



City of Burlington Electric Department  
Update to the  
2024-2026 Energy Efficiency Utility  
Triennial Plan

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Prepared for the Vermont Public Utility Commission

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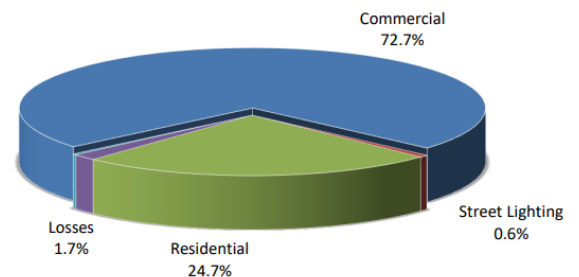
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## Quick Context

Burlington characteristics that provide additional context to the 2024-2026 EEU Triennial Plan are included below.

- City of Burlington population: 43,000 (approx.)
- Burlington Electric Department (BED) serves approximately 13 sq. miles, including a portion of the Burlington International Airport property.
- Customer count - 21,400 (Residential: 17,500 & Commercial: 3,900)

- As graph to the right shows, commercial accounts & street lighting consume nearly **75 percent** of total energy load.

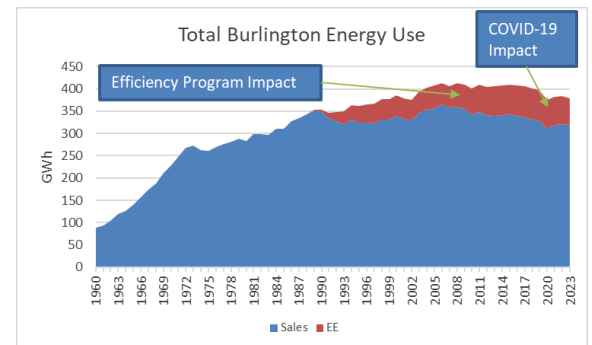


- The top 20 largest commercial accounts consume nearly **50 percent** of the total energy load delivered (residential and commercial).

- Energy Efficiency has helped to flatten BED's energy load requirement since the 1990's.

- Approximately 11,000 residential customers consume less than 500 kWh per month; residential sector average is 395 kWh/month.

- 60 percent of residential, and 70 percent of commercial, customers rent or lease which creates a "split-incentive" paradigm with property-owners who do not pay the energy bills.



- Over 95 percent of residential, and 99 percent of commercial, buildings are served by natural gas.

- ~96% advanced meter deployment on homes and businesses.

- BED turns over about 35% of its residential customers annually due mostly to UVM and Champlain College; about 3,900 college students in live off-campus rentals.

## Introduction

This update to the Burlington Electric Department's (BED) 2024-2026 EEU Triennial Plan is submitted to the Vermont Public Utility Commission (PUC) and the Vermont Department of Public Service (DPS), pursuant to BED's responsibility for delivery of EEU services within the City of Burlington. BED remains committed to offering its customers high-quality and affordable service and a secure, environmentally sound supply of future electricity. Energy efficiency continues to play a major role in achieving that goal.

The attached report updates the 2024-2026 EEU Triennial Plan-Revised Plan B that BED submitted to the PUC on January 30, 2024 (Case No. 23-4102), and describes any planned changes, modifications, updates, or variations to the 2024-2026 Triennial Plan. BED notes that it is not planning for any significant changes heading into 2025, but we do want to provide updates to ongoing EEU activities, and a 2025-2026 program outlook that describes some of the challenges facing many of our commercial customers.

The plan consists of five main sections:

- Electric Resource Acquisition (RA) programs
- Electric Development and Support Services (DSS)
- Thermal Energy & Process Fuels programs (RA) programs
- Thermal Energy & Process Fuels Development and Support Services (DSS)
- Act 44 programs

BED worked collaboratively with the DPS, and its consultants, on the development of the 2024-2026 EEU Triennial Plan. The plan is based on an electric energy efficiency potential study of BED's service territory conducted by the DPS with supporting data and customer information provided by BED to inform the results. BED wishes to acknowledge the collaboration and assistance from the DPS on the potential study process. Conducting an energy efficiency potential study in Burlington, with its high percentage of renters and high saturation of natural gas users, can present challenges.

As shown in the budget and savings tables below, with a three-year cumulative investment in EEU electric resource acquisition (RA) programs (starting in 2024) of \$7.6 million, BED expects to reduce energy consumption in the city by 12,170 MWh. Assuming an average measure life of 10 years across the portfolio of energy service programs, the estimated levelized cost of saved energy amounts to \$0.06 to \$0.09/kWh.

Total Program Budget (Plan B) EEC & Inflation Adj				
Resource Acquisition	2024	2025	2026	3 yr cumulative
Commercial	\$ 1,567,055	\$ 1,587,426	\$ 1,626,539	\$ 4,781,020
Residential (Mkt Rate)	\$ 624,397	\$ 581,925	\$ 544,761	\$ 1,751,083
Income Eligible	\$ 47,198	\$ 98,401	\$ 152,327	\$ 297,926
<b>Act 44</b>	<b>\$ 245,450</b>	<b>\$ 255,348</b>	<b>\$ 258,193</b>	<b>\$ 758,991</b>
<b>RA Budget</b>	<b>\$ 2,484,100</b>	<b>\$ 2,523,100</b>	<b>\$ 2,581,820</b>	<b>\$ 7,589,020</b>

Plan B MWh Savings	2024	2025	2026	3 yr cumulative
Commercial	3,356	3,307	3,337	10,000
Residential (Mkt Rate)	717	670	628	2,015
Income Eligible	26	55	74	155
<b>Total</b>	<b>4,099</b>	<b>4,032</b>	<b>4,039</b>	<b>12,170</b>

BED's TEPF programs are projected to deliver 156,400 MMBTU's of additional savings as shown in the tables below. More details on BED's TEPF efforts are described, starting, on Page 21.

Plan B Revised Thermal Energy & Process Fuels Programs				
	2024	2025	2026	3 YR Cum. Total
<b>Revenues, net</b>	<b>\$ 505,646</b>	<b>\$ 499,155</b>	<b>\$ 488,496</b>	<b>\$ 1,493,297</b>
Traditional Programs	\$ 58,000	\$ 51,000	\$ 47,000	\$ 156,000
Vermod	\$ 45,000	\$ 45,000	\$ 45,000	\$ 135,000
<i>Custom Tier III C&amp;I project support and Super Users program</i>	\$ 200,000	\$ 200,000	\$ 200,000	\$ 600,000
<b>Total RA</b>	<b>\$ 303,000</b>	<b>\$ 296,000</b>	<b>\$ 292,000</b>	<b>\$ 891,000</b>

Plan B TEPF Savings (mmBTUs)	2024	2025	2026	3 YR Cum. Total
Residential	140	122	112	374
Commercial	15	13	12	40
VERMOD	137	137	137	411
Super User	6,626	6,626	6,626	19,879
Com. Custom Retrofit	45,232	45,232	45,232	135,696
<b>Total</b>	<b>52,150</b>	<b>52,130</b>	<b>52,119</b>	<b>156,400</b>

This update also describes BED's on-going delivery of technical assistance and financial incentives to help Burlington residents and businesses reduce their energy costs as well as services for residential and commercial new construction and renovation projects. This update also helps to describe BED's working relationships with the EEU

teams at VGS and Efficiency Vermont (EVT) among several other partners and key community stakeholders.

BED remains committed to investing ratepayer funds in effective programs that address the energy needs of all customer sectors: owner-occupied residences, residential rental units, income-eligible customers, small and large commercial customers, and municipal customers, such as K-12 schools. BED will continue to make these investments through seven well-established resource acquisition programs, and the Act 44 pilot programs, shown below:

- Retail Efficient Products (EPP)
- Residential Existing Buildings (REB)
- Business New Construction (BNC)
- Thermal Energy and Process Fuels (TEPF)
- Act 44 Programs
- Residential New Construction (RNC)
- Income – eligible homeowners and renters
- Business Existing Facilities (BEF)

### *2025-2026 Outlook*

As the table in Appendix A (BED's 2024-2026 Key Quantifiable Performance Indicators (QPI) & Minimum Performance Requirements (MPR) Progress thru Q3 2024) shows, program activity has been sluggish especially in commercial new construction and commercial existing facilities, in-particular. Looking at savings year-to-date, BED is currently 20% behind the 2024-2026 performance period mWh savings goal as we approach the end of 2024. Spending to budget is on track with expected spending between 90 to 95% of the 2024 annual budget.

Regarding BED's 2025-2026 program outlook, as BED discussed with the DPS in late 2023, BED continues to closely monitor existing commercial customer activity as the business community continues to face several challenges. We continue to hear of staffing shortages, staff safety, customer safety and retail theft issues that can, understandably, distract business owners from making energy efficiency improvements. Also, a high percentage of office-based employees are still working from home, full or part-time, so decreased sales are a compounding issue.

The commercial sector represents about 75% of BED's total savings goals with the Business Existing Facilities (BEF) program representing about 55% of the total three-year savings target and 45% of the total budget. BEF participation levels need to be robust for BED to meet savings and budget targets.

Currently, BED is not projecting a 2024-2026 DRP goals adjustment request. However, BED will continue to assess program activity, including the large new

construction projects identified in the Demand Resource Plan as likely to complete in 2024-2026, and will inform the PUC and DPS, as soon as possible, of any on-going concerns that may materially impact 2024-2026 goals, and if a savings and budget adjustment request is prudent.

BED will continue to leverage relationships with key community partners and stakeholders, and will continue to use our website, videos, webinars, and social media platforms to inform customers and contractors about all our energy efficiency program efforts. The next section below highlights some of the outreach and engagement including an increased focus on our BIPOC and LMI customers.

### *Outreach and Engagement with a Focus on BIPOC and Low- and Moderate-Income Customers (LMI)*

BED will continue to use multiple communication channels to inform customers, contractors, and design community about all our EEU and Tier 3 program efforts including:

- Website
- Social media
- Press conferences
- Press releases
- E-Newsletter
- Podcast
- Videos (internal & external)
- Front Porch Forum
- North Avenue News articles
- Print ads
- Photos
- Yard signs
- Radio ads

BED continues to recognize that these are both exciting and challenging times in the emerging energy transformation world for many customers and we remain committed to ensuring that all our customers have access to our EEU and Tier 3 programs and services. To reduce potential barriers to participation, BED is also committed to making sure that our utility billing and payment processes are clear, and easy to navigate, especially for those customers struggling with household budgets.

As a city department and community member, BED acknowledges the hardships that many of our customers have still been experiencing due to on-going local and global economic impacts. Working toward our EEU, Tier 3 and Net Zero Energy City (NZE) goals, while also overcoming economic related challenges, continues to require support and engagement from the community over an extended period. BED also continues to recognize the focus on social and racial justice issues in our community and nation as an opportunity to ensure that our programs and services are available, accessible, and affordable to all our customers. As the bullet point examples below indicate, BED has embarked on some of this important work to ensure that our programs are consistently

impactful. BED also recognizes that the efforts listed below (along with other efforts) will need to be regularly monitored and improved upon as needed.

- BED-Trusted Community Voices (TCVs) Dialogue - Led by the Burlington's Community Economic Development Office Opportunity and Engagement Team (CEDO), the TCV initiative seeks to enhance community engagement efforts and create open dialogue for Burlington residents, with a focus on immigrant and refugee communities. Known as TCV liaisons, trusted community members serve as a bridge between the City/CEDO and their communities to foster more effective, engaging, and supportive relationships. BED continues working with TCV on the following issues:
  - *How BED can do more to reach out to customers, with language translation or other services, so more of our customers can learn about and participate in our programs?*
  - *What are the most useful means for broader communications with our community – inserts in the monthly BED bill, emails, radio, Front Porch Forum, social media, other?*
  - *What types of energy rebate or assistance programs would be most helpful?*
- BED's Project & Equity Analyst position started in January 2023 and is now fully trained on all BED programs and services- This position will continue to focus on many activities including: advising and coordinating with other BED departments on equitable and accessible processes, program design and implementation; identifying opportunities to help advance energy efficiency and fossil fuel reduction among BIPOC and other under-represented community members; works collaboratively to improve BED's customer care processes, energy efficiency and strategic electrification program design and delivery, and is designing and developing BED's community ambassador program and other community engagement efforts, including regular listening, communication, and outreach with key community stakeholders. This position works across all areas of BED.
- In 2025, Equity and Project Analyst will continue outreach to stakeholder groups and community members, including the CVOEO, Family Room, BHA's Bobbin Mill, BHA's Hillside Apartments, Northgate Apartments, and will continue the Monday afternoon energy clinic program at the King Street Laundry whereby BED is available to answer questions and address customer bill concerns. The King Street Laundry is in one of Burlington's most income challenged neighborhoods, and the owner has allowed it to become an "informal" community resource center.

- BED staff will continue to table at several regular community events in 2025 including: the downtown Farmers Market, the Old North End Farmers Market, Summervale at the Intervale Community Farm and Lake Monster's baseball games.
- Please visit our website for many examples of our growing [energy education podcast](#) series. This series helps to convey BED's broad reach into the Burlington community and the partnerships that we continue to cultivate with community members.

## **Electric Resource Acquisition Programs**

As in previous years, BED will continue to implement its energy efficiency programs in accordance with 30 V.S.A. 209(d) and shall strive to acquire all reasonably available, cost-effective electric energy savings. To acquire such savings, BED will need to continue to effectively address multiple markets in a coordinated manner as described in each program below.

### *Retail Efficient Products (EPP) Program*

EPP addresses market driven and replace-on-burnout opportunities by reducing the initial cost of Energy Star certified products. Over the past few years, EPP savings have begun to transition away from screw-based lighting and consumer electronics to other Energy Star labeled home products. With this transition, BED remains committed to motivating customers to use their appliances, including heating and cooling equipment, in the most efficient manner. EPP incentives helps BED to effectively address market-driven and replace-on-burnout opportunities by increasing the cost competitiveness of retail efficient products vis-à-vis traditional products.

### *Primary Objectives*

- Increase cost competitiveness of EnergyStar labeled products.
- Elevate the level of consumer energy awareness and product knowledge.
- Build and maintain relationships with retailers and distributors operating in the region.

### *Implementation*

The EPP is part of BED's and Efficiency Vermont (EVT's) planned annual coordination agreement supporting market channel stakeholders (i.e., product distributors and installation contractors). EPP is managed and implemented by EVT with BED's input, financial assistance, and promotion to customers. While EVT is primarily responsible for managing the program operations, including specifying eligible products, contractor outreach, product/program advertisement and payments, BED concentrates its efforts on local installation contractors and customers.

### 2025 - 2026 Outlook

Over this performance period, BED will continue to augment EVT's public outreach campaigns with its own public education and product awareness initiatives using social media channels and customer newsletters.

### Residential New Construction (RNC)

The RNC program will continue aiming to improve the efficiency of all new homes, and buildings undergoing substantial renovation. This includes single-family homes, multi-family homes and low-income projects. It addresses all major end uses such as thermal envelope, space heating, water heating, central cooling, ventilation, major appliances, and lighting. RNC encourages builders and customers to the high efficiency program standards that are offered statewide from EVT, VGS and BED. RNC provides technical and financial assistance to home builders, developers, and architects to design and build new homes (or major renovations) that exceeds Vermont's Residential Building Energy Standard (RBES).

### Primary Objectives

- Provide technical and financial assistance to building owners with projects that exceed RBES.
- Influence market actors to build high performance homes and multi-family buildings.
- Increase contractor knowledge of the latest building science practices.

### Implementation

Working with Burlington's planning and zoning office, City building inspectors, VGS, and Efficiency Vermont, the RNC program will continue to engage designers, builders, and homeowners by providing technical assistance, energy rating services, and financial incentives. The RNC program will also continue to provide market actors with relevant and timely information on technologies and design - build strategies that address all major end uses in new buildings, such as, thermal envelope, space conditioning, water heating, ventilation, major appliances, and lighting.

As part of Burlington's net zero energy city goal, BED will continue to encourage the development of low-load or net zero energy homes. To help promote program objectives, BED will actively participate in regional events such as the Better Building by Design conference and work with relevant associations such as the Vermont Green Building Network and the Vermont Passive House Association.

### [2025-2026 Outlook](#)

BED anticipates that multi-family structures with cold climate heat pumps (CCHP's) (aka ductless mini splits) will continue to be the dominant building type in this program. Heat pumps have become the most popular HVAC solution for market-rate multi-family new construction projects due to the relatively low first installation cost, and most property-owners desire to offer air conditioning. Consequently, BED, as part of our on-going beneficial electrification efforts, will continue to focus on high performance thermal envelopes, and controls, to mitigate possible future regrets from strategic thermal electrification.

As we have noted in previous EEU reports, from a thermal decarbonization, and net zero energy city perspective, the use of CCHP's can be a positive solution. However, most heat pump buildings to date use standard electric resistance heat to back-up the CCHP's so potential winter peak, and customer high bill issues, need to be carefully considered. Fortunately, all the CCHP buildings built to date have worked with BED to design and construct high performance thermal envelopes which has mitigated peaking, high bill, and comfort issues. Also, per RBES, the electric baseboard heat is on a master control so that it cannot come on until the outside temperature is lower than 5 degrees F.

BED has reviewed the 15-minute electric usage data for the CCHP buildings, and



they are performing well from both a kWh and CP-kW perspective. BED credits the strong attention to detail on the thermal envelopes with a particular focus on air leakage reduction work and blower door testing.

### [Residential Existing Buildings \(REB\)](#)

In general, the REB program seeks to address both market-driven and discretionary, early replacement/retrofit opportunities in single family homes, multifamily buildings,

and condominiums. This means that whenever a customer needs to replace an appliance that is no longer working (market-driven) or is seeking to replace equipment early to reduce energy costs, increase comfort or usability (discretionary), BED can provide the customer with support – either with a financial incentive, technical assistance, or both. While BED’s EEU efforts focus on electric load reducing measures, BED staff also help customers transition to beneficial electrification measures to reduce their GHG emissions.

### Primary Objectives

- Address energy efficiency and strategic electrification opportunities across all–fuels by increasing customer and contractor awareness about all available EEU and Tier III programs from BED, as well as any new commercially available technologies and practices.
- Partnering with VGS to weatherize hybrid homes that heat partially with traditional NG systems and advanced heat pumps.
- Develop and encourage the use of online tools that have the potential to empower customers to take more control of their energy consumption.
- Integrate whole-building approach to enhancing energy efficiency in the built environment.

### Implementation

To achieve savings goals for the REB program, BED staff will continue to focus on three main areas: customers with high bill complaints, hybrid homes, and split incentives.

First, BED will continue to provide hands-on assistance to customers with high bill complaints and higher than average energy consumption so that customers are able to reduce energy bills substantially, as well as solve any comfort and/or moisture related issues they may have. On-site or virtual energy audits, customer energy education, appliance meter loans, technical assistance, project management and cash incentives are all part of this service.

Second, BED will also continue to focus on expanding the number of hybrid homes in the city. As noted earlier, BED and VGS are collaborating to provide a full suite of incentives to homeowners heating their buildings partially with NG and partially with heat pumps. As part of this initiative, BED and VGS are sharing the cost of weatherizing buildings, as well as the savings, with a heat pump installed.

In addition to the hybrid home initiative, BED and VGS will continue to encourage private (market-rate) rental housing owners to increase both participation in our respective energy efficiency programs, as well as to increase the depth of savings per participant. Renters in Burlington comprise 60% of BED’s residential customers and have not, historically, been strong program participants and the same holds true for property-owners where the tenants pay the energy bills directly. Thus, creating a “split-incentive”

paradigm in about 85% of rental units. Accordingly, BED and VGS will continue our efforts to increase program participation.

### 2025-2026 Outlook

BED and VGS will continue program coordination and collaboration in 2025-2026 designed to encourage more residential customers to participate in available efficiency programs. We will continue to help customers to take a more complete look at their total energy picture including the thermal shell, HVAC, thermostat controls, appliances, along with solutions for comfort or moisture related issues.

About 95% of BED's residential customers use natural gas as their primary space heating source. However, there are several dwellings that are mostly natural gas heated but electric usage data also reveals relatively high electric heat usage and/or air conditioning usage. Customers scheduling energy audits are asked their permission for the two EEU's to share usage data for analysis purpose. BED and VGS have established a methodology so that BED now offers an additional customer incentive to complete the recommended weatherization work. VGS now includes this information in the customers' report with the goal of increasing the "energy audit" to "actual project" completion rate. Anecdotally, customers are very pleased with the VGS and BED joint effort.

Again, BED and VGS have also developed a similar weatherization cost sharing process where cold climate heat pumps are installed but they can only provide a portion of the space heating load. Customers and contractors are made aware that the full weatherization rebate amounts are available to "hybrid" heated buildings, and they will get a proportional rebate check from both EEU's.

### REB Income Qualified Customers (REB-IC)

The REB-IC program will continue to seek to reduce energy consumption and bills for income-qualified customers through technical assistance, incentives, and educational outreach. To effectively address the needs of the community, BED will continue to partner with the Champlain Valley Weatherization Service (CVWS), who combine their services with BED incentives to deliver a comprehensive suite of energy services to lower income households. Other partners include the Burlington Housing Authority, Champlain Housing Trust, Cathedral Square Corporation, Champlain Valley Office of Economic Opportunity (CVOEO), Maloney Properties at the Northgate Apartments, Burlington's Community Economic Development Office (CEDO), Burlington's 2030 District Steering Committee and 3E Thermal now providing WAP services for larger multi-family rental buildings that are five or more units.

### Primary Objectives

- Reduce the economic burden of energy consumption for households with incomes equal to or less than 80 percent of the median county income.

- Increase energy consumption awareness to help customers find ways to save money on their energy bills.
- Increase program participation.

### Implementation

This program is primarily implemented through CVWS who delivers the Low-income Weatherization Assistance Program (WAP) that is mostly focused on space heating improvements. BED will continue to support CVWS so that they can more comprehensively assist qualified residents to identify and implement all cost-effective energy efficiency upgrades. This partnership allows electrical efficiency measures to be delivered at the time they receive thermal shell, space heating, health and safety, and water heating improvements.

### 2025-2026 Outlook

BED will continue to cultivate partnerships and pursue initiatives that allow for additional opportunities to engage with the low- and moderate-income customers and those organizations that serve these customers. As mentioned in the *Outreach* section above, BED is engaged in several initiatives on this front.

Burlington's Rental Housing Weatherization Ordinance (for high-energy using rental housing buildings) will also continue to directly benefit LMI customers in the coming months and years as many buildings that do not qualify for WAP will be weatherized.

BED will continue to partner on the APPA DEED grant that helps Burlington's 2030 District program offer free "Property Energy Plans" (PEPs) to affordable housing organizations which should also result in direct energy saving benefits to our LMI customers as the Property Energy Plans are structured to encourage participation in BED's and VGS's EEU program.

### Business New Construction (BNC)

The BNC program will continue to assist commercial builders and developers to incorporate the most energy efficient products and systems possible when building or renovating. We have designed the program to help customers exceed Vermont's Commercial Building Energy Standard (CBES) by working directly with designers and owners as early as possible so that when decisions about building designs and mechanicals are made, they choose to install the highest efficiency systems.

### Primary Objectives

- Provide financial incentives, and technical assistance for new construction and major renovation projects designed to meet or exceed existing commercial new construction codes.
- Help customers through the decision-making process and help them to maximize energy investments.
- Integrate heat pump technologies and transportation alternatives into the design and development of new buildings.

### Implementation

The program offers financial incentives for the installation of cost-effective efficiency measures. Customers gain technical assistance, verification services and financial incentives to help with energy modeling, third-party building commissioning services and the installation of efficient thermal envelopes and equipment. The BNC program addresses all energy consuming equipment, components, or practices, including thermal envelope measures, motors, lighting, heating, ventilation, air-conditioning (HVAC&R) and control packages.

With appropriate and consistent funding, BED will continue to influence the adoption of energy efficient systems and techniques through proactive outreach, financial incentives, and technical assistance. As both an electric distribution utility and a municipal department with a role in the City's design review process, BED is in a unique position to identify new construction and major renovation before significant design efforts begin. BED coordinates this effort with other city agencies including the city's Planning Department and its Department of Permitting & Inspections.

### 2025- 2026 Outlook

The program will continue to provide performance-based tiered incentives. Under this "energy model" approach, BED pays 50 percent of the total estimated incentive upon project completion, provided the building has been built to the agreed upon specifications. The remaining incentive is then paid about 12 months after project completion. Approval of the remaining balance is contingent on a comparison of the actual, post-occupancy energy use to the results of the baseline (CBES) energy model performed during the design phase. It is often the case that the baseline energy model needs to be calibrated to reflect actual operations of the occupied building including actual plug loads, HVAC set-points and operating hours.

The "energy model" approach acknowledges that it often takes about a year for larger commercial buildings to be fully occupied, equipped, and debugged when performance issues present themselves. This tiered approach allows for deeper BED involvement, more accurate savings claims and ensures that building operators are

encouraged to optimize the performance of their buildings. BED will continue to follow this energy model approach over this performance period.

As in the recent past, BED will also seek to further integrate BED's EEU and Tier 3 programs together and offer customers a full suite of energy services that maximize customer benefits and reduce GHG emissions. BED also remains engaged with its customers to fully evaluate the costs and benefits of various HVAC and heat pump systems such as air source and ground source heat pumps. To further advance the adoption of these technologies, and where appropriate, BED's Tier 3 program will help offset the initial cost of ground source or variable refrigerant flow (VRF) heat pump systems. Combining Tier 3 and EEU funds together can help to further the City's transition away from fossil fuels to renewable electricity. Tier 3 funds can be used to influence heat pump adoption and EEU funds can be applied toward the highest efficiency water source heat pumps, energy recovery ventilation, HVAC controls and thermal shell measures. And ground source heat pump systems can provide for a more efficient central cooling system which can help to reduce summer peak issues.

Under this program, BED will also continue to offer financial assistance for commercial building envelope commissioning. With the growing number of heat pump heated and cooled buildings coming online, high performance building shells, combined with advanced HVAC controls, will continue to be of great interest to many of our customers. Accordingly, these opportunities will continue to be a primary focus of BED's attention and effort.

BED, through its complimentary Tier 3 efforts, will also seek to influence developers' decisions with respect to electric vehicle charging equipment - or to at least ensure that appropriate trenching and/or other "make-ready" infrastructure is made available to accommodate future installations of EV charging equipment. Such encouragement helps to prepare building owners and developers to better serve their customers/tenants as EV's start to become more prevalent on Vermont's roads.

### *Business Existing Facilities (BEF)*

The BEF program will continue to pursue market-driven and discretionary retrofit energy efficiency opportunities. Market-driven opportunities include naturally occurring equipment replacements on burn out. Discretionary retrofits typically include custom projects focused on functioning but inefficient equipment and building systems. Such custom projects also take a holistic approach to identifying electric and thermal related savings.

BEF program managers assist commercial customers of all sizes to fully understand their energy usage and bills. On-site assessments uncover cost effective opportunities to optimize building operations and processes, and ultimately reduce energy costs.

#### Primary Objectives

- Acquire cost effective market-driven and discretionary retrofit energy efficiency.
- Focus on total energy solutions that consider demand response opportunities, system controls and building management systems.
- Expand the number of small to medium size businesses participating in the program.
- Further develop the HVAC and heat pump solutions to prevent lost opportunities as customers consider alternative heating and cooling solutions.
- As appropriate, BED also aids with building envelop efficiency measure when buildings are substantially heated with advanced heat pump technologies and integrated controls.
- Assist customers with replacing existing 4 ft. linear fluorescent lamps with LED's which have become obsolete and cannot be replaced due to the passage of HB 500 in the next two years.

#### Implementation

The BEF program will continue to assist commercial customers evaluate their best options to optimize the overall energy performance of their business spaces. This work includes meeting with customers and their contractors, reviewing and evaluating efficiency proposals, modelling building energy consumption and trends, sharing information and data on best practices; proposing and processing incentives including on-bill financing options; and evaluating, measuring, and verifying energy savings upon project completion.

With respect to short-term lighting measures (i.e., 4 ft. linear fluorescent lamps), BED will continue working with EVT, lighting suppliers, designers, property owners and others to educate the distributors of the legislation banning mercury-based lighting lamps. Coincident with these efforts, BED will help to make sure that larger customers are aware of the new law (including proper disposal requirements) and that BED can provide financial assistance to all customers to replace such lamps as early as possible. As always, customers and contractors will continue to be able to take advantage of statewide upstream incentives for eligible HVAC, and refrigeration equipment, which BED supports through Efficiency Vermont.

#### 2025-2026 Outlook

BED will continue to move beyond lighting as the dominant measure in this market. HVAC, HVAC system controls, refrigeration, and other measures, are now playing a more

prominent role. As a response, BED will continue to explore methods to help customers identify, early before equipment burnout, cost-effective HVAC, and refrigeration related improvements.

BED will continue to leverage its participation and leadership in the Burlington 2030 District effort. 2030 Districts are unique private/public partnerships in designated urban areas across North America committed to reducing energy use, water, and transport emissions. Overseen by Architecture 2030, 2030 Districts are in the vanguard of grassroots collaborative efforts to renovate existing buildings and construct high-performance infill development and redevelopment. More information is available at: <http://www.2030districts.org/burlington>. Participants in Burlington’s 2030 District have appreciated BED’s and VGS’s close collaboration on their projects.

**Electric Development and Support Services (DSS)**

Development & Support Service (DSS) activities are essential support services that are not directly related to the acquisition of energy savings but are necessary to ensure that the RA program portfolio is well managed and forward thinking. DSS activities in research, education, and training, for example, focus on new and emerging best practices to reduce barriers to efficiency, address potential lost opportunities and transform markets. In total, the DSS budget encompasses the following work areas: education, training, and engagement, applied research and development, planning and reporting, evaluation, information technology and administration and regulatory affairs. Within each of these general activity areas are several sub-activities which are explained in further detail below.

For the 2024-2026 period, BED’s electric DSS approved budget is \$546,000, as shown in the table below. 2024 year-to-date spending is at \$105,535 which is about 20% of the approved three-year budget.

Electric DSS Activity	2024 Spending (YTD)	2024-2026 Budget	% 2024-2026 Budget (YTD)
Education, Training & Engagement	\$ 29,289	\$ 110,500	27%
Applied Research & Development	\$ 1,991	\$ 20,700	10%
Planning & Reporting	\$ 9,780	\$ 143,130	7%
Evaluation	\$ 27,046	\$ 58,000	47%
Information Technology	\$ 8,768	\$ 51,900	17%
Administration & Regulatory Affairs	\$ 28,661	\$ 161,770	18%
<b>Total</b>	<b>\$ 105,535</b>	<b>\$ 546,000</b>	<b>19%</b>

## 2025 - 2026 Outlook

BED is not anticipating any major changes to the six DSS initiative described below and in the 2024-2026 EEU Triennial Plan.

### **Education, Training & Engagement**

This category continues to capture BED's work on increasing customer awareness about energy efficiency and how to take specific actions to lower energy use. BED provides education to builders and contractors, real estate professionals, K-12 students and teachers, college and universities and the public. As described in the introductory section, BED's Program & Equity Analyst position will continue to work across all areas of BED.

Additional activities include:

- Energy Codes and Standards Support
- Energy Literacy Project Support
- General Public Energy Education
- Better Building by Design Conference
- Building Energy Labeling & Benchmarking

### **Applied Research & Development**

This work continues to include BED's collaboration with EVT, VGS and other entities on applied research and development activities designed to optimize the creation of cost-effective solutions to meeting BED's long-term resource acquisition goals.

The focus of applied R&D is in the following three areas:

- Field-testing new implementation strategies such as digital engagement and social networking
- Technology demonstrations
- Research of emerging technologies and innovative efficiency implementation strategies

Sub-categories of activity in this area include:

- Emerging Data services and analytics

### **Planning and Reporting**

This DSS activity continues to cover the cost of informing the Vermont PUC, the DPS, and other stakeholders about BED's EEU activities. BED regularly submits quarterly,

annual reports and an annual plan to the Commission and DPS. This activity also supports BED's engagement with the VSPC and the ISO-NE FCM program.

Sub-categories include:

- Annual Plan
- Demand Resource Plan
- Vermont State Planning Committee (VSPC)
- ISO-NE FCM Participation
- Reporting

## **Evaluation**

Evaluation, measurement, and verification (E, M&V) is integral to understanding energy efficiency program performance. Accordingly, BED will continue to conduct E, M&V of its programs over the next triennial period. Such *ex post* analyses not only boost BED's confidence that its programs are resulting in persistent and real savings, but E, M&V findings also point out how program managers can implement improvements as market conditions evolve. Many activities in this work area are coordinated with the DPS and Efficiency Vermont.

Sub-categories include:

- Annual Savings Verification
- Technical Advisory Group (TAG)
- Technical Reference Manual (TRM)

## **Administration & Regulatory Affairs**

This DSS activity continues to capture BED's participation in discussions about energy efficiency and EEU related issues that typically occur throughout the year with regulators, the media, the public and other stakeholders. This category also covers BED's costs for the overall management of EEU programs not specific to the individual programs and includes general staff meetings, coordination of program implementation across all program functions, coordination with other EEU's and managing and monitoring of overall performance and spending.

Sub-categories include:

- Public Affairs
- Regulatory Affairs
- General Administration
- Administrative Efficiency

## Information Technology

BED’s IT activities consist of continuing the support of, and improvement to, the DSM database system for the collection and processing of project data and program information critical to tracking, reporting, and planning functions. There is a regular need to alter existing tools or add new tools and functionality to the system, which helps us to better understand and respond to changes in the Burlington marketplace.

## Thermal Energy & Process Fuels (TEPF)

### TEPF Budget, MMBTU Goals & 2024 Progress to Date

As described in BED’s 2024-2026 EEU Triennial Plan, pursuant to Act 44, Section (f), BED plans to utilize up to \$600,000 in new regional greenhouse gas initiative (“RGGI”) and forward capacity market (“FCM”) revenues to support its traditional TEPF programs, install three advanced manufactured home in the North Avenue Cooperative mobile home park and also to implement two new pilot programs: Super Users and Commercial Custom Projects over the 2024-2026 period. If the budget allows, BED may also utilize any remaining TEPF funds, after funding the traditional and Zero Energy Modular home programs, to augment its existing Tier III and Act 44 programs by enhancing existing Tier III and Act 44 incentives to further program participation and improve the cost competitiveness of beneficial electrification.

Plan B Revised Thermal Energy & Process Fuels Programs						
				3 YR Cum.		
	2024	2025	2026	Total		
<b>Revenues, net</b>	\$ 505,646	\$ 499,155	\$ 488,496	\$ 1,493,297		
Traditional Programs	\$ 58,000	\$ 51,000	\$ 47,000	\$ 156,000		
Vermod	\$ 45,000	\$ 45,000	\$ 45,000	\$ 135,000		
<i>Custom Tier III C&amp; I project support and SuperUsers program</i>	\$ 200,000	\$ 200,000	\$ 200,000	\$ 600,000		
<b>Total RA</b>	\$ 303,000	\$ 296,000	\$ 292,000	\$ 891,000		

Plan B TEPF Savings (mmBTUs)	2024	2025	2026	3 YR Cum. Total
Residential	140	122	112	374
Commerical	15	13	12	40
VERMOD	137	137	137	411
Super User	6,626	6,626	6,626	19,879
Com. Custom Retrofit	45,232	45,232	45,232	135,696
<b>Total</b>	<b>52,150</b>	<b>52,130</b>	<b>52,119</b>	<b>156,400</b>

### Traditional Weatherization Programs

BED's traditional weatherization service continues to focus on providing non-VGS residential homeowners and businesses with energy audits to identify cost-effective weatherization opportunities and incentives to offset the full cost of eligible work. BED's residential customers gain access to our incentives and technical assistance through the *Home Performance with EnergyStar program*, co-managed with EVT and VGS. Commercial customers access the statewide *Commercial Performance* program. Both programs tap into Vermont's network of Building Performance Institute (BPI) certified contractors, who perform energy audits of buildings, as well as install a wide range of thermal measures (i.e., air sealing and insulation) that can improve occupant comfort and reduce energy consumption.

BED notes that the traditional TEPF program customer is very small in Burlington as over 95% of residential buildings use natural gas for space heating and closer to 99% of commercial buildings do as well. Currently, BED projects that the TEPF potential market consists of roughly 350 residential dwellings and 10 – 15 small businesses. The single-family market is made up of homes that are in the more affluent Burlington neighborhoods where the properties have been relatively well maintained and updated over the years. The potential for energy efficiency savings in the condominium market is also limited but it too presents challenges as about 35% of the units are rentals. The rental property owner, who does not typically pay the energy bill, and will not benefit from the energy savings, is typically unmotivated to participate.

BED's TEPF weatherization program will continue to mimic VGS's incentive levels to help avoid confusion among weatherization contractors and customers.

BED will continue promoting our TEPF service through a variety of channels including social media as well as through Vermont's contractor networks. For example, BED provides specific program information in EVT's quarterly newsletter that is sent out to the Efficiency Excellence Network (EEN) of contractors, installers, retailers, EV dealers, designers, builders, and architects.

### 2024 (YTD) Progress-

2024 (YTD) program participation has been very sluggish with no completions to date. We hope to have one single-family completion by the end of 2024 and are currently completing an energy savings analysis on a 24-unit unit condominium complex heating with propane gas. If the owners decide to pursue all the recommended work, then the projected savings will cover about 60% of BED's total 2024-2026 savings goal when combining the 825 MMBtu goal for residential, commercial and ZEM. This project will likely not be completed until later in 2026.

Program	Residential	Commercial	Total
<b>Period Costs for TEPF Savings</b>			
Costs for Period	14,609	1,235	15,844
Budget for Period	85,833	2,417	88,250
Year to Date Costs	14,609	1,235	15,844
Annual Budget	103,000	2,900	105,900
% of Annual Budget	14%	43%	15%
<b>TEPF Savings Results</b>			
MMBtu for Period	0	0	0
MMBtu Year to Date	0	0	0
Annual MMBtu Goal	277	15	292
% of Annual MMBtu Goal	0%	0%	0%
<b>Progress Towards Contract MMBtu Goals</b>			
MMBtu Cumulative to Date	0	0	0
3-Year MMBtu Goal	785	40	825
% of 3-Year MMBtu Goal	0%	0%	0%

### *Zero Energy Modular Homes (ZEM)*

Since 2017, BED has been actively promoting ultra-efficient ZEM homes with our partners: North Avenue Cooperative (“NAC”), Green Mountain Habitat for Humanity, Champlain Housing Trust’s Homeownership Program (“CHT”) and VEIC who promotes ZEM’s throughout Vermont. ZEM homes can be net-zero energy, which eliminates fossil fuel usage, and can have a significant financial impact for customers when compared to existing high energy costs. ZEM owners can save money in the long run and shield themselves from fossil fuel price inflation and volatility

The NAC is Burlington’s only mobile home park and consists of about 110 homes heated by LP gas or kerosene. Many of the homes are very old and ready to be replaced, there are also about five empty lots in the park.

Thus far, only three ZEM homes have been installed in the NAC. Demand for these homes has been very low recently due to the challenging economic conditions that many of the NAC residents face, high construction costs coupled with high mortgage rates.

BED will continue to work with the NAC Board to encourage more ZEM homes in the park and will continue working with CHT’s Homeownership Program and Green Mountain Habitat for Humanity to find eligible buyers.

### *2025 - 2026 Outlook*

BED is encouraged by some recent developments that we hope will lead to additional ZEM homes being installed in the NAC in 2025 and 2026. First, in partnership with VEIC staff, BED has learned that some of the largest mobile home manufactures (that sell in Vermont) are now building homes that meet or exceed DOE’s Zero Energy Ready Manufactured Homes (ZERH MH) specifications. These homes still come equipped with fossil fuel-based heating equipment but working with manufactures to offer a fully electric option using no fossil fuels. These are still “mobile homes” but built to a much higher

efficiency standard and the companies can produce them at much higher volumes, and at lower cost, when compared to previous locale factory-built home options.

The second development involves [Vermont's Rapid Response Mobile Home Infill Program](#). This state program was established to address the urgent need for affordable housing around Vermont and to help address flood impacted counties. Grants are provided to income eligible Vermonters to buy new mobile homes. BED arranged a meeting at the NAC, this month, with the MHU-Task Team Co-Chair, members of the Board and BED staff to tour the property and to discuss the grant opportunity. The Board members are planning to enroll in the program, and they know that BED stands ready to assist with a ZEM option.

#### *Super User Program EV Program for High Mileage Drivers*

Pursuant to Act 44, Section 1 (f) Thermal Energy and Process fuel efficiency funding ("TEPF"), BED introduced in 2024 a new "Super Users" program designed to further motivate customers with high transportation fuel use to transition to all-electric vehicles which BED will continue to offer in 2025. Super User customers are eligible for up to \$250 incentive (on top of BED's Tier III incentive, enhanced income eligible incentives, if applicable, and/or any other State, Federal or manufacturer's incentive), provided customers can demonstrate that they consume 700 gallons (or more) of gasoline annually for transportation purposes. Potential customers who can demonstrate they consume over 1000 gallons annually can qualify for another \$250 incentive (on top of other BED incentives, as noted above). Super User customers may also receive another \$250 per eligible Level 2 EVSE, provided customers also agree to enroll in BED's off-peak EV rate tariff.

No customer activity to date but BED will continue to promote the program through normal marketing and outreach channels and provide program updates in upcoming EEU quarterly reports and in the 2024 EEU Annual Report due on or before May 1, 2025.

#### *Commercial Custom Program(s)*

Under this pilot program, BED plans to provide commercial customers enhanced incentives for custom Tier 3 projects, as needed, to ensure major renovation or new construction projects incorporate electrification where feasible and *exceed* existing building codes and local ordinances. The objective is to improve the capital cost competitiveness of super-efficient projects relative to merely complying with existing building codes and local ordinances. Targeted projects include those with long measure lives (i.e., 20+ years) and are expected to result in significant overall GHG emission reductions. Examples include but are not limited to advanced heat pump projects (i.e., ground source heat pumps, air to water heat pumps, variable refrigerant flow heat pumps and air source heat

pumps – ducted or ductless), electric buses, EV charging equipment and building envelop projects.

BED is continuing to work through the program implementation details and will provide updates in upcoming quarterly reports and in the 2024 EEU Annual Report due on or before May 1, 2025.

### TEPF Development & Support Services (DSS)

Development & Support Service (DSS) activities are essential support services that are not directly related to the acquisition of energy savings but are necessary to ensure that the RA program portfolio is well managed and forward thinking. DSS activities in research, education, and training, for example, focus on new and emerging best practices to reduce barriers to efficiency, address potential lost opportunities and transform markets. In total, the DSS budget encompasses the following work areas: education & training, applied research & development, planning and reporting, evaluation, information technology and administration & regulatory affairs.

For the 2024-2026 period, BED’s TEPF approved budget is \$23,450, as shown in the table below. 2024 year-to-date spending is at \$8,879 which is about 38% of the approved three-year budget.

TEPF DSS Activity	2024 Actual		% 2024-2026 Budget (YTD)
	Spending (YTD)	2024-2026 Budget	
Education & Training	\$ 3,112	\$ 6,900	45%
Applied R&D	\$ -	\$ 900	0%
Planning & Reporting	\$ 1,049	\$ 5,100	21%
Evaluation	\$ 614	\$ 1,200	51%
Information Tech	\$ 780	\$ 2,350	33%
General Administration	\$ 1,613	\$ 7,550	21%
<b>Total</b>	<b>\$ 7,168</b>	<b>\$ 24,000</b>	<b>30%</b>

#### 2024-2026 Outlook

BED is not anticipating any major changes to the six DSS initiative described below and in the 2024-2026 EEU Triennial Plan.

#### **Education and Training**

This work continues to include BED’s efforts to build overall awareness of energy efficiency, weatherization, building performance issues and availability of efficiency services from BED, VGS and the low-income weatherization program administrator; CVWS. These activities are not tied to specific program goals. It includes presentations at public forums and workshops, and activities with Burlington’s numerous educational

institutions. Media responses and the development of monthly energy tips that submitted to various publications and blogs are also included. BED also shares program costs with EVT for the Home Performance with Energy Star Program.

### **Applied Research and Development**

This activity supports research on activities such as “smart” thermostatic controls installed in buildings where there are multiple heating systems present. For example, a heat pump and a central fossil-based heating system.

### **Planning and Reporting**

This work continues to include BED’s responsibility to provide the PUC and DPS with detailed EEU Annual Plans as described in the “Process and Administration of an Order of an Appointment” document. This work covers all required regulatory reports associated with BED’s EEU activities. These reporting activities also help to keep the PUC, DPS, Burlington Electric Commission and customers informed about how BED is meeting its established budgets and savings targets. Such reports include:

- EEU Annual Report- submitted by May 1 annually.
- BED Monthly and Quarterly Reports
- Periodic Ad hoc reporting requests

### **Evaluation**

This activity continues to support BED's TAG and TRM participation along with other general program evaluation activities such as conducting periodic savings verification studies.

### **Information Technology (IT)**

BED’s IT activities mainly consist of continuing the support of, and improvement to, the DSM database system for the collection and processing of project data and program information that is critical to tracking, reporting and EEU planning functions. There are periodic needs to alter existing tools or add new tools and functionality to the system which helps us to better understand and respond to changes in the Burlington marketplace.

### **Administration and Regulatory Affairs**

This category covers BED’s costs for the overall management of TEPF programs including general staff meetings, coordination of program implementation across all program functions, coordination with other EEU’s and managing and monitoring of overall performance and spending. This activity also supports BED’s participation in broad energy efficiency public discussions and EEU related regulatory proceedings.

## Act 44 Programs

### Introduction

As described in greater detail in BED's 2024-2026 EEU Triennial Plan, consistent with Act 44 legislation, BED continues to pursue several activities that are additive to and complementary to our existing Tier III programs. These activities are directed at programs that are intended to reduce greenhouse gas emissions in the thermal energy and transportation sectors, have a nexus with electricity usage, do not compete with BED's (or any other DU's) Tier III programs, and may result in additional greenhouse gas ("GHG") emissions reductions in a cost-effective manner.

Act 44 activities include the following:

- Enhanced incentives for new and pre-owned all-electric vehicles and more efficient plug-in electric vehicles.
- Enhanced incentives for workplace/retail electric vehicle supply equipment ("EVSE) located in neighborhoods designated as disadvantaged communities.
- Enhanced incentives for EVSEs located at residential multifamily apartment buildings (market rate & low income), provided the units are available to the public.
- Enhanced incentives for EVSE's located at single family/home residences.
- Advanced heat pumps.
- DeltaClima program support
- Geo-thermal well testing
- Preferred EV dealer network support.

The main objective for implementing the approved enhanced incentive programs is to accelerate Tier III measure adoption by providing customers with additional incentives, thus, reducing their upfront capital costs even further and increasing the cost competitiveness of beneficial electrification technologies.

As the table below indicates, electric vehicles and heat pumps continue to be the most active measures, but we also continue to see customer interest in exploring geo-thermal heat pump systems.

**2024 Act 44 Activity (thru Q3 2024)**

	Advanced Heat Pumps	Ground Source Heat Pump Test Wells	Electric Vehicles (EV & PHEV)	EV Charging Station Support	Preferred Dealer Network Support	Delta Clime VT (energy related business accelerator)	Total Act 151 Programs
2024 Spending	\$ 65,307	\$ 44,348	\$ 85,500	\$ 20,082	\$ -	\$ 16,800	\$ 232,037
2024-2026 Budget	\$ 269,539	\$ 135,000	\$ 193,880	\$ 97,572	\$ 15,000	\$ 48,000	\$ 758,991
% of Budget	24%	33%	44%	21%	0%	35%	31%

## **Appendices**

*Appendix A - BED's 2024-2026 Key Quantifiable Performance Indicators (QPI) & Minimum Performance Requirements (MPR) Progress thru Q3 2024*

QPI#	Title	Performance Indicator	2024-2026 Target	Policy Goal Advanced	Progress towards 3 yr. Goal (thru Q3 2024)
1	Total Resource Benefits	Present worth of lifetime electric, fossil, and water benefits	\$15,273,300	Encourage BED to design and implement efficiency initiatives that will maximize the lifetime electric, fossil fuel, and water benefits	TBD at end of 3-year period
2	Electricity Savings	Annual incremental net MWh expected savings	12,170	Annual incremental MWh savings indicator intended to encourage BED to design and implement efficiency initiatives that will maximize annual incremental electrical energy savings	6%
3	Summer Peak Demand Savings (MW)	Cumulative net summer peak demand expected savings	1.94	Cumulative summer peak demand savings indicator intended to encourage BED to design and implement efficiency initiatives that will maximize the capacity reduction coincident with peak summer demand	5%
4	Winter Peak Demand Savings (MW)	Cumulative net winter peak demand expected savings	1.95	Cumulative winter peak demand savings indicator intended to encourage BED to design and implement efficiency initiatives that will maximize the capacity reduction coincident with peak winter demand	6%
5	Weighted Lifetime MWh Savings	Cumulative Lifetime MWh Savings	176,652	Encourage BED to design and implement efficiency initiatives that will maximize the lifetime electric benefits	TBD at end of 3-year period
6	Administrative Efficiency	Total Administrative cost as a % of total budget	\$43,739	5% savings based on total Admin costs in next DRP - TBD	TBD at end of 3-year period

TEPF QPI/ MPR	Title	Performance Indicator	2024-2026 Target	Policy Goal Advanced	Progress towards 3 yr. Goal (thru Q3 2024)
1	Thermal & Mechanical Energy Efficiency Savings (Residential and Commercial)	Incremental net MMBTU savings (3Yr total)	835	Intended to encourage BED to design and implement efficiency initiatives that will maximize unregulated thermal energy savings	0%
2	Residential single family comprehensiveness	1) Average air leakage reduction per project 2) Percent of projects with both shell and heating systems measures installed.	1) 30% reduction per project 2.) 16% of premises	Intended to ensure that energy efficiency initiatives are designed and implemented to acquire comprehensive savings	0%
3	Equity for residential customers	A minimum level of overall efficiency efforts, as reflected in "traditional" TEPF program spending, will be dedicated to residential customers or 95% of total budget	\$ 148,600.00	Intended to encourage BED to design and implement efficiency initiatives that will maximize unregulated thermal energy savings	7%

MPR #	Title	Performance Indicator	2024-2026 Target	Policy Goal Advanced	Progress towards 3 Year Goal (thru Q3 2024)
1	Minimum Electric Benefits (Equity for all Electric Ratepayers)	Total electric benefits divided by total costs	Equal or greater than 1.0 benefit/cost ratio	Equity for all Vermont electric customers as a group by assuring that the overall electric benefits are greater than the costs incurred to implement and evaluate the <i>EEU</i> and the <i>EEC</i>	TBD at end of 3-year period
2	Equity for Residential Ratepayers	A minimum level of overall efficiency efforts, as reflected in spending, will be dedicated to residential customers	A minimum of 85% of residential-sector share of total RA spending be in the residential sector (\$1,484,338 over the 3 year period).	Equity for residential customers by assuring that a minimum level of overall efficiency efforts, as reflected in spending, will be dedicated to residential customers	51%
3	Equity for Low-income Customers	A minimum level of overall efficiency efforts, as reflected in spending, will be dedicated to Low-income customers	A minimum of 85% of the low-income sector share of total RA spending be on low-income services (\$253,237 over the 3 year period)	Equity for low-income customers by assuring that a minimum level of overall efficiency efforts, as reflected in spending, will be dedicated to low income households	45%
4	Equity for Small Business Customers	Number of total non-residential premises with annual electric use 40,000 kWh/yr. or less participating in energy efficiency programs.	205	Equity for small business customers by assuring that a minimum level of overall efficiency efforts, as reflected in participation, will be dedicated to small business accounts	35%