

ASSOCIATED INDUSTRIES OF VERMONT

REPRESENTING THE VERMONT INDUSTRIAL AND BUSINESS COMMUNITY SINCE 1920

May 3, 2019

Ms. Mary Jo Krolewski
Hearing Officer
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620

Re: Case No. 19-0302-INV, Proposal for Decision -- Energy Savings Account Pilot Program

Dear Ms. Krolewski:

AIV appreciates the opportunity to provide comments on the above referenced proposal for decision.

AIV is concerned about the implications of the proposal's recommendation in Section G, Scope of Allowed Activities and Program Design, to, "with respect to expenses eligible for reimbursement under the ESA pilot program, . . . adopt the program design approach developed for electric energy efficiency efforts under the existing ESA pilot program".

The purpose of Act 150 and the provisions outlining the directives and criteria in the Act are intended to provide for significant flexibility and greater value and utility for qualifying customers relative to what is currently allowed under existing ESA rules.

With regard to Section G and other relevant sections of the proposal, the Commission should ensure that customers are able to avail themselves of the widest possible range of qualifying projects, maximum cost recovery, and control over their Energy Management Plans as allowed and directed under Act 150, not as might be restricted by adhering too closely to the existing ESA program.

This will best allow the pilot program to demonstrate benefits for customers that are not available under the existing program, as well as broader benefits to Vermont through economic goals including job creation, job retention, and capital investment as addressed in Act 150.

Thank you for your consideration of these comments, and we look forward to continuing to work toward the success of this process.

Sincerely,



William Driscoll
Vice President