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January 9, 2019

Ms. Judith Whitney, Clerk  
Vermont Public Utility Commission  
112 State Street, Floor 4  
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 Ms. Whitney:

Please find enclosed a joint filing from the Agencies of Transportation (AOT) and Natural Resources (ANR) and the Public Service Department (the Department) responding to the Public Utility Commission's (PUC) Information Request Re: Transportation Funds dated December 20, 2018. AOT, ANR, and the Department have developed the enclosed responses collaboratively. The Department has typically had primary responsibility for the development of policy positions on EV infrastructure in proceedings at the Commission; however, several of the questions were directed at and required detailed responses regarding funds administered by AOT. The enclosed joint responses are representative of the agreement among the agencies regarding the policy recommendations for the contribution by electric vehicle users to the maintenance of the state's transportation infrastructure.

The Commission's December 20<sup>th</sup>, 2018 order seeks input from participants in this investigation regarding options for maintaining funding for Vermont's transportation infrastructure as EV usage continues to rise in Vermont. Specifically, the Commission's order requested recommendations from the participants on "options to address how EV users pay toward the cost of maintaining the State's transportation infrastructure."

The Commission also requested that the parties provide answers to seventeen questions, and directed the parties to "take into consideration how their recommendations address, among other things, potential revenues generated, the sustainability and consistency of the revenue source, the ease and costs of implementation and enforcement, the effects of the revenue source on transportation choices, consistency with State goals and policies, and equity of the revenue source, including whether it reflects the extent of usage of or impacts on the state's transportation infrastructure."

Finally, AOT and the Department respectfully draw the Commission's attention to reports those agencies have previously written regarding the contribution of EV users to the maintenance of the state's transportation infrastructure.<sup>1</sup> These reports provide some additional background information and context for the recommendations that are made in the enclosed filing.

Sincerely,

/s/ Jim Porter

James Porter, Director for Public Advocacy  
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Montpelier, Vermont 05620  
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ENCL

cc: Parties of Record by ePUC

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<sup>1</sup> These Reports Included:

Vermont Agency of Transportation, *Section 15 2016 Plug-in Hybrid and Electric Vehicle Registration Fees: Legislative Report December 2016*, Available at: <https://legislature.vermont.gov/assets/Legislative-Reports/2016-Legislative-EV-Study-FINAL-formatted.pdf>.

Vermont Public Service Department, *Section 28 of Act 12 of 2013: A Study on Replacing Motor Fuel Tax Revenues Not Collected from Plug-In Electric Vehicles*, 2013, Available at: <https://legislature.vermont.gov/assets/Documents/Reports/295260.PDF>.

Vermont Agency of Transportation, *Act 153: Section 39: Alternative Fuel Vehicle User Fee Options*, 2012, Available at: <https://legislature.vermont.gov/assets/Documents/Reports/292517.PDF>.