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December 7, 2016

Ms. Judith Whitney, Clerk
Vermont Public Service Board
112 State St. Drawer 20
Montpelier, VT 05620-2701

Re: CLF Motion to Alter

Dear Ms. Whitney:

Pursuant to Public Service Board (“Board”) Order dated 11/17/16 in EEU-2016-03, Vermont Energy Investment Corporation (“VEIC”) offers the following comments.

On November 8, 2016, Conservation Law Foundation (“CLF”) filed a motion to alter or amend the Board’s Order of October 27, 2016 excluding reference to statutory restriction on the use of Energy Efficiency Utility funds (“EEC”) for transportation or thermal end uses, or in the alternative to provide relief from operation of the Order regarding stated limits that “the use of EEC funds for investments in such end uses [electrification of transportation and thermal loads] is subject to statutory restrictions...”.¹ Further, CLF posited that the statutory and policy goals that energy efficiency investments are meant to achieve include reducing greenhouse gas emissions (GHGs), and that therefore the Board is empowered to evaluate how transportation and thermal end uses can use electricity to reduce GHGs (and improve efficiency), save money, and be part of the integrated provision of energy supply and services.

VEIC submits this letter in support of CLF’s motion to alter, and believes that CLF has raised issues of importance regarding electrification and the realities of energy transformation. VEIC also agrees that further investigation is warranted to better understand the impact of how these energy end-uses may affect the Energy Efficiency Utility (“EEU”) and EEU services in the future.

VEIC appreciates the opportunity to comment on CLF’s motion. If you have questions concerning the above please do not hesitate to contact me. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Westman", is written over a light blue horizontal line.

David C. Westman

¹ EEU-2016-03 Board Order of 10/27/16 at 13