



2152 Post Road
Rutland, Vermont 05701

Carolyn Anderson
Associate General Counsel

Phone: (802)770-3253
Carolyn.Anderson@greenmountainpower.com

October 15, 2018

Filed electronically in ePUC

Mrs. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05620

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

Dear Mrs. Whitney:

A workshop was held on October 1, 2018 in this proceeding. On October 4, 2018, the Public Utility Commission (“Commission”) issued a Post-Workshop Memorandum requesting comments regarding (1) how to proceed with this investigation given what was learned at the October 1 workshop; (2) specific next steps for this investigation, including proposals for future workshops; and (3) the appropriate scope of jurisdiction, if any, over EV charging stations and whether legislative changes are necessary to effectuate participants’ recommendations.

Regarding the first topic, how to proceed, Green Mountain Power (“GMP”) recommends targeted workshops or comments to address the specific topics that were discussed during the October 1 workshop. Promoting the use of electric vehicles (“EVs”) in an innovative and cost-effective way is critically important to our customers and our climate, so it is important that this proceeding be designed in a way to efficiently and effectively enable changes that promote EV adoption and use, while also providing the Commission with the information it needs to meet the July 1, 2019 deadline to submit a report relating to the charging of EVs.

Regarding the second topic, specific next steps, GMP agrees with the Commission’s focus on jurisdiction, since clarity on this issue will enable more infrastructure to further support broad EV adoption and use. This topic should be addressed first as laid out in more detail below. Several other topics also could be explored, including but not limited to: consumer protection, innovative charging options, incentives and other ways to promote EV ownership, grid infrastructure, and peak demand. GMP has heard the top concern for EV adoption from customers is the upfront cost of the car.

Regarding the third topic, the appropriate scope of jurisdiction over EV charging stations, GMP supports non-utilities owning retail charging stations and selling energy for EVs. To help all customers, these charging retailers should purchase the energy from Vermont’s distribution utilities (“VDUs”). It seems clear that such companies would fall under the jurisdiction of the

Ms. Judith Whitney, Clerk

October 15, 2018

Page 2

Commission and the Department of Public Service (“DPS”). By statute, in Vermont, the Commission and DPS *shall* have jurisdiction over the following:

- (1) A company engaged in the manufacture, transmission, distribution, or sale of gas or electricity directly to the public or to be used ultimately by the public for lighting, heating, or power and so far as relates to their use or occupancy of the public highways.¹

The sale of electricity to charge EVs is a sale directly to the public and as such is covered under Section 203a. As noted during the workshop, while the Commission and DPS have jurisdiction over companies that sell electricity, this does not mean that only Vermont’s regulated distribution utilities are allowed to sell electricity. By statute, Vermont also allows campground submetering where campgrounds can sell electricity subject to Commission rules which generally are designed to protect the consumer and include provisions for notice of rates and charges, accuracy of electrical submeters, and reasonable billing and complaint procedures.²

A legislative change similar to the campground submetering would provide guidance and enable EV charging companies to sell electricity subject to the rules of the Commission which should include appropriate consumer protections, provisions for meter accuracy and other matters to be identified by stakeholders. Given the existing decline in loads, which is forecast to continue into the future, existing grid infrastructure is well-suited to accommodate an increase in EV charging stations. Because there is no way to predict how quickly this market will take off, and in this rapidly changing energy landscape, what unintended consequences might materialize for customers, GMP recommends the legislation sunset after three years, which will keep all stakeholders focused on addressing and improving issues that may arise, and ensure that changes, if necessary, are made.

In terms of how to proceed, given the interest in deploying more charging options, GMP suggests that at the next workshop, stakeholders should address appropriate consumer protections, metering issues and other matters important to the sale of electricity by non-VDUs, such as the appropriate scope of Commission and DPS jurisdiction. During the workshop, stakeholders also could address whether sufficient protections could be put in place to spur EV adoption in a way that protects customers but does not impose extensive administrative costs and resources. These discussions could help frame legislation.

GMP is committed through innovation to fight climate change and support our customers driving electric vehicles. Thank you for the opportunity to comment, and please contact me with any questions.

Sincerely,



Carolyn Browne Anderson

CBA

cc: ePUC Service List

¹ 30 V.S.A. § 203(1)

² 30 V.S.A. 249a