

	EVT Rate Change	GMP Rate Change
2013	+10.8%	-0.40%
2014	+7.07%	+2.46%
2015	+8.96%	-1.46%
2016	+7.93%	+0.08%
2017	+10.72%	+0.64%

4. We also share the Department’s view that, while energy efficiency programs should continue to be a tool in the toolbox of how we manage our portfolio by reducing the size of future power purchases and minimizing customer bills through conservation and efficient energy usage, the potential, positive impact of efficiency measures on costs and outcomes is declining in comparison to their costs.

5. In the last few years, other Vermont energy policies have caused advancements that also reduce load materially. Net-metering is a prime example. Net-metering has grown significantly in the past few years, as exemplified by the following breakdown of current installed net-metered capacity by utility:

- WEC 9.8% (at current trend for 2017; expects to be at 17% be end of the year);
- VEC 14.7 % and climbing;
- BED 10.7 % (total application as of January); and
- GMP 20 % (includes what’s built and what’s in the queue- and increasing daily).

6. The combination of very rapid growth of net-metering installations, aggressive

efficiency measures, and a sluggish Vermont economy has resulted in energy loads that are now roughly lower than 2005 levels. These lower loads cause fewer available efficiency benefits to be available.

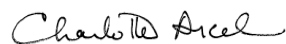
7. Finally, in the context of the Board's consideration of resource allocation budgets, GMP posits that streetlight efficiency efforts, specifically, converting streetlights from older technologies to more efficient LEDs, is finite in opportunity. The work remaining can be clearly quantified, as the number of state and municipal streetlights as well as private security streetlights that have not been upgraded to LED technology is known. GMP therefore recommends that the parties establish timelines for the completion of this program, and its subsequent sun setting and a corresponding budget reduction.

Conclusion

GMP respectfully requests that the Board and the parties take these issues under consideration as they continue to deliberate in these proceedings.

Respectfully submitted,

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