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December 15, 2023

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

Re: Case No. 23-2221-INV, Investigation into the Clean Heat Standard Default Delivery Agent Costs and Quantities

EFFICIENCY VERMONT REQUEST TO EXTEND DEADLINE

Dear Ms. Anderson,

On November 6, 2023 comments were filed by the Vermont Public Service Department, and separately by Efficiency Vermont, VGS, BED, VECAN, VPIRG, and CLF ("Joint Responders") on a proposed schedule in the above-referenced proceeding. On December 8, 2023 the Vermont Public Utilities Commission ("PUC" or "Commission") issued a scheduling order that was based in part on the comments provided in the November schedule proposals. On December 11, 2023 the Commission issued an Order soliciting comments addressing the possible number, geographic scope, obligations, and responsibilities of Clean Heat Standard default delivery agents ("DDAs"). Comments were directed to be filed before or on December 22nd 2023.

Given the complexity of this topic, and the need to thoroughly address all of the Commission's questions, Efficiency Vermont requests an additional period of time to develop its comments and recommendations on the number, scope, and responsibilities of the DDA. Efficiency Vermont respectfully requests opportunity to file comments on this matter by no later than January 19, 2024, and to hold a workshop the following week.

As a signatory party to the Joint Responder's letter, Efficiency Vermont appreciates the Commission's willingness to consider and enact a schedule that is based in part on the recommendations provided by the Joint Responders. The identification of DDA Responsibilities was recommended by the Joint Responders as Track 1, Task 1 in the DDA proceeding, and is a critical first step towards the eventual appointment of one or more DDAs. Efficiency Vermont believes it is critical for the comments solicited by the Commission on this topic to be complete, and to be a fair representation of the party's positions. The joint responders suggested this task could take upwards of three months (from November 2023 through January 2024) to resolve.

Therefore, for the Commission to be assured of a complete and thorough record, Efficiency Vermont requests a reasonable period of time to develop, review, and share among stakeholders the recommendations and comments it would file under the Commission's request.

Efficiency Vermont requests expedited review of this request given the timeliness of comments due under the Commission's current schedule. Please do not hesitate to contact me with any questions.

Sincerely,



David C. Westman

Director, Regulatory and State Agency Affairs