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February 21, 2025

Holly Anderson, PUC Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 24-2317-INV, Efficiency Vermont Comments to Public Utility Commission Proposal for Decision Addressing Energy Savings Account & Customer Credit Programs.

Dear Ms. Anderson,

On August 22, 2024, the Public Service Department (“Department”) filed a Proposal for Program Design Changes for Energy Savings Account (“ESA”) and Customer Credit Programs (“CCP”) pursuant to Act 142, signed by Governor Scott on May 30, 2024. Parties filed comments in response to the Department’s Proposal by September 12, 2024. On February 10, 2025, the Commission released a Proposal for Decision Addressing Energy Savings Account & Customer Credit Programs. Pursuant to the Commission’s cover letter, comments in response to the Proposal for Decision are to be filed by February 21, 2025. This filing provides Efficiency Vermont’s response.

Efficiency Vermont has served as the administrator of the existing ESA, and the ESA Pilot Program. In Efficiency Vermont’s review of the Commission’s Proposal for Decision, Efficiency Vermont suggests the Commission provide additional clarity in screening responsibilities. The Commission’s Proposal for Decision suggests that the Energy Efficiency Utility (“EEU”) will provide societal cost-effective screening for all measures as they do for existing programs. However, Efficiency Vermont does not presently screen all measures that may be eligible under the ESA and CCP as approved in this proposal and may in fact be unable to screen the non-energy efficiency measures (e.g., energy productivity, energy storage) that are eligible under both programs. In effect, Efficiency Vermont is prepared to screen any energy-efficiency measure that the EEU is authorized to deploy, but requests that the screening for any non-energy efficiency measure should not be the responsibility of Efficiency Vermont and may need to be screened through another party.

With this request for clarification, Efficiency Vermont supports the Commission's Proposal for Decision addressing ESA & CCP and finds that the proposal aligns with the Department's proposal, and Efficiency Vermont's comments.

Thank you for this opportunity to provide comments.

Sincerely,



David C. Westman

Director, Regulatory and State Agency Affairs