.

Dated at Stowe, Vermont this 27rd day of February, 2026

for Town of Stowe Electric Department



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