



Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 0288

February 28th, 2023

Dear Commissioners,

Thank you for the opportunity to provide public comment. My name is Amanda Barker and I am the policy advocate at Green Energy Consumers Alliance. We are a non-profit organization working to speed the transition to a low carbon future.

We fully support the deployment of advanced meters. Advanced meters will enable whole-home time-varying rates, which will allow us to reduce peak demand and benefit all ratepayers. Advanced meters are key to Rhode Island meeting its climate goals.

I would like to take this time today to comment publicly on a related issue: namely, **that the roll-out of advanced meters NEED NOT DELAY the implementation of off-peak charging for electric vehicles.**

Rhode Island Energy has said that their Advanced Meter Time Varying Rate program won't start until 2026 and that it is yet to be determined whether time varying rates will be instituted on an opt-in or opt-out basis. We want to emphasize that advanced meters, while needed to enable *whole-home* time-of-use rates, are not needed to begin off-peak charging, as evidenced by Rhode Island Energy's Smart Charge RI program. Off-peak charging can be implemented NOW with smart chargers or [vehicle telematics](#).

Off-peak charging rebates are a win-win-win: they benefit EV drivers by offering lower fuel costs, benefit ratepayers by making more efficient use of the grid and lowering peak demand, and benefit all of us by incentivizing EV adoption.

Secondly, we would like to take this opportunity to urge you to include ALL the benefits of using electricity off-peak when calculating off-peak charging rebates and/or time-of-use rates. When setting the Time of Use rate, important benefits of off-peak charging such as avoided transmission and distribution costs, avoided emissions and emission costs, avoided reliability costs, avoided costs due to induced price effects, and non-energy benefits must be included. [Analysis by the Applied Economics Clinic](#) shows that including these benefits in a value for off-peak charging should result in a 13 to 15 cent rebate per kWh. Rhode Island Energy's Smart Charge program only offered a 4 to 6 cent per kWh incentive, which was far too low. A higher rate that reflects the lower costs of serving off-peak charging is crucial to customer response and further incentivizing the adoption of Electric Vehicle's. Furthermore,

even with a 4-6 cent discount for charging off-peak, the EV driver is paying above the cost of service, which is unfair and counterproductive.

Finally, the PUC and Rhode Island Energy must develop a Time of Use rate before the advanced metering plan is complete. This way, we will have a better understanding of the rate structure and benefits that could be achieved before approving the advanced metering plan without fully understanding the precise rate structure, which Rhode Island Energy would likely propose much later. A [Utility Dive article](#) recently discussed how advanced metering benefits haven't been flowing to customers because the Time of Use gets pushed to a later step in the process.

Thank you for the opportunity to comment.

Sincerely,

Amanda Barker
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