

October 6, 2025

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:

We, the undersigned organizations, appreciate the workshop the Commission provided on July 16th to gather input from stakeholders as required by Vt. Act No. 142 of 2024, An Act Relating to Miscellaneous Changes Related to the Public Utility Commission (“Act 142”). During the workshop, Staff Attorney Jake Marren invited suggestions for how the Commission might effectively engage low-income customers as required by Act 142.

Section 21(c) of Act 142 states:

"In conducting the study required by this section, the Commission shall seek input from interested stakeholders, including... low-income program representatives, consumer-assistance program representatives, statewide environmental organizations, environmental justice entities, at least one low-income cost reduction program participant, at least one moderate-income cost reduction program participant..."

We are not aware of particular efforts to fulfill the requirement to include low or moderate-income cost-reduction program participants as of the submission of this comment.

Not only does Act 142 require the inclusion of the voices of low-income stakeholders, but lowering barriers to participation and actively listening to those most impacted by a high energy burden is essential to formulating recommendations that will truly change the reality many Vermonters face when it comes to choosing between paying their utility bills or feeding their families.

To this end, the undersigned respectfully request that, ahead of the workshop scheduled for October 14th, efforts be made to include Vermonters experiencing a high energy burden during this workshop. Ways to meaningfully engage a diverse group of Vermonters with a high energy burden include:

- Providing an in-person and virtual workshop option;

- Providing a stipend for low-income individuals who participate in meetings or provide feedback regarding the study;
- Making translation services and sign-language interpretation available to participants;
- Providing transportation and childcare, or offering reimbursement if the event is in person;
- Using accessible plain language, policy speak can be intimidating to many folks not already part of the policy sector, and
- Reaching out to organizations with connections to low-income communities, including:
 - Community Action Agencies
 - Downstreet Housing
 - Environmental Justice Network
 - Migrant Justice
 - Northeast Kingdom Organizing (NEKO)
 - Vermont Legal Aid
 - Vermont Workers Center
 - Vermont Center for Independent Living
 - Vermont Tenants Association

We are committed to ensuring that the voices of low-income ratepayers are heard in this investigation. With sufficient advanced notice, we are prepared to assist in facilitating workshop engagement from Vermonters facing a high energy burden.

With appreciation for your continued work investigating this issue,

350Vermont

Champlain Valley Office of Economic Opportunity (CVOEO)

Climate Economy Action Center

Conservation Law Foundation

Environmental Justice Network

Northeast Employment and Training Organization (NETO)

Northeast Kingdom Organizing (NEKO)

Third Act Vermont

Renewable Energy Vermont

Resilience Occupational Therapy

Slingshot

Southeastern Vermont Community Action (SEVCA)

Upper Valley Affinity Group
Vermont Community Thermal Networks
Vermont Healthy Soils Coalition
Vermont Interfaith Power and Light
Vermont Workers Center