

September 6, 2024

Via ePUC

Ms. Holly Anderson, Clerk
Vermont Public Utilities Commission
112 State Street
Montpelier, Vermont 05620-2701

Re: **23-2221-INV**, Investigation into the Clean Heat Standard Default Delivery Agent Costs and Quantities, EAG Memo on DDA RFP Recommendations

Dear Clerk Anderson,

The Equity Advisory Group (EAG) for the Clean Heat Standard (CHS) submits the following memo on the topic of DDA RFP Recommendations.

The Default Delivery Agent (DDA) will be an important resource for serving many of the populations that are expected to be disproportionately impacted by increased costs related to the Clean Heat Standard. The EAG encourages the Commission to ask that proposals for the DDA include a description of the entity's experience with, and plan for serving, the following groups:

- Renters
- Low-income households
- Moderate-income households
 - Does the organization plan to offer financing or connect households to financing opportunities to encourage increased installation of clean heat measures?
- Manufactured homes
- Households living in older homes
 - Does the organization have experience working with contractors on installed measures?
 - Does the organization have a plan for serving homes in need of significant repair, and connecting those households with available resources supporting enabling upgrades?
- Households with Limited English Proficiency (LEP)
 - Does the organization have a Language Access Plan (LAP) or other plan to provide translated materials and/or translated materials to serve individuals with LEP?
 - Does the organization have experience in community outreach, particularly among First Generation or immigrant communities?
- Vermonters of color
- Small businesses and industrial and commercial entities

Since the Commission is permitted under Act 18 to select more than one DDA, it may be possible that the DDAs will be sector-specific and not all applicants would have a plan to serve

all these demographic groups. However, in this case, the Commission should carefully review applicants to ensure that the selected DDAs jointly have the capacity and experience to serve all the impacted populations described above.

To support these groups and an equitable implementation of the CHS overall, EAG encourages the Commission to require that DDA(s) have a DEI Plan or equivalent organizational framework. Such a plan should include clearly defined goals and actions that increase diversity, equity, and inclusion in all areas of the organization and its work.

Finally, although Act 18 requires that the DDA offer statewide services, the Commission should review applicants to ensure that the entity has sufficient experience and capacity to effectively serve the entire state of Vermont, including rural areas that have historically experienced underinvestment.

Thank you for your consideration.

Sincerely,

/s/ Benjamin Bolaski

On behalf of the Clean Heat Standard Equity Advisory Group