



July 30, 2018

Case No. 18-2660-INV

Ms. Judith C. Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpellier, VT 05620-2701

RE: Comments of Greenlots on Scope, Structure and Schedule

Dear Ms. Whitney,

Greenlots submits these comments in response to the Vermont Public Utility Commission's ("the Commission") July 9, 2018 Order opening Case No. 18-2660-INV, "Investigation into promoting the ownership and use of electric vehicles in the State of Vermont" ("the Order"). In this Order, the Commission solicits comments on the scope, structure and schedule for this investigation, opened following receipt of the June 12, 2018 letter from the Department of Public Service ("the Department"), requesting a broad investigation into issues related to electric vehicles. The issues identified by the Department are in accordance with Section 25 of Act 158 (H.917) from the 2017-2018 Vermont legislative session.

Greenlots is a leading provider of electric vehicle (EV) charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and is increasingly supporting programs in the workplace, retail, and residential Level 2 space. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic electric vehicle charging loads and respond to local and system conditions. Greenlots is a strong advocate for open standards, and is a founding member of the Open Charge Alliance.

Greenlots is generally supportive of the issues for investigation raised by the Department in its June 12 letter, and as further grouped into three sets of issues as described in its July 25 comments. Indeed, the three foundational issues identified are those that may implicate the potential need for enabling legislation and therefore warrant initial focus given the timing of the upcoming legislative session.

As the Department notes however, many of the issues are interdependent. In particular, the key foundational issue of "the appropriate role of electric distribution utilities with respect to the deployment and operation of EV charging stations" intersects directly with essentially every topic the Department identifies in its "Third Issue Set". Indeed, "determining the removal or mitigation of barriers to EV charging", "strategies for managing the impact of EVs on, and services provided by EVs to, the electric transmission and distribution system", and "electric system benefits and costs of EV charging", all identified in the "Third Issue Set", are key issues themselves in determining the foundational issue of the appropriate utility role in deploying and operating EV charging stations.

We would also suggest for possible inclusion a key threshold question regarding the appropriate role of utilities in deploying and operating EV charging stations. Currently not identified in the Department's various question sets is whether or not there is a competitive market and sustainable non-utility business model for developing and operating publicly accessible EV charging stations. Further, whether there are market failures across different segments of this market. This is a key threshold question in determining the appropriate role of utilities in developing and operating EV charging stations.

Finally, Greenlots would suggest that issues currently identified in the "Second Issue Set" may functionally, if not logically be backseat issues to some of the issues in the third set. In particular, the "Removal or mitigation of barriers to EV charging", currently part of the third set, should really be a primary – if not the primary – overarching issue for this regulatory undertaking. The issues pertaining to the limited existing stations that exist as currently grouped in the "Second Issue Set" functionally are likely less of a priority in meeting the Vermont's environmental goals as discussed in the Order, than the issues related to spurring deployment of EV charging infrastructure, many of which are grouped in the "Third Issue Set". At a high level, the Commission should focus on overarching enabling policies and strategies to spur EV adoption over technical details that while important, should not distract from what is needed to meaningfully move the market forward for both vehicles and infrastructure.

Greenlots appreciates the work that the Department and the Commission have already invested into this process. We look forward to continued participation in this investigation and digging more deeply into the relevant issues to best be able to support transportation electrification and advanced mobility in Vermont.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Ashley', with a stylized, cursive flourish at the end.

Thomas Ashley
VP, Policy