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July 3, 2025

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

Re: Case No. 24-2317-INV, Comments on Tracking and Reporting Program Caps for ESA & CCP

Dear Ms. Anderson,

On June 5, 2025 the Commission released an Order in Case No. 24-2317 approving the Department of Public Service's ("The Department") filed program design elements for ESA & CCP. The total annual amount of customer EEC funds that can be placed into an ESA program or the CCP are \$2,000,000 and \$1,000,000, respectively. In the June 5 Order, the Commission requested the Energy Efficiency Utilities ("EEUs") and the Department track the total annual amount of EEC funds for the programs, and for the Department and EEUs to file a response by July 3, 2025 regarding the appropriate reporting mechanism for conveying this information to the Commission. This filing provides the Department's and the EEU's response.

i. Participant confidentiality

The reporting of the total program contributions of ESA & CCP could potentially include confidential information of the participants. The EEU is willing to make a projection of total ESA and CCP program collections if these contributions can be clearly aggregated and not used to identify a participants' individual contributions. If aggregating the total collections in an anonymous manner is not possible, Efficiency Vermont proposes to file an attestation that confirms all contributions have been tracked and tabulated, and that total collections did not exceed the statutory caps. In the instance that BED has a participant in ESA and/or CCP, the EEUs will coordinate to track the program caps of their programs.

ii. Reporting mechanism

The Department and the EEUs support including either an aggregation of total collections or an attestation from the EEU in the EEU's savings claim report, filed annually with the Commission in April, as the appropriate mechanism for reporting the ESA program & CCP's total collections. Until the first pool of applicants is known, it will be difficult to determine what their total estimated annual contributions will be. Therefore, if the total pool of applicants is projected to be at or close to the program caps, then the EEUs could account and report the status of the program caps in more frequent periods.

Sincerely,

Emily Roscoe
Project Manager