

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Investigation into promoting the ownership and use of electric vehicles in the State of Vermont	Case No. 18-2660-INV
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**Final Comments and Recommendations of**  
**Vermont Electric Cooperative**

Vermont Electric Cooperative (VEC) appreciates the time and effort that has been invested in this docket by the Public Utility Commission (Commission) and the various interested parties. It is a critical time for the transformation of transportation towards a cleaner energy future. We have an opportunity and a responsibility to help create a system that is both environmentally and fiscally responsible to ensure its success and sustainability into the future. We hope that VEC has contributed information and perspective over the past year that will assist the Commission with this substantial task. Our final comments below outline a few important principles that VEC has raised in prior submissions that we believe are worth emphasizing as the Commission develops final recommendations.

**1. Administrative simplicity is critical to avoid unnecessary costs that may inhibit EV adoption.**

As discussed in previous comments, VEC supports the goal of transforming our transportation system and appreciates the need for all users of our transportation infrastructure to pay their fair share of transportation infrastructure costs. However, VEC urges the Commission to not let policy purity get in the way of a simple and low cost system that will help spur this emerging market. At this time, the complexity to administer a per-kWh infrastructure fee on electric vehicles will increase costs to both the utility and the customer, without resulting in substantial net revenue given low adoption of EV's. We expect that over time, as EV adoption increases, there will be a concurrent improvement in the prices and the technology necessary to meter and integrate metering with billing for individual devices (as opposed to whole home metering). Until that time, we do not believe Vermont should be out front of other states in requiring per kWh infrastructure fees.

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**2. All drivers should pay their fair share for maintenance of road infrastructure**

Although VEC does not support the imposition of per kWh fees at this time, as outlined in earlier comments there are a variety of other ways to ensure in-state and out-of-state EV users pay their fair share for infrastructure such as per kWh fees on electricity from public charging stations, fees on vehicle inspection, and fees on registration of plug-in vehicles.

**3. The system should not shift costs between electricity users or between fuels.**

The system created should not require users to pay more than necessary to power their vehicles. For example, we should not require a VEC member to purchase a special meter to measure electricity used just for EV charging. The system should also not have members pay artificially less than cost for electricity (for example, “free” charging stations or subsidized electricity via above market net metering rates).

**4. Vehicle-only tariffs can be piloted but should not be mandated.**

While we are interested and open to exploring the influence that vehicle-only tariffs may have on consumer behavior, the survey information provided by Drive Electric Vermont at the April 23, 2019 workshop showed that rates are not a barrier to the purchase of EV’s, with less than 5% of respondents ranking it as the top barrier, and less than 15% listing it as one of the top 3 barriers. After we tackle some of the top barriers (purchase price of vehicle, range, public charging availability, and performance) we may want to consider requirements related to vehicle-only tariffs.

Thank you for the opportunity to comment. VEC looks forward to continued partnership on this discussion so that the state can achieve the goals of reducing greenhouse gas emissions in a way that is fair and cost-effective.

Respectfully submitted,  
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