



December 13, 2019

Judith Whitney, Clerk
Vermont Public Utility Commission

Re: Case No. 19-3272-PET Petition to Open Demand
Resource Proceedings for Performance Years 2021-2023

Dear Ms. Whitney:

On November 14, 2019 the Vermont Public Utility Commission ("Commission") issued an order in establishing a schedule for the initial phase of the Demand Resource Proceeding ("DRP") for performance years 2021 to 2023. Pursuant to that order, energy efficiency utilities ("EEU") are to file DRP proposals with pre-filed testimony by December 20, 2019. With this letter, and for the reasons explained below, Vermont Gas Systems ("VGS") requests an extension of that due date to January 24, 2020. VGS recognizes that the Commission currently has a workshop to review EEU DRP plans scheduled for January 13, 2020. We respectfully suggest that the workshop could proceed as planned for any EEU who files their DRP by December 20 and a second workshop in early February for any EEU who files the DRP proposal on January 24. We believe that even with this extension and delayed workshop, the remaining work to approve the DRP can be accomplished in the required timeframe.

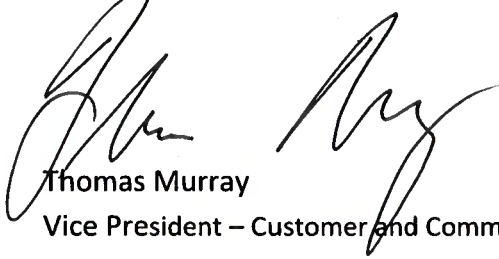
As the Commission may be aware, last month VGS announced an ambitious goal to significantly reduce greenhouse gases by 2030. A significant increase in energy efficiency, particularly home weatherizations, is a cornerstone of that goal. Subsequently VGS requested that Cadmus and GDS Associates, the consultants the Department of Public Service ("Department") retained to conduct the efficiency potential study for the EEUs, run some additional scenarios reflecting VGS' planned efficiency expansion. Those scenarios were just recently received and VGS needs additional time to analyze the results.

Further, while the draft DRP VGS circulated to stakeholders, including the Department, on November 27, 2019 contained some high-level information on VGS' expanded efficiency thinking, the Department has noted some areas where additional information would be helpful. The final DRP proposal may not be able to address all the details requested by the Department, but the additional time will allow us to incorporate what we can.

Finally, the holidays and staff's availability are also factors impacting the requested extension to January 24, 2020.

We appreciate the Commission's consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Murray', is written over the printed name and title.

Thomas Murray

Vice President – Customer and Communities