Case No. 25-0443-INV
VEC Reply to Request for Comments
August 28, 2025

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STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Re: Case #25-0443 INV	
Investigation pursuant to Act 142 of 2024 into the creation of a statewide program to reduce energy burden	

Vermont Electric Cooperative (VEC) Response to July 31, 2025 Request for Comments

Section 21 of Act 142 of 2024 ("Act 142") directs the Vermont Public Utility Commission ("Commission") to conduct a cost stabilization study and determine whether a statewide program to reduce energy burden is needed in Vermont. On July 16, 2025, the Commission convened a workshop on this topic, and on July 31, 2025, issued a Request for Comments seeking stakeholder. Vermont Electric Cooperative (VEC) respectfully submits the following comments.

VEC appreciates the commitment of legislative and regulatory policymakers to ensuring a cost-effective and equitable electric system that supports all Vermonters, particularly those with the highest energy burdens. Drawing on our extensive experience serving cooperative members—many of whom face significant affordability challenges—VEC emphasizes the importance of designing programs that provide meaningful assistance without imposing disproportionate costs on other ratepayers. We recommend avoiding complex or duplicative administrative structures that would increase costs at a time when Vermont is seeking to accelerate electrification. VEC supports collaborative approaches among service providers to achieve efficiencies and cost savings that can reduce energy burden.

Question 1. *Act 142 directs the Commission to "make a determination as to whether a statewide program to reduce energy burden is needed in Vermont." The Commission requests input from all stakeholders addressing this question with respect to:*

> *(a) a statewide program to assist customers with low-income with their electric utility bills, and*
> *(b) a statewide program designed to reduce transportation, thermal, and/or electric energy costs for low- and moderate income households through investments in efficiency or electrification measures*.

VEC supports programs-whether statewide or local- that assist high-burden households in reducing energy costs and maintaining bill affordability. This support can take many forms including direct financial bill assistance support, and program incentives for electric efficiency and electrification, either locally or statewide. Bill assistance programs may be most efficiently implemented at a statewide level although the challenge remains how to fund a bill assistance program.

Vermont's experience with weatherization and fuel assistance should inform any new initiatives. New programs should build on existing infrastructure, community connections, and expertise in working with the targeted communities. VEC does not support layering on new, and potentially costly or redundant infrastructure and systems. If funding is to be raised to support those with high energy burdens, these funds must not be diverted for unnecessary or duplicative administrative systems.

Question 2.
Please provide recommendations as to how existing programs may be better coordinated to ensure low- and moderate-income Vermonters are reducing their total energy consumption and/or costs.

VEC defers to weatherization assistance program leaders and community action organizations regarding best practices to effectively work with high energy burdened individuals and communities. Based on our experience working with income eligible members (e.g., VEC's ACRE and VEC's income eligible battery program), we have learned that outreach needs to be grassroots and personal. For example, in person meetings and phone calls, rather than mass emails or online forms. We believe bill assistance could be most cost-effectively delivered through alignment with existing fuel assistance programs.

Question 3.
Please identify any obstacles and recommended solutions for increasing coordination across electric, thermal, and transportation energy cost reduction programs, including through the sharing of best practices and program design and implementation successes.

Simplicity is essential. A single point of entry supported by coordinated expertise is most likely to succeed, particularly if services address broader household needs beyond energy. Many households struggling with affordability are hindered by having to navigate multiple agencies or contact points.

Question 4.
If a statewide program is recommended, please:
a. Explain whether existing programs should continue to operate and align with a new statewide energy cost stabilization program or whether existing programs should cease operations.
b. Identify the most appropriate financing mechanism for a statewide energy cost stabilization program.
c. Describe any recommended eligibility requirements for a statewide energy cost stabilization program.
d. Suggest and describe a process for making and monitoring eligibility determinations for a statewide energy cost stabilization program.

VEC does not currently operate a cost stabilization program beyond efforts to minimize ratepayer costs. We caution against approaches that would increase electric rates for members just above income thresholds, many of whom also face affordability challenges. Now is also not the time to increase ratepayer costs as we all work to meet carbon reduction and energy transformation goals.

Eligibility determinations should not rest with distribution utilities, which lack income-verification expertise. Instead, a model such as is used for the VEC ACRE program—where eligibility is verified by the Department for Children and Families (DCF) and utilities receive an approved participant list—provides a secure and efficient approach.

Question 5:
Stakeholders may provide information or data to support or challenge the assumption in Act 142 that "electric costs might rise but that total energy costs are expected to decrease because of increased electrification, efficiency, storage, and demand response activities."

Total energy costs depend on numerous variables, and energy markets are currently volatile. That said, increased electrification, efficiency, storage, and demand response—if implemented thoughtfully—can reduce overall costs and improve affordability. VEC recommends the Commission review the findings of the Energy Action Network's 2025 Annual Progress Report, expected in mid-October, which will provide updated analysis of how efficiency and electrification investments impact affordability and energy burden.

VEC appreciates the opportunity to provide comments on this important topic and looks forward to continued engagement as the process advances.

Sincerely,

Andrea Cohen, Leader
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Vermont Electric Cooperative