

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 24-1493-PET

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| Efficiency Vermont request for a proceeding to review the effects of unanticipated Energy Efficiency Utility funding on quantifiable performance indicators, fees, and services, including the 2024-2026 Demand Resources Plan |  |
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DEPARTMENT OF PUBLIC SERVICE COMMENTS ON  
EFFICIENCY VERMONT DEMAND RESOURCE PLAN  
PROPOSED AMENDMENT

This case concerns Efficiency Vermont’s request for a proceeding to review the effects of unanticipated Energy Efficiency Utility (“EEU”) funding on its quantifiable performance indicators (“QPIs”), fees, and services and to review related amendments to the Demand Resources Plan (“DRP”) for the 2024-2026 performance period. This proceeding also addresses other unrelated amendments to Efficiency Vermont’s DRP approved in Case No. 22- 2954-PET, including: (1) changes to the TEPF funding forecast, modeling results, and performance metrics; (2) revisions to the scope of the new construction program; and (3) updates to reflect current effects of the Energy Savings Account program.

On September 13, 2024, Efficiency Vermont filed proposed DRP amendments and supporting materials. To develop the proposed DRP amendments, Efficiency Vermont represented that it consulted with the Vermont Department of Public Service (“Department”) to formulate the proposal. On September 20, 2024 Efficiency Vermont stated that it is not aware of any non-consensus DRP amendment elements and was awaiting feedback from the Department. Efficiency Vermont proposed that the schedule be revised to give the Department additional time to determine if there are any non-consensus elements. On October 8, 2024 the Public Utility

Commission (“Commission”) issued a scheduling order including a time frame for informal discovery on Efficiency Vermont’s proposed DRP amendments and an October 18, 2024 deadline for parties to file notice on consensus DRP amendment elements, comments and/or supporting testimony and exhibits on consensus DRP amendment elements.

At this time the Department does not contest any elements of the amendment proposed by Efficiency Vermont. The Department concurs with Witnesses Westman’s, Pilliod’s, and Roe’s testimonies which indicate Efficiency Vermont engaged with the Department to discuss a variety of aspects of the proposed amendment including but not limited to a TEPF budget increase of \$2.5M which preserves a substantial portion of available revenue to support activities in the next performance period<sup>1</sup> and budget resources proposed to be approved and set aside now for a future TEPF funded workforce development initiative to be further specified as part of Efficiency Vermont’s 2025 Triennial Plan Update.<sup>2</sup>

Further, the Department served informal discovery questions on Efficiency Vermont on September 20, 2024 and received responses shortly after.<sup>3</sup> After receiving discovery responses the Department met with Efficiency Vermont to clarify elements of the responses related to proposed increases in Low-income spending, increase in Low-income sector share, and proposed increase in the portfolio Benefit Cost Ratio (“BCR”). As a result of this inquiry, the Department concludes, that when compared to the base case, the proposed amendment invests more resources and proposes to complete more projects in the Low-income sector. This is due to rebalancing within the proposed amendment to complete as many as 98 additional Low-income

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1 Roe pf. at Page 6.

2 Westman pf. at 15.

3 The Department’s questions and Efficiency Vermont’s responses are included with this filing as Attachment A.

projects given the availability of federal ARPA funding which is focused on the Moderate-income sector and managed separately from TEPF initiatives. Finally, the Department views the proposal's slightly greater cost per unit MMBTU saved and reduction in moderate/market rate projects as reasonable tradeoffs given the circumstances and the countervailing improved BCR ensuring incremental value.

In conclusion, the Department has not identified any areas of Efficiency Vermont's proposal that it disagrees with and believes the proposal presents a reasonable set of benefits and tradeoffs. Therefore, the Department recommends the Commission approve Efficiency Vermont's proposed DRP Amendments without further process.

Dated at Montpelier, Vermont this 17<sup>th</sup> day of October 2024.

VERMONT DEPARTMENT OF PUBLIC SERVICE

By: /s/ Megan Ludwig  
Megan Ludwig, Special Counsel  
112 State Street  
Montpelier, VT 05620-2601  
(802) 828-4014  
[megan.ludwig@vermont.gov](mailto:megan.ludwig@vermont.gov)