

June 2, 2017

Ms. Judith C. Whitney
Clerk of the Board
Vermont Public Service Board
112 State Street
Montpelier, VT 05620-2701

Re: EEU 2016-03, 2016-2017 Demand Resources Plan Proceeding

Dear Ms. Whitney:

I offer the following comment on the Department of Public Service's ("Department") recommended Energy Efficiency Utility ("EEU") budgets for resource acquisition scenario models for 2018-2020. I'm a law student at CUNY School of Law that is currently working in Vermont. I have high hopes that Vermont may one day be my permanent home, and as such have a strong interest in ensuring that Vermont continues its role as a leader in energy efficiency.

1. The Department has a statutory mandate to adjust the Energy Efficiency Charge ("EEC") "as necessary in order to realize all reasonably available, cost-effective energy efficiency savings."¹ The Department's proposed budgets do not appropriately achieve this objective in light of the statutory criteria or the ever-changing technological landscape. The Department's proposal finds declining potential from increased investment in energy efficiency. That may be true in the current technological landscape, but an examination of the most basic technologies shows rapid development in energy efficiency over a brief period.² The Department found past success in implementing energy-efficient measures as a reason for reducing funding over the next three years. These successes are an indication that the program is working as intended and that Vermont should continue funding the EEU at current levels to ensure Vermont stays a leader in energy efficiency, not an indication that funding should be reduced. Even if there is a declining return on investment for energy-efficiency measures, the EEU is the easiest way to ensure that all Vermonters see decreased energy costs and have long-term access to efficiency and conservation programs. Further, the EEU is critical to meeting the State's goal for reduced energy consumption by 2050.³ As such, the Public Service Board should reject the Department's proposed funding reduction.

¹ 30 V.S.A. § 209(d)(3)(B).

² See The History of the Light Bulb, U.S. Dept. of Energy (2013), <https://energy.gov/articles/history-light-bulb>. ("Since 2008, the cost LED Bulbs has fallen more than 85 percent and . . . are six to seven times more efficient..."); American Council for an Energy-Efficient Economy, *How Your Refrigerator Has Kept its Cool Over 40 Years of Efficiency Improvements*, <http://aceee.org/blog/2014/09/how-your-refrigerator-has-kept-its-co>. (Average household refrigerator energy use declined nearly 250 kWh/year from 2000-2010).

³ See Vt. Dept. of Pub. Service, *Comprehensive Energy Plan 2016*, located at https://outside.vermont.gov/sov/webservices/Shared%20Documents/2016CEP_Final.pdf.

2. Vermont is third in the nation for energy efficiency and one of the lowest per capita emitters of carbon pollution in the nation.⁴ Vermont's investment in energy efficiency over the last decade has been critical to this success.⁵ This sort of leadership in reducing greenhouse gas emissions and investing in efficient use of energy is needed more than ever as the Trump administration withdraws the United States from non-binding provisions of the Paris Climate Accord.⁶ As the United States enters a future with uncertain energy goals and climate directives, Vermont can be an example for other states to emulate in combatting the dangers associated with human-driven climate change and providing a safer, cheaper, and more sustainable future for its citizens. Continued investment in energy efficiency will ensure that Vermont does not lose its place as one of the most energy-efficient states in the nation and, more importantly, will ensure that Vermonters continue to reap the rewards of continued efficiency for decades to come.

Conclusion

I respectfully request that the Public Service Board ensure Vermonters have continued access to efficient and clean energy by rejecting the Department's proposed reduction to the EEU budget.

Respectfully Submitted,

/s/ Christian C. Harned

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⁴ U.S. Energy Information Agency, *Energy-related Carbon Dioxide Emissions at the State Level, 2004-2014*, located at <https://www.eia.gov/environment/emissions/state/analysis/>.

⁵ U.S. Energy Information Agency, *Energy-Related Carbon Dioxide Emissions at the State Level, 2004-2014*, January 2017 at 7, <https://www.eia.gov/environment/emissions/state/analysis/pdf/stateanalysis.pdf> (Showing declining emissions over the last decade as investment in efficiency and renewable energy increased).

⁶ Anne Galloway, *Trump's Pullout of Paris Climate Agreement Draws Sharp Rebuke From Vt. Pols*, Vtdigger.org (Jun. 2, 2017), located at <https://vtdigger.org/2017/06/02/trumps-pullout-paris-climate-agreement-draws-sharp-rebuke-vt-pols/>.