

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 18-2660-INV

Investigation into promoting the ownership and use of electric vehicles in the State of Vermont	
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**COMMENTS OF VERMONT ELECTRIC COOPERATIVE, INC.**

Vermont Electric Cooperative, Inc., (VEC) offers the following comments in response to the Order Opening Investigation entered on July 9, 2018 regarding the promotion of ownership and use of electric vehicles. VEC generally supports the scope of work identified in the Order and finds it consistent with the goals and provisions of Section 25 of Act 158. We do offer comments in response to the two submittals provided by the Department on Public Service (DPS).

We concur with the comment in the DPS submittal of June 12, 2018, that a “thoughtful regulatory framework must be developed that provides clarity and expectations regarding the roles and responsibilities of our utilities, public and state entities, and private interests that will be the source of needed capital.” We also concur with the statement in the July 25, 2018 DPS submittal that “many of the issues identified in Section 25 are inter-dependent and that the information, analysis, and potential conclusions related to each of the issues may inform the conversations regarding the other issues.” This is why we do not believe regulatory changes related to reselling of electricity by public charging stations owned and operated by persons other than electric distribution utilities should be pushed ahead of the comprehensive study as a foundational issue ripe for legislation in 2019. To the contrary, decisions regarding the appropriate regulatory and financial oversight of non-distribution utility charging stations must be carefully considered and determined in the context of the other policies and recommendations being investigated in this docket. This is essential to ensuring an electric vehicle charging system that is robust, fair and cost-effective over the long term.

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Accordingly, we believe that the scope of jurisdiction of the Commission, the Department of Public Service, and other State agencies for electric distribution utilities, and persons other than electric distribution utilities, should be investigated as a foundational issue so we can be assured that we have the necessary oversight to ensure transparency, fairness and adequate consumer protections.

Thank you for the opportunity to comment. VEC looks forward to continuing this discussion so that we can achieve the goals of reductions in greenhouse gas emissions in a way that is fair and cost-effective.

Respectfully submitted,

VERMONT ELECTRIC COOPERATIVE, INC.

A handwritten signature in black ink, appearing to read "A. Cohen".

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