

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

November 6, 2018
Case No. 18-2660

Investigation into promoting the ownership and use of electric vehicles in the State of Vermont	
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VERMONT ELECTRIC COOPERATIVE, INC.- RESPONSE TO COMMISSION QUESTIONS

Vermont Electric Cooperative, Inc., (VEC) responds to questions pertaining to issues concerning the Commission’s investigation into promoting the ownership and use of electric vehicles in the State of Vermont. VEC answers are for the questions for which we have opinions or expertise.

Question 4. Do or should the fees charged to consumers at public EV charging stations vary based on the electricity rates charged by the utility that serves the charging station?

The most important principles concerning rates charged to consumers for EV charging is transparency and accuracy (to ensure that rates are based on accurate usage). If those principles can be assured, we believe the fee system should be able to be appropriate for the particular charging station scenario (public, workplace, multiunit apartment, etc.).

Q5. Will or should variations in electricity rates due to time-of-use rate structures offered by the electric utility serving a public charging station be passed through to the users of public EV charging stations?

We believe the particular billing structure is best determined by the charging station owner or operator provided there is transparency and accuracy of rate structures.

Q9. How will a utility determine the electricity usage of a charging station connected to its distribution grid?

Depending on the charging scenario, the utility will bill for the entire location (which would include the charger), or we could bill through an AMI meter dedicated just to the charging station. We are aware that many charging stations have their own internal metering systems but at this time we are not able to use those as substitutes for “billing grade” meters.

Q10. Would utilities prefer to install their own meters or rely on meters included in the EV charging stations?

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At this time we would need to use our own AMI meters if we want the charging station metered distinct from the other usage at the site. We know our meters are billing grade and we know they integrate into our billing and any demand control systems.

Q11. If a utility relies on the meter in a charging station to measure electricity service to that charging station, will the utility be able to determine the time of sale for each kWh delivered to the charging station for the purpose of applying time-of-use-rates to the electricity delivered?

If we use our metering system, we can determine the time of sale for the energy delivered to the charging station.

Q15. What information should be available to the users of public EV charging stations at the time they are charging their vehicles (e.g., phone number for technical assistance from station operator, phone number for consumer protection assistance, etc. posted in plain view on the charging station)?

The information should at a minimum include contact information for operator, contract information for CAPI, and information about rates and payment options.

Q17. Do any Vermont utilities have an interest in offering their own charging facilities? If so, how would that arrangement be structured (e.g., facilities and services subject to traditional utility regulation or services provided by an affiliate subject to the same level of regulation applied to non-utility providers of charging services)?

At this time VEC is not planning to offer our own charging facilities but we would not preclude future consideration. If we did offer charging we would recommend that the regulatory oversight for the part of our operation involving charging infrastructure be treated commensurate with the oversight of third party owner/operator systems.

Q19. If a utility offers time-of-use rates to a residential customer for charging an EV at home, or to a business customer for charging employee EVs at work, would or should that utility also offer the same time-of-use rates to non-utility operator of a public EV charging station? What considerations would go into determining whether to tariff such an offering?

We would like the option of offering a time-of-use rate to EV charging stations but it may need to be different than our current time-of-use rate. At this time we believe we should be allowed some

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flexibility to develop rate structures that incentivize EV charging without causing significant cost shifts to other Co-op members.

Q20. Are there other considerations that these questions do not reflect, and if so, what are they?

As outlined in our comments of October 15, 2018. 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 regulatory or legislative changes to create a simple and low cost regulatory system.