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July 15, 2025

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

Re: Case No. 24-3351-INV; Efficiency Vermont Comments to PUC Information Request

Dear Ms. Anderson,

On May 27, 2025 the Commission issued an order in the above-referenced proceeding seeking additional information from participants on a range of topics. The questions posed by the Commission are appropriately wide in scope to address the potential for future overload conditions referenced in the most recent VELCO Long Range Transmission Plan ("LRTP"), though Efficiency Vermont will focus its response herein to the specific question posed by the Commission regarding processes stipulated under the MOU in Docket 7081. Efficiency Vermont does not have substantive comments at this time on the additional topics raised by the Commission in its information request. By this letter, please accept Efficiency Vermont's comments to this limited question.

The Commission requested participants to address the "present condition of coordination of statewide distribution and transmission planning work, including strengths and weaknesses, and what steps are needed to ensure that NTAs are given full, fair and timely consideration as envisioned by Docket 7081." As an Energy Efficiency Utility ("EEU"), Efficiency Vermont is not engaged in the "step-by-step" process used by the Distribution Utilities or VELCO for developing data sets, load growth projections, or cost/resiliency factors that go into a Docket 7081 screening methodology. However, in the capacity as participants in the Vermont System Planning Committee, Efficiency Vermont has participated in every annual review of transmission and sub-transmission projects since the formation of the Vermont System Planning Committee (VSPC). The utilities present their analysis to a "Geo-Targeting" subcommittee of

the VSPC using the project screening criteria adopted in Docket 7081, and in this manner, Efficiency Vermont is familiar with the results and key outputs of the project screening criteria, though as explained below there hasn't been a meaningful result from this analysis in over a decade.

The Commission asks whether participants in the proceeding have “any recommendations for changes to the Docket 7081 process to ensure NTAs are given full consideration.” In the historical context, a signature success of Vermont's investment in energy efficiency over the past 25 years has been a relatively stable demand for electricity, and consistent peak loads that have limited the need for costly investments in infrastructure. In the years following the final order in Docket 7081, Efficiency Vermont provided several efficiency and demand-reduction NTA programs targeted at specific geographic regions of the state. Those projects were largely successful at deferring or eliminating load-growth related infrastructure, though as Vermont's statewide investment in efficiency and distributed energy grew with time, electric loads remained relatively flat (or declined). At present, nearly all projects being developed by the utilities and presented at the Geo-Targeting subcommittee of the VSPC are primarily asset-condition related, and not driven by transmission or sub-transmission load growth, and therefore not identified as a candidate project for an NTA. This is a reasonable outcome to follow from the statewide investment in efficiency and distributed energy, but it means that it has been well over a decade since a utility project reviewed under the Docket 7081 criteria has been eligible for deferral through an NTA.

Additionally, the tools that would have been used to build an NTA solution twenty years ago would have looked much different than today and would have mainly been focused on lighting. Whereas, today the lighting market is nearly transformed into high-efficiency LED, and the NTA solution set would have to be much broader to include technologies like batteries, flexible HVAC load, electric vehicle charging, and direct management of energy resources. Many of these solutions involve substantively different ownership and operational structures than the relatively simple plug-and-play consistency of customer-owned passive efficiency, and should be considered as an additional complexity to developing an NTA in the future.

When it was first enacted twenty years ago, the requirement for NTA analysis stipulated in Docket 7081 was a groundbreaking development for managing system costs. Efficiency

Vermont continues to believe that the structure of the requirements of Docket 7081 are sound, and have been effective at reducing costs for Vermonters over the last twenty years. Nonetheless, ownership and operational complexities for the new suite of demand-management tools shouldn't be a barrier to the development of new NTA solutions. Efficiency Vermont supports a comprehensive reexamining of the Docket 7081 requirements such that the new generation of measures and tools will have a fair process for consideration in NTA analysis.

Thank you for the opportunity to provide these comments on this important matter. Please do not hesitate to contact me if there are any questions regarding these comments.

Sincerely,



David C. Westman

Director, Regulatory & State Agency Affairs