



October 13, 2022

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

Re: Case 22-2417 - Electric Efficiency Charge ("EEC") for CY 2023;
Effective 2/1/2023.

Dear Ms. Anderson,

Pursuant to Public Utility Commission ("Commission") Rule 5.306(A), the City of Burlington Electric Department ("BED") submits its proposed 2023 electric energy efficiency charge ("EEC") for review and approval.¹

The proposed EEC was calculated in accordance with Rule 5.305(F) using the applicable billing determinates. The 2023 EEC is expected to generate \$1,956,461 in collections, a 9.4 percent overall reduction relative to CYE 2021 calculated collections.

Total EEC to be Billed in 2023 compared to the calculated EEC using 2021 Billing determinates and 2022 EEC rates	\$1,956,461	\$ 2,159,734	-9.4%
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As shown in the summary table below, the proposed 2023 EEC rates are lower for all customer classes compared to 2022 EEC rates. Overall, 2023 EEC collections are anticipated to decrease by approximately \$200,000 relative to estimated CYE 2022 collections. Changes in the 2023 EEC rates are mainly a function of reduced EEU budgets relative to prior years and customer credits associated with EEU carryovers.

¹ The Commission granted BED an extension of time to file this proposed EEC on or before October 17, 2022; Order of 9/30/2022.



Rate Classifications		2023	2022	% diff
w/o Demand Charges	Residential	\$0.00676	\$0.00690	-2.0%
	Commercial	\$0.00607	\$0.00703	-13.6%
w/ Demand charges	Commercial			
	kWh	\$0.00371	\$0.00416	-10.8%
	kW	\$0.90498	\$1.09775	-17.6%
	Industrial			
	kWh	\$0.00310	\$0.00323	-4.1%
	kW	\$0.80407	\$0.86942	-7.5%
Public street lighting		\$0.00607	\$0.00700	-13.3%

With respect to the 16 net-metered customers without production meters, the proposed flat monthly EEC is \$2.95 and \$2.94 for commercial (SG3) and residential (R3) customers, respectively. The proposed rates are up from \$2.87/month (SG3) and \$2.93/month (R3).

The proposed 2023 EEC is derived – in part - from the following key inputs:

- 2021 Billed energy (323,011,602 kWh) and demand (526,033 kW);
- 2021 customer charge, energy & demand revenues (\$46.3 million);
- “True-up” of actual 2021 uncollectible balances and estimates of 2022 uncollectible balances by rate class; resulting in a net reduction of \$9,295 (over-collection);
- “True-up” of actual 2021 EEC collections by rate class; resulting in a net reduction of \$36,411 (over-collection) in expected 2023 EEU requirements;
- Partial “True-up” of 2022 EEC collections by rate class²; resulting in a net decrease of \$223,896 (over-collection) in expected 2023 EEU requirements;
- 2023 Approved demand resource plan budget (\$2,691,482); pursuant to PUC Order in Case 19-3272, Aug 26, 2021); and,
- Customer credits reflecting EEU carryovers from previous performance periods;

² Actual data was incorporated for the months of Jan – Aug 2022; estimates were used for the remaining months of 2022.



- \$310,350 (1/3 of \$931,050 carried over from 2015-2017 performance period)³;
- \$175,221 (1/2 of \$350,442 carried over from 2018-2020 performance period)⁴;
- and,
- Gross Revenue Tax & Weatherization fees (\$20,152).

With respect to the aforementioned customer credits associated with prior performance period carryovers, BED will incorporate the remaining amount of credits into future EEC calculations. This means that the credit associated with the 2015-2017 performance period will amount to another \$310,350 in CY2024. Customer credits of \$175,221 that are associated with the 2018 – 2020 performance period will end by CYE2023.

In conclusion, BED respectfully requests Commission approval of BED's proposed 2023 EEC in accordance with the above captioned table for each customer class. The effect of the above-noted adjustments is a 9.4 percent net reduction overall in estimated total EEC collections across all customer classes relative to estimates of calculated 2022 EEC collections.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Thomas Lyle,
Burlington Electric Department
Tel: 802-922-3204

³ Pursuant to Case 20-2241, Order of 11/13/2020).

⁴ Pursuant to Case 21-1616, Order of 8/31/2021.