

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 18-2660-INV

Investigation into promoting the ownership and use of electric vehicles in the State of Vermont	
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Order entered: 02/04/2019

INFORMATION REQUESTS RE: PER KWH FEES ON EV CHARGING

On December 20, 2018, the Vermont Public Utility Commission (“Commission”) issued an order containing a series of information requests regarding various potential methodologies for addressing how electric vehicle (“EV”) users will pay toward the cost of maintaining the State’s transportation infrastructure.

The Commission received answers from 14 different entities in response to its December 20 information requests.¹ The answers included specific recommendations on what approach to take in ensuring that EV users pay an appropriate share of the costs of maintaining Vermont’s transportation infrastructure, why a specific entity’s recommended approach was most appropriate, and why other approaches were less desirable.

The two approaches that generated the most interest and support were a fee based on vehicle miles traveled and a fee applied to each kWh purchased when charging an electric vehicle.² The Commission found each of these approaches to be potentially viable.

The recommendations for vehicle miles traveled were accompanied not only by supporting explanations, but also by references to information sources that will allow the Commission to do further research into how such an approach would be implemented and how pilot programs implementing such a fee have fared in other jurisdictions.

On the other hand, while the per-kWh recommendations were accompanied by supporting explanations, they were not accompanied by any references to information sources that would allow the Commission to research how such an approach has been implemented in other jurisdictions and how successful such an approach has been. Additionally, responses from Green Mountain Power Corporation, the City of Burlington Electric Department (“BED”), and members of the Vermont

¹ Some of the entities filed their responses jointly.

² Neither a special purchase-and-use tax applied to EVs at the time of sale nor a special annual registration fee applied to EVs garnered much support.

Public Power Supply Authority (“VPPSA”)³ asserted that implementation of a kWh fee would impose substantial costs on Vermont’s distribution utilities as a result of necessary modifications to their billing systems to enable them to charge and collect such a fee.

The Commission seeks to better understand the process and implications of implementing a kWh fee on EV charging and therefore requests that participants in this investigation provide information on the following:

1. The costs and requirements that are expected to be incurred by Vermont distribution utilities if the State of Vermont were to impose a tax or fee on EV charging on a kWh basis and if Vermont distribution utilities were required to calculate, bill, and collect that tax or fee.
2. For any Vermont utility that currently has in place a program or tariff that provides a rate specific to EV charging, an explanation of how EV charging is tracked and accounted for when billing a customer using that rate and whether such tracking could also be used for calculating and billing for a kWh tax or fee applied to that same usage. Please explain any differences in your response for at-home charging versus charging at a public charging station, and any differences based on the use of Level 1, Level 2, or DC fast-charging facilities.
3. Any information or reference materials on other jurisdictions that have implemented, whether by pilot program, statute, or otherwise, a kWh fee on EV charging for the purpose of collecting contributions from EV users. Information explaining how such a tax or fee was implemented and collected and how successful the program has been would be particularly useful.

Any responses to these questions must be filed with the Commission no later than close of business on February 15, 2019. For instructions on how to file your responses in ePUC, please see the memorandum from the Clerk’s Office issued October 24, 2018. Please do not file your responses as “public comments.”

³ BED and VPPSA filed a joint response.


Dated at Montpelier, Vermont, this 4th day of February, 2019



John J. Cotter, Esq.
Deputy General Counsel

OFFICE OF THE CLERK

Filed: February 4, 2019

Attest: 
Deputy Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

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