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September 19, 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

Dear Ms. Whitney:

Please accept this late-filed request from the National Consumer Law Center (NCLC), requesting an opportunity to make a short presentation of 15-20 minutes at the October 1, 2018 workshop in this proceeding. NCLC learned of the October 1 workshop earlier this week, and was not able to submit this request by the September 17 deadline. We respectfully ask that you consider this request at this time.

At the October 1 workshop, NCLC would like to address the potential benefits and risks of transportation electrification for low-income consumers, and strategies for mitigating these risks, as part of the following workshop topics:

(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).

NCLC is a nonprofit organization with a long history of working with low-income and disadvantaged consumers, and our work has included analysis of the equity and access concerns that arise in the transition to transportation electrification. Since 1969, the nonprofit National Consumer Law Center (NCLC) has used its expertise in consumer law and energy policy to work for consumer justice and economic security for low-income and other disadvantaged people, including older adults, in the United States. NCLC's expertise includes policy analysis and advocacy in consumer law and energy matters. NCLC works with nonprofit and legal services organizations, private attorneys, policymakers, and federal and state government and courts across the nation to stop exploitive practices, help financially stressed families build and retain wealth, and advance economic fairness.

If permitted to participate, NCLC would present information about barriers to transportation electrification with an emphasis on the needs of low-income consumers, and recommendations for addressing these barriers. The presentation would include findings from our section of a report released recently by Lawrence Berkeley National Laboratories, titled *The Future of Transportation Electrification: Utility, Industry and Consumer Perspectives*, (available at <https://emp.lbl.gov/projects/feur>).

In part, NCLC hopes to provide information and a perspective to the Commission that would inform the Commission's analysis and recommendations regarding the following requirement of Section 25 of the Act 158: "1. Removal or mitigation, as appropriate, of barriers to EV charging, including strategies, such as time-of-use rates, to reduce operating costs for current and future EV users without shifting costs to ratepayers who do not own or operate EVs[.]"

Thank you for considering this request, and please contact me with any questions.

Respectfully submitted,

s/Jenifer Bosco

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