



August 12, 2021

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05620

Re: Case 22 – 2417 Energy Efficiency Charge (“EEC”) Rates for 2023
Request of Waiver of Rule 5.304(B)

Dear Ms. Anderson,

Pursuant to Public Utility Commission (“Commission”) Rule 5.304 (B), electric distribution utilities annually file their electric sales information to calculate the subsequent year’s statewide EEC on or before August 1 with the Commission, Department of Public Service (“Department”) and the Energy Efficiency Utility (“EEU”) serving its area. Burlington Electric Department (“BED”) has not previously filed this information with the Commission or the Department on August 1st. The reason BED has not filed this information is because BED files a comprehensive report, in accordance with PUC Rule 5.306, on or before October 1 of each year. This comprehensive filing includes the relevant information identified in PUC Rule 5.304(B), as well as the calculation of BED’s EEC for the subsequent calendar year.

As the Commission knows, our EEC rate is specific to the City of Burlington. Consequently, BED’s Rule 5.304(B) information is not needed by Efficiency Vermont to calculate their proposed statewide EEC rate for the other electric customers in Vermont. It has recently come to BED’s attention that PUC Rule 5.304(B) could be interpreted as a requirement of BED even though the information is redundant to the information included in BED’s October 1 filing and not needed by Efficiency Vermont. Consequently, BED requests that the Commission waive the August 1 filing requirement for BED, pursuant to Rule 2.107.

BED believes a waiver is warranted because the August 1 filing is redundant and unnecessary as the Commission does not typically issue a ruling regarding these August 1 filings by the other electric distribution utilities. It is BED’s understanding that these filings are necessary for Efficiency Vermont only since they need the information to calculate their statewide EEC rate. BED’s information would be of no use to Efficiency Vermont.



BED appreciates the Commission's attention to this matter and would be happy to discuss this waiver request with the Commission, if the Commission or Staff have any questions or concerns. BED has shared a copy of this letter with the Department.

Sincerely,

Thomas Lyle
Burlington Electric Department
Tel: 802.922.3204