



FILED VIA ePUC

September 5, 2025

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

Re: Case No. 25-0443-INV, Public Utility Commission investigation pursuant to Act 142 of 2024 into the creation of a statewide program to reduce energy burden

Dear Ms. Anderson:

Vermont Gas Systems, Inc. (“VGS”) provides the following comments in response to questions posed in the Commission’s July 31, 2025 Request for Comments.

Some of the Commission’s questions ask whether a statewide program to reduce energy burden is needed and whether there is a need for a statewide program to reduce thermal energy costs for low- and moderate-income households through investments in efficiency or electrification measures. VGS notes that we have been operating thermal energy efficiency programs for our customers since 1992 and we were appointed as a state Energy Efficiency Utility (“EEU”) in 2016. Through our energy efficiency work, we have been successful in lowering customers’ energy usage and associated energy costs through proven programs, including through provision of energy audits, weatherization incentives, efficient equipment rebates, technical and financial support for affordable housing developments, and low-cost financing and payment options. Our “FastTrack” program, which provides free energy audits, a comprehensive weatherization package including incentives and financing options, contractor identification, project management support, and quality assurance, is a particularly effective model to overcome many of the challenges that homeowners face when considering a weatherization project.

The FastTrack program’s success is due in part to the fact that our EEU is embedded within the utility. From a customer perspective, the relationship between fuel provider and the efficiency provider is seamless, eliminating a potential barrier for customers who prefer a “one-stop shop” for their energy needs. Future program design for thermal efficiency should recognize the benefit of integrated, accessible, and easy-to-use services for customers.

VGS also notes that we have been operating a Low-Income Assistance Program (“LIAP”) since 2013, through which we provide a 20% discount to income-eligible customers on their monthly gas bills. This program has been in operation for many years and has had steady enrollment. For customers who do not qualify for the LIAP discount but meet certain eligibility requirements, there are assistance programs in place for energy costs as well as energy efficiency.

The Commission asked commenters to identify obstacles and recommend solutions for increasing coordination across electric, thermal, and transportation energy cost reduction

programs. VGS is open to sharing information about best practices and program design from our experience with LIAP and as an Energy Efficiency Utility. As the Commission continues its investigation and prepares recommendations for its December report to the General Assembly, we look forward to discussing how other utility and EEU programming can promote thermal energy affordability.

Thank you for your time and effort investigating energy burden on Vermonters. Please do not hesitate to reach out to our team with any questions or requests.

Respectfully submitted,

/s/ Mary G. Bouchard

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