STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 19-3272-PET

Petition of Vermont Department of Public	)
Service to open a proceeding to initiate an	)
EEU Demand Resource Plan proceeding for	)
the 2021 – 2023 performance period	)

MOTION OF EFFICIENCY VERMONT TO AMEND ITS
APPROVED 2021-2023 DEMAND RESOURCE PLAN
TO ADDRESS PROPOSED AMENDMENTS TO ALLOW
THE USE OF ENERGY EFFICIENCY CHARGE FUNDS FOR
GREENHOUSE GAS EMISSIONS REDUCTION PROGRAMS

Now Comes Efficiency Vermont[1] and requests that the Vermont Public Utility Commission (the "Commission") approve amendments to its 2021-2023 Demand Resource Plan ("DRP") to allow Efficiency Vermont to use funding raised via the Energy Efficiency Charge ("EEC") for the implementation of greenhouse gas emissions reduction programs as authorized by the Vermont General Assembly under Act No. 151.[2] In support of this Motion Efficiency Vermont represents as follow:

1. Efficiency Vermont is an entity appointed to provide electric energy efficiency and conservation programs and measures statewide pursuant to 30 V.S.A. § 209(d)(2)(A) for calendar years 2021–2023.

2. By Order issued October 22, 2020 in Case No. 19-3272-PET the Commission approved Efficiency Vermont's 2021-2023 DRP.

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[1] Efficiency Vermont is the statewide Energy Efficiency Utility ("EEU") administered pursuant to an Order of Appointment by the Vermont Energy Investment Corporation ("VEIC"). *See* Case No. 18-2867-INV, *VEIC Order of Appointment*, dated November 26, 2019.

[2] Act No. 151 refers to An act relating to energy efficiency entities and programs to reduce greenhouse gas emissions in the thermal energy and transportation sectors as enacted by the Vermont General Assembly and signed into law on September 23, 2020.

3. Efficiency Vermont's 2021-2023 DRP was determined by the Commission pursuant to 30 V.S.A. § 209(d)(3)(B).

4. Efficiency Vermont's total approved electric resource acquisition ("RA") budget for the 2021–2023 performance period does not exceed its total electric RA budget for the 2018–2020 performance period.

5. Pursuant to Act No. 151, the Commission is granted jurisdiction to authorize an EEU whose approved RA budget for the 2021–2023 performance period does not exceed its 2018–2020 performance period RA budget to spend a portion of its electric RA budget, in an amount to be determined by the Commission but not to exceed $2,000,000.00 per year, on programs, measures, and services that reduce greenhouse gas emissions in the thermal energy or transportation sectors.[3]

6. In accordance with the jurisdiction granted to the Commission pursuant to Act No.151, Efficiency Vermont has developed proposed amendments to its approved DRP in order to include programs, measures, and services that: (1) reduce greenhouse gas emissions in the thermal energy or transportation sectors, or both; (2) have a nexus with electricity usage; and (3) are additive and complementary to, and do not replace or compete with, electric utility energy transformation projects implemented pursuant to 30 V.S.A. § 8005(a)(3) such that they result in the largest possible greenhouse gas emissions reductions in a cost-effective manner.

7. Efficiency Vermont's proposed amendments to the programs, services and measures authorized in its 2021-2023 DRP are described in the prefiled testimony and exhibits included with the submission of this Motion.

[3] *See* Act No. 151 at Section 1(b).

8. Efficiency Vermont's proposed DRP amendment was developed in consultation with relevant State agencies and the Vermont Department of Public Service (the "Department"), and are not duplicative or in competition with programs delivered by said agencies or the Department.

9. The DRP amendment now proposed by Efficiency Vermont will be delivered on a statewide basis. However, if any of these funds are used for services specific to a retail electricity provider, the funds used for services to each retail electricity provider for the calendar years 2021–2023 shall be reasonably proportionate to the EEC funding collected in that territory.

10. As described in Efficiency Vermont's supporting testimony and exhibits, the amendment proposed to its approved DRP will be provided in cooperation with the retail electricity providers located in Efficiency Vermont's service area.

11. As required under Section 1(c)(1) of Act No. 151, Efficiency Vermont will not claim any savings and reductions in fossil fuel consumption or in greenhouse gas emissions by the customers of any retail electricity provider resulting from the program, measure, or service if said retail electricity provider elects to offer the program, measure, or service pursuant to 30 V.S.A. § 8005(a)(3) unless the entity and provider agree upon how savings and reductions should be accounted for, apportioned, and claimed.

12. Efficiency Vermont proposes that its amended 2021-2023 DRP be subject to the monitoring and evaluation terms and conditions of its approved DRP including the strategies developed to measure the effectiveness of the programs, measures, and services in relation to the Efficiency Vermont's Demand Resources Plan proceeding.

13. In support of this Motion Efficiency Vermont files the following supporting testimony and exhibits of its witnesses:

Witness	Subject of Supplemental Testimony
David Westman	Provides an overview of the proposed DRP amendment.
Carol Weston	Offers a description of the proposed amended Efficiency Vermont programs, service and measures to be offered to customer during the 2021-2023 DRP performance period.
Jay Pilliod and James E. Massie, III	Sponsors updated portfolio modeling and performance metrics associated with the proposed DRP amendment.

REQUEST FOR RELIEF

WHEREFORE, Efficiency Vermont respectfully requests that the Commission:

(1) Convene such proceedings as are necessary or appropriate to consider Efficiency Vermont's proposed 2021-2023 DRP amendment;

(2) Make such findings of fact and conclusions of law as are required under 30 V.S.A. § 209 and Act No. 151;

(3) Find that the proposed amendment to Efficiency Vermont's 2021-2023 DRP will be beneficial to the ratepayers of the companies where Efficiency Vermont provides EEU services;

(4) Authorize Efficiency Vermont to undertake the actions as described herein and in its testimony and exhibits; and

(5) Issue an Order amending Efficiency Vermont's 2021-2023 DRP in accordance with this Motion and Efficiency Vermont's supporting materials.

DATED at WINOOSKI, VERMONT this twelfth day of February 2021.

RESPECTFULLY SUBMITTED,
EFFICIENCY VERMONT

By:_/S/__________________________

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cc: Parties of Record (via ePUC)