

September 10, 2013

Susan Hudson, Clerk  
Vermont Public Service Board  
112 State St., Drawer 20  
Montpelier, VT 05620-2701

Re: EEU-2013-01  
2013 – 2014 Demand Resources Plan Proceeding  
CLF reply comments on savings scenarios to be considered

Dear Ms. Hudson:

Conservation Law Foundation (CLF) offers the following reply comments on the scenario options proposed for development in this proceeding. In general terms, CLF supports the proposals of VEIC. CLF is concerned that the proposals of the Public Service Department are insufficient to provide the information that will be necessary to determine what budget level will acquire all reasonably available cost effective energy efficiency savings. All of the proposed scenarios are driven by artificial or arbitrary parameters. They include a level budget, essentially maintaining the status quo, or a specific savings target. Each evaluates a scenario with a specific limitation that is not specifically based on the statutory criteria.

The purpose of the scenario exercise must be to develop guideposts that represent a range of possible solutions. They must be based on the statutory criteria. The statute requires that the budget be set at a level that will acquire all reasonably available cost effective energy efficiency. 30 V.S.A. § 209. CLF urges the Board to include in one of the scenarios an evaluation of how it meets the full attainment of the statutory goal within a reasonable time frame.

Based on the scenarios presented and the above recommendation for electric efficiency, CLF supports pursuing the three scenarios recommended by VEIC. In particular, VEIC Scenario #3 will provide useful information as Vermont moves forward integrating renewable energy and distributed generation into its overall electricity supply. VEIC Scenario #2 provides a relatively aggressive increase consistent with the level of resource acquisition needed to meet statutory goals. VEIC Scenario #1 provides a modest increase consistent with growing efficiency acquisition over time. The DPS Scenarios fail to provide an evaluation of the budget needed to meet the statutory requirements. Overall, they do not provide for evaluation of growth and changes in programs and efficiency resources over time.

Thank you for your consideration of these comments.

Sincerely,



Sandra Levine



cc: Service List (by email)