

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 24-2317-INV

Investigation of the Energy Savings Account and Customer Credit programs pursuant to 30 V.S.A. 209(d)(3)(c)	
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DEPARTMENT OF PUBLIC SERVICE COMMENTS ON ORDER ADDRESSING ENERGY
SAVINGS ACCOUNT AND CUSTOMER CREDIT PROGRAM
PARTICIPATION AND TRACKING OF FUNDS

Case No. 24-2317-INV concerns the implementation of the Energy Savings Account (“ESA”) program and Customer Credit Program (“CCP”) pursuant to Public Act 142 of the 2024 Vermont legislative session. Pursuant to 30 V.S.A. § 209(d)(3)(C), these programs allow customers who meet certain eligibility standards to use a percentage of their annual electric energy efficiency charge (“EEC”) payments to self-administer energy efficiency as a substitute for participation in energy efficiency utility (“EEU”) programs.

The Department of Public Service (“Department”) is filing these comments in response to the questions posed in the Public Utility Commission’s (“Commission”) order of September 23, 2025 regarding “any implementation issues related to simultaneous participation by these companies (Ethan Allen Operations, Inc., Mack Molding Company, and Weidmann Electrical Technology, Inc.) in both the ESA pilot and the revised ESA program.” The Commission specifically asked whether “funds accrued through participation in the revised ESA program [should] be allowed to be used for projects identified by the participant during the ESA pilot period?” The Commission noted that WestRock Converting, LLC participated in the ESA Pilot program; however, Smurfit Westrock Missisquoi Mill, VT applied for the new ESA Program and is enrolled.

The Department and Efficiency Vermont met to discuss potential implementation issues regarding simultaneous participation by previous ESA Pilot and ESA Legacy participants and the revised ESA Program. As a result of these discussions the Department recommends that the funding and projects undertaken during the ESA Pilot and Legacy Programs be tracked separately from the new ESA Program. Projects undertaken during the previous programs should be completed under those programs. However, the Department recommends that projects identified under the previous programs but not undertaken should be allowed to be pursued under the new ESA Program if desired by the participants. Participants should still complete the required energy audit to identify cost-effective electric efficiency measures at the participants facility(s) prior to pursuing projects. If the projects participants wish to pursue are non-electric efficiency projects the Department would recommend that the participants still follow the new program rules and complete an Energy Management Plan that at minimum explains the need for the non-electric efficiency project(s), the estimated energy and non-energy benefits, the expected cost, and, if all electric efficiency measures identified in the required energy audit have not been completed, why the project is being prioritized by the participant.

With respect to the Commission's questions regarding WestRock Converting, LLC's participation in the ESA Pilot and Smurfit Westrock Missisquoi Mill, VT being enrolled in the revised ESA Program, the Department does not believe that the merger should pose any implementation issues given the facility where the projects are implemented under the pilot and new program are the same. The Department has no objection to the Smurfit Westrock renaming from Westrock and does not believe a corporate merger should prohibit Smurfit Westrock from completing the projects started under the ESA Pilot program as well as implementing projects under the new program, so long as it does not impact the number of accounts or additional

facilities in the state, which would require a new application.

It is the Department's understanding that Efficiency Vermont will submit their own filing to confirm that they will track the funds for the ESA pilot separately from the funds for the revised ESA program for simultaneous participants.

Dated at Montpelier, Vermont this 8th day of October 2025.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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