



May 13, 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 electric vehicle (EV) investigation docket. As directed by the Commission at the April 23, 2019 workshop, these comments supplement our prior recommendations in this matter.

As we have stated in our prior comments, Sierra Club believes that it is imperative for the Commission and the state to take strong action to speed transportation electrification and decrease greenhouse gas emissions from Vermont's transportation sector, as doing so is the only viable path for meeting the state's greenhouse gas reduction goals. Climate change is the most pressing environmental issue we face and it must be addressed now if we hope to pass on a livable planet to the next generation. The world's leading scientists have made clear that we have a rapidly shrinking window of opportunity to avoid the worst effects of climate disruption, and federal policies have made it clear that real leadership on this issue must come from the states.

To that end, we recommend the Commission's final report lay bare the current disconnect between the state's climate objectives and our current suite of transportation policies. As we explained in our April 8, 2019 comments, a business as usual approach to transportation electrification will see the state fall far short of its goals. Incremental improvements and modest incentives will simply not achieve the necessary results. For example, there is broad consensus among the stakeholders here that point-of-purchase rebates are a highly effective incentive for increasing EV ownership, as has been shown in past rebates in the state, including the \$10,000 rebate offered to Green Mountain Power customers for Nissan Leafs in the summer of 2017. Yet it does not appear that the Legislature or the Governor has proposed an incentive program that is sufficiently large enough to increase the number of EVs in line with stated EV adoption targets. This disconnect must be corrected if the state is going to meet our greenhouse gas reduction goals.

We also recommend that the Commission invite Vermont utilities to submit transportation electrification proposals to the Commission for review and approval. Commissions in other states such as Michigan, Ohio, Washington, Oregon, and California have done so as a means of improving transportation electrification and speeding EV adoption. We highlight two models below.

## Minnesota

Throughout 2018-19, the Minnesota Public Utilities Commission facilitated an investigation into EVs and EV charging in order to understand the opportunities and challenges that EVs create for the electric grid. In its final order in that case, the Commission directed utilities to develop a “Transportation Electrification Plan” identifying what EV-related initiatives the utility is contemplating over the next two years, including next steps as specific programs to scale up current or currently proposed EV pilots or tariffs, and to “file proposals, which can be pilots, intended to enhance the availability of or access to charging infrastructure, increase consumer awareness of EV benefits, and/or facilitate managed charging or other mechanisms that optimize the incorporation of EVs into the electric system.”<sup>1</sup>

## Massachusetts

In Massachusetts, the Department of Public Utilities conducted an investigation into EV charging and issued an order encouraging utilities to submit EV pilots. “The Department will allow – and, in fact, encourages – investment in and cost recovery for RD&D related to EVs, EVSE, and EV charging as part of a distribution company’s RD&D proposal in its grid modernization plan, or as a separate, approved pilot.”<sup>2</sup> The Department clarified that in order to receive approval and allowance of cost recovery, any proposal must be in the public interest; meet a need regarding the advancement of EVs in the state; and not hinder the development of the competitive EV charging market.<sup>3</sup>

We recommend the Commission similarly encourage Vermont utilities to submit EV pilot projects that include a range of specific EV-related considerations, including purchase incentives; time-variant rates for home charging; public education regarding the environmental, cost, and public health benefits of EV adoption; grid benefits; and ensuring the benefits of transportation electrification reach all Vermonters.

Finally, we want to reiterate that transportation electrification enjoys broad support throughout the state. Attached to these comments, we are submitting a letter joined by 358 Vermonters encouraging the Commission to recommend strong action to increase EV adoption in the state. These attachments include (1) the letter from Sierra Club members and supports; (2) a spreadsheet indicating the names and addresses of signatories; and (3) short individual notes submitted by many of these individuals.

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<sup>1</sup> See Minnesota Public Utilities Commission, “Order Making Findings and Requiring Filings,” filed February 1, 2019 in Docket 17-879 ([link](#)) (finding that “electrification is in the public interest” and directing investor-owned utilities to “file proposals, which can be pilots, intended to enhance the availability of or access to charging infrastructure, increase consumer awareness of EV benefits, and/or facilitate managed charging or other mechanisms that optimize the incorporation of EVs into the electric system.”).

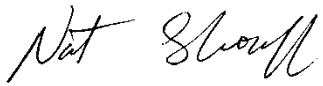
<sup>2</sup> Modernization of the Electric Grid, D.P.U. 12-76-B at 27-30 (June 12, 2014).

<sup>3</sup> *Order on Department Jurisdiction Over Electric Vehicles, The Role of Distribution Companies in Electric Vehicle Charging and Other Matters* at 16, DPU 13-182-A, Investigation by the Department of Public Utilities upon its own Motion into Electric Vehicles and Electric Vehicle Charging (filed August 4, 2014), Massachusetts Department of Public Utilities.

We appreciate the opportunity to participate in this important investigation into EV issues and transportation electrification in Vermont. We believe that Vermont is well positioned to lead on climate and transportation issues, and the Commission's report to the legislature presents an excellent opportunity to move the state forward.

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](mailto:nathaniel.shoaff@sierraclub.org).

Respectfully submitted,



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

Dear Commissioners,

Thank you for considering the important issues of electric vehicles and transportation electrification. The transportation sector accounts for the largest share of Vermont's greenhouse gas emissions, and it is critically important to bridge the divide between our transportation policies and our efforts to meet our climate objectives. I understand that the Commission is preparing a report on electric vehicles for the state legislature, and I am writing to urge the Commission to recommend the strongest possible set of actions to promote the growth of electric vehicles in Vermont.

I am proud that Vermont has aggressive goals for reducing greenhouse gas emissions, but I am deeply concerned about our ability to meet those goals based on our current policies. The world's top scientists have told us very clearly that if we do not act now, it will be too late to avoid the most destructive climate harms, some of which are already being felt across the state.

I hope that you will recommend strong changes that promote transportation electrification by:

- Improving and expanding incentives to purchase electric vehicles (EVs) in a way that will result in far more EVs on our roads;
- Improving consumer education about the reliability, cost and fuel savings, and environmental benefits of EVs;
- Reducing barriers to the growth of EV charging stations throughout the state; and
- Reaffirming the Vermont Agency of Transportation's conclusion in the 2016 Plug-In Hybrid and Electric Vehicle Registration Fees report that Vermont should not adopt any electric vehicle fees until electric vehicles have reached a 15% market share.

These are critically important issues.

Our climate crisis must be met with strong and immediate action if we want to pass on a liveable planet to the next generation. Thank you for tackling this important issue.

## Attachment B

### **Personalized Sierra Club Supporter Comments to PUC**

I own a Prius hybrid. I love the fact that I can sit in traffic (like the current Brandon construction) and not spew emissions. I love the fact that I can get 60+ miles to the gallon. Vermont does not have a lot of public transportation and increasing the availability of electric vehicles will help us do our part in reducing greenhouse emissions. Ellen Sheffer Brandon

Cleaning up transportation emissions and pollution is the largest action we can do today to care for people and the planet. Please lead this effort along, do not stall it behind a cautionary approach, because the positive results far outweigh any small vested interests. Karl Kemnitzer Windsor

Please help us to move in the right direction with this report and offer creative ways to transform our transportation infrastructure. John Langhus Norwich

I think supporting the transition to electric vehicles is extremely important in Vermont, especially because we have such limited access to public transportation out in the countryside, and some of us are too old to ride bicycles. The hills are steep around here! Susan Bonthron Guilford

I don't yet have an electric vehicle, but my next vehicle probably would be if the above mentioned changes were made. I have a 10 year old Prius; would certainly get a plug in if the time comes (I am 76, so would most likely only get 1 more car). Elizabeth Ezerman Williston

I'm an EV owner. The state needs to make EV ownership more accessible to Vermonters, including credits and more charging stations. Stuart Blood Thetford Center

I think it would also be great if electric bikes were given some sort of "encouragement" too. They are cheaper than a car and might be a less expensive way for at least a part of the population to migrate away from gas powered vehicles. Jonathan Kinnersley Brattleboro

Is there a small 4wd truck available in electric? I live on 9 miles of mountainous dirt road. I want to go electric, too. Sandy Morningstar Waterbury

What better time than Green-up Day to seal the deal and immediately go Electric! William Riley Essex Junction

I have an electric car powered by the solar panels we had installed 10 years ago. Time to make this happen NOW, no more foot-dragging. Suzanne Tokarsky Jacksonville

I would love to help and encourage use of electric vehicles to save our planet earth, leave a future for our kids and grandchildren! It is time! Huibertha Sorgi Rochester

Time is running out, we must act now and act boldly. We have one planet, one home and if we destroy her now there is no "do over" for our children and grandchildren. Let's keep Vermont a leader on climate reform. Madeleine Wennerstrom Randolph

The climate crisis is the most urgent issue right now. Please do the right thing here. This will have a huge positive impact in addressing this crisis. Marlene O'Connor Brattleboro

Vermont, usually the leader in good causes, is lagging behind in the battle against global warming. People watch us (and you) to set their compasses. Everyone, not just large states and countries, must do their part. Electrifying cars is one of the greatest benefits in reducing CO2 . Thanks for considering.  
Donald McIntyre Burlington

We have owned a prius hybrid for over 10 years and have been very satisfied with everything about it ... we would add an EV if the number of charging stations, incentives for purchase, and so on encouraged us to do so ... so would others ... please help to make that possible ... thanks Roland Marx Belmont

I also support the rapid advent of autonomous vehicles. Amelia Lee Brattleboro

I co founded the Northern Power Windmill Company, and teach design and sustainability. THIs is important. Vt. could be the first state to go more than 50% EV. DO IT David Sellers Warren

I don't have children of my own, I do have family members with young children. I worry about the world we are leaving them and am deeply concerned that they will be inheriting a nightmare world that previous generations and ours have created. We need to do everything we can to mitigate that legacy.  
Peggy Rishel Brandon

Please make a priority of improving and expanding incentives to purchase electric vehicles (EVs) and please heed the Vermont Agency of Transportation's conclusion in the 2016 Plug-In Hybrid and Electric Vehicle Registration Fees report that Vermont should not adopt any electric vehicle fees until electric vehicle sales constitute 15% of the market share. David Ellenbogen Calais

I have recently purchased an electric vehicle. I am very interested in supporting a transition to electric vehicles; gas vehicles pollute too much, and the electric car technology is here. Thanks. Robert Blais Montpelier

We really need to act now for the future of our children and grandchildren. It seems that I see more and more people driving pick up trucks that use so much gas. Please do something to promote electric vehicles. Susan Schulman Hinesburg

We need to do everything we can to address the climate crisis. As a mother of three who is very concerned about the future our children will inherit, I urge you to take this step. As a consumer who will soon need to replace a failing car, I can add that the incentives for purchasing electric vehicles have me rethinking our original plans to purchase an s.u.v. We now want to see if we can make an electric vehicle work for our family. Elizabeth Kervick Cornwall

We must protect the environment. Linda Hughs Stamford

Switching to an electric car is about the fastest way to reduce carbon pollution in Vermont. My next car may be electric and support by the state would make a difference, whether through tax incentives or an increase in charging stations. Dave Parker Manchester Center

We must transition to clean power. Nicholas Harmon Waitsfield

Even the Wall Street Journal says electric cars are the way to go and that BMW, Mercedes, and VW will stop research to improve combustion engines by 2021. Frederick Cressman Thetford

We have an all-electric vehicle - 2013 Leaf SL and we live in a condo association where there are four other electric vehicles. It is hard to be on the cutting edge - whatever help we can get makes a big difference. Now we are struggling to install the infrastructure to support more electric cars in our condo

association and we have no models, no incentives, no skilled help to make our way through this process. A project that should take a month or so, is being to take years because no one has done this before in Vermont. So please bring us all the help that you can. Thanks Don Schramm Burlington

Help Vermont lead the way in saving our planet. Sue Westin Dorset

Vermont needs to do it's own part to mitigate climate change. Marcia Hylan

I would love to see electric cars put financially into the reach of my 20 something children. So would they. Yves Gonnet Huntington

I now have my third Prius and would not drive anything else. Were the electric car support infrastructure available, I would go fully electric. Phillip Howard Burlington

As longtime electric vehicle owners (8 years), we are keenly aware of the largest deterrent to the expansion of the EV market --range anxiety! Without having fast charge (level 3) locations readily available on interstate highways, perhaps at underused weigh stations, people will not join us. The stations must be credit-card friendly and available to many vehicles at a time. They should be state-owned and operated, with the income used to supplement the funding for highway maintenance. Eric Brattstrom Warren

If we consider ourselves a world leader, then we should be out in front, saving the environment. This earth is the only home we have. We have to take care of it ourselves. Katja Nystrom Colchester  
As an owner of an EV, I'm acutely aware of the need for more charging stations, especially the DC type which provide a rapid charge. Action by the state to support increased numbers of charging stations is important. David Newbury East Thetford

I strongly support more robust state incentives for people to purchase EVs. The state also needs many more charging stations, especially the DC type. Catharine Newbury East Thetford

Some of us can't afford new, or even recent cars. Why can't the people who can send operational cameras to Ultima Thule design electric retrofits for old automobiles - or, for that matter figure out how to make all packaging and other trash biodegradable, recyclable, or compostable. Not romantic enough for a Nobel Prize, eh? Robin Rothman Danville

We also need more electric public transportation and state vehicles. Thanks. Joanna Cole Williston

There is very little time left to tackle global warming. Electric vehicles are a critical part of doing so. Reto Pieth Grafton

Please support vehicle electrification as a way of reducing climate change! Diana & Charles Bain Bridport

So important! W Lhamon Brattleboro

This matters to me because our future depends on changes like this one. Kate Williams Brandon

Is anyone for dirty air and water.? Seems so. Jep Barendse East Dorset

Establishing--or facilitating the establishment of--charging stations at frequent and convenient places is absolutely essential to an effective social transition to truly electric vehicles. It can't happen without the state behind it, but it is essential (because of issues over "range") to make this work. David Newbury East Thetford

I highly support electrical vehicles...will help cut down on greenhouse gases that are rapidly accelerating! Judith MacDonald Braintree

We must go in this direction to save VT and the planet! Melinda Stucker Norwich

At the same time we need to implement a fair way for electric vehicles to pay for their highway use. David Giguere Montpelier

We have to go electric sooner or later, so the sooner we do it the more benefit we will get. Jonathan Draudt Warren

Please do everything you can to encourage Vermonters to move toward electric vehicles. Thank you! Susan MacCleod Poultney

Vermont has been an environmental leader for 50 years with laws like Act 250, billboards and bottle return--keep our state in the vanguard. Janis Murcic South Pomfret

Please help us save the planet. Lauren Johnson Craftsbury Common

This is an exciting prospect for Vermont to lead the nation. Ann Randall Manchester Center

Support EV policies that put Vermont on the forefront of ditching oil dependence. Nick Gruschow Waterbury Center

As a family physician in northern Vermont, I feel strongly that Vermont do everything possible to to meet carbon emissions reductions goals. I'm also a current electric vehicle owner and believe strongly in the ability of Vermont to unify behind the cause of reducing carbon emissions from our transportation system. We must do so now, and electrification of our transportation fleet is a critical step in that direction. Dan Quinlan Williston

I support VT providing monetary incentives to new owners. Jan Drechsler Guilford

Let's pull together to get more EVs on the road along with the charging infrastructure to support their use. This is one, among many, critical climate justice actions that will showcase Vermont as a leader in the direction we desperately need to go. David Skopin Essex Junction

As EVs have bigger batteries with more range, it becomes more important to have high-speed DC chargers available especially near the Interstates in places where people can stop for an hour and get something to eat. This will help people travel longer distances in EVs. John Rosenblum Calais

I would be much more likely to purchase an electric car as my next car (I currently have a hybrid) if there were more infrastructure for electric vehicles here. Katrina Martin Burlington

Please make going green affordable for all. Thank you Bonnie Bresett Chelsea

Electric cars are not yet affordable for me but they are getting closer to affordability, and I hope to own one someday. We all have to make painful changes if our kids are to have a livable planet. Lillian Pickering Williston

Thank you for driving down emissions with legislation that supports a sustainable environment. Jennifer Knight Brownsville



I do also have concerns about where the electricity to charge these vehicles comes from, but I think change needs to start somewhere. Katherine Williams Marlboro

If we don't take this needed step for our environment what legacy will we have left??? Jeannie Slauson Shelburne

Anything we can do to combat climate change should be an imperative! Thanks!!! Emily Bowers

As an EV owner and driver, I can attest to how beneficial driving electric can be. I am enjoying driving a car with almost no maintenance, zero tailpipe emissions, and much lower energy costs to operate. It also handles Vermont winter weather just fine. What I don't like was the high upfront cost to purchase, and cost is the biggest barrier for most people. We need incentives to make driving electric accessible for all Vermonters, not just the ones who have the means to make responsible vehicle purchases. Joel Rhodes Waitsfield

I have an amazing solar system and I would like eventually to be able to buy an electric car and take it vantage of my solar panels, please help. Donna Williams Bradford

We can't wait. This is crucial. As a physician, I recognize that the biggest long term threat to my patient's health is climate change. David Rand Burlington

With your support we can do this! Sandy Gmur Hartland

Get green businesses that pay well with out a lot of restrictions, that pay well so employees can afford them. Timothy Taussig Newfane

This is critical. We can do this. Jay Curley South Burlington

I have two young girls and I want them to be able to live in a healthy environment when they are older. Sarah Kim Williston

The more electric vehicles are purchased, the price will go down. I'm just waiting for an electric car to be affordable. If I had subsidy, I'd probably get one sooner. Gene White Essex Junction

The sooner the better. Diora Kania Burligton

I see no reason to be using fossil fuels when there are so many other better alternatives. Paula Rimmer Montpelier

Please stand up and do the right thing by supporting zero emissions! Nina Jaffe Colchester  
Paris has many plug feeds for electric vehicles. I thought the electric vehicles quietness and the ready availability of recharge stations was phenomenal. I'd like to see the furtherance of our USA recharge stations. It's wonderful not to have to breathe fumes. David Davison White River Junction

11 years to free us from dependence on fossil fuels. That is the task that the UN has passed down to humanity and I ask you to rise to it with me. Jack O'Callaghan Burlington

We have to step up and take action. My cousin works for Green Mountain Power and owns an electric car. It's awesome. The more electric cars and charging stations there are in the State, the better! Michelle Kaufman Rutland

Transportation is one of our largest sources of GHG in the state and one of the most challenging to overcome, we need action from leaders in state house. State action will encourage more people to

adopt the technology and as it does the cost will decline. Please we need to take action if we want to preserve the Vermont we know and love. William Hayes South Royalton

Please make this important work a priority!! Sarah Sparks Addison

This is good for our environment. Please support this measure. Rachel Senechal East Montpelier

We're in the brink of losing life & a beautiful planet; time to act responsibly. Meridith Bjork Hartland

I commute a total of 90 miles per day, and would like to do this in an affordable EV. Please support the important changeover to cleaner transportation! Bill Storz Lyndonville

I am hoping to purchase an EV at the end of this year. I am excited by what I see on the roads and look forward to another means of reducing my carbon footprint. Molly Moerdyk Burlington

One more step in the right direction! Heidi Quattrocchi Poultney

Our time is running out to make a difference with our CO2 emissions. The Trump administration is doing nothing to advance climate change initiatives and Vermont needs to take a stand. Vermont is a mostly rural state, which requires a car for many to meet basic transportation needs. Supporting electric vehicles and electric charging stations would help promote and encourage electric vehicle purchases. Another focus on legislation could be education and providing more information on the reasons to go electric, as well as programs that promote electric vehicles to low income families. Sarah Loya Waterbury

At the moment I use my privilege to be able to have access to a hybrid as that was the technology that was lost available and that I could afford the last time I was ready and able to be in need of a new/used car. I hope to do the same in the future and I hope it will be easier and more accessible with more e-vehicles on the market. This is one thing I can do to possibly support the Earth's sustainability if I have to keep driving at all. Thank you for considering helping someone like me to be a part of this effort. Elisabeth Slatt Burlington

I own an electric car. We need more charging stations to make it easier for people to own them. Dale Perzanowski Hartford

All around us our planet is dying, the animals are suffering, and yet we continue to live in our regressive ways. Change is the only option or the world will change for the worse and we will not live to regret it. Thank you! Isaac Robison Springfield

Electric vehicles charging up during the middle of the day can help absorb the solar electric power being generated during the day. Adrian Owens Craftsbury Commons

Anything we can do to reduce greenhouse gases entering our atmosphere; we all share this planet, regardless of how we may think our individual actions are insignificant, every action has an effect. Let's work together to make our planet; our home(!) a pleasant place that is sustainable and healthy for future generations! Let's help each other! Recognize our differences and share our unique gifts and talents to create the most beautiful, healthy environment we can, so as to benefit all of mankind and life on the planet \*eco-friendly\* the air and water are common territory; electrification of vehicles is one way to offset petroleum dependence! We can wean our way from petroleum, and source our energy from more sustainable sources (naturally). Respect is mutual. Love is natural. Let's get creative and use Biomimicry to better make use of our resources! Thank you Jp Guardino Warren