

VPPSA Comments on H. 529

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Promote Equity in Vermont's Energy Transformation

- ▶ Public Power perspective of ensuring fairness among ratepayers
- ▶ We are transitioning towards a renewable electric sector.
- ▶ Heating and transportation sectors will rely increasingly on electricity as an energy source.
- ▶ Ensure that the energy transformation that is underway maximizes benefits and minimizes costs to citizen ratepayers.



Allow an Objective and Comprehensive PUC Study

- ▶ H. 529 assumes the implementation of a per kWh fee on EV charging.
 - ▶ Costly to implement
 - ▶ Added meters
 - ▶ Data integration
 - ▶ Easy to avoid, especially in residences and behind the meter EVSE installations.
 - ▶ Technological difficulties of distinguishing EV load
- ▶ The PUC study should explore options for EV owners to contribute to the T. Fund and recommend the best alternative.
 - ▶ Current PUC proceeding may recommend a different option.



Maintain the Prohibition on using NM credits to sell EV charging

- ▶ Vermont ratepayers pay a significant premium for Net Metered generation (\$.04 -.08/kWh)
- ▶ For-profit entities should not be permitted to receive ratepayer subsidies and then re-sell electricity to the public at an *unregulated* price.
- ▶ Ratepayers should not be required to fund profits for private companies.
- ▶ Alternatives exist for those that wish to purchase/consume renewable or solar energy.

