



February 15, 2019

Mrs. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05602

Filed electronically on e-PUC

Re: **Case No. 18-2660-INV** Investigation into promoting the ownership and use of electric vehicles in the State of Vermont

Dear Mrs. Whitney,

Please accept these comments filed on behalf of the Sierra Club in the above-referenced docket. The comments respond to the Commission's February 4, 2019 Order seeking information regarding a potential per kilowatt hour (kWh) fee for electric vehicles (EV) as a means of bolstering the state's transportation infrastructure fund.

As explained more fully in our January 9, 2019 comments filed with the Commission, Sierra Club does not support the imposition of additional fees or taxes on EV drivers at this time. We believe that the growth of the EV market is critical for Vermont to meet its statewide greenhouse gas emission reduction goals, and that Vermonters should be incentivized – not penalized – for switching to EVs.

The first two requests for information in the Order are directed specifically at electric utilities. Accordingly, Sierra Club provides no response to those questions. The Commission's third request for information reads as follows:

“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.”

Sierra Club has worked on the intersection of EVs and utility regulation in many states across the country, including Vermont, California, Connecticut, Colorado, Florida, Kentucky, Massachusetts, Maryland, Michigan, Minnesota, Missouri, New York, North Carolina, Ohio, Nevada, Rhode Island, Utah and the District of Columbia.

At this time, Sierra Club is not aware of any state that imposes an additional per kWh tax on EV drivers for the purpose of supplementing the state's transportation infrastructure fund.

Thank you for the opportunity to provide input on the Commission's ongoing efforts to accelerate EV adoption and promote transportation electrification in Vermont.

If you have any questions about the material in the comments, please do not hesitate to contact me at 415.200.9778 or nathaniel.shoaff@sierraclub.org.

Respectfully submitted,



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