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Via ePUC

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

Re: Case No. 25-0443-INV – Investigation into the creation of a statewide energy program to reduce energy burden for Vermonters pursuant to Act 142 (2024)

Dear Ms. Anderson:

Green Mountain Power (GMP) appreciates the opportunity to provide these comments in response to the Commission's July 31, 2025, request for input on the scope, need, and structure of statewide efforts to help low- and moderate-income Vermonters as required by Act 142 of 2024.

GMP offers an Energy Assistance Program (EAP) that provides a 25% discount on the customer charge and energy usage charge to participants, alongside a one-time arrearage forgiveness benefit for new enrollees. Participation is funded by a non-bypassable monthly fee on all customer accounts. The EAP was last updated in December 2022 in Case No. 22-5173-TF to raise the eligibility level from 150 percent to 185 percent of the current federal poverty level, consistent with 30 V.S.A. Section 218(e). This expansion, approved and implemented in March 2023, enabled more customers to participate and streamlined enrollment in partnership with the Vermont Department for Children and Families (DCF).

In addition to EAP, income eligible customers can participate in the Affordable Community Renewable Energy (ACRE) Program funded by the Department of Public Service and GMP's Shared Solar Program (SSP), both of which connect customers to Vermont solar projects, so they receive credits that lower their bills. When combined, the EAP and these solar programs can provide between a 30–40% discount for income-eligible customers.

There are also Tier III programs for income-eligible customers, and several other energy savings programs administered by other entities that are statewide or offered across utility territories, as captured in the previous information request by the Commission.

GMP offers the following comments on the questions asked by the Commission:

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.**

Our EAP is carefully designed to find a balance between costs to all customers and direct benefits to participating customers. With rising costs from other pressures outside of GMP's control—regional transmission as an example—asking all customers to pay more on their electric bills runs counter to broader state goals of increasing affordability and reducing carbon emissions. We are not supportive of a statewide program that is paid for by electric customers to establish a pool of funds accessed by all utilities. We are open to considering a statewide program to increase direct savings for income eligible customers if it is funded by state or federal funds and it provides additional support beyond what our EAP provides without increasing costs for electric customers. As captured in the responses to the earlier information request by the Commission, programs exist across many utility territories and are offered by entities serving customers statewide. Often those take the form of incentives to support investments in electrification or weatherization, rather than direct bill assistance. If a statewide program is pursued, it might be worth considering direct bill assistance to free up customers' funds to help with rising costs across different sectors.

With regard to the part of the question regarding investments in efficiency or electrification measures, focused on other energy costs (transportation, thermal, etc.), we would want to understand more how any such additional investment would harmonize with existing programs and what gap additional investment would fill that current well-funded programs cannot already address, what problem the statewide program is trying to address, and avoid simply adding on top of existing programs. An evaluation of the existing programs, eligibility, level of investment, and effectiveness in reaching households, and how the work is delivered could be beneficial before determining whether or what type of additional statewide program is needed.

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.**

GMP encourages the Commission to hear from community action organizations and other stakeholders who directly coordinate and work with eligible customers connecting them with the various programs focused on reducing energy costs. A few examples of successful work for our customers include our work with DCF to auto-enroll customers into our EAP who are signing up for fuel assistance. Our ACRE and Shared Solar programs also feature auto-enrollment using our existing EAP customer list. This streamlines the customer experience, connecting eligible Vermonters to assistance with fewer steps. Partnering with an entity such as DCF has been key in this, because they work directly with customers and have expertise in income verification. Should a statewide program be considered, it would be important to review and align eligibility with other programs that can be independently verified rather than create a new threshold or require utilities to track or customers to provide income information.

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.**

As discussed above and in similar proceedings, simplicity is important for customers to access programs they are eligible for and explain the process for enrollment. To the extent there are existing programs out there designed to address customer costs across energy sources, often there are multiple points of entry to accessing the programs. We agree with points raised by VPPSA, Stowe Electric, and Vermont Electric Cooperative (VEC) around considering ways to simplify eligibility which would in turn create the opportunity to have a coordinated single point of entry across funding streams.

4. **Considerations for a Statewide Program, if Recommended**

Please see our response to the first information request, which outlines our recommendations in the event a statewide program is pursued.

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."**

While total energy costs for customers depend on a variety of factors, we agree those strategies can help mitigate cost pressures including regional transmission costs. Electricity has been a lower cost, cleaner, and less price-volatile source of energy than many other choices, as outlined in Energy Action Network's 2024 Annual Progress Report.[1]

[1] See https://eanvt.org/2024-annual-report/key-findings/.

GMP appreciates the Commission's leadership in advancing Act 142's goals and its review of these topics across multiple proceedings. We are available to participate in any future workshops or answer additional questions.

Thank you and please let me know if you have any questions.

Sincerely,

Candace Morgan
Director, Government and Regulatory Affairs