

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 17-4632-INV

Continuing issues related to the implementation of the Renewable Energy Standard	
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Order entered: 12/10/2018

**FINAL ORDER APPROVING 2017 RENEWABLE
ENERGY STANDARD COMPLIANCE FILINGS**

This case concerns Vermont’s Renewable Energy Standard (“RES”), which is implemented by the Vermont Public Utility Commission (“Commission”) pursuant to an order issued by the Commission on June 28, 2016, in Docket 8550 (the “June 2016 Order”). The purpose of the RES is to require Vermont’s electric distribution companies (“utilities”) to secure more renewable energy for their customers and to help reduce the consumption of fossil fuels.

The June 2016 Order directs the utilities to make annual filings with the Commission to demonstrate their compliance with the RES.¹ In this Order, we adopt the hearing officer’s proposal for decision and approve the utilities’ 2017 RES compliance filings.

PROPOSAL FOR DECISION

In today’s proposal for decision, I recommend that the Commission approve the utilities’ 2017 RES compliance filings and facilitate process improvements for the RES.

I. Background

The RES was established by the Vermont General Assembly pursuant to Public Act No. 56 of 2015, informally known as “Act 56.” Act 56 requires utilities to acquire specified amounts of renewable energy, in the form of renewable energy credits (“RECs”) or renewable attributes (“attributes”), and to achieve fossil-fuel savings from energy transformation projects, which may

¹ *Investigation re: Establishment of RES*, Docket 8550, Order of 6/28/2016 at 79.

include programs to support building weatherization and to encourage the purchase and use of electric vehicles and electric heating systems.²

The RES is divided into three categories or tiers. The first tier (“Tier I”) requires utilities to procure an amount of renewable energy equivalent to 55% of their annual retail electric sales for the year 2017, increasing by 4 % every third January 1 thereafter, eventually reaching 75% in 2032.³ The second tier (“Tier II”) requires utilities to procure an amount of renewable energy equivalent to 1% of their annual retail sales from distributed generation resources⁴ in 2017, increasing by three-fifths of a percent each year thereafter, eventually reaching 10% in 2032.⁵ The third tier (“Tier III”) requires utilities to procure additional renewable distributed generation eligible for Tier II or acquire fossil-fuel savings from energy transformation projects equivalent to 2% of their annual retail sales in 2017, increasing by two-thirds of a percent each year thereafter, eventually reaching 12% in 2032.⁶

To demonstrate compliance with Tiers I and II of the RES, a utility must own and retire RECs, which are accounted for in the New England Power Pool Generation Information System, known as “NEPOOL GIS,”⁷ and must provide the Commission with documentation of its ownership and retirement of RECs through the submittal of a RES banking spreadsheet approved by the Commission.⁸ If a utility wishes to demonstrate compliance with Tiers I and II of the RES through attributes that are not monitored through NEPOOL GIS or through procurement of energy from Hydro-Quebec or the New York Power Authority, the utility must submit an attestation with its RES compliance filing showing that it owns the attributes in question, that the attributes are eligible for the RES, and that the attributes have not been claimed in any other jurisdiction.⁹

² 30 V.S.A. chapter 89, subchapter 1.

³ 30 V.S.A. § 8005(a)(1)(B).

⁴ Distributed generation resources must be renewable, must have a nameplate capacity of 5 MW or less, and must have been commissioned after June 30, 2015. 30 V.S.A. § 8005(a)(2)(B).

⁵ 30 V.S.A. § 8005(a)(2)(C).

⁶ 30 V.S.A. § 8005(a)(3)(B).

⁷ NEPOOL GIS issues and tracks certificates for all MWh of generation and load produced in the ISO New England control area as well as imported MWh from adjacent control areas. See <https://www.nepoolgis.com/> for additional information.

⁸ *Investigation re: Establishment of RES*, Docket 8550, Order of 6/28/2016 at 64-65; *Continuing issues related to the implementation of the Renewable Energy Standard*, Case No. 17-4632-INV, Order of 6/8/2018.

⁹ *Id.* at 64.

As for Tier III, if a utility complies with Tier III of the RES through implementation of energy transformation projects, rather than through procurement and retirement of additional Tier II RECs, the utility must show the fossil-fuel savings from the projects in accordance with the requirements of the June 2016 Order.¹⁰

The Commission established a schedule for utilities to provide the foregoing information in the June 2016 Order. Under the Order, utilities are directed to annually submit reports regarding their Tier III savings claims by no later than March 15 and compliance filings demonstrating compliance with all three tiers of the RES by no later than August 31.¹¹ For purposes of compliance with the RES for 2017, the utilities were required to submit their Tier III reports by March 15, 2018, and their RES compliance filings by August 31, 2018.¹²

Utilities that fail to comply with the RES requirements may be subject to an alternative compliance payment. For 2017, the alternative compliance rates are: Tier I - \$10.00/MWh, Tier 2 - \$60.00/MWh, and Tier III - \$60.00/MWh.¹³

II. Procedural History

On March 15, 2018, Vermont Electric Cooperative, Inc. (“VEC”), Green Mountain Power Corporation (“GMP”), and Washington Electric Cooperative (“WEC”) filed reports regarding compliance with their Tier III obligations.

On March 16, 2018, Burlington Electric Department (“BED”) filed its report regarding compliance with its Tier III obligations, and GMP filed amendments to its March 15 filing.

On June 1, 2018, the Vermont Department of Public Service (“Department”) filed a report on the utilities’ compliance with their Tier III obligations (the “Tier III Report”).

On August 30, 2018, VEC made its RES compliance filing.

¹⁰ *Id.* at 69-77.

¹¹ *Id.* at 72 and 79.

¹² Certain utilities were exempt from the Tier III requirements for 2017. Those entities must comply with Tier III requirements starting in 2019. *See* 30 V.S.A. § 8005(a)(3)(B).

¹³ 30 V.S.A. § 8005(a)(4).

On August 31, 2018, GMP; Vermont Public Power Supply Authority (“VPPSA”) on behalf of 12 of Vermont’s municipal utilities;¹⁴ Stowe Electric Department (“Stowe Electric”); BED; and WEC made their RES compliance filings.

On September 4, 2018, WEC and GMP each made supplemental compliance filings.

On September 19, 2018, GMP and the Department filed comments on the utilities’ compliance filings.

On September 25, 2018, Stowe Electric made supplemental compliance filings.

On September 26, 2018, WEC, VPPSA, and BED each made supplemental compliance filings.

On September 27, 2018, GMP made supplemental compliance filings.

On October 1, 2018, the Department filed a second round of comments on the utilities’ compliance filings (“Department Comments”).

On October 10, 2018, VEC made supplemental compliance filings.

III. RES Compliance Filings

Burlington Electric Department

BED filed a Tier III report, compliance letter, and supporting documentation, including the Commission-approved banking spreadsheet and appropriate attestations, demonstrating that it complied with its 2017 RES requirements.

BED stated that in 2017 it retired 345,458 Tier I attributes covering more than 100% of its retail electric sales for 2017. Because BED retired attributes equivalent to more than 100% of its retail electric sales and continues to accept net-metering systems within its service territory, BED is in compliance with its Tier I obligations and exempt from its Tier II obligations for 2017.¹⁵

¹⁴ Pursuant to 30 V.S.A. § 8004(e) the VPPSA member utilities are permitted to meet their RES requirements in the aggregate. VPPSA filed on behalf of Barton Village, Inc. Electric Department, Village of Enosburg Falls Water & Light Department, Inc., Town of Hardwick Electric Department, Village of Hyde Park Electric Department, Village of Jacksonville Water Company, Village of Johnson Water & Light Department, Village of Ludlow Electric Light Department, Village of Lyndonville Electric Department, Village of Morrisville Water & Light Department, Town of Northfield Electric Department, Village of Orleans Electric Department, and Swanton Village, Inc. Electric Department.

¹⁵ 30 V.S.A. §§ 8005(a)(1)(B) and 8005(b).

For Tier III, BED had a requirement of 6,642 MWh of savings for 2017. In its Tier III Report, the Department confirmed that BED achieved 1,274 MWh of savings through its Tier III energy transformation projects and retired 5,368 Tier II RECs to meet the remainder of its Tier III obligation. Based on BED's filings and the Department's findings, BED is in compliance with its Tier III obligations.

Green Mountain Power

GMP filed a Tier III report, compliance letter, the Commission-approved banking spreadsheet, and necessary attestations demonstrating that it complied with its 2017 RES obligations.

For Tier I, GMP needed to retire 2,280,744 RECs or attributes in 2017. GMP exceeded its Tier I requirement of retiring RECs or attributes equal to 55% of its retail electric sales and elected to retire 2,446,594 RECs and attributes, which is equal to 60% of its retail electric sales.

For Tier II, GMP met its obligation to retire RECs from distributed generation resources equivalent to 1% of its retail electric sales by retiring 41,469 RECs from distributed generation resources.

As for Tier III, GMP was required to provide 82,937 MWh of savings for 2017 – the equivalent of 2% of its retail electric sales. In its Tier III Report, the Department confirmed that GMP completed energy transformation projects achieving 129,932 MWh of Tier III savings towards its 82,937 Tier III obligation. GMP banked excess Tier III credits beyond its 82,937 MWh requirement for use in future years.

Based on the foregoing, GMP has met its 2017 RES requirements.

Stowe Electric Department

Stowe Electric filed a compliance report, appropriate attestations, and the Commission-approved banking spreadsheet to demonstrate compliance with its 2017 RES requirements.

For 2017, Stowe Electric had a Tier I obligation to retire 41,915 RECs and a Tier II obligation to retire 762 RECs. Stowe Electric reported that it retired 41,914 Tier I RECs (one less than its obligation) and 762 Tier II RECs. Stowe Electric's banking spreadsheet and supplemental filings indicate that its New York Power Authority and Hydro Quebec attributes

were used for 2017 compliance. Stowe Electric noted that in retiring RECs, it failed to reduce the number of RECs to be used from the New York Power Authority to reflect the execution of a new contract for power from the St. Lawrence Hydro Project, leaving Stowe Electric one REC short of its Tier I obligation.¹⁶

Stowe Electric does not have a Tier III obligation in 2017 because municipal utilities serving fewer than 6,000 customers do not have Tier III obligations until January 1, 2019.¹⁷

Based upon the foregoing, Stowe Electric has met its 2017 RES obligations, provided that it submits an alternative compliance payment in the amount of \$10.00 to the Clean Energy Development Fund.¹⁸

Vermont Electric Cooperative

VEC filed a Tier III report, compliance letter, appropriate attestations, and the Commission-approved banking spreadsheet demonstrating that it complied with its 2017 RES obligations.

For Tier I, VEC needed to retire 244,293 RECs in 2017. VEC demonstrated that it met its Tier I requirement of 55% renewability by retiring 244,293 RECs, as required.

For Tier II, VEC demonstrated that it had met its 1% obligation with the retirement of 4,442 Tier II RECs.

For Tier III, VEC was required to provide savings equivalent to 8,883 MWh. In its Tier III Report, the Department approved VEC's energy transformation projects, which produced 9,763 MWh of Tier III savings to put towards VEC's 8,883 Tier III obligation for 2017. VEC banked the remaining Tier III savings for use in future years.

Considering the foregoing achievements, VEC has met its 2017 RES requirements.

¹⁶ The new St. Lawrence Hydro Project contract requires utilities to negotiate terms to claim the renewability of the associated energy. Stowe Electric did not negotiate and agree to terms prior to submitting its 2017 RES compliance filing.

¹⁷ 30 V.S.A. § 8005(a)(3)(B).

¹⁸ 30 V.S.A. §§ 8004(d) and 8005(a)(4).

VPPSA Members

VPPSA filed a compliance letter, appropriate attestations, and a banking spreadsheet demonstrating Tier I and II compliance in aggregate for its 12 municipal members.

In 2017, VPPSA members had a Tier I requirement of 213,569 RECs and met that requirement by retiring the necessary number of RECs.

Regarding Tier II, VPPSA members, excluding Swanton Electric, met their 1% obligation by retiring 2,967 Tier II RECs. Swanton Electric demonstrated that it retired RECs equivalent to 100% of its retail electric sales and maintains a net-metering program, which exempts Swanton Electric from compliance with Tier II requirements.¹⁹

VPPSA members serving fewer than 6,000 customers do not have a Tier III obligation in 2017 because such utilities have a delayed start for Tier III compliance.²⁰

Considering the abovementioned achievements, VPPSA members have met their 2017 RES requirements.

Washington Electric Cooperative

WEC filed a Tier III report, compliance letter, appropriate attestations, and the Commission-approved banking spreadsheet to establish that it met its 2017 RES obligations.

WEC demonstrated that it retired 68,822 RECs in 2017, which was equal to 100% of WEC's retail sales. Because WEC demonstrated that it retired RECs equivalent to 100% of its retail electric sales and continues to offer a net-metering program, it is exempt from Tier II compliance.²¹

In its Tier III Report, the Department recommended that the Commission approve 826 MWh of WEC's Tier III savings from energy transformation projects. Subsequent to the Tier III Report, in an August 24, 2018 Order, the Commission approved an additional 580 MWh of WEC's Tier III savings generated through weatherization projects. WEC applied these approved Tier III savings towards its Tier III obligation of 1,376 MWh of savings for 2017 and banked the remainder.

¹⁹ 30 V.S.A. § 8005(b).

²⁰ 30 V.S.A. § 8005(a)(3)(B).

²¹ 30 V.S.A. § 8005(b).

At an October 29, 2018, workshop held by Commission staff concerning the weatherization project savings mentioned above, Department staff requested that the Commission clarify where dollars paid for weatherization work already completed in WEC member homes may be spent. The August 24, 2018, Order addressed this issue in the second full paragraph on page six. The additional dollars may be used to conduct low-income weatherization work in the utility's service territory or in other utilities' service territories.

Based upon the foregoing, WEC has met its 2017 RES requirements.

IV. Comments

On September 28, 2018, the Commission received public comments from the Vermont Chapter of the Sierra Club on the RES compliance filings. Sierra Club noted that many if not all of the compliance filings included "electricity purchases or RECs from Hydro-Quebec in their compliance with the Tier 1 requirement of the RES," and urged the Commission to find that these kilowatt hours are not in fact renewable.²²

Sierra Club observes that 30 V.S.A. § 8002 defines renewable energy as that "energy produced using a technology that relies on a resource that is being consumed at a harvest rate at or below its natural regeneration rate."²³ Sierra Club argues that the "resource that is being consumed" is not limited to the flowing water of a hydroelectric facility. Rather, they argue that the "resource being consumed" extends to multiple aspects of a complex system, such as aquatic life, wildlife, surrounding habitats, etc.²⁴ When viewed as such, Sierra Club contends that Hydro-Quebec energy and RECs should not be considered renewable for purposes of the RES.²⁵

V. Discussion

Having reviewed the filings made by the utilities and the comments filed by the Department, I find that the utilities have all met their RES obligations for 2017. I agree with the Department that:

²² Sierra Club Comments at 1.

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.* at 2-3.

these 2017 RES compliance filings are the first of this type, and while there are improvements to be made on the reporting process, overall, the utilities did excellent work in meeting the RES requirements and delivering more renewable energy to Vermonters.²⁶

I am also persuaded by the Department that there is room for improvement going forward, particularly in the Commission's banking spreadsheet. I recommend that the Commission direct the utilities to work with the Department in expanding the existing Commission-approved banking spreadsheet into an all-encompassing reporting tool that includes all pertinent details, including retail sales, obligations, and other potential improvements. Should the Department and the utilities find that a workshop would facilitate this process, then either the Department or the utilities may petition the Commission to initiate a workshop. Should a workshop not be needed, I encourage the Department to file with the Commission any recommendations for implementing an all-encompassing reporting tool.

Further, I agree with the Department that it is the responsibility of the utilities to clearly demonstrate ownership, eligibility, and renewability if attributes are not identified in NEPOOL GIS as a qualified RES resource. I recommend that the Commission require utilities, in future compliance filings, to ensure their filings include such demonstrations of ownership, eligibility, and renewability of attributes not identified in the NEPOOL GIS.

Finally, regarding the Sierra Club's comments, I recommend that the Commission not address them in this matter. Sierra Club's comments are beyond the scope of a compliance filing case and would be better addressed in Commission's case number 18-3810-INV, which is preparing for a RES rulemaking. The Sierra Club should file its comments in case number 18-3810-INV, if it wishes the Commission to consider them.

²⁶ Department Comments at 10.

VI. Conclusion

Having reviewed the filings made by the utilities and the comments filed by the Department, I recommend that the Commission rule that the utilities have met their RES requirements for 2017 and adopt the Department's recommended process improvements.

This proposal for decision has not been circulated to the parties pursuant to 3 V.S.A. § 811 because it is not adverse to any party.

A handwritten signature in blue ink, reading "John C. Gerhard". The signature is written in a cursive style with a horizontal line underneath it.

John C. Gerhard, Esq.
Hearing Officer

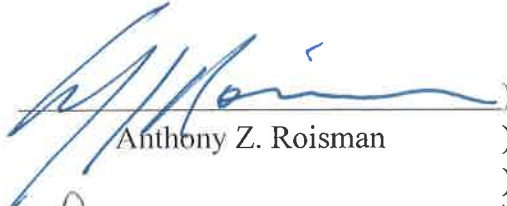
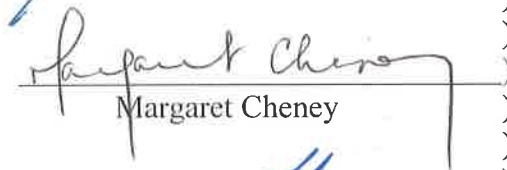

ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Vermont Public Utility Commission that:

1. We adopt the hearing officer's proposal for decision.
2. The Department or the utilities may petition the Commission to hold a workshop in which participants investigate transforming the existing Commission-approved banking spreadsheet into an all-encompassing reporting tool that includes all pertinent details for RES compliance, such as retail sales, obligations, retired RECs, banked RECs, and any other improvements. Such a petition should be filed via ePUC²⁷ into case number 18-3810-INV (Investigation into Renewable Energy Standard rulemaking).
3. Should the workshop mentioned in ordering paragraph two of this Order not be needed, then we ask the Department to file with the Commission any current recommendations for implementing an all-encompassing RES reporting tool. Such recommendations should be filed via ePUC into case number 18-3810-INV (Investigation into Renewable Energy Standard rulemaking).
4. Utilities shall ensure that any future RES compliance filings include such demonstrations of ownership, eligibility, and renewability of attributes not identified in NEPOOL GIS.
5. The Town of Stowe Electric Department shall submit an alternative compliance payment of \$10.00 to the Vermont Clean Energy Development Fund.

²⁷ ePUC is the Commission's electronic file-management system, accessible at <https://epuc.vermont.gov/>.

Dated at Montpelier, Vermont, this 10th day of December, 2018.

)	
Anthony Z. Roisman)	PUBLIC UTILITY
)	
)	
Margaret Cheney)	COMMISSION
)	
)	
Sarah Hofmann)	OF VERMONT

OFFICE OF THE CLERK

Filed: December 10, 2018

Attest: 
Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov).

Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.

PUC Case No. 17-4632-INV - SERVICE LIST

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