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October 18, 2024

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Post Office Drawer 20
Montpelier, Vermont 05620-2701

Re: Case No. 24-1493-PET
Efficiency Vermont Scheduling Proposal

Dear Clerk Anderson:

This case was opened by the Vermont Public Utility Commission (the “Commission”) to review the effects of unanticipated Energy Efficiency Utility (“EEU”) funding on Efficiency Vermont’s quantifiable performance indicators (“QPIs”), fees, and services and to review related amendments to its Demand Resources Plan (“DRP”) for the 2024-2026 performance period. On September 13, 2024, Efficiency Vermont filed proposed DRP amendments, supporting testimony and exhibits (the “proposed DRP amendments”). On October 17, 2024 the Vermont Department of Public Service (the “Department”) advised the Commission and participants that the Department does not contest any elements of the proposed DRP amendments, and recommends the Commission approve the proposed DRP amendments without further process (the “Department Comments”).¹ By this submission, Efficiency Vermont joins the Department’s recommendation and asks the Commission to approve the proposed DRP amendments at this time.

In support of this recommendation, Efficiency Vermont requests that the Commission admit into the record all of the testimony and supporting materials provided by the parties

¹ See Case No. 24-1493-PET, *Department of Public Service Comments on Efficiency Vermont Proposed DRP Amendments*, dated October 17, 2024 at 2 to 3.

without objection in this case, and advises the Commission that it waives any opportunity for hearing on the proposed DRP amendments. Moreover, to the extent that the Hearing Officer concludes that an order approving the proposed DRP amendments substantially in the form of the Proposed Order filed by Efficiency Vermont as an element of its *Motion to Amend its Approved 2024-2026 DRP* dated September 13, 2024 should be issued,² Efficiency Vermont waives any opportunity to review and comment upon the Hearing Officer's proposal for decision. All of the elements of the proposed DRP amendments are consensus elements and there remain no non-consensus elements awaiting further review. Efficiency Vermont maintains that all of the information necessary for the Commission to approve the proposed DRP amendments has been presented to the Commission and that there are no further filings scheduled to be filed by participants. Accordingly the matter is ripe for Commission resolution.

When the Commission first established a schedule in this case by Order issued July 24, 2024,³ the procedures were designed to target the Commission's issuance of an order on consensus DRP amendment elements for December 1, 2024. That schedule called on the participants to have provided all the information necessary for the Commission to decide the matters concerning consensus elements by October 18, 2024, which has now been accomplished with the submission of the Department's Comments. The initial schedule did not provide for any further procedures in the review of the consensus elements. As such, Efficiency Vermont encourages the Commission to target further case activities towards the issuance of a December 1st order.

As with prior scheduling recommendations, Efficiency Vermont requests that the Commission afford it sixty (60) days from the date of the order to file its annual update of its triennial plan. To the extent that the Commission is able to decide this matter within the timeframe discussed, Efficiency Vermont could be prepared to participate in a triennial plan workshop before the Commission during December of 2024. While the triennial plan update would yet to have been filed, convening the workshop in December would enable Efficiency Vermont to consider the input of participants as it finalizes its plan for submission to the Commission. Once submitted, the Commission has a variety of methods it can employ to seek additional information including convening a subsequent workshop should one be deemed appropriate.

An advance copy of this submission was shared with counsel for the Vermont Department of Public Service.

Efficiency Vermont is prepared to respond to any outstanding information requests that the Commission may have regarding the proposed DRP amendments, and to provide any

² *Id.* at 14 to 15.

³ Please note that this Order was superseded at the parties' request of September 20, 2024 by Order issued October 8, 2024 in this case.

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requested comments or submissions. Should you have questions, please do not hesitate to contact us.

Respectfully submitted,
Efficiency Vermont

/s/MORRIS L. SILVER

Morris L. Silver
Counsel for Efficiency Vermont

cc: Parties of Record (via ePUC)