

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.	Case No. 19-0302-INV Vermont Electric Cooperative
--	--

COMMENTS OF VERMONT ELECTRIC COOPERATIVE, INC.

Vermont Electric Cooperative, Inc., (“VEC”) appreciates the opportunity to offer the following comment to the Public Utility Commission regarding the Proposal for Decisions (“PFD”) issued by the Hearing Officer on April 22, 2019. Our primary interest is to ensure the program creates the opportunity for businesses in VEC service territory to pursue the most cost effective options for energy efficiency and that participants should be given as much flexibility as possible to design, implement, and measure their projects in this pilot program. We therefore support new approaches and encourage the Commission to structure the pilot differently from the existing ESA program to facilitate increased engagement and participation.

We suggest a change to Section G of the PFD that recommends using the same program design approach for eligibility of expense reimbursement. We believe this approach will be overly restrictive and would not allow participants the full range of opportunity anticipated by statute such as in the Energy Savings Account Partnership Pilot section of the Act, section (b)(3) which established the types of projects for eligible reimbursement:

“Notwithstanding any contrary provision of 30 V.S.A. § 209, the Customer EEC Funds may be used for one or more of the following: electric energy efficiency, thermal energy and process-fuel efficiency for unregulated fuels, energy productivity measures, demand management, and energy storage that provides benefits to the customer and its interconnecting utility. In addition, for a customer who is a manufacturer and whose purchases of regulated fuel exceeded 600,000 thousand cubic feet (MCF) in 2017, the Funds may be used for thermal energy and process-fuel efficiency for regulated fuels and

This document is being filed electronically using ePUC.

any regulated fuel savings attributable to investment of Customer EEC Funds through the pilot program shall be counted towards EVT's performance indicators. EVT may allocate the cost of the pilot across regulated and unregulated fuel funding sources in a manner that avoids or reduces the need to adjust savings goals approved by the Commission".

We believe participants should we allowed to recover 100 percent of its ESA account balance as specific in statute and that may not be facilitated by utilizing the existing reimbursement program design. Thank you for the opportunity to comment.

Respectfully submitted,
VERMONT ELECTRIC COOPERATIVE, INC.

A handwritten signature in black ink, appearing to read "A. Cohen".

Andrea Cohen, Manager
Government Affairs & Member Relations
Vermont Electric Cooperative, Inc.
42 Wescom Road
Johnson, Vermont 05656
802-696-9036
acohen@vermontelectric.coop