

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 19-2956-INV

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Investigation pursuant to Act 62 into the creation of an all-fuels energy efficiency program, expansion of energy efficiency utility programs and services, and funding options for those programs	
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Order entered: 02/21/2020

**PROCEDURAL ORDER SEEKING INFORMATION AND SCHEDULING RECOMMENDATIONS**

On January 15, 2020, the Vermont Public Utility Commission issued its Act 62 Preliminary Report. The Commission now seeks information and recommendations to inform the remainder of this investigation and the final report, due January 15, 2021.

Act 62 directs the Commission to consider and address many topics regarding energy efficiency. I request that participants address each of the following topics, drawn directly from Act 62. If a participant believes that a particular topic can be addressed using existing information previously filed in this proceeding, please identify that information as responsive to a particular question. If a participant believes that a particular topic can be addressed through paper filings, and without additional process or information gathering, please provide a suggested filing schedule to address that topic. If a participant believes that a particular topic would benefit from additional information, research, discussion, or process, the participant is requested to please identify the topic(s) and provide suggestions for further process. When addressing a topic, please refer the Commission to any relevant materials that would better inform the Commission's considerations.

1. Should the Commission recommend the creation of an all-fuels energy efficiency program? As part of any recommendation in response to this question, please address the following.
  - a. Whether one or more entities should be appointed to provide for the coordinated development, implementation, and monitoring of efficiency, conservation, and related programs and services as to all regulated fuels, unregulated fuels, and fossil fuels as defined in 30 V.S.A. § 209(e)(3).

- b. The best model to create an all-fuels efficiency program, including whether to appoint one or more new entities, or to appoint one or more existing energy efficiency or distribution utilities to provide for the coordinated development, implementation, and monitoring of efficiency, conservation, and related programs and services as to all regulated fuels, unregulated fuels, and fossil fuels as defined in 30 V.S.A. § 209(e)(3).
  - c. How would the entities identified above work together to provide for the coordinated development, implementation, and monitoring of efficiency, conservation, and related programs and services as to all regulated fuels, unregulated fuels, and fossil fuels as defined in 30 V.S.A. § 209(e)(3).
  - d. Whether and how distribution utilities that are currently providing programs and services pursuant to 30 V.S.A. § 8005(a)(3) fit into the recommended all-fuels energy efficiency program.
  - e. Whether and how existing Energy Efficiency Utility Orders of Appointment issued by the Public Utility Commission would need to be altered or revoked in order to facilitate an all-fuels energy efficiency program.
  - f. Whether and what statutory changes would be necessary to facilitate the creation of an all-fuels energy efficiency program.
2. Whether and how the appointment of an all-fuels efficiency entity or entities to deliver an all-fuels energy efficiency and conservation program would accelerate progress toward the State goals set forth in 10 V.S.A. §§ 578, 580, and 581 while continuing to further the objectives set forth in 30 V.S.A. § 209(d)(3)(B).
3. Whether the appointment of an all-fuels efficiency entity or entities to deliver an all-fuels energy efficiency and conservation program would accelerate progress toward the recommendations contained in the State Comprehensive Energy Plan while continuing to further the objectives set forth in 30 V.S.A. § 209(d)(3)(B).
4. Whether the appointment of an all-fuels efficiency entity or entities to deliver an all-fuels energy efficiency and conservation program would further the objectives set forth in 30 V.S.A. § 8005(a)(3) while continuing to further the objectives set forth in 30 V.S.A. § 209(d)(3)(B).

5. How to: develop and utilize a full cost-benefit, full life cycle accounting method for analyzing energy policy and programs, and employ metrics that assess positive and negative externalities, including health impacts on individuals and the public in the context of an all-fuels energy efficiency and conservation program.
6. Whether the entities identified above in 1(a) and 1(b) should incorporate additional technologies, services, and strategies, including:
  - a. demand response;
  - b. flexible load management;
  - c. energy storage;
  - d. reduction of fossil fuel use through electrification and the use of renewable fuels and energy; and
  - e. building shell improvement and weatherization.
7. How best to provide consistent, adequate, and equitable funding for efficiency, conservation, and related programs and services, including:
  - a. How to use existing or new funding sources to better support existing efficiency and conservation programs and services;
  - b. How to use existing or new funding sources to provide sufficient funds to implement and support the recommendations provided above regarding the creation of an all-fuels energy efficiency program.
8. Whether Thermal Renewable Energy Certificates (T-RECs) can be used to provide for the proper valuation of thermal load reduction investments, to create a revenue stream to support thermal load reduction work, and to evaluate the role of such work within the overall suite of energy programs designed to reduce greenhouse gas (GHG) emissions and generate savings for Vermonters.

In addition to the items enumerated above drawn from Act 62, the Commission seeks information and recommendations related to the following topics:

- All-fuels energy efficiency resource standards or goals;
- So-called “white certificates” or energy savings certificates, and
- Pay-as-you-save (“PAYS”) programs/tariffs.

In order to inform its consideration of different program funding options, the Commission also seeks recommendations and information regarding the economic impacts of the different all-fuels efficiency funding options. Participants are requested to address whether the Commission should consider contracting with an independent expert to address this topic and, if so, how to pay for the expert's services.

Participants are requested to file their information and substantive and procedural recommendations by no later than March 13, 2020. All procedural recommendations should reflect that, in order to deliver its final report by January 15, 2021, the Commission's information gathering must conclude by the end of October 2020.

**SO ORDERED.**

Dated at Montpelier, Vermont, this 21st day of February, 2020.



Thomas Knauer  
Hearing Officer

OFFICE OF THE CLERK

Filed: February 21, 2020

Attest: Judith C. Whitney  
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](mailto:puc.clerk@vermont.gov))*

PUC Case No. 19-2956-INV - SERVICE LIST

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