



BURLINGTON
ELECTRIC
DEPARTMENT



July 30, 2018

Ms. Judith C. Whitney, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05620

Re: Case 18- 2660
Investigation into promoting the ownership and use of electric vehicles

Dear Ms. Whitney,

Pursuant to Public Utility Commission (“Commission”) Order dated July 9, 2018, the City of Burlington Electric Department (“BED”) and the Vermont Public Power Supply Authority (“VPPSA”) submit the following recommendations regarding the scope and structure of this proceeding. Please note that BED has also discussed these recommendations with the Washington Electric Cooperative (“WEC”) and Green Mountain Power (“GMP”). As a result of those discussions, we are able to report that WEC and GMP concur with the recommendations provided below.

BED and VPPSA recommend that the Commission establish a 5 track working group process.

Track 1

BED and VPPSA recommend that issues pertaining to the jurisdictional scope of the various state agencies involved in this proceeding be included in Track 1. To the extent that the Commission or the Public Service Department (“Department”) lack authority to fully and adequately protect consumer’s interests, we believe it would be good to know well in advance of the upcoming legislative session so that appropriate legislative changes can be made. Accordingly, BED and VPPSA suggest that the parties to this investigation work to determine whether such regulatory gaps exist and, if they do, seek to develop appropriate remedies at the outset of this proceeding.



BURLINGTON
ELECTRIC
DEPARTMENT



Track 2

Concurrent with Track 1 activity, BED and VPPSA recommend that the Commission separately address, in Track 2, issues pertaining to the role of Vermont's electric distribution utilities with respect to the deployment, ownership and operation of EV charging stations.

Track 3

After Track 1 & 2 issues have been satisfactorily resolved, we recommend that the Commission address in Track 3 the following issues:

1. Removal, or mitigation, of barriers;
2. Strategies for managing the impact of EVs on the electric grid;
3. Electric system benefits and costs;
4. Utility planning for EV charging;
5. Rate designs;
6. Accuracy of electric metering and sub-metering; and,
7. Whether persons and/or entities other than a Vermont distribution utility can resell electricity – on a kWh basis, a membership/subscription basis or otherwise – to electric vehicle owners and, if so, the terms and conditions under which such persons and/or entities would be able to obtain electric energy for resale to such EV owners.

Track 4

Upon the conclusion of Track 3, we recommend that the Commission commence Track 4 to investigate issues related to EV charging stations owned and operated by persons and/or entities other than Vermont's electric utilities. Track 4 issues would include:

1. Safety standards;
2. Whether such station owners may freely set their rates or prices at which they provide electric energy to EVs, and other issues relevant to appropriate regulatory oversight of such stations; and,
3. Billing and complaint procedures.

Track 5

Track 5, which would commence after Track 4 issues have been resolved, could include issues pertaining to:



BURLINGTON
ELECTRIC
DEPARTMENT



1. Options to address how EV users pay toward the cost of maintaining the State's transportation infrastructure, including consideration of methods to assess the impact of EVs on that infrastructure and how to calculate a charge based on that impact, the potential assessment of a charge to EVs as a rate per kilowatt hour delivered to an EV; varying such a charge by size and type of EV; and phasing in such a charge;
2. Strategies to encourage EV usage at a pace necessary to achieve the goals of the State's Comprehensive Energy Plan and its greenhouse gas reduction goals, without shifting costs to electric ratepayers who do not own or operate EVs; and,
3. Any other issues that the Commission considers relevant.

With respect to issues not specifically identified in Section 25 of Act 158 but may be relevant to the proceeding, BED and VPPSA suggest that the Commission undertake an evaluation of the following issues:

- Whether raising transportation infrastructure funds through a vehicle miles travelled surcharge on all vehicles or some other non-by passable payment structure (as opposed to a kWh charge on EVs and PHEVs) is more equitable and sustainable;
- Alternative business models (i.e. such as mini, multi model transit/commuter hubs) that would effectively address so-called first & last mile challenges that patrons of public transit authorities face and whether such models would result in lower GHG emissions; and,
- Whether other public policies such as designating high occupancy vehicle lanes along select highway corridors (such as Route 189, off Exit 13 and/or Interstate 89, near Exit 14) during morning and afternoon commute times would result in lower GHG emissions.



BURLINGTON
ELECTRIC
DEPARTMENT



BED and VPPSA appreciate the opportunity to provide these recommendations and look forward to actively participating in the Commission's proceeding. Lastly, the Commission may also want to consider inviting local electric vehicle dealership owners to a workshop to discuss their operations, barriers and success stories. We believe their perspective would be invaluable to the Commission, Department and Vermont's Electric Utilities. Such discussions would help Vermont's stakeholders to better understand this dynamic market and determine whether specific shifts in public policy could further advance our collective goal of reducing greenhouse gas emissions. With respect to the aforementioned first and last mile challenges, the Commission may also appreciate the insight of regional public transit authorities such as [Green Mountain Transit](#) and other Transportation demand organizations like [CarShareVT](#) and the Chittenden Area Transportation Management Association or [CATMA](#). The input of these organizations would help to provide greater insight into how Vermont may begin to transition from a single occupancy, car-centric society to a shared, multi-modal transportation platform network.

Should Commission staff have any questions or concerns, please do not hesitate to contact us.

Sincerely,

Thomas Lyle,
Programs and Policy
Burlington Electric Department
Burlington Vermont 05401
Tel: 802-865-7335

Melissa Bailey
Regulatory & Legislative Representative
Vermont Public Power Supply
Waterbury, Vermont 05677
Tel: 802-244-7678