



October 15, 2018

Case No. 18-2660-IN

Ms. Judith C. Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpellier, VT 05620-2701

RE: Greenlots Post-Workshop Comments

Dear Ms. Whitney,

Greenlots submits these comments in response to the Vermont Public Utility Commission's ("the Commission") October 4, 2018 Memorandum following the October 1 workshop in this proceeding. In this Memorandum, the Commission solicits comments on three topic areas to which Greenlots responds below.

Greenlots is a leading provider of electric vehicle (EV) charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and is increasingly supporting programs in the workplace, retail, and residential Level 2 space. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic electric vehicle charging loads and respond to local and system conditions. Greenlots is a strong advocate for open standards, and is a founding member of the Open Charge Alliance.

First, the Commission asks how it should "proceed with this investigation given what was learned at the October 1 workshop". At a high level, Greenlots believes the process would benefit from a refined focus on specific issues moving forward, and that treating issues individually may be more productive. There should be a heightened focus on market barriers and strategies the state can employ to overcome them. As part of this, the Commission may find it productive to focus on unique considerations for Vermont such as the state's broad rural geography, and the specific needs and market barriers this presents.

Second, the Commission asks stakeholders to advise on "Specific next steps for this investigation, including proposals for future workshops". In Greenlots' experience, formulating and issuing specific questions for stakeholders to respond to in written form can be an effective path forward in gathering more focused responses and input. A key topic in an investigation such as this should be the economics of deploying public charging infrastructure, and the different business models that exist for doing this, as the answer to these questions is a primary factor in determining the manner and extent of utility involvement in this space. Other important topics include grid integration, rates, technology and managed charging, and the medium and heavy-duty and off-road market sectors. This approach can also help lead to more focused workshops and panel discussions on these and related topics.

The process may also benefit from a phased approach when issuing specific questions, focusing on broader questions first, and getting to more specific questions later, instead of issuing a single lengthy list of questions at first that attempts to address all potentially relevant topics.

In addition to the Commission's report to the legislature, an outcome of this process should be to develop a policy or interpretative statement from the Commission to guide investment and market participant actions and helping to support and accelerate transportation electrification in Vermont.¹ In line with the phased approach suggested above, it may be appropriate to issue an initial or interim statement on key topics, possibly guiding and encouraging utility action and pilots in different areas, leading to a broader statement at a later date. Additionally, the investigation would likely benefit from an articulated timeline and roadmap for the process moving forward. Greenlots also encourages the Commission to leverage the experience of Drive Electric Vermont to aid in this overall process.

Finally, the Commission asks for input on "the appropriate scope of jurisdiction, if any, over EV charging stations and whether legislative changes are necessary to effectuate participants' recommendations". Greenlots acknowledges that the issue of private entities having the ability to resell electricity on a per-kWh basis for the purposes of electric vehicle charging, given current statute, is an issue that likely requires the legislature to weigh in. On this specific issue, Greenlots generally believes that there should be no statutory or regulatory limitations on different methods or models of reselling electricity for the express purpose of charging electric vehicles. While this is a topic that deserves resolution, we must note that much more can and should be moved forward as part of this Commission investigation, the key topics identified above in particular.

Greenlots appreciates the work that the Commission has invested into this process, and the opportunity to offer these comments. We look forward to continued participation in this investigation and digging more deeply into the relevant issues to best be able to support transportation electrification and advanced mobility in Vermont.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, cursive script.

Thomas Ashley
VP, Policy

¹ A good example of this is the "Policy and Interpretive Statement Concerning Commission Regulation of Electric Vehicle Charging Services" issued by the Washington Utilities and Transportation Commission in Docket UE-160799 on June 12, 2017.