

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Investigation into promoting the ownership and use of electric vehicles in the State of Vermont	October 15, 2018 Case No. 18-2660-INV
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**COMMENTS OF VERMONT ELECTRIC COOPERATIVE, INC.**

Vermont Electric Cooperative, Inc., (VEC) offers the following comments in response to the Post-Workshop Memorandum entered on October 4, 2018 regarding electric vehicles.

1. How to proceed with this investigation given what was learned at the October 1 workshop.

VEC found the October 1 workshop to be informative and educational. We believe there is tremendous opportunity for collaboration between the distribution utilities and the private sector service providers, including both charging station equipment providers and automobile manufacturers. The appropriate level of regulatory oversight and system deployment can best be established by all parties working together to identify issues that need resolution. We encourage the PUC to facilitate this process through continued workshops and opportunities for comment.

2. Specific next steps for this investigation, including proposals for future workshops.

If we resolve the regulatory oversight issues, it will facilitate the other programmatic issues with charging and vehicle deployment. We believe it would be advantageous to have another workshop prior to the legislative session to review a draft PUC position on the proposed regulatory system for EV charging, which would identify whether legislative action is needed. If there is disagreement about the draft position, it would be beneficial to facilitate a resolution prior to start of the legislative session.

We also believe it is essential to prioritize impacts and opportunities for rural and lower income Vermonters to be part of this transportation transition. At the October 1 workshop, the National Consumer Law Center highlighted this priority. VEC will not be able to support

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proposals that pose significant cost shifts to these populations or that leave them behind as we incentivize deployment.

3. The appropriate scope of jurisdiction, if any, over EV charging stations.

VEC is committed to promoting electrification of transportation, which is a critical component of meeting our greenhouse gas reduction goals. We believe some basic regulatory oversight is appropriate to ensure adequate consumer protection and to create a system that is sustainable and has integrity. In most industries the good actors find that some basic level of oversight is in their interest so that disreputable players are discouraged from entering or gaming the system.

We believe that there should be a registration system for EV charging stations with the vendors being subject to general rules that ensure transparency of cost and accuracy of metering and billing. There would need to be a modest fee associated with this registration so that the Vermont Agency of Agriculture, Weights and Measures Program, would have adequate staff and equipment to perform routine testing and complaint response. For the integrity and sustainability of the program, it is important that we create a level playing field. VEC would be supportive of legislative changes to create a simple and low cost regulatory system.

VEC would have concerns about non-utility electricity generators being able to re-sell electricity without adequate regulatory oversight (for example a net-metering generator selling electricity via charging stations). We are not yet aware of any proposals of this type, but we do believe it would require more study before we could support regulatory relief. We propose that any reduced regulatory oversight for charging stations only be extended to non-generators until we have more time and experience to consider any potential unintended consequences.

VEC would strongly oppose any rate mandates (time of use, eliminating demand charges, etc.) imposed on the distribution utilities. As stated above, we are interested and motivated to facilitate EV charging, especially at the right time and the right place. What will not work is being required to use rates that are not in the interest of all our ratepayers. For example, we should not be required to charge lower rates than needed to cover our costs. We need to be allowed to develop and offer rates that facilitate EV charging without unnecessarily shifting

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costs to the other ratepayers. As mentioned above, our more rural and low-income members must not be left behind as we support early adoption. We welcome the exchange of ideas and any feedback or assistance, but would oppose mandates that would cause us to be less nimble or responsive to the market.

4. Whether legislative changes are necessary to effectuate participants' recommendations.

It appears that a strict reading of 30 V.S.A. section 203 would place EV charging stations under the jurisdiction of the Public Utility Commission. As noted above, VEC would support a relatively light and tailored regulatory structure designed to provide information and protect consumers. To the extent that such a structure would require an exemption from Title 30 for EV charging stations, VEC would support legislation to adopt such an exemption.

Thank you for the opportunity to comment. VEC looks forward to continuing this discussion so that we can achieve the goals of reductions in greenhouse gas emissions in a way that is fair and cost-effective.

Respectfully submitted,

VERMONT ELECTRIC COOPERATIVE, INC.



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