

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Investigation to establish an Energy Savings Account partnership pilot program, establish a methodology for evaluation, measurement, and verification of Self-Managed Energy Efficiency Program and Energy Savings Account projects, and review the Customer Credit Program.	March 26, 2019 Case No. 19-0302-INV Vermont Electric Cooperative
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COMMENTS OF VERMONT ELECTRIC COOPERATIVE, INC.

Vermont Electric Cooperative, Inc., (VEC) appreciates the opportunity to offer our comments in response to the 3/14/2019 proposed criteria for customer selection in the Energy Savings Account (ESA) pilot program. Our primary goal is to create the opportunity for businesses in VEC service territory to pursue the most cost effective options for energy efficiency. In our relatively rural and lower income service territory any opportunity to support businesses bottom line, without compromising important energy efficiency goals, is welcomed and encouraged by VEC.

To accordance with these goals, VEC recommends that:

- Requests for timelines and budgets in the RFP must be reasonable and allow for the needed planning processes for large organizations.
- Participants must not be required to leverage additional capital to participate, nor should they be given a preference for offering to do so as a part of the RFP response.
- Participants should be given as much flexibility as possible to design, implement, and measure their projects.
- At least one participant should be chosen in the “thermal” group so we can explore those opportunities as part of the pilot.
- Projects already in process with EVT should be allowed to continue during the pilot, and EEU payments made prior to pilot participation should be allowed to be allocated toward the pilot.

This document is being filed electronically using ePUC.

Thank you for the opportunity to comment. VEC looks forward to the learning opportunities created as a result of this pilot program.

Respectfully submitted,
VERMONT ELECTRIC COOPERATIVE, INC.

A handwritten signature in black ink, appearing to read "A. Cohen". The signature is written in a cursive style with a large initial "A" and a long, sweeping underline.

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