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350Vermont.org



August 29, 2025

350Vermont

Re: Case No. 25-0443-INV

350Vermont is a statewide, grassroots climate justice organization building a people-powered and people-led climate justice movement in Vermont for a just, thriving world. Our network includes 15 volunteer-led local and working groups throughout the state, over 500 people taking action, and a larger base of nearly 7,000 Vermonters receiving our regular communications. We work at the intersection of the climate crisis and social justice to advance equitable and effective climate solutions. For the past several years, we have been committed to addressing the undue electricity burden facing low-income Vermonters.

To begin, we'd like to offer some recommendations regarding the need for feedback from low-income communities. Firstly, if possible, a stipend should be provided for low-income individuals who participate in meetings or provide feedback regarding the study. This is particularly necessary if these listening sessions and workshops are held during work hours. We also recommend that for in-person events, transportation and childcare are either offered or reimbursed to reduce that barrier. Furthermore, we suggest reaching out to organizations with connections to low-income communities rather than waiting for these communities to come to you. Organizations to reach out to include, but are not limited to: Vermont Community Action Agencies, Vermont Legal Aid, the Vermont Workers Center, Migrant Justice, the Vermont Center for Independent Living, and the Vermont Tenants Association. These steps are crucial to an equitable solution created with and for low-income communities.

In addition, we want to emphasize the importance of developing a statewide program¹ to assist low and middle-income Vermonters with rising electricity costs, especially with the possible elimination of federal assistance programs like LIHEAP. According to national and state energy reports, Vermont has an average electric rate of 22.57 cents per kilowatt-hour². This is 34.90% higher than the US average rate of 16.73 cents³, and as Vermont phases out fossil fuels, households will rely more on electricity to meet their needs for home heating and cooling and transportation. Ratepayer protection would allow for electrification without the fear of rising costs, resulting in savings for households, more affordable heating, and a greener future. While electric utility assistance programs exist in Vermont, they are underutilized, difficult to apply for, and offer significantly lower discounts than those in other states. Furthermore, existing programs are located only in certain areas of the state; much of the Northeast Kingdom has no access to assistance programs through its utilities, even though it's one of the poorest areas in Vermont.

Even in areas that are served by a utility that offers an assistance program, there is no guarantee that the program is comprehensive, let alone advertised to its rate base. For example, while Green Mountain Power (which covers around 70% of the state) does offer an Energy Assistance Program (EAP), only around 25% of those eligible are enrolled, and 1 in every 7 of GMP's customers still receive disconnection notices. According to disconnection reports filed by GMP, this is the highest number of disconnection notices sent to customers out of all electric utilities in the state, at approximately 16%, a clear indicator that GMP's EAP is not sufficient. The Burlington Electric Department (BED) also offers an EAP, though it's only a 12.5% discount for qualified customers. BED has the second-highest rate of sending disconnection notices, sending them to 14% of its customers, while only 4.3% of its customers receive discounts through its assistance program. This low number of participants may result from the limited discount offered by the program (a far lower discount than the programs in other states) and the yearly application process.

¹ Henceforth a statewide program to reduce energy burden may be referred to as a ratepayer protection program.

² "Vermont State Energy Profile." 2024. U.S. Energy Information Administration. December 19, 2024.

³ Hope, Matt. 2021. "Vermont Electricity Rates & Average Electricity Bills." Find Energy. March 16, 2021. <https://findenergy.com/vt/>.

The current system of utility-based assistance programs also excludes smaller co-op and municipal utilities; most of these utilities could not bear the cost and labor burden on their own of implementing and funding an assistance program. It's not enough to simply require every utility to develop its own assistance plan; we've already seen the shortcomings these plans can have, and it's leaving many Vermonters with the highest energy burden behind.

Rather than requiring utilities to develop their own assistance plans or enhancing existing plans, we recommend the creation of a statewide ratepayer protection program consisting of tiered discounts funded through a statewide rate base and with automatic enrollment through existing social services. Tiered discounts would allow for different amounts of assistance depending on income and mitigate a benefit cliff. Funding through a statewide rate base would help smaller cooperative and municipal utilities, as funding would be pooled from across the state to aid those with the highest energy burdens. We urge the PUC to carry out the necessary research and modeling of a tiered discount statewide ratepayer protection program as a first step in creating a Ratepayer Protection Program for low and middle-income Vermonters.

Commissioners, thank you for your time and the opportunity to provide feedback on this issue.

Sincerely,

Mieke Riddlebarger on behalf of 350Vermont