

Q.DPS.BED.1-24. BED will be subject to new requirements under the Renewable Energy Standard, as enacted in Act No. 179 of 2024 (H. 289), some of which will occur in BED's rate year. Please:

- a. Provide a description of all impacts to BED's cost of service associated with the new requirements and an estimate of said costs.
- c. Confirm the extent to which any of these costs are already embedded in BED's cost-of-service model.

OBJECTION: Requests for calculations/estimates of costs not included in the rate filing are beyond the scope of permissible discovery. Without waiving the foregoing or any other objection, BED responds as follows:

RESPONSE:

- a. BED's rate request was filed on June 14, 2024, when it was not yet clear whether Act 179 would become effective. (The Vermont legislature voted to override the Governor's veto on June 17, 2024.) BED's response to the PUC in Case No. 24-9001-INV (see attached file: *Q1-24 BED comments in Case No. 24-9001.pdf*), may be helpful, however.
- b. BED has not included any additional cost related to Act 179 in its cost of service for the rate year. How such potential expenses should be treated in a cost-of-service filing is unclear to BED, as the most significant additional costs would be those related to meeting the requirements for new load/load growth (and load growth is not typically assumed in a rate filing). Said another way, were there to be increased costs related to Tier V between the test year and rate year, they most likely would be driven by an assumed increase in load, which has not been considered in past rate filings.

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