

September 17, 2018

Judith Whitney, Clerk
Vermont Public Utilities Commission
112 State St., Drawer 20
Montpelier, VT 05620-2701

Re: Case No. 18-2660-INV
Investigation into promoting the ownership and use of electric vehicles in the State of Vermont.
CLF Request for Presentation

Dear Ms. Whitney:

Conservation Law Foundation (CLF) requests the opportunity to make a presentation for a total of 20 minutes at the October 1, 2018 workshop in this proceeding. CLF would like to address the following workshop topics:

- (3) barriers to the widespread deployment of eV charging stations;
- (4) barriers to the widespread ownership and use of EVs in Vermont; and
- (5) strategies for the removal of any barriers identified in topics (3) and (4).

Conservation Law Foundation has unique and relevant expertise to bring to the workshop. While CLF appreciates the work of the Department of Public Service to coordinate presentations, the proposed panels are too narrow in the interests represented. They include a fair amount of repetition of presenters, which limits the perspectives offered throughout the day. They also include environmental interests on only one panel, while private sector representatives are included on all the panels. They also fail to include consumer interests, and specifically fail to include consumer interests with any expertise on equity and low income interests.

Conservation Law Foundation has broad experience from throughout New England on Electric Vehicles. In 2015, CLF, together with Sierra Club and Acadia Center, published the report: "Charging Up: The Role of States, Utilities, and the Auto Industry in Dramatically Accelerating Electric Vehicle Adoption in the Northeast and Mid-Atlantic States." The report is available here: <https://www.clf.org/publication/charging-role-states-utilities-auto-industry-dramatically-accelerating-electric-vehicle-adoption-northeast-mid-atlantic-states/> . CLF would present updated information drawing on recent analysis regarding the barriers and strategies to remove the barriers and highlight best practices from around the region.



On the consumer perspective regarding the barriers and the strategies to overcome them, CLF would draw on the recent work from the National Consumer Law Center which recently published a chapter in “The Future of Transportation Electrification: Utility, Industry and Consumer Perspectives.” The report is available here:

https://www.nclc.org/images/pdf/energy_utility_telecom/electric_vehicles_evs/future-transportation-report-2018.pdf

The workshop process benefits from the Public Utilities Commission (PUC) and the participants hearing from a wide range of interests. The PUC’s Order Opening Investigation in this proceeding recognized and highlighted the environmental risks of increasing greenhouse gas emissions and the need to “develop an environment in which more Vermonters choose renewable-energy forms of transportation” so that as a state, Vermont can reduce the amount of greenhouse gas emissions from the transportation sector. This calls for broad inclusion of environmental and consumer interests and perspectives in the upcoming workshop. CLF’s presentation would address these broader perspectives.

Thank you for your consideration.

Sincerely,

s/ Sandra Levine