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Ms. Holly Anderson
Clerk of the Commission
112 State Street
Montpelier, VT 05620

RE: Docket 25-0443-INV; Act 142 of 2024 Commission Request for Comments

Dear Ms. Anderson:

Washington Electric Cooperative (WEC) appreciates the opportunity to comment on the July 31, 2025 questions raised by the Vermont Public Utility Commission ("Commission") after the July 16, 2025 workshop investigating the creation of a statewide program to reduce energy burden. WEC found the workshop helpful and was happy to participate on behalf of its ~12,000 members. WEC participates in multiple programs to help low to moderate income members and any improvements in current programs or ideas on how better to serve this population is in our member's interest.

Washington Electric Cooperative supports the development of a statewide program to assist low to moderate-income Vermonters. A statewide program administered by a third party has the potential to more efficiently reach low to moderate-income Vermonters through a reduction in administrative burdens and increased awareness of the program. A statewide program can also promote equity across service territories with varying income level distributions and different average energy consumption. If a program is funded through utility rates or fuel use, service areas with higher concentrations of low to moderate income families and lower average energy consumption would be able to participate in the program at similar levels as service territories with lower concentrations and higher energy consumption. A well-designed program could also address the concerns of a "cliff" of support for those that may just exceed the threshold of the qualification income requirements through the use of gradual reductions in support.

Continuity and awareness are critical components of any statewide program. Should the Commission and stakeholders agree that a statewide program is appropriate and current programs need to be modified, WEC recommends that current programs continue for a minimum of two years if the program operators are able to do so efficiently with adequate messaging and outreach to participants of any program changes. Program awareness is a hurdle to adoption, and any current program disruption should include a long lead time, so recipients have ample time to replace those services if they continue to be needed. At this time, WEC does not have recommendations on the financing mechanism, eligibility requirements and monitoring for a statewide program other than the Commission leave opportunities for stakeholder input should a statewide program be recommended. Act 142 of 2024 asks the Commission to make a determination in its December report if a statewide program to reduce energy is needed. Should the Commission make that determination after review of stakeholder input, a recommendation in the December report for a process and timeline to determine the programs design to allow for stakeholder input is appropriate.

Program offerings submitted by the many participants in this case highlight that there are many non-electric programs available to Vermonters to help reduce transportation and thermal energy costs. The Commission was directed to provide recommendations on these programs in addition to low and moderate income programs targeting the use of electricity. The "2023 Vermont Energy Burden Report" by Efficiency Vermont[1] reported that 80% of energy spending is due to thermal and transportation expenses with 20% of energy spending due to the use of electricity. A focus in the Commission's December report on suggestions for efficiencies or expansions to current programs or even a new program addressing transportation and thermal energy spending would help address the majority of energy spending in the state, producing a larger impact. WEC agrees with GMP, VEC, SED, and VPPSA that while Vermont's Distribution and Efficiency Utilities offer many programs for fuel switching in transportation and thermal energy, input from community action groups and organizations assisting low-income households with weatherization, fuel assistance and related programs will be valuable for the Commission's report.

Alleviating rate pressure from current rate designs can help with energy burden for low to moderate income residents. Rate designs that balance the many goals in VT to address legislative priorities have been found by the Vermont Department of Public Service[2] ("DPS") and the Commission[3] to impact ratepayers who do not participate in programs developed to support those priorities. As an example, reducing identified cost shifts from net-metering participants to non-participants by designing rates that reflect the avoided costs from net metered systems can help the state reach its goals more equitably while reducing energy burden for all ratepayers, including low to moderate income ratepayers. WEC recommends that the Commission include a recommendation in its December report that it continue to work towards reducing cost shifts among ratepayers from statewide programs when those cost shifts have been identified and measured with a priority on those cost shifts that disproportionally impact low to moderate income Vermont residents as found by the DPS[4].

Act 142 of 2024 recognizes that the concept of energy burden is not just a focus on the reduction of energy costs. Public power and consumer owned utilities are focused on delivering the least cost solution while meeting the needs of its ratepayers and VT's goals outlined in the Renewable Energy Standard, Climate Action Plan and others. The Commission's report has the opportunity to recommend that the Legislature continue to focus on the numerator of the energy burden equation, income. Increasing disposable income through affordable housing, workforce training, employment services, lower tax burdens, access to affordable food, etc. are all ways to reduce the energy burden of low to moderate income families. While these topics are not within

[1] Sears, J., Lucci, K. "2023 Vermont Energy Burden Report" pg. 8

[2] *In re: Biennial update of the net-metering program*, Case No. 24-0248-INV, Order of 5/30/24 pg.17.

[3] *Id*.pg 5

[4] *Comments and recommendations of the Vermont Department of Public Service re: Biennial update of the net-metering program*, Case No. 24-0248-INV, 4/1/24 pg.27

the jurisdiction of the Commission, it is appropriate for the Commission to recognize in its report that Act 142 requests ideas to reduce energy burden, not just energy expenses and income is a component when determining energy burden.

Thank you for the opportunity to attend and comment on the workshop held to learn more about Vermont's low to moderate income programs helping to address energy burden. Should there be any questions please do not hesitate to contact me.

Brian Callnan
Director of Power Supply and Regulatory Affairs
Washington Electric Cooperative

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