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January 9, 2019

Vermont Public Utility Commission
Attn: Judith Whitney, Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 18-2660-INV: Information Request – Transportation Funding

Dear Clerk Whitney,

Attached for electronic filing in the above-referenced matter, please find comments on behalf of ChargePoint, Inc. Please let me know if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Kevin Miller", written in a cursive style.

Kevin George Miller
Director, Public Policy
ChargePoint

Case No. 18-2660-INV: Comments on Transportation Funding Information Request

February 9, 2019

Pursuant to the Vermont Public Utility Commission’s (“Commission”, or “PUC”) Information Request, issued on December 20, 2018 in the above-referenced docket, ChargePoint, Inc. respectfully submits these comments.

I. INTRODUCTION AND BACKGROUND

On December 20, 2018, the Commission issued an Information Request regarding transportation funding in the above-referenced proceeding. The Commission subsequently requested that participants file comments addressing: options for funding the maintenance of Vermont’s transportation infrastructure as EV usage continues to rise in Vermont”.¹ The Commission issued a series of seventeen detailed questions regarding preferred methods for generating and collecting revenue to support the operations and maintenance of Vermont’s transportation infrastructure.

ChargePoint is the nation’s largest electric vehicle (“EV”) charging network and is the only charging technology company on the market that designs, develops, and manufactures hardware and software solutions in every category EV drivers charge: at home, at work, around town, and on the road. ChargePoint sells its EV charging equipment and network services to a wide variety of independent customers, including residential EV owners, employers, commercial and industrial businesses, cities and public agencies, ports, schools, public transit, delivery truck fleet operators, utilities, and multi-unit dwelling owners. Entities that install charging equipment and network services on their property are commonly referred to as “site hosts.”

II. Comments by ChargePoint

ChargePoint submits these comments in lieu of responding to each of the seventeen questions identified by the Commission. We believe that each of the questions posed by the

¹ Case No. 18-2660-INV – Information Request re Transportation Funding at 1.

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Commission merit quantitative and qualitative review to ensure that the Commission's final recommendations are based in a robust cost-benefit analysis.

Electric vehicles are an important and developing segment of Vermont's innovative transportation sector. ChargePoint respectfully urges the Commission to either convene additional issue-specific workshops on the issue of transportation funding or commission an analysis of the various methods for generating and collecting transportation revenues. That analysis should be specific to Vermont's transportation needs, as well as the current and future make-up of the vehicles registered in and traveling through the State. This will ultimately allow the Commission to ensure that its recommendation results in all drivers paying their fair share for infrastructure.

EV Fees

Generating transportation revenue through EV fees can be punitive and discourage growth in EV markets if fees are set without considering the complexities of the transportation sector. In the event that Vermont chooses to impose a fee on electric vehicles, ChargePoint recommends that a portion of the funds be dedicated to programs to build out EV infrastructure in the State in perpetuity or for a multi-year phase.

The approach of structure has been successfully employed in Colorado, which adopted a \$50 registration fee, of which \$30 goes into the state's Highway Users Tax Fund and \$20 is earmarked for state's Electric Vehicle Grant Fund, which pays for public charging stations and other infrastructure.²

Per kWh Fees

Generating transportation revenue through a fee that is assessed on drivers on a per kWh basis raises a range of critical issues should be considered carefully. In the event that an issue-

² "[42-3-304. Registration fees](#)" in Colorado Revised Statutes as amended by HB 13-1110.

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specific workshop on this subject is not convened, we identify two key compliance issues for the Commission to consider.

First, it would be important to fully explore and understand the extent to which compliance with such a fee is enforceable. The purpose of a per-kWh fee would be undermined if the existence of that fee incentivizes drivers to charge behind-the-meter or on non-networked stations, which do not readily facilitate revenue collection.

Furthermore, ensuring compliance for this kind of policy could be costly given current regulatory requirements. Assessing a per-kWh fee on drivers would currently require the installation of additional utility meters at every EV charging station in the State, which would be cost prohibitive and restrict growth in the EV and EV charging markets. ChargePoint recommends that the Commission consider steps being taken in other jurisdictions to take advantage of “smart”, networked EV charging stations that have embedded metering capabilities that are as accurate as utility meters. One example is Minnesota, whose Public Utility Commission recently approved a pilot program by Xcel Energy to directly implement an EV time-of-use rate with smart, networked L2 charging stations.

Conclusion

As noted above, ChargePoint recommends that the Commission convene additional issue-specific workshops on the issue of transportation funding or commission an analysis of the various methods for generating and collecting transportation revenues. Thank you for the opportunity to provide high-level comments on the important questions identified in the Information Request.