

BEFORE THE VERMONT PUBLIC SERVICE BOARD
MONTPELIER, VT 05620

In the Matter of

EEU Demand Resources Plan Proceeding
Case No. EEU-2016-03

**COMMENTS OF PETER J. MANDYCH, J.D. CANDIDATE
BOSTON COLLEGE LAW SCHOOL**

I am pleased to submit these comments on the Public Service Department's ("Department") recommended Energy Efficiency Utility ("EEU") budgets for resource acquisition scenario models for 2018-2020. I am a law student at Boston College Law School and aspiring Vermont resident with an interest in ensuring that Vermont continues to set the highest standards¹ for energy efficiency, for the benefit of its citizens and as an example for the rest of the United States.

1. The Department's recommendations do not adequately account for "all reasonably available, cost-effective energy efficiency savings."² Furthermore, "reducing the generation of greenhouse gases" is one of the statutory factors that must be given "particular emphasis" when determining the appropriate Energy Efficiency Charge.³ The Board is not relieved from this express requirement merely because "[greenhouse gas] emissions contribution from Vermont loads are declining over time."⁴ Initial successes do not constitute good cause to

¹ See THE STATE ENERGY EFFICIENCY SCORECARD, <http://aceee.org/state-policy/scorecard> (last visited June 1, 2017) (listing Vermont third behind only California and Massachusetts).

² VT. STAT. ANN. tit. 30, § 209(d)(3)(B).

³ *Id.*

⁴ State of Vermont Department of Public Service, Re: EEU 2016-03 Public Service Department Demand Resource Plan Proceeding Budget Recommendations for Energy Efficiency Utilities (May 5, 2017).

abandon the pursuit of further success. Surely neither the Department, nor the Board, nor the Vermont Legislature would intend such a reading of the statute.

2. If the Department is serious about its commitment to ninety-percent renewable energy for Vermont by 2050, as set out under the Comprehensive Energy Plan,⁵ investment in energy efficiency remains vitally important. Now is not the time to scale back efforts to attain this ambitious but achievable goal. The Board should set the EEU budgets accordingly.

Given the United States' momentous decision to withdraw from the Paris Climate Accord,⁶ individual states must assume an increasingly central role in moving the nation forward towards a renewable and efficient energy future. Vermont's initial successes in achieving a higher standard of energy efficiency do not support throwing in the towel at this critical juncture. I urge the Board to consider how its decision will affect the health and economic well-being of all Vermonters in the coming decades, rather than bowing to a vocal minority of businesses that cannot be troubled to make minor investments in Vermont's energy efficient future. I respectfully request that the Board not decrease the EEU budgets.

Respectfully Submitted,

/s/ Peter J. Mandych

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⁵ VT. DEP'T OF PUB. SERV., COMPREHENSIVE ENERGY PLAN 5 (2016).

⁶ Michael D. Shear, *Trump Will Withdraw U.S. From Paris Climate Agreement*, N.Y. TIMES (June 1, 2017), <https://www.nytimes.com/2017/06/01/climate/trump-paris-climate-agreement.html>.