

**STATE OF VERMONT
PUBLIC UTILITIES COMMISSION**

Docket No. 18-2660-INV

**Investigation into promoting the)
ownership and use of electric vehicles)
in the State of Vermont)**

**CONSERVATION LAW FOUNDATION'S
PROPOSED SCOPE, STRUCTURE & SCHEDULE
COMMENTS**

Conservation Law Foundation (CLF), pursuant to the Vermont Public Utilities Commission's Order Opening Investigation of July 9, 2018, offers the following recommendations regarding the proposed scope, structure and schedule for this proceeding.

Conservation Law Foundation generally supports the schedule proposed by the Public Service Department. It will be helpful to phase this proceeding to allow consideration first of any foundational matters that may require legislative action. These include any recommendations regarding electric vehicle (EV) charging stations owned or operated by persons or entities other than Vermont's electric distribution utilities. In particular, matters regarding the jurisdiction of the Commission, the Department and other State agencies over the stations should be addressed during an initial stage.

Conservation Law Foundation supports the Public Service Department's recommendations on the proposed grouping of the issues into three sets.

Regarding additional research, Conservation Law Foundation recommends that the Commission, together with the Agency of Transportation, gather information on a range of potential methods of paying for transportation infrastructure that will allow electric vehicles and internal combustion vehicles to contribute to costs equitably and on a level playing field. This could include consideration of a Vehicle Miles Traveled fee that supplements or replaces the current gasoline tax, and/or changes to vehicle registration fees, based on size, weight, cost, efficiency, emissions or other metric. The research should include a review of how transportation infrastructure is currently paid for, as well as an evaluation of what drives or impacts transportation costs, and the sustainability of various funding sources over time as transportation transforms away from reliance on internal combustion engines. Recommendations for contributing to the cost of transportation infrastructure should not counteract the incentives or efforts to promote electric vehicles. Research should include evaluation of phasing in any changes to how electric vehicles and other vehicles contribute to the cost of transportation infrastructure to avoid interfering with incentives and efforts to promote electric vehicles.

Dated at Montpelier, Vermont, this 26th day of July, 2018.

CONSERVATION LAW FOUNDATION

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