

**STATE OF VERMONT  
PUBLIC UTILITIES COMMISSION**

**Docket No. 18-2660-INV**

**Investigation into promoting the )  
ownership and use of electric vehicles )  
in the State of Vermont )**

**CONSERVATION LAW FOUNDATION’S  
COMMENTS ON PROCESS, NEXT STEPS AND SCOPE OF JURISDICTION**

Conservation Law Foundation (CLF), pursuant to the Vermont Public Utilities Commission’s Post-Workshop Memorandum dated October 4, 2018, offers the following comments regarding process, next steps and the scope of jurisdiction over EV charging stations and whether legislative changes are needed.

1. Process

The October 1 workshops provided valuable background information on barriers, strategies to remove barriers and jurisdictional issues. The workshop process is well-suited to addressing these sorts of policy inquiries, and in allowing a timely and open exchange of ideas and can be a good structure to facilitate further review and sharing of information.

Conservation Law Foundation recommends continuing with the workshop process as outlined below under “Next Steps” in addition to a separate track for proposing and reviewing jurisdictional legislative issues.

## 2. Next Steps

Conservation Law Foundation recommends that a series of 4 additional workshops be scheduled over the next few months, each addressing a specific issue or related set of issues.

CLF recommends that the following issues be a subject of the workshops.

- a. Grid management and EVs;
- b. Consumer benefits of vehicle electrification, smart charging and time sensitive rates;
- c. Environmental benefits of vehicle electrification; and
- d. Designing and paying for EV and EVSE incentives

For each workshop, participants should identify in advance proposed presenters and topics for presentation. Participants should also be encouraged to provide “straw man” proposals that can be discussed at the workshop.

Following each workshop participants should have the opportunity to identify additional information and analysis that is needed and how the Public Utilities Commission can obtain that information and analysis.

## 3. Jurisdiction and Legislation

Conservation Law Foundation recommends that legislation be proposed to eliminate the prohibition on non-utilities selling electricity as a means to promote the availability of consumer-friendly charging stations. Charging stations should be treated like an appliance in terms of their access to the power grid. In exchange for access to the power grid, there should be provisions for charging stations to:

- a. post real-time rates for charging so any consumer knows in advance what the cost will be;

- b. be available for use by members of the public if the charging station is in a public location;
- c. provide load management capability; and
- d. share physical location and charging data on a publicly available platform.

Conservation Law Foundation may provide additional comments after reviewing the transcript of the October 1, 2018 workshop, including specific legislative language.

Thank you for the opportunity to provide comments.

Dated at Montpelier, Vermont, this 15<sup>th</sup> day of October, 2018.

CONSERVATION LAW FOUNDATION

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