September 4, 2025

Holly R. Anderson
Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 25-0443-INV, Investigation pursuant to Act 142/creation of statewide program to reduce energy burden

Dear Ms. Anderson,

In response to the Public Utility Commission ("Commission")'s July 31, 2025, Memorandum requesting comments, Burlington Electric Department ("BED") submits this letter with responses to each of the Commission's questions.

*(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*

BED does not recommend establishment of a statewide ratepayer-funded program at this time because individual electric utilities are in the best position to determine which programs will best serve their eligible customers. BED notes that the relative number of eligible customers will differ by utility service territory and the energy burden differs by utility service territory and by rates. Examples of such utility-specific programs include the Energy Assistance Programs ("EAPs") implemented by BED and Green Mountain Power, as well as the many other resources and income-qualified programs described in utilities' April 2025 filings in this Case. If there is contemplation of a state-funded (instead of ratepayer funded) statewide program to assist income-eligible customers with electric or energy bills, BED is supportive of that concept. But if ratepayer funded, BED believes individual utility programs are best positioned to serve income-qualified customers.

*(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.*

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BED first notes that its own Tier 3 rebate programs and many similar utility programs currently offer enhanced incentives for transportation and thermal electrification measures for income-qualified customers. BED is supportive of continued focus on providing enhanced incentives and programs for income-qualified customers through the Tier 3 and energy efficiency utility program work already underway. If a statewide program was established and funded by state or other resources (not by ratepayers who already fund the Tier 3 and efficiency programs) that could further enhance the opportunity to reduce energy burden through electrification measures for income-qualified customers and BED would welcome and support that concept.

Perhaps such a program could be funded by the State and administered by an organization with expertise in providing community services such as the Vermont Department for Children and Families ("DCF") or the regional community action agencies. Based on the title of the Commission's Investigation to update and improve energy efficiency utility and Renewable Energy Standard Tier III Programs in Case No. 25-1094-INV, the subject matter of that Case may cover this question as well.

*(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.*

In general, BED's experience is that steps that allow enrollment in multiple programs via a single intake/application process will most meaningfully help expand access to supportive programs. Setting common eligibility criteria (such as qualifying income threshold) across disparate programs is one such example (BED set the income threshold for its EAP to be in line with VGS's EAP for this reason). BED also qualifies customers automatically for its EAP based on eligibility lists from other state agencies to which BED has access,

In addition, Vermont DCF currently maintains an Energy Assistance website (https://dcf.vermont.gov/benefits/eap) listing programs that help lower-income Vermonters afford energy for their homes. Based on BED's discussions with DCF, however, BED's understanding is that this website only lists the assistance programs of entities who contract with DCF to provide program enrollment and income verification services. Ideally, this website could be expanded—or another similar one could be created by another state office or other entity—to become a clearinghouse of information about such opportunities for customers, irrespective of DCF involvement in program administration. Utilities and community resource providers could potentially coordinate to share information about their respective energy burden reduction programs by posting on respective websites and making announcements at meetings such as regional provider network meetings and monthly EEU equity meetings.

*(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.*

A primary concern with sharing information across programs about successful best practices would be maintaining confidentiality of customer information, but sharing high-level information on programs and practices could likely be done without an exchange of customer information. We recommend that any initiatives to coordinate programs across sectors be customer-centered and include a process to prioritize customer privacy, existing utility privacy policies, best practices, and preventing duplication of resources.

*(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.*

As noted previously, BED does not recommend establishment of a ratepayer-funded statewide program but rather supports individual utility programs. If a new statewide program were funded by non-utility funds--for instance, by a legislative appropriation to DCF--it should be in addition to existing utility and community action programs. Any eligibility criteria and verification should be as consistent as possible with existing services.

Given BED's work in getting its EAP program up and running and enrolling customers, BED believes existing programs should continue to operate in the event a new statewide program is launched, in order to avoid disqualification or interruption of benefits for already enrolled customers.

*(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."*

BED generally agrees with the assumption referenced from Act 142 that electrification, efficiency, storage, and demand response activities will allow for a reduction of total energy costs on a global level as electrification measures are typically more energy efficient. In the thermal sector, BED is conscious that in service territories with access to natural gas service such as Burlington, certain thermal measures may impact cost discussions for individual customers differently than they might in areas served primarily by unregulated fuels that may be higher cost. In the transportation sector, the cost of fueling an electric vehicle (EV) is documented to be cheaper than fueling a gasoline vehicle on a per mile equivalent basis, and EVs also offer generally lower maintenance costs.

Thank you for the opportunity to provide comments. Please feel free to reach out with any questions.

Sincerely,

Amber Widmayer
Regulatory Specialist
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