

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 24-1493-PET

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)

EFFICIENCY VERMONT'S RESPONSE TO
THE INFORMAL INFORMATION REQUESTS OF
THE VERMONT DEPARTMENT OF PUBLIC SERVICE

October 4, 2024

EFFICIENCY VERMONT’S RESPONSE TO THE INFORMAL INFORMATION
REQUESTS OF THE VERMONT DEPARTMENT OF PUBLIC SERVICE

GENERAL OBJECTIONS

The following general objections of Efficiency Vermont are incorporated by reference in its responses to each informal information request whether or not an objection is stated in any particular response. Any response provided below is given without waiver of any objection, whether or not an objection is stated.

1. Efficiency Vermont objects to each Request on the grounds and to the extent that it seeks responses that are subject to any or all of the following privileges: (i) the attorney-client privilege; (ii) trial preparation privilege; (iii) executive privilege, or that are otherwise privileged or protected from disclosure.

2. Efficiency Vermont objects to the Requests as overbroad and unduly burdensome on the grounds and to the extent they call for responses that are neither relevant to the subject matter of the pending action, nor reasonably calculated to lead to the discovery of admissible evidence.

3. Efficiency Vermont objects to the Requests on the grounds and to the extent that they are overbroad, unduly burdensome and oppressive, purport to impose obligations on Efficiency Vermont that are beyond the scope of the Public Utility Commission (the “Commission” or “PUC”) Rules, including without implied limitation Rule 2.000, or other applicable law, cannot be produced without undue burden to Efficiency Vermont and/or that require an unreasonable investigation on the part of Efficiency Vermont in order to be produced, or purport to require Efficiency Vermont to create documents responsive to any such Requests.

4. Efficiency Vermont objects to the Requests to the extent that they seek the production of documents and information already in the possession of, or publicly available to, or readily obtainable to the Vermont Department of Public Service (the “Department” or “DPS”) and its counsel, on the ground that with respect to such production, the DPS’s Requests are thereby rendered unduly burdensome.

5. Efficiency Vermont objects to the Requests to the extent that they seek the production of documents and information in the possession, custody or control of entities other than Efficiency Vermont, on the ground that such demanded production is beyond the scope of the Commission Rules or other applicable rules and laws.

6. Efficiency Vermont expressly reserves the right to supplement, clarify, revise or correct any or all of the responses herein at any time. By making any response to the Requests, Efficiency Vermont does not waive, and hereby expressly reserves, the right to assert any and all objections as to the admissibility of such responses into evidence at the time of trial of this action, or in any other proceeding, on any and all grounds, including but not limited to, competency, relevance, materiality and privilege. Further, Efficiency Vermont provides the responses herein without in any manner, express or implied, admitting that the items in the Requests, or in any response thereto, are relevant or material to the subject matter of this proceeding.

EFFICIENCY VERMONT’S RESPONSE TO THE INFORMAL INFORMATION
REQUESTS OF THE VERMONT DEPARTMENT OF PUBLIC SERVICE

Questions for David Westman

- Q1. Please provide the currently approved Efficiency Vermont budgets in the same format as the proposed amendments contained in exhibit titled “24-1493-PET - 2024.09.13 Exhibit EVT-DW-2”. For each line item please quantify the variance between current and proposed values.
- a. Please provide backup calculations for electric non-RA, TEPF DSS and compensation budget category changes driven by proposed TEPF budget increase.
- A1. Provided with this response as Attachment EVT-Q1-*Discovery response budgets.xlsx*, is a spreadsheet that includes: one tab reflecting the proposed budgets in Case No. 24-1493-PET Exhibit EVT-DW-2 (“Amendment 2 budgets”), one tab reflecting the PUC-approved budgets in Case No. 22-2954-PET (“PUC baseline budgets”), and one tab that shows the differences between the two sets of budget tables. While reviewing this information, Efficiency Vermont found an error in the Electric RA (resource acquisition) amounts for 2027 through 2043 filed as Exhibit EVT-DW-2 in this case. Efficiency Vermont will file with the Commission a corrected version of Exhibit EVT-DW-2 that includes the Amendment 2 budgets, which will reflect that there are no changes to the PUC baseline budgets for years 2027 through 2043.

Regarding years 2024 through 2026, the only changes to the electric RA budgets result from: the addition of ESA Pilot carryover,¹ electric DSS (development and support services) reductions based on increased TEPF (thermal energy and process fuels) portions of DSS budgets, and a small reduction in operations fees and performance award associated with the reduction in the electric portion of DSS funding. The TEPF budget differences between the Amendment 2 budgets and the PUC baseline budgets only impact 2024 through 2026. The changes include an increase in the TEPF RA budget and associated increases in the TEPF portion of DSS budgets, operations fees, and performance award.

¹ There are no operations fees or performance award associated with the ESA Pilot funding.

- a. Attachment EVT-Q1-*Discovery response budgets.xlsx*, includes calculations for the EEC (energy efficiency charge) and TEPF split for DSS funding. The summary of these differences is shown in the table below.

Summary of DSS funding differences	% EEC	% TEPF	\$ Electric	\$ TEPF
Amendment 2 budget	81.7%	18.3%	\$9,259,860	\$2,069,240
PUC baseline budget	82.9%	17.1%	\$9,395,845	\$1,933,255
Difference	-1.2%	1.2%	(\$135,985)	\$135,985

Response provided by David Westman and Gillian Eaton.

- Q2. Please provide total resource acquisition costs, in \$/MMBtu, for currently approved and proposed market rate savings, and currently approved and proposed LI savings, in the TEPF program. Similarly, please provide cost/benefit ratios for the same 4 categories.
- A2. The following table compares the cost of acquisition, in \$/MMBtu, of the currently approved and proposed TEPF residential market rate and low income programs. The budgets used for the numerator include all resource acquisition costs, both incentives and non-incentives, for the three years 2024-2026. The MMBtu savings in the denominator are the modeling results for each program plus the 5% stretch needed to meet the QPI targets.

	2024-2026	
	TEPF PUC Approved Baseline	TEPF Proposed Amendment #2
	\$/MMBtu	\$/MMBtu
TEPF Market Rate Residential	\$81.54	\$92.93
TEPF Low Income Residential	\$201.71	\$225.66

Efficiency Vermont only calculates societal cost/benefit ratios at the portfolio-wide level and at the measure level. It does not calculate societal cost/benefit ratios for individual programs or market sectors. Please see Case No. 24-1493-PET *Exhibit EVT-JP-1 Efficiency Vermont Amended Model (redline)*, pages 63-64, which shows the shift in societal Benefit-Cost Ratio (BCR) from 4.11 in the PUC Approved Baseline model to 4.28 in the Proposed Amendment across the TEPF portfolio for the three years, 2024-2026.

Response provided by David Westman and Jay Pilliod.

Questions for Jay Pilliod

- Q3. Please prove final overall proposed amended sector shares for the TEPF portfolio compared to A) the currently approved sector shares of 21% Low Income, 75% Residential, and 25% Commercial and B) the incremental TEPF revenue proposed shared of 42% Low Income, 87.5% Residential, and 12.5% Commercial.
- A3. The following table compares the budget percentage by sector for Residential, Commercial, and Low Income for the currently approved TEPF budget and the Total Proposed Amendment Budget.

	2024-2026	
	TEPF PUC Approved Baseline	TEPF Proposed Amendment #2
	% of Budget	% of Budget
Residential	75%	76%
Commercial and Industrial	25%	24%
Low Income²	21%	23%

Response provided by Jay Pilliod.

² Please note that the table does not add up to 100% because Low Income spending is a subset of Residential spending. The percentage presented for Low Income represents the percent of total TEPF RA budget.

- Q4. Ref JP Testimony, page 11 at line 14: Please describe in detail why non-incentive TEPF budgets will increase proportionally to the incentive budget even though the number of weatherization projects funded by TEPF will decrease in the 2024 - 2026 performance period. Please provide specific categories of spending that are included in the TEPF non-incentive budget proposal and their respective changes in budget allocations.
- A4. The non-incentive TEPF budget will increase proportionally to the incentive budget in the Proposed Amendment, regardless of the number of weatherization projects funded, because the non-incentive budget consists of two budget categories: Workforce Development and Indirect. The workforce development budget is intended to fund initiatives that will help enable the weatherization program to meet its goals and fully deploy the Contract No. 4731 and TEPF funding. At this time the amount of funding for Workforce Development is a placeholder and the amounts of incentive and non-incentive costs are not defined. The indirect budget is directly related to the overall TEPF budget and therefore increases proportionally to the overall budget. The following table shows the proposed budget for these two non-incentive budget categories by year for 2024-2026.

Non-Incentive Budget Category for Proposed TEPF Amendment	Reporting Category	2024	2025	2026	2024-2026
Work Force Development Initiative ³	6036		\$ 300,000	\$ 300,000	\$ 600,000
Indirect	6036	\$ 12,495	\$ 29,473	\$ 49,473	\$ 91,441
	6034	\$ 52,505	\$ 10,527	\$ 10,527	\$ 73,560
	6013	\$ 25,000	\$ -	\$ -	\$ 25,000
	6017	\$ -	\$ 5,000	\$ 5,000	\$ 10,000
Total:		\$ 90,000	\$ 345,000	\$ 365,000	\$ 800,000

Response provided by Jay Pilliod.

³ For a discussion of Efficiency Vermont’s proposed Workforce Development Initiative please see Case No. 24-1493-PET Westman *pf.* of 9/13/24 at page 14 to 17.

Questions for Haley Roe

Q5. Please provide an updated “Exhibit EVT-HR-1” showing the gross RGGI income and the split between EVT and BED that feeds into this exhibit.

A5. This information can be found in the native Excel spreadsheet of Case No. 24-1493-PET Exhibit EVT-HR-1 that was emailed to the Department on September 13, 2024. See rows 24-34 of the “RGGI Revenue” tab in the native spreadsheet.

Row 24 of the “RGGI Revenue” tab pulls annual gross RGGI income from the “RGGI Auctions” tab.

Rows 27-34 of the “RGGI Revenue” tab subtracts RGGI expenses (Agency of Natural Resources costs, RGGI Trustee costs, etc.) and splits resulting RGGI revenue between BED and Efficiency Vermont, by 6% and 94% respectively.

Row 7 of the “Amendment Summary” tab of Exhibit EVT-HR-1 displays annual net RGGI income for Efficiency Vermont (*i.e.*, annual RGGI revenues that are directed to Efficiency Vermont after RGGI expenses (Agency of Natural resource costs, RGGI Trustee costs, etc.) and after revue is split with BED).

Response provided by Haley Roe.

DATED at WINOOSKI, VERMONT this 4th day of October 2024.

Respectfully submitted,
EFFICIENCY VERMONT

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