
From: Nathaniel Shoaff <nathaniel.shoaff@sierraclub.org>

Sent: Monday, September 17, 2018 10:45 AM

To: PUC - Clerk <PUC.Clerk@vermont.gov>

Subject: Case No. 18-2660-INV, request to participate in October 1 workshop

Dear PUC:

On behalf of Sierra Club, I am writing to request time at the October 1 Workshop regarding electric vehicle policies in Vermont. A PUC Order dated 8/8/18 invited interested persons to notify the PUC by COB today, 9/17/18.

The PUC case number and title of the 8/8/18 order:

- PUC Case No. 18-2660-INV.
- Investigation into promoting the ownership and use of electric vehicles in the State of Vermont.

Topic areas for Sierra Club's participation:

The brief presentation would focus on nos. 5 and 6 identified in the PUC's 8/8/18 order: "(5) strategies for the removal of any barriers identified in topics (3) and (4); and (6) the appropriate scope, if any, of Commission or other state agency jurisdiction over EV charging stations owned and operated by both utility and non-utility entities."

Time requested: 5-7 minutes, adjusted as appropriate given participation of others and the structure of the workshop.

Sierra Club expertise:

Sierra Club has significant experience with the legal and policy issues at the intersection of EVs and utility regulation, including particular expertise in the design of utility programs to deploy vehicle charging infrastructure and regulatory models for this new area of utility investment.

Sierra Club has addressed these issues in proceedings before state utility commissions across the country, including California, Connecticut, Colorado, Florida, Kentucky, Massachusetts, Maryland, Michigan, Minnesota, Missouri, New York, North Carolina, Ohio, Nevada, Rhode Island, Utah and the District of Columbia. In addition to Sierra Club's work in cases and stakeholder processes before state utility commissions, our team regularly presents on EV-related policy matters at industry events (most recently at the EV Roadmap 11 conference and the National Association of Utility Regulatory Commissioners winter policy summit).

Finally, Sierra Club was one of several founders of the Transportation Electrification Accord, which is a set of joint principles to guide action by regulators, legislators and utilities on EV issues. The Accord has nearly 100 signatories, including vehicle manufacturers (e.g., GM, Honda, BYD, Proterra), technology companies (e.g., Lyft, Siemens, Greenlots), electric utilities (e.g., Southern Company, Exelon, Southern California Edison), and NGOs representing consumer, labor, and environmental interests.

Sierra Club interests:

With respect to transportation electrification and utility regulatory policy, Sierra Club works to promote its ratepayer members' interest in bill-sensitive policies that further their environmental and climate objectives, including effectively using price signals and load management practices to maximize benefits to the system, electricity customers and electric vehicle drivers, including facilitating the integration of renewable resources; providing equitable deployment of services, including commitments to disadvantaged communities; fostering a competitive market and the engagement of third party vendors of electric vehicle charging infrastructure and services in a manner that supports continued growth of the broader electric vehicle charging industry; and increasing access to electric vehicle charging beyond single-family homes with a focus on multi-family dwellings, workplaces, and public high-power "fast charge" locations, in order to improve electric vehicle adoption and awareness.

If you have any questions regarding this request, please contact me at 415-200-9778 or by email.

Thank you,

Nathaniel

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