



July 25, 2023

Holly R. Anderson
Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

Re: Proceeding to design the potential Clean Heat Standard, Case No. 23-2220-RULE and Investigation into the Clean Heat Standard Default Delivery Agent Costs and Quantities, Case No. 23-2221-INV

Dear Ms. Anderson,

In response to the Public Utility Commission's ("Commission's") request for comments within its June 30, 2023, opening orders in Case No. 23-2220-RULE and Case No. 23-2221-INV, Burlington Electric Department ("BED") provides comments under the copied and italicized Commission text below.

Case No. 23-2220-INV

First, we solicit feedback on the efficiency and transparency of using this proceeding to centralize information related to the potential Clean Heat Standard.

Using this proceeding to efficiently and transparently centralize information related to the Clean Heat Standard seems like a reasonable approach.

Second, considering the array of issues to be covered in these proceedings as required by Act 18, we seek feedback on what other elements of this process (aside from the topics covered in 23-2221-INV and the appointment of a Default Delivery Agent, which we anticipate will be carried out in another distinct proceeding) may need to be considered in a separate proceeding.

BED does not have substantive comments at this time on whether any additional items may need to be considered in a separate proceeding. BED will follow the case and will be available to provide any input that may be useful.

Third, we seek input on which individuals and organizations should be contacted as part of our effort to recruit members for the Equity Advisory Group and the Technical Advisory Group.

BED would be happy to serve on the Technical Advisory Group if its experience from participation in the Tier Three Technical Advisory Group would be useful in development of the potential Clean

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Heat Standard. BED is also happy to serve on the Equity Advisory Group if BED's experience in providing services to a diverse population in the largest municipality in Vermont would be useful to the group.

Case No. 23-2221-INV

We request comments from stakeholders and members of the public as to the scope and process to be followed in this proceeding. In particular, we request comments on whether there are other matters from Act 18 that are appropriately addressed within the scope of this proceeding rather than in Case No. 23-2220-RULE, or perhaps another proceeding.

As mentioned above, BED does not have substantive comments at this time on whether any additional items may need to be considered in a separate proceeding. BED will follow the case and will be available to provide any input that may be useful.

We also request comments on whether we should follow any contested-case-like procedures for this proceeding.

Following contested-case-like procedures for this proceeding seems like it will maximize transparency, equal treatment, and clarity of process for all stakeholders.

Thank you for the opportunity to provide comments in these cases and please feel free to contact us if you have any questions.

Sincerely,



Amber Widmayer
Regulatory Specialist
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