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August 3, 2023

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05620-2701

Re: Case No. 23-2220-RULE and Case No 23-2221-INV.

Dear Mrs. Anderson:

The Town of Stowe Electric Department ('SED') files this comment in response to the Public Utility Commission's ("Commission") request for comments in both opening orders in Case No. 23-2220-RULE and Case No. 23-2221-INV.

Case No. 23-2220-RULE.

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

SED agrees with Burlington Electric Department's comment that one docket focused on designing the 'Clean Heat Standard' is the best approach. The Vermont distribution utilities are focused on how the Clean Heat Standard might impact their ratepayers and the Renewable Energy Standard Tier 3 credits and rebates, which can be accomplished in the existing dockets.

2. 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.

SED looks forward to learning how the Clean Heat Standard and the Clean Heat Credits accounting system might impact credits accrued under Tier 3 of the Vermont Renewable Energy Standard. See Act No. 18 (S.5) §(k)(1), pg. 26.

SED experienced strong success in the past two years in our Tier 3 program through our partnership with Efficiency Vermont (EVT). This has expanded SED's rebate offerings, increased the volume of rebates provided and credits earned, and improved communications with SED's ratepayers. SED hopes that any Clean Heat Credit program will enhance rebate offerings that already exist.

SED is interested to learn more about how the Clean Heat Standard and Clean Heat Credits will be communicated to utility ratepayers. EVT and the utilities have developed a cohesive marketing and advertising strategy around Tier 3 rebates. SED learned from the first iteration of the State of Vermont electric vehicle dealer incentive program that confusion existed among SED ratepayers seeking the dealer

incentive and the SED Tier 3 incentive. Any Clean Heat Credit program should fit within the existing marketing and advertising for Tier 3 rebates.

SED would like to know if the Clean Heat Standard and Credits will have the same Tier 3 equitable opportunity aspirational target for low-income spending, and how renters and those on fixed-incomes could be impacted by this new program. A concern is that increasing rebate offerings for moderate- and high-income earners without a more lucrative rebate offering for income-eligible Vermonters will further alienate this demographic from participating in beneficial electrification measures.

3, 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.

SED suggests, in addition to those stakeholders already identified by the Commission, providing the opportunity for the following entities to participate directly in the Equity Advisory Group and Technical Advisory Group: AARP, each Regional Planning Commission, the League of Cities and Towns, and municipal utilities.

Case No. 23-2221-INV

1. 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.

SED does not advocate opening additional proceedings outside of Case No. 23-2220-RULE and Case No. 23-2221-INV.

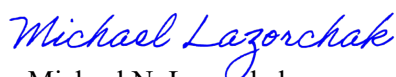
SED is interested to know if the study conducted by the Vermont Department of Public Service under this docket will include updated information on the energy burden experienced by Vermonters and updated information presented by Efficiency Vermont's 'Vermont's Total Energy Burden by Town', available at <https://www.efficiencyvermont.com/news-blog/whitepapers/vermont-energy-burden>. Updating the 2019 Energy Burden Reports with data that includes COVID-19 pandemic economic data is critical to understanding the financial impact that the Clean Heat Standard and the Vermont Renewable Energy Standard might have on low-income and moderate-income Vermonters.

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

SED agrees with Burlington Electric Department and Green Mountain Power - the Commission should follow contested case procedures for this proceeding.

If you have any questions, please contact me at 802-253-7215 or mlazorchak@stoweelectric.com.

Respectfully,



Michael N. Lazorchak
Manager Regulatory
Affairs Stowe Electric
Department